

Appendix 2d - Rothwell

Response Number	KBC Response
<p>Id 25 (Neither) - Although the project is part of the JCS rather than the Pt 2 Local Plan, nonetheless Harrington Parish Council wished to take this opportunity to express the view that it is very important that the planned Relief Road is built prior to the commencement of any construction work on the Rothwell North development. Access along Harrington Road / Fox Street into Rothwell is already very problematic, without the addition of the substantial extra burden that would result once construction commences.</p>	<p>Noted. This is not a matter under consideration through the SSP2.</p>
<p>Id 69 (Objecting) - I live in Desborough, having just visited your planning SSP2 meeting in Rothwell on Friday 6th July.</p> <p>I was aghast at the poor forethought behind the idea of building houses on any spare land found without thought to the unsuitable surrounding small roads/junctions that already strain to cope at high traffic periods. Just this week two Montsaye School buses crashed injuring 14 people. Local schools have little expansion options and local doctors surgeries are already hard to obtain appointments.</p> <p>With plans approved for a lorry park of 200 lorries, just a mile away, how will the small local roads etc. cope then?</p>	<p>Careful consideration has been given to the impact of potential sites on the road network. The selection of sites was informed by a piece of work which considered the impact of different combinations of sites in Rothwell and Desborough on the road network. The site identified in Rothwell will have access to the A6 through the Rothwell North development, minimising the impact on the local road network.</p> <p>Where appropriate development will make contributions towards infrastructure, including schools and medical facilities.</p>
<p>Id 74 (Neither) - <u>Rothwell North/Land to the west of Rothwell</u></p> <p>Before this additional land is designated for housing, the plans should specify how there is going to be provision of:</p> <ul style="list-style-type: none"> a) School places - primary & secondary b) Health services - via health centre C) Shops d) Employment opportunities 	<p>Where appropriate development will make contributions towards infrastructure, including schools and health care facilities.</p> <p>The North Northamptonshire Infrastructure Delivery Plan identifies strategic priorities for infrastructure requirements. However any site specific infrastructure requirements which are needed to deliver development at a local level will be identified in the SSP2.</p> <p>The SSP2 will identify sites for employment development to complement the strategic sites identified in the North Northamptonshire</p>

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<p>There should be further guarantees regarding provision of access road</p> <p>All in all the proper infrastructure needs to be in place</p>	<p>Joint Core Strategy.</p> <p>Draft policy ROT04 part h) requires that the section of the strategic link road within Rothwell North which connects this site to the A6 be completed before development commences.</p>
<p>Id 62 (Objecting) - 1. The consultation with staff present was inadequately staffed as several questions raised by several of our members could not be answered e.g around opportunity redevelopment sites within Rothwell.</p> <p>2. If development of land R8 for industrial use goes ahead then traffic leaving the site to travel along A14 westwards (towards M1 & M6) would need to use Harrington Road, which is already a bottle neck at times and this will increase when Rothwell North Development is completed.</p> <p>3. Question - Is there anything within this consultation that could prevent a haul road from Harrington Road to access Rothwell North Development if all other plans for construction site management fails?</p> <p>4. The table 11.3 was out of date even in 2016 when the survey was made.</p>	<p>Further assessment will be undertaken for employment sites prior to determining whether they should be progressed in the plan. Consideration will be given to the impact of traffic needing to travel westbound. This document doesn't include proposals for the Rothwell North development. Comments relating to table 11.3 are noted, however a detailed survey was undertaken in the town to inform this table which was correct at the time it was prepared.</p>
<p>Id - 63 (Objecting) - 1. I object to development of the Fire Station site if this means the fire station will be removed from Rothwell.</p> <p>The fire station provides 1st response to the town of Rothwell and virtually always arrives before a paramedic or ambulance.</p>	<p>Noted. The Fire Station is identified as an opportunity site and sets principles for development should the Fire Station relocate. This would ensure that should the site become vacant it is redeveloped with an appropriate use.</p>
<p>Id - 93 (Objecting) - 1) Area R3 is not suitable as potential employment allocation because it is between a listed building and a recreation ground. Also, it is now part of the Priory Land at 11 Desborough Road, Rothwell</p>	<p>Further assessment will be undertaken for employment sites prior to determining whether they should be progressed in the plan.</p>

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<p>2) Rothwell North has been shown coloured yellow on the Rothwell proposals map, but the area adjoining the A6 bypass should be coloured red because it has always been agreed this part of Rothwell North will be allocated for Industrial/Employment use</p>	<p>Rothwell North is allocated in the JCS and is shown for information purposes only in the SSP2.</p>
<p>Id 99 (Neither) - As I understand that permission for the housing development known as Rothwell North was given on the proviso that a link road would be built before any construction began, now that the building contractors are refusing to honour their agreement and build the link road I would like to know why permission for the housing development cannot be withdrawn. The pollution from standing traffic on Kettering Road and Bridge Street is already very high and should be of concern to the council. The town is often gridlocked without the addition of the construction vehicles which will need to access the proposed building site through Rothwell and the additional traffic as the new houses become occupied will make an already unacceptable situation much worse. There is already a parking problem in the town and the existing infrastructure of the town will not be able to support an influx of inhabitants of this number. As well as the local services struggling to cope with the proposed increase in population there will be no services for young families if the proposed closure of the library goes ahead.</p>	<p>Noted. Rothwell North is allocated in the JCS and is shown for information purposes only in the SSP2. This development now has outline planning permission.</p> <p>Through the preparation of the SSP2 careful consideration has been given to the impact of potential sites on the road network. The selection of sites was informed by a piece of work which considered the impact of different combinations of sites in Rothwell and Desborough on the road network. The site identified in Rothwell will have access to the A6 through the Rothwell North development minimising the impact on the local road network.</p> <p>Where appropriate development will make contributions towards infrastructure, including schools and health care facilities.</p>
<p>Id 417 (Neither) – Rothwell Map 11.2 RO/088a There may be potential for non-designated archaeological remains to be preserved in this area. We therefore advise that you should be guided by the detailed advice of the County Archaeological Advisor.</p>	<p>Noted. NCC Archaeology has been involved in the assessment of the site. The assessment concluded that information was required on archaeological significance and therefore a criterion has been added to the draft policy for the site requiring proposals to be supported by a scheme for the programme of archaeological works in order to record and examine any archaeological features uncovered.</p>
<p>Id 428 (Neither) - With regards to Rothwell itself, we do carry out nitrogen dioxide</p>	<p>Noted. Further detail on this proposed</p>

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monitoring at two locations – the cottages in close proximity to the mini roundabout at the Bridge Street/High Street junction, and on High Street itself on the post office façade. Pollution levels have been high due to the closure of the A6 and subsequent traffic re-routing through the town. Levels are now returning to their previous levels prior to the road closure.

However any proposals to narrow High Street further will increase congestion. The road is already congested with on street parking. I'd need more definite plans showing the exact proposals to be able to comment more specifically.

scheme would need to be developed before a scheme is implemented and Environmental Health would be consulted on this.

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<p>Id 421 (Neither) – KETTERING BOROUGH SITE SPECIFIC PART 2 LOCAL PLAN DRAFT FOR CONSULTATION JULY 2018</p> <p>ROTHWELL SITE ALLOCATIONS</p> <p>I am writing in response to the above consultation, and on behalf of my client, the owner of land south of Rushton Road. During the Plan preparation process, this land has been referenced R0/204, and as you know my client has made representations seeking allocation of the land for housing at each relevant stage.</p> <p>It is obviously disappointing for my client that the land has not been identified as a residential allocation in the draft Plan. The Council has opted for a single allocation for 300 dwellings under Policy ROT04, in order to provide for the extant housing requirement of 284 units. My client has previously expressed the view that to rely upon this single allocation is not prudent. It is not suggested that the ROT04 site is undeliverable at all, but it is clearly subject to some major constraints on delivery which have the potential to inhibit its progression during the Plan period. Proposed Policy ROT4 itself recognises these constraints, including:-</p> <ul style="list-style-type: none">• The reliance upon the Rothwell North strategic allocation (SUE) being delivered such that the site can be appropriately accessed by all modes• The condition that the strategic link road within Rothwell North SUE and the A6 is complete before development of ROT04 can commence at all• The condition that acoustic impacts be assessed and mitigated, which may affect the developable area of the allocation and its dwelling yield. <p>The process of bringing forward the SUE has been on-going for at least 11 years, with the outline application for the development having been submitted in 2007 (KET/2007/0461). That application went to Committee in February 2017, and Members resolved to grant outline permission subject to prior completion of a s106 agreement. To date, the s106 has not been completed some 18 months after the resolution. When the application was reported to Committee, Officers advised Members of the development timetable that had been put forward, which included the submission of a reserved matters application in 2017, and commencement of development in 2018. Both of these targets are now missed. As regards the strategic link road, it was postulated</p>	<p>The landscape assessment previously submitted has been fully taken into account in the assessment process. No additional information has been submitted in relation to this which would alter the assessment of the site.</p> <p>Sufficient flexibility has been built into the SSP2 in relation to delivering housing. In the growth town and market towns the SSP2 has already identified 10% more dwellings than the requirements set out in the JCS. The pre-submission plan will be accompanied by a background paper setting out additional information on the Council's housing trajectory; this will include the timing of Rothwell North in relation to the additional land identified as Rothwell North/ Land to the west of Rothwell.</p>
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that this would be completed in 2022/2023. I am aware that the Council has recently issued a screening direction that the link road should be the subject of environmental assessment. A planning application for the link road does not yet appear to have been submitted, and of course there are no reserved matters application for the SUE overall. The North Northamptonshire Monitoring Report January 2018 has the SUE delivering 425 dwellings in the 5 year period 2018 to 2023. This is optimistic. We consider that given progress to date and therefore taking a precautionary approach, the earliest that dwellings would begin to be delivered at the SUE is 2020. The knock-on effect of this is that the strategic link road may not be in place before 2024/ 25.

Thus, Policy ROT04 would only allow development to commence in 2024/25, and ultimately the delivery of the allocation is entirely a hostage to fortune of the SUE.

In contrast, my client's land is deliverable. It is available for development now, with no known physical or legal constraints on its delivery. My client has consistently maintained that it is suitable for development, and has commissioned a landscape and visual assessment, and transportation assessment commensurate with the level of detail necessary for the Local Plan preparation process, to demonstrate this. The Council has been provided with this background evidence, and my client requests that this is reconsidered before further recommendations are made to Members as to the content of the submission Plan.

In relation to landscape impact, it is undeniable that my client's land is located at the edge of the town and therefore its development would have an influence upon the town's landscape setting. However, this is a generic feature of edge of settlement allocations. The question is what the impact would be, and the extent to which it may be mitigated. The conclusion of the landscape assessment is that:-

"In terms of the effect of the potential development of the site upon the receiving landscape character, it is acknowledged that the proposals will represent a change in the character of the site. However, the site is not subject to any specific landscape designations and is not considered to represent a valued landscape. Furthermore the site lies immediately adjacent to the existing hard settlement edge. The compartmentalised character of the immediate setting will ensure that the perceived settlement edge is softened and contained. The proposals will incorporate a set back

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from Rushton Road to ensure that the character of the street scene is not compromised and as such it is considered that the proposals can be integrated in this location without harm to the wider landscape setting of Rothwell. With regard to the effect of the potential development of this site upon the visual environment, it is considered that any views of the proposed development would be highly localised, filtered by intervening vegetation and seen within the context of existing residential built edge. The site presents opportunities to accommodate a sympathetic and considered layout without harm to the wider visual environment. The retention of existing vegetation and its reinforcement with new planting will soften the perceived edge of the development and assist its integration. It is considered that the proposals can be integrated without harm to the character and qualities of the visual environment."

The conceptual layout that has been prepared shows a well landscaped development of 69 dwellings. A further copy of the landscape assessment, which includes the conceptual layout, is appended to this letter.

We have also already provided material to the Council to demonstrate that vehicular means of access off Rushton Road is deliverable, and that a secondary pedestrian/cycle access directly into the existing urban area is also deliverable.

Since the publication of the draft Plan, the Government has issued the new National Planning Policy Framework (NPPF). It is noted that the published timetable for the Part 2 Plan has it being submitted for Examination in March 2019, and by reference to the implementation section of the NPPF it is clear that the Part 2 Plan must be in accordance with the new NPPF policies when submitted. The Part 2 Plan must therefore be reviewed to address consistency with the new NPPF.

More than ever, the Government is seeking to boost the supply of housing through the delivery of sustainable development. The introduction of the Housing Delivery Test reinforces the importance of delivery of housing, being a measure of past performance as well as there still being a measure of projected performance through the maintenance of a 5 year housing land supply. The presumption in favour of sustainable development at paragraph 11 of the NPPF now specifies that meeting objectively assessed needs is a minimum requirement. The emphasis upon ensuring

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<p>flexibility is maintained. In short it does not matter if Local Plan allocations exceed the OAN, and the more flexible the Plan the better, as this allows for a response to changing circumstances. The NPPF now requires Councils to have an action plan in place where the Housing Delivery Test identifies only a 5% shortfall on the housing requirement over the previous 3 years. Councils are also encouraged to be proactive and have an action plan in place anyway, so that a shortfall can be rectified without delay.</p> <p>Applying this overall emphasis to Rothwell, the draft Part 2 Plan is predicated on the delivery of development which is itself dependent upon delivery of another development. There is major infrastructure provision involved, with a significant lead-in time. It is not part of our client's submission that ROT04 should be omitted, but instead that the Plan should adopt flexibility mindful of the delivery constraints involved, in order to do all that it can to ensure that as a minimum, the OAN for one of the Borough's sustainable market towns is provided for. Whilst my client's primary position has always been that site R0/204 should be allocated for residential development with an indicative dwelling number of 69, my client's secondary position is that there should be an additional policy ROTOS that designates it as a reserve site to be brought forward in the Plan period should site ROT04 not commence before a specified date. That date should be geared to the completion of the strategic link road in the SUE, with 1 January 2024 suggested. In effect, this would be a proactive action plan for the delivery of housing at Rothwell, and as such would be firmly within the spirit of the new NPPF, enhancing the robustness of the Plan insofar as the delivery of development at Rothwell is concerned.</p> <p>Our client requests that this submission is taken into account in the further evolution of the Part 2 Local Plan.</p> <p>ATTACHMENT – Landscape Visual Appraisal</p>	
<p>Id 194 (Supporting) - Persimmon Homes Midlands has an interest in the land known as Rothwell North/ Land to the West of Rothwell identified as site RO/088a (also referred to as Rothwell Central). We support the allocation of the site for 300 dwellings and consider the proposed allocation to be positively prepared, justified, effective, and consistent with national policy. The site is deliverable in that it is viable, available now, offers a suitable location of</p>	<p>Support for the identification of this site and the site assessment is noted.</p>

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development now, and will clearly deliver new homes within the next five years and within the plan period. The site is in the control of Persimmon Homes, a major national housebuilder, and can make a considerable contribution to the Borough's deliverable supply of housing land early on in the plan period.

The allocation of site RO/88a for 300 dwellings is consistent the spatial strategy identified in the JCS. Table 1 and Policy 11 of the JCS sets out a settlement hierarchy for North Northamptonshire. This identifies Rothwell as a Market Town, a higher order settlement second only in the hierarchy to the Growth Towns of Corby, Kettering, Wellingborough, and Rushden. The role of Market Towns is described as providing "a strong service for their local community and the wider rural hinterland." Table 1 states that development requirements in Market Towns will be met by, among other things, Sustainable Urban Extensions and development sites identified in Part 2 Local Plans or Neighbourhood Plans. The allocation of Site RO/88a would be consistent with this development strategy and compliant with the principles articulated within the NPPF as it would maximise the use of public transport, walking, and cycling. Bringing forward sustainable urban extensions to Kettering Borough's higher order settlements will ensure that new development supports and is supported by existing services, facilities, and communities thus reducing the need to travel and promoting the vitality of existing settlements.

The JCS allocates Rothwell North for 700 dwellings as well as employment and associated facilities and states at paragraph 9.16 of the supporting text that "Site assessment work has indicated that there is potential for a larger site area which could accommodate additional dwellings and that the additional land will be considered in the Part 2 Local Plan prepared by Kettering Borough Council." Accordingly, development of land west of Rothwell is underpinned and supported by the JCS which has successfully passed through examination and forms part of the adopted development plan for Kettering Borough. Table 5 identifies a need for 10,400 dwellings in Kettering Borough over the plan period 1,190 of which will be brought forward in Rothwell. The Council states that 250 dwellings have been delivered in Rothwell in the period 2011 – 2017 and land to the North of Rothwell is already allocated in the JCS for 700

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dwellings. This leaves a residual requirement of 165 dwellings to be accommodated in Rothwell. In common with other Market Towns and Kettering, the Council has added a 10% buffer onto the overall housing requirement for Rothwell for the purposes of making allocations. This approach is supported since it would contribute to boosting significantly the supply of housing as required by the NPPF and would promote suitable flexibility to enable allocations to come forward in a timely fashion. The buffer would also ensure that the SSP2 is positively-prepared and effective through providing a reasonable oversupply to reduce the risk of identifying inadequate land to meet future growth needs thereby contributing to the Borough Council's ability to meet its housing requirement. Data from the DCLG (as then was) suggests that there is on average a 10-20% non-implementation gap together with a 10-20% lapse rate. This suggests that it is good practice to plan for more housing numbers than the minimum required

It is clear that the decision to allocate Site RO/088a has been informed by extensive site assessment work where allocation of the land has been judged against alternative sites based on a consistent set of criteria. This is illustrated in the evidence base which comprises extensive site assessment work the most recent iteration of which is contained in the Housing Allocations Background Paper dated May 2018. It is clear from this part of the evidence base that Site RO/088a is one of most robust sites available to meet the housing needs of Rothwell within the current plan period.

From the comparative assessment in the background paper, it is evident that RO/88a performs strongly in relation to impact on townscape and landscape when compared to the other options, namely those sites promoted to the north of the town. Site RO/88a is closely abutted by a dense pattern of existing residential development to the east across its entire easterly boundary. To its north lies the existing allocation of Rothwell North and to site RO/88a's westerly boundary lies the A6. The background paper acknowledges that development of the site would see a net gain in terms of townscape impact and sustainability by virtue of the fact that it would link Rothwell North to the easterly edge of the existing built-up area. Site RO/88a clearly benefits from a high degree of visual containment which would significantly mitigate

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<p>both landscape and townscape impact.</p> <p>Those sites put forward to the north of the town, by contrast to site RO/88a, are extremely exposed and are physically detached from the existing built-up edge of the settlement resulting in significant impact on landscape and the townscape. Even the more modestly sized sites located to the south of Rushton Road are physically detached from the prevailing settlement pattern and are prominent in views from the public realm. The Council also states in a report to the Planning Policy Committee dated 6th June 2018 that two of the three sites located to the south of Rushton Road may not be available or deliverable given the site promoters have not engaged any further with the Council. According to evidence submitted by the promoters of Site RO/204, the dwelling yield of this site is likely to drop to 69 in any event due to the site's landscape constraints and this would be insufficient to meet the identified housing need for Rothwell.</p> <p>Site RO/088a scores well in relation to proximity to services and facilities by virtue of its connectivity with commercial uses that will be located at Rothwell North. Whilst other sites may score well in this regard as well, there are no alternative sites available to the in other parts of the town that would not be accompanied by the significant landscape harm referred to above and as such Site RO/088a is sequentially preferable in this regard.</p> <p>In respect of the other relevant criteria, it is noted that Site RO/88a would appear to score poorly in relation to impact on cultural heritage. However, there are no listed buildings or other designated heritage assets either on, adjoining, or within close proximity to the site. Drilling down further into the site assessment put forward in the background paper, it is evident that the scoring in relation to cultural heritage arises from the fact that further information on archaeology is required. A Desk Based Assessment (DBA) can be submitted as part of a future planning application on the site which can inform subsequent decision-making. Further work, if deemed necessary, can be secured by way of planning condition The PPG reinforces the fact that decision-taking regarding archaeological interests require a proportionate response by local planning authorities. It states that "following an initial</p>	
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assessment of archaeological interest only a small proportion – around 3%- of all planning applications justify a requirement for a detailed assessment.” Accordingly, it is considered that the site’s impact on cultural heritage is not an overwhelming constraint to development of the site.

The background paper identifies Site RO/88a as having landscape impact (but one which is nonetheless capable of mitigation) and observes that the site occupies agricultural greenfield land. In relation to the scale of development required to meet Rothwell’s identified housing needs, such development will invariably result in some impact on the landscape. There is insufficient capacity within Rothwell’s existing built-up area to accommodate the identified housing requirement nor are there suitable, available, or deliverable brownfield sites in or around Rothwell. Accordingly, the use of an agricultural greenfield site can be fully justified. Notwithstanding this fact, Site RO/88a does not occupy an area that is covered by any statutory, national, or local landscape designation. It is not considered to be a “valued landscape” within the meaning of the NPPF given that the site is devoid of any features that would give it any particular or identifiable landscape qualities. As observed by the site assessment in the Housing Background Paper, the site’s landscape impact is capable of mitigation in any event through the introduction of appropriate structural landscaping.

Criteria e. and f. of Draft Policy ROT04 relate to the potential impacts on the living conditions of future occupiers arising from the site’s proximity to the A6 and A14 and the impact on junction 3 of the A14 and the A6/Rothwell link road junction. In terms of impact on living conditions, a requirement of the draft policy is to introduce a Green Infrastructure link on the western flank of the site (parallel to the A6 and corresponding to the green infrastructure planned as part of Rothwell North) which would mitigate impact of noise and odour arising from the A6. The technical work undertaken as part of the planning application lodged on the site to the south of RO/88a, which has a similar relationship to the A6, included a Noise Impact Assessment which found that with the appropriate buffer strips, glazing, and ventilation, an acceptable internal living environment could be achieved. The Council was satisfied that an acceptable internal living environment can be achieved with suitable

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<p>mitigation and there is no reason to believe that the same conclusion would not apply to Site RO/88a. Similar technical work was undertaken in respect of air quality and the Council came to the same conclusion that the development of the site to the south of RO/88a would be acceptable in this regard. Again, there is no reason to believe that a similar conclusion would not be reached. Accordingly, air quality and noise are clearly not overwhelming constraints to RO/88a coming forward and can be adequately mitigated.</p> <p>The draft policy refers to the impact of development on the surrounding road network including the A6 and the A14. Whilst the impacts and mitigation measures would need further elaboration in the form of a Transport Assessment, a report to the Planning Policy Committee states that the sites in Rothwell have been subject to high-level transport assessment work which has effectively ranked the various sites or combination of sites according to their transport impact. Site RO/088a is ranked number 2 of 7. Number 1 of 7 is a combination of the site to the south of Site RO/088a and RO/202. However, as mentioned above and according to the same report, RO/202 is not deliverable or developable and therefore it cannot be relied upon to deliver new homes within the plan period. As such, on the basis of the work undertaken to date, the transport impact of RO/088a would be the least significant out of the deliverable and developable sites that have been assessed.</p> <p>ATTACHMENT – Rothwell Central Statement</p> <p>ATTACHMENT – Rothwell Central Indicative Plan</p>	
<p>Id 195 (Neither) - Persimmon Homes Midlands has an interest in Site RO/085 which is referred to in the Housing Background Paper as Land West of Rothwell. In order to avoid confusion with Site RO/088a, however, the site is referred to here as Rothwell South or by its reference number.</p> <p>Rothwell South has been discounted and is not being put forward as a housing allocation in the plan. Having regard to Housing Background Paper, however, it performs equally well as Site RO/088a against all key criteria apart from the fact that the assessment work claims the site is not well-related to existing facilities. This is paradoxical since the same assessment scores the site's</p>	<p>Sufficient flexibility has been built into the SSP2 in relation to delivering housing. In the growth town and market towns the SSP2 has already identified 10% more dwellings than the requirements set out in the JCS. 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.</p>

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<p>accessibility to public transport and employment opportunities in the town centre quite well, with it being ranked “green” against each of these criterion. Aside from this, the Council have identified no fundamental constraints to this site being brought forward. It is noted that Draft Policy ROT4 which proposes to allocate the land to the north for 300 dwellings contains a criterion which states that any development brought forward on this site should maintain future opportunities for vehicular, cycle, and pedestrian access to land to the south. It is also clear that the delivery of Rothwell South would represent a logical “rounding off” of the settlement and integrate the western and northern urban extensions to Rothwell with the main body of the town.</p> <p>Persimmon Homes consider that allocation of Rothwell South would give Kettering Borough Council much-needed flexibility in maintaining its deliverable housing supply. According to recent Section 78 appeal decisions, Kettering Borough Council’s five year housing land supply currently sits at around 5.7 years. Whilst this is in excess of the five year requirement, the Borough Council should use the opportunities presented by the Part 2 Local Plan to significantly boost housing supply in light of the recent changes to the National Planning Policy Framework such as a more onerous definition of deliverability and the introduction of the Housing Delivery Test. Having regard to the monitoring data, whilst Kettering Borough Council has performed well in the last two monitoring years, the overall picture of housing delivery since 2011 (the base date of the JCS) is one of significant fluctuation. Identifying suitable sites above the requirement in the JCS would provide additional flexibility to address any downward trend in housing delivery.</p> <p>As reinforced by the JCS itself and the Inspector’s report into the JCS there is a need to provide a “suitable and sufficient system...to address problems as soon as reasonably practical so the Plan’s strategy is not stalled.” The Inspector also reinforced the importance of the JCS containing “sufficient detail of the necessary mechanism and how, why, and when it would be instigated so it can be readily implemented, if triggered.” This has been translated into paragraph 9.18 of the JCS’s supporting text which states that if strategic sites are not developed fast enough to maintain a deliverable five year supply of housing land against identified requirements, then the local planning</p>	<p>The SSP2 will identify adequate land for development in the plan period in accordance with the spatial strategy set out in the JCS. Any development proposed in excess of this should be considered through a review of the JCS.</p>
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authorities will identify additional sources of housing, with the priority being on the Growth Towns followed, where appropriate, by the Market Towns." This strategy described in the JCS could be readily facilitated through the identification of additional appropriate allocations or at the very least reserve sites in the Part 2 local plans, which could be triggered through the five year housing land supply or the Housing Delivery Test mechanisms thus giving the Council sufficient plan-led flexibility to meet requirements through the identification of a suitable contingency.

Identifying and allocating additional sites above the requirement in the JCS will also allow the Council to stimulate the delivery of much-needed affordable housing in the Borough given the significant need identified in the JCS and its supporting evidence for affordable homes. Referring to Table 6, this suggests that 43.9% of all housing delivered from 2011-2031 will need to be affordable. This significantly outstrips the 30% affordable housing target identified in the JCS and so the Council should use the opportunity posed by the production of the Part 2 Local Plan to boost affordable housing delivery by allocating suitable sites for development which can contribute towards meeting this need.

Having regard to the scoring in the Housing Background Paper 2018 it is clear that site RO/085 performs equally well against all criteria as Site RO/88a save for the assertion that the former is not "well-related to existing facilities." Persimmon disputes the assessment that Site RO/085 is not well-related to existing facilities. The background paper does not explicitly define what facilities need to be accessible to a site in order for it to rank well in this regard nor does it define what distances it considers to be acceptable or desirable. Having regard to other site assessments, the category of "facilities" generally includes schools, open spaces, sports/leisure, medical facilities, and shops. Accessibility to public transport and employment are assessed separately and RO/085 scores well against each of these criteria.

Whilst it is not an "existing facility," RO/085 can continue the Green Infrastructure corridor running along the western flank of Rothwell North and Site RO/88a. This will provide high quality and accessible open space in close walking and cycling distance to residents of the site. Accordingly, RO/085 will

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<p>well-related to open space which can be delivered as part and parcel of this site. The site's entrance onto Harrington Road is slightly less than 1km from Rothwell's town centre which contains a church, two schools lower age schools, a library, and numerous shops. The site is less than 1km from Montsaye Community Sports Centre and Montsaye Academy, a secondary school. The site is located just over 1km away from Lloyds Pharmacy and Rothwell and Desborough Healthcare, a GP surgery.</p> <p>Whilst there is no definitive standard as to the desirable walking distances, the old Planning Policy Guidance Note 13 (Transport) stated that walking offers the greatest potential to replace short car trips, particularly for those under 2km. The Chartered Institute for Highways and Transport sets out preferred maximum walking distances of 0.8km to town centres, 2km to schools and employment opportunities, and 1.2km elsewhere. Manual for Streets states that in order to achieve walkable neighbourhoods a range of facilities must be located within a 0.8km walk. Reviewing these standards as a whole, it is evident that a distance of about 1km to key facilities in Rothwell is perfectly reasonable and Site RO/085 would provide a location for development which is accessible by walking and cycling as well as public transportation. Rothwell North will also deliver a new local centre and an employment area which would also be located within 1km when measured from the centre of Site RO/085. As a result, it is considered that RO/085 scores well in relation to its accessibility to local facilities and that this should not be a reason for discounting the site.</p> <p>ATTACHMENT – Rothwell South Statement</p> <p>ATTACHMENT – Rothwell South Indicative Plan</p>	
<p>Id 438 (Neither) - Potential Employment Allocation R6 (Land south of A14 Junction 4) is within Flood Zone 1 and 2, however, the selection of this site has to be subject to the flood risk sequential test.</p>	<p>Noted. Further assessment of the potential employment sites will be undertaken prior to preparation of the Pre-submission version of the SSP2. A flood risk sequential assessment will be undertaken where necessary for employment allocations.</p>
<p>Id 294 (Objecting) - Chapter 11: Rothwell identifies the development strategy for Rothwell and includes allocations for residential development. No</p>	<p>Sufficient flexibility has been built into the SSP2 in relation to delivering housing. In the</p>

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objections are made to the specific allocations in Rothwell since the adopted JCS identifies a specific housing target for the town and allocations are made accordingly, but concern is raised about housing delivery and the delivery of affordable housing at the strategic allocations and other allocations in Rothwell.

It is noted that the delivery of the Rothwell North SUE has been delayed; the application (Ref. KET/2007/0461 was submitted in 2007, the Council resolved to grant planning permission at Planning Committee on 21st February 2017, but the decision notice has not yet been issued. It is also noted that Rothwell North is only required to provide 20% affordable housings. It is assumed in the AMR 2016/17 that development at Rothwell North would commence in 2018/19 i.e. the current monitoring year. This is clearly unrealistic since planning permission has not yet been granted. It will clearly take time to discharge relevant conditions, submit reserved matters, and complete primary infrastructure before the residential development can commence. These actions do take some time to complete, and need to be fully reflected in the housing trajectory for Draft SSKLP. It is likely that development will not be delivered at Rothwell North as predicted in the AMR and it will take at least another two years before housing completions occur i.e. 2020/21. As a result, it is concluded that 125 dwellings less would be delivered at Rothwell North SUE during the 5 year period (2018/19 to 2022/23) than predicted in the AMR 2016/17.

It is also assumed in the AMR 2016/17 that the delivery of development at Rothwell North would overlap with the delivery of the other strategic allocation in Rothwell which is adjacent (ROT4 - Rothwell North/Land to the west of Rothwell for 300 dwellings). These two strategic scale developments are located in close proximity of one another which must have implications for housing delivery because they will in effect compete with one another for housebuilders and purchasers because they are within the same local housing market. The close proximity of these sites has not been taken into account in the housing trajectory contained in AMR 2016/17. It is much more likely that the delivery of ROT4 would follow on from the delivery of Rothwell North, and

growth town and market towns the SSP2 has already identified 10% more dwellings than the requirements set out in the JCS. 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.

The SSP2 will identify adequate land for development in the plan period in accordance with the spatial strategy set out in the JCS. Any development proposed in excess of this should be considered through a review of the JCS.

Affordable housing requirements are not included in policy ROT04 because these requirements are set out in Policy 30 of the JCS. Sites proposed through the SSP2 would need to meet the requirements of this policy.

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<p>it is requested that the housing trajectory is amended accordingly.</p> <p>It is noted that Policy ROT04 does not state the affordable housing requirement for this strategic developments. Policy 30 in the adopted JCS expects developments in the designated market towns to provide 30% affordable housing. Rothwell North SUE is required to provide 20% affordable housing. It is requested that the affordable housing requirements for the additional strategic allocation in Rothwell is stated. If policy compliant levels of affordable housing cannot be delivered at this site, then it is requested that additional allocations are made so that affordable housing supply can be increased; the proposed development at land south of Higham Road in Burton Latimer would deliver affordable housing.</p>	
<p>Id 312 (Supporting) – Supporting - h) Give priority to redevelopment of historic buildings and buildings of local significance</p>	Noted
<p>Id 314 (Supporting) – Supporting - g) Be supported by a scheme for the programme of archaeological works in order to record and examine any archaeological features uncovered</p>	Noted
<p>Id 491 (Objecting) - Support is given to the identification of Rothwell as a Market Town reflecting the JCS settlement hierarchy. It is stated at paragraph 11.1 of the SSP2 that the role of market towns is to <i>"...provide a strong service role for their local community and surrounding rural area with growth in homes and jobs to support regeneration and local services, at a scale appropriate to the character of the town.</i></p> <p>Paragraph 11.5 considers the options for growth at Rothwell. It is reiterated that the Borough Council is proposing to plan for the housing requirement established within the JCS (1,190 dwellings) with an additional 10% buffer to the JCS requirement. It is noted that there are existing commitments to the housing supply, including the Rothwell North allocation for 700 dwellings and as such there is a residual requirement to identify land to allocate to enable the delivery of 284 dwellings (165 + 119 = 284 dwellings).</p> <p>Comment: We welcome the application of a 10% buffer to the supply of housing, in the interests of significantly boosting the supply of homes across</p>	<p>Sufficient flexibility has been built into the SSP2 in relation to delivering housing. In the growth town and market towns the SSP2 has already identified 10% more dwellings than the requirements set out in the JCS. 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.</p> <p>The SSP2 will identify adequate land for development in the plan period in accordance with the spatial strategy set out in the JCS. Any development proposed in excess of this should be considered through a review of the JCS.</p> <p>The assessment for RO/088a recognises that the scores for accessibility would</p>

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the Borough, but careful consideration needs to be given to whether this buffer is sufficient particularly with the introduction of the 'Housing Delivery Test' as of November 2018.

Recommendation: Table 11.2 states that there is 1,025 dwellings identified as 'completions and commitments'. Given the revised definition of 'Deliverable' (NPPF 2018, page 66) the Council should review the sites it considers to be commitments and clearly identify when these are anticipated to be delivered. This will inform the Council's forthcoming Housing Delivery Assessment in November 2018.

Rothwell Housing Allocations

SSP2 Map 11.2 (page 108) identifies site ref: 'RO/088a' Land south of the Rothwell North allocation as proposed extension to the current allocation. Draft Policy ROT04 proposes that the site will deliver 300 dwellings.

It is noted that the following Draft Policy ROT04 criteria requires the site to be:

- a) accessed via the Rothwell North development; ...
- e) be supported by a transport assessment and mitigate the impact of development on the highway network, including junction 3 of the A14 and the A6/ Rothwell link road junction; ...
- h) Only commence once the section of the strategic link road within Rothwell North connecting this site to the A6 is complete.

As stated above, the draft policy wording specifically restricts the delivery of development at the proposed allocation site until key transport infrastructure is available. The Borough Council has not published a housing trajectory to confirm when it anticipates dwellings to be delivered at this site. It is considered that the Council should reconsider its approach to the identification of this site as a draft allocation due to concerns about timely delivery.

Paragraph 11.17 of SSP2 notes that the Council has assessed a number of potential housing sites at Rothwell including RO/205 and RO/206 both of which have been promoted by Taylor Wimpey. It is considered that sites RO/205 and

improve once Rothwell North has been developed but this has not been taken into account in the scoring for the site. The assessment of deliverability also recognises the need for Rothwell North to be delivered to enable access to the site.

No information has been provided which would address issues identified in relation to the site RO/206.

No information has been submitted in relation to which portion of RO/205 would be required to provide the 300 dwellings as suggested. This proposed site would need to be accessed solely from Rushton Road; this would result in a significant impact on the local highway network which is constrained.

Combining these sites would not overcome the issues identified through the site assessment work.

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<p>RO/206 are suitable alternative residential allocation site 'RO/088a Rothwell North/ Land to the west of Rothwell'.</p> <p>Page 22 of the 'Housing Allocations Background Paper' (May 2018) summaries the findings of site assessments as follows.</p> <p>We strongly object to the assumptions made in respect of RO/088a in respect of 'accessibility to employment, accessibility to public transport, and deliverability' as these have all received a positive result or double positive result and in part rely on the delivery of the Rothwell North allocation. We reiterate, particularly in respect of 'deliverability' category, that this site is directly reliant upon the delivery of the existing Rothwell North allocation.</p> <p><u>Alternative Rothwell Allocations</u> Site RO/206 scores highly when assessed in isolation and this should be appropriately acknowledged by the Council. Delivery of housing at this site can be achieved immediately (subject to securing planning permission).</p> <p>It is requested that the Council also reassess the potential of sites RO/206 and part of RO/205 being allocated together to deliver 300 dwellings in total. Access to the site could be taken from Rushton Road (at site RO/206) to an internal road which in turn acts as the vehicular access to RO/205.</p> <p>The sites are considered to be large enough to incorporate the necessary mitigation measures in respect of landscape, surface water drainage. Taylor Wimpey would like to discuss proposals with the Council as it continues to prepare its emerging SSP2.</p> <p>Remedy: Allocate site RO/206 'Land to the north of Rushton Road, Rothwell' and in part RO/205 'Land to the west of Shotwell Mill Lane, Rothwell' for residential development.</p> <p>ATTACHEMENT – Summary of site assessments for RO/088a, RO/205 and RO/206</p>	
<p>Id 549 (Neither) - The County Council notes the significant level of new housing</p>	<p>Noted. KBC will continue to work with NCC</p>

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<p>to be delivered during the draft SSP2 period to 2031 in Desborough and Rothwell, and the additional sites proposed for inclusion in the Housing Allocations for the town.</p> <p>Current capacity across Desborough and Rothwell for Primary school places is extremely limited. This is demonstrated by the inclusion of a requirement for a new 2FE Primary School to be delivered as part of the Desborough North SUE, and a further 2FE Primary school to be delivered as part of the Rothwell North SUE.</p> <p>Additional housing development coming forward during the plan period impacting on capacity further will therefore be expected to contribute towards delivery of this and additional infrastructure, as may be required, in order to effectively mitigate the impact of the development on existing and planned provision.</p> <p>In terms of Secondary school places, capacity at Montsaye Academy (Rothwell) is expected to be fully utilised by September 2019 based on three year trend & birth rate data alone. This, in conjunction with the significant capacity issues across remaining Secondary Schools in the Kettering area as previously set out in this response, may require further mitigation measures to be put in place over and above the new and extended Secondary school projects highlighted above.</p> <p>The County Council will continue to monitor the position closely, however it is expected that additional capacity may be required to be created at Montsaye Academy in order to accommodate the additional pupils stemming from housing development in the vicinity, coming forward during the draft SSP2 period. Section 106 contributions will therefore be required from major housing developments in the area to support this requirement.</p>	<p>education to ensure that adequate provision is made for education.</p>
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