

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
1	Local Resident	Policy GED1	Geddington Development Principles						
Reasons/Details of representation									
None.									
Proposed Actions/Changes									
None.									
Officer Response									
None.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
2	Local Resident	13	Geddington						
Reasons/Details of representation									
<p>On first reading the proposals concerning Geddington seem reasonable with good controls/restraints in place to safeguard the 'feel' a historic village that blends into the adjacent countryside assuming, of course, that the controls are fully implemented. No mention is made of the type of dwellings at any of the locations. These must include a good proportion of affordable homes for first time and family buyers. Re. GED 2 & 4 – Grafton road is already difficult to navigate on foot and by bike and car, due to roadside parking outside the houses immediately before the allotments as you come out of the village. A safe continuous pavement needs to be provided for pedestrians going to the Youth Club. Re. GED 5 – Grange Road is already problematical for traffic due to on-road parking. The grass verges at the top of</p>									

Item 6 Appendix 1

<p>Skeffington Close are in a disgraceful state but they constitute the only off-road parking currently available to Grange Road residents. A solution seems readily available; our understanding is that the wooden bungalow on the west side of the A4300 was built as a temporary dwelling for the time when access was required to the land behind where the new extended industrial unit area is proposed. If this route was opened up to access all the industrial units then the current access off Grange Road could be closed and the land between the units and Grange Road used for off-road parking. Furthermore, if the new access road off the A4300 was to be aligned with the new access road required the GED 3 development on the east side of the A4300, then a roundabout could be put in place to serve also as a speed control through the village (subject to the trunk road status of this section of the A4300).</p>
<p>Proposed Actions/Changes</p>
<p>None</p>
<p>Officer Response</p>
<p>The issues raised are adequately addressed by existing policy, including policy 8 and 30 of the JCS, and the criteria proposed through policies GED1, GED2, GED 4 and GED5 of the SSP2.</p>
<p>Officer Recommended Change(s)</p>
<p>No changes are recommended.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
3	Local Resident	4	Housing	No	No	No	No	Yes	Yes

<p>Reasons/Details of representation</p>
<p>It is disappointing that there is no reference to energy efficiency requirements or any firm policy commitments to address the need for new development to be fit for 21st century living. National policy is for there to be a move away from gas heating for domestic dwellings, Kettering could live up to the JCS vision of being at the forefront of modern technology by requiring new development to introduce carbon neutral technology. Please refer to https://passivhaustrust.org.uk/ and join the growing list of authorities using this protocol to require development fit for the 21st Century and live up to your Climate Change commitment.</p>
<p>Proposed Actions/Changes</p>
<p>None</p>

Officer Response
Policy 9 of the JCS and its supporting text sets out the approach to energy efficiency requirements. It is not considered necessary for this to be repeated in the SSP2.
Officer Recommended Change(s)
No changes are recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
4	Local Resident	2	Outcomes	No	No	No	Yes	Yes	Yes

Reasons/Details of representation
The JCS vision makes reference to a low carbon future but there is no positive reference to this in the Local Plan outcomes. It would be more proactive and forward looking to build in plans for electric vehicle infrastructure, Passivhaus standards for new development etc.
Proposed Actions/Changes
None
Officer Response
Paragraph 2.16 sets out how the plan will contribute towards outcome 2 of the JCS – adaptability to climate change. The Government is proposing that building regulations are altered to include electric vehicle infrastructure requirements.
Officer Recommended Change(s)
No changes are recommended

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
----	------------	----------------	------	-----------	-----------	---------------------	---------------------------------	-----------	--------------------

Item 6 Appendix 1

5	Local Resident	Table 4.3	Housing	No	No	No		Yes	Yes
Reasons/Details of representation									
Whilst it is understood that a housing allocation for the rural areas was imposed by JCS it is a little difficult to understand what is trying to be achieved by the locations chosen. The spread is uneven with a significant contribution being made by the two villages, Broughton and Mawsley which are the closest to Kettering. If the intention was to provide housing across the Borough to support the rural communities and provide additional housing for young families to remain in their home environment this plan does not fulfil this objective.									
Proposed Actions/Changes									
None									
Officer Response									
The Categorisation of Villages: Background Paper (October 2019) sets out the approach taken to the distribution of housing in the rural area. This provides justification for the approach taken.									
Officer Recommended Change(s)									
No changes recommended.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
6	Local Resident	Table 19.1	Appendix 4 - Infrastructure Delivery Schedule	No	No	No	No	Yes	Yes
Reasons/Details of representation									
Section 19, Appendix 4, Infrastructure delivery. Nothing about electric vehicle infrastructure. This should be part of transport infrastructure policy. There could be policies to move towards electric only buses and taxis in Kettering and EV charging points in car parks. This plan is "business as usual" rather than a blueprint for the future.									
Proposed Actions/Changes									
None									

Officer Response
The Government is proposing that building regulations are altered to include electric vehicle infrastructure requirements. Policies for moves towards electric only buses and taxis are outside the remit of the SSP2.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
7	Local Resident	Policy HWC2	Protection of Community Facilities and Proposals for New Facilities	No	No	No		Yes	Yes

Reasons/Details of representation
Policy HWC2 Care should be taken when considering the value of a facility in a village. The criteria for a sustainable location includes the presence of a shop, pub etc. Modern life does mean that often these facilities fail due to lack of use and in that case it is fair to say that the property can be used for another purpose. If that decision then results in that community being regarded as unsustainable in planning terms the opportunity to create additional housing in that community will be denied which will lead to "rural" housing being concentrated in ever fewer large villages eventually turning them into towns or more likely exhausting their ability to sustain the population.
Officer Response
Noted.
Officer Recommended Change(s)
None.

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
8	Kettering Amateur Swimming Club	Policy HWC3	Sport, Recreation and Physical Activity	Yes	No	Yes	Yes	Yes	Yes

Reasons/Details of representation

7.21 refers to the Council's Playing Pitch Strategy (2019) and Sports Facility Strategy (2019), neither of which have been published and therefore are unavailable for review in the context of determining whether the Plan is effective. The Sustainability Appraisal provides some of the information with respect to sports facilities but is not adequate to make decisions on the effectiveness of the Plan. Policy HWC3 is positive in its intent, but without sight of the above Strategies it is not possible to determine whether the intent meets the needs of the Borough and is therefore effective.

Proposed Actions/Changes

None.

Officer Response

See below.

Officer Recommended Change(s)

A Main Modification is proposed to address the issues raised in this response. Refer to the Main Modification Schedule, reference number MM5

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
9	Local Resident	Policy DES3	Opportunity Environmental Improvement	Yes	Yes	Yes	Yes	Yes	Yes

			Sites in Desborough						
Reasons/Details of representation									
DES3 b. The B576 at the Lower Street junction suffers from a high number of injury collisions mainly due to traffic travelling too fast on the main road. This junction needs the construction of a mini roundabout to slow traffic down and make it easier and safer for the large number of vehicles that turn in and out of Lower Street to/from the main road. DES3 c. It is very difficult for vehicles turning right from Gold Street into Kettering Road due to the lack of visibility of traffic travelling from the left coming from Harborough Road. A double mini roundabout, also incorporating the High Street junction, would help to improve safety at this location. DES3 d. The B576 itself is a road that suffers from excess speeding and a high injury collision rate so much so that it has been classified as a 'Red Route' in the past. A Traffic Calming Feasibility Study was prepared by Northamptonshire Highways on January 2017 but has not yet been adopted. It's recommendations are excellent and should be implemented at the earliest opportunity.									
Proposed Actions/Changes									
None.									
Officer Response									
Noted. The areas identified are areas of opportunity for redevelopment, detailed schemes would need to be developed for these areas.									
Officer Recommended Change(s)									
No changes recommended.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
10	Kettering Eco Group	Policy HWC1	Health and Well-being	Yes	No	Yes	Yes	Yes	No

Reasons/Details of representation									
The 2019 Air Quality Annual Status Report shows that NO2 (nitrogen dioxide) pollution from traffic at several sites in the Borough are so high that they present a danger to public health on a monthly basis. The Bowling Green Road-London Road junction (KT11 - figure 7.2 in the Sustainability Appraisal) would have been declared an Air Quality management Area were it not for exceedingly low measurements from one month (June), which forced the average below the legal 40ug/m3 threshold, meaning the site was not classified as a danger that									

necessitated the creation of an AQMA (Air Quality Management Area). The June measurement was only 15ug/m³, which is unusually low as all other measurements were between 35 to 53ug/m³ in 2018. In light of the East Kettering development, traffic flow through the town is likely to increase. The response outlined in 7.2.2 of the Sustainability Appraisal nor the Publication Plan do not represent an adequate mitigation strategy to protect residents from harmful levels of pollutants in the near future, and only vague pledges to monitor that do not accord with the urgent action implied by the Climate Emergency declaration KBC made in July 2019. Residents of Kettering and Rothwell were exposed to unsafe levels of pollution at 4 sites in 2018 judging by monthly data presented in the 2019 ASR. Any pedestrians walking through these areas - especially during times of peak traffic - would have breathed unsafe levels of polluted air. The World Health Organisation states that children are especially vulnerable to pollution, as they breathe faster than adults and inhale air closer to the ground where pollutant levels are higher. The risk to children has not been accounted for in the plan, especially at other candidate high pollution zones - of particular concern are the roads and junctions in the vicinity of schools and areas where children congregate, such as the western end of Deeble Road near Kettering Science Academy, and Barton Road-Windmill Avenue junction near Wicksteed Park and St Edward's and Isebrook schools. Monitoring sites do not exist in these areas - especially in those idling such as Southfields School. Air quality is therefore not afforded sufficient respect in the Local Plan, and it does not offer strategies to address the ongoing (and growing) risk to public health in the borough at key monitoring sites given that air pollution is recognised as a contributing factor in onset of heart disease and cancer, and the health cost to society of impacts of pollution in UK is around £16bn per year. The arbitrary 40ug/m³ threshold seemingly precludes the council from making it abundantly clear to Kettering residents that current pollution levels at the site and elsewhere in the borough are dangerously high - 39ug/m³ is seen as a concerning figure simply warranting further monitoring, however a 41ug/m³ figure would be of major concern and result in the declaration of an AQMA. The Council's plan must be proactive, not reactive in response to this aspect of the report. The ASR annual value from KT11 states the NO₂ level was 37.4ug/m³ in 2017 and 35.7ug/m³ in 2018 - a supposed 'reduction' of 1.7ug/m³ as stated in the Executive Committee summary. This ignores that KT11 exceeded the national air quality objective for NO₂ of 40ug/m³ on 8 of 11 months in 2018. The ASR misleadingly suggests NO₂ levels broadly declined at KT11 in 2018, however the reality is that two months (October and December) saw increases in pollution compared to 2017. UK Air Quality Strategy objectives for NO₂ state roadside pollution must not exceed 40ug/m³ annually and 200ug/m³ hourly no more than 18 times per year. KBC's hourly ASR does not include hourly values. Mean monthly concentrations of NO₂ at KT11 rose as high as 53.7ug/m³ in December. Annualised raw data from 2018 for KT11 exceeds the UK Air Quality Strategy objective for NO₂ at 41.2ug/m³ (even with June's curiously low value of 15.5ug/m³ factored in). Two additional Kettering sites (KT20 and KT21) exceed 40ug/m³ on a combined 13 of 20 months in 2018 (readings were not taken in January and March at these sites). NO₂ levels at a site in Rothwell (RW1) were also higher than 40 ug/m³ on 2 months of 11 in 2018. RW1 has the highest monthly value recorded in the borough at 58.1ug/m³ (December). KBC uses national 'diffusion tubes bias adjustment factors' from DEFRA to recalculate raw annualised values from each of the 17 sites as there are 'no diffusion tubes co-located with automatic monitoring units that can provide local adjustment factors'. Diffusion tubes used by other local authorities for air monitoring purposes are analysed by laboratories using differing preparation methods. This process seems to result in a range of bias adjustment factors that effect how raw roadside pollution data is recalculated. Instead of having its own diffusion tubes analysed, KBC relies on an

<p>aggregate factor from other Gradko laboratory tests to generate the 0.89 bias adjustment used in its 2019 ASR. Bias adjustment factors for Gradko tests performed for other local authorities range from 0.75-1.29. This is suggestive of a large variance between diffusion tubes and necessitates laboratory testing of KBC's own equipment to ensure accuracy of the bias adjustment factor used to calculate mean NO2 concentrations at Kettering sites subsequent ASR's.</p>
<p>Proposed Actions/Changes</p>
<p>It must include a plan to broaden pollution monitoring in the borough through the introduction of a raft of new sites to the scheme that cover as many major thoroughfares as is logistically feasible and affordable. Traffic monitoring should be undertaken in advance to ascertain the current and projected busiest routes, and readings compared to those from control sites. The current level of sites being monitored in Kettering does not encompass problem areas known for high congestion and poor traffic flow, such as near London Road-Pytchley Road-Barton Road junction, Northampton Road-Netherfield Road roundabout and other sites outlined in this response. Accurate conclusions about air quality borough-wide cannot be drawn from the small amount of data that is available. Provisions for more sustainable modes of transport should be presented in the Local Plan, including clear, achievable strategies to improve cycling and walking options and public transport options that discourages the use of private, emission producing vehicles in built-up areas (e.g. Kettering and Rothwell town centres where data is available and pollution levels are concerningly elevated). More transparent, less misleading and more granular reporting on data in annual reports such as the ASR is necessary - if air quality data is in the public domain (as it should be) in subsequent years, it will be most assuredly found and flagged up if interpretations or summaries written by the council or contractors are believed to be erroneous or do not reflect the gross trend of data, which should be accessible in raw form (e.g. Excel spreadsheets) to allow the general public to gain confidence in the council's progress on this front.</p>
<p>Officer Response</p>
<p>The location of pollution monitoring in the Borough is beyond the remit of the SSP2. Policy 8 of the JCS requires design of development to integrate sustainable modes of transport and Policy 15 of the JCS requires design of development to give priority to sustainable means of transport. The Northamptonshire Transportation Plan sets out transport policies, objectives and vision for the longer term. The Northamptonshire Transportation Plan is made up of a suite of documents, these include walking cycling and bus strategies.</p>
<p>Officer Recommended Change(s)</p>
<p>No changes recommended.</p>

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
11	Avison Young on behalf of National Grid	General Comments	Site Specific Part 2 Local Plan- Publication Plan						
Reasons/Details of representation									
We have reviewed the above document and can confirm that National Grid has no comments to make in response to this consultation.									
Proposed Actions/Changes									
None.									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
12	Local Resident	Policy MAW2	Land to the West of Mawsley						
Reasons/Details of representation									
I am resident on Cransley Rise. Any construction in the field about 6 houses down from me is going to significantly increase traffic flow and related pollution. My house is on the roadside and already it is noisy . With a further 50 houses , usually 2 car families plus fast driving delivery lorries at all hours of the day and evening infringe of my house , this is a huge increase in vehicle numbers. I understand Cransley Rise will be the only access road to the site. This is an issue not only through the building process but long term. Child safety with increased									

<p>traffic is also a concern . If the field is developed , the following must be a focus; Speed bumps Second entry/exit route - certainly needed for building traffic as Cransley Rise is too narrow with cars parked I front of houses on both sides. Lorries just will not get past. Continuation of village bike track around site Trees and green spaces Look and feel same as houses on Cransley Rise. We don't want it looking like the other end of the village, must retain characterful properties in different stone/ brick of varied sizes, paths, verges, trees etc. Bungalows for purchase required. Ageing residents that are home owners not housing association need bungalow options for the future. 1,2 and 3 bed options with gardens south facing . Let's at least try to offer something positive out of this if it goes ahead. Questions that the chap in the consultation couldn't answer; Last time this site was rejected for development it was due to lack of sewage capacity, so what changed and when ? If it's 40% social housing what is the definition between affordable housing and housing association ? How best we can ensure villagers views as a whole get represented eg via parish council ? How will large building equipment get down Cransley Rise with island in middle and cars each side ? Not enough space ?</p>
<p>Proposed Actions/Changes</p>
<p>None.</p>
<p>Officer Response</p>
<p>The issues raised have been considered through the site assessment work, the detail of this is included in the Housing Allocations Background Papers (2012, 2013, 2018 and 2019). Where appropriate, criteria have been included in Policy MAW2 to ensure issues identified through the assessment process are adequately addressed.</p>
<p>Officer Recommended Change(s)</p>
<p>No changes recommended.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
13	Eskmuir Securities	5	Employment	13					

<p>Reasons/Details of representation</p> <p>On behalf of our client, Eskmuir Properties Limited ('Eskmuir'), Savills is instructed to make representations to the Site Specific Part 2 Local Plan ('SSP2LP') Publication Plan Consultation. Eskmuir is an asset management and investment company with a track record of investing in and improving their existing assets. It prides itself in active asset management, ensuring its real estate is of high quality and occupancy</p>
--

maximised to the benefit of local economies and communities. Within Kettering, Eskmuir is the freehold owner of Baron Avenue Trade Park within Telford Way Industrial Estate. Baron Avenue Trade Park consists of 11 no. standalone industrial units located either side of Baron Avenue. Current occupiers include ScrewFix, Howdens Joinery and Topps Tiles whilst planning permission was granted in 2018 for the change of use of a unit from Class D1 to a flexible Class B1, Class B2, and/or Class B8 use (ref. KET/2018/0656). Eskmuir provided comments as part of the consultation on the Draft SSP2LP in August 2018. At that consultation, Eskmuir's comments were twofold and related to what was then Draft Policy EMP 01 (Safeguarding Employment Land). It was recommended that: 1. The definition of employment uses was broadened from the narrow definition of employment uses which just included those in the B Use Classes to include employment generating Sui Generis uses¹; and 2. The document include a policy framework which permits the change of use away from employment uses subject to certain criteria being met. Overall it is positive to see that the employment policy framework has evolved in line with some of our comments but there are a few further alterations that Eskmuir suggest are made. Given the nature of their ownership and their comments provided on the Draft SSP2LP the extent of Eskmuir's commentary is very narrow, relating just to Policy EMP 1 (Safeguarding Employment Land) and Policy EMP 3 (Non Employment (Non-B Use Class) in Safeguarded Employment Area) of the Publication SSP2LP. 1 Such as training facilities, waste management, builders' yards, tyre fitting, cash and carry warehouses, postal sorting offices or telecommunications centres. Policy EMP1 (Safeguarding Employment Land) Much like Draft Policy EMP 01 of the Draft SSP2LP, this policy continues to identify nine established employment areas which are to be safeguarded for Class B1, Class B2, and Class B8. Baron Avenue Trade Park is within the Telford Way Industrial Estate which is safeguarded employment land. During the consultation on the Draft SSP2LP Eskmuir suggested that, whilst almost certainly its intention, actually Draft Policy EMP 01 did not offer support for proposals for the intensification of such use and therefore Eskmuir welcome the specific support for proposals that result in the modernisation of these sites that is now offered by Policy EMP 1. Policy EMP 3 (Non Employment (Non-B Use Class) in Safeguarded Employment Area) In order to be compliant with the National Planning Policy Framework and to compliment Policy 22 (Delivering Economic Prosperity) of the North Northamptonshire Joint Core Strategy, during the consultation on the Draft SSP2LP Eskmuir suggested the need for the inclusion of a policy which allowed for the alternative use of safeguarded employment land subject to certain criteria being met. With that in mind it is positive to see the introduction of Policy EMP 3 in Publication SSP2LP which now contains a criteria based policy framework that can permit the introduction of non-employment uses (and on the flip-side the alternative use of established employment uses) within Safeguarded Employment Areas. The use of a criteria based framework allows applications for alternative uses of land or buildings to be treated on their merits and will play a role in preventing the long-term vacancy of sites allocated for employment use where there is no reasonable prospect of a site being used for such purposes. At present six criteria are listed but it is not clear whether, for this policy to be satisfied, there is a need for all six or just one of the criteria to be satisfied. Eskmuir suggest that there is a need for this to be clarified through the addition of the use of the words 'and' and 'or' to add clarity to this. In terms of the criteria themselves, Eskmuir's comments are summarised in the table below: Criteria a) Provide evidence to show the site has been marketed at a reasonable price and period, as well demonstrating that there is no realistic prospect of the proposal site being used for an employment use. b) Provide evidence to demonstrate that employment use on the site would no longer be viable. Commentary for A & B Given that Criteria A requires a period of marketing to demonstrate that there is no

realistic prospect of re-use and that Criteria B requires that it is demonstrated that employment uses are not viable, it is considered that either only one of these criteria is retained or they are merged into a single criteria. Criteria c) Be suitable in the location in which it is proposed and ensure that it does not impact current and future operations of adjoining businesses. d) Not undermine the existing employment uses and adversely affect the character of the area. Commentary for C & D These two criteria should be combined as both relate to the impact that non Class B uses will have on the operations of occupiers in the surrounding area. Criteria e) Not result in an over-concentration of non B- Class uses within a Safeguarded Employment Area. f) Not adversely affect the supply of employment opportunities within a Safeguarded Employment Area Commentary for E & F This criteria could be removed as it is not clear what the concerns are with an over-concentration of non B-Class uses if the balance of uses is changing locally. At present, the six criteria used in Policy EMP3 of the SSP2LP are very much high level with the associated subtext fails to provide further guidance. For example, Criteria A identifies the need for marketing over a reasonable period of time but no guidance is given as to what this time may be. On this point, Eskmuir suggest that that six months would be an appropriate time period and is used in the Basingstoke Local Plan and the Swindon Local Plan. It is Eskmuir's understanding that Policy EMP03 does not apply (and therefore the criteria do not need to be satisfied for) for proposals for the introduction of uses which are ancillary to employment uses given the inclusion of the phrase 'which are not ancillary to existing uses'. Eskmuir supports this approach as it recognises the suitability of locating non Class-B sui generis uses and other ancillary uses within safeguarded employment areas. Conclusion These representations are submitted on behalf of Eskmuir as freehold owners of the Baron Avenue Trade Park which forms part of the Telford Way Industrial Estate, Kettering. Overall it is positive that the comments provided by Eskmuir at the Draft SSP2LP stage have been incorporated and generally Eskmuir welcome the breaking down of Policy EMP01 in the Draft SSP2LP into Policies EMP1 and EMP3 in the Publication SSP2LP. Whilst Eskmuir generally support this approach, this covering letter has identified a few sections where either clarification or fairly modest alterations are required for the policies to operate effectively. I trust these observations and comments are helpful and will be taken into consideration.

Proposed Actions/Changes

None.

Officer Response

Proposals for non-B class uses in safeguarded employment areas would have to be in accordance with all criteria set out in Policy EMP3. Criteria a) and b) will be merged as it is considered that the use of one criteria can sufficiently cover the contents of the two criteria as currently drafted in the Publication Plan. Criterion a) of Policy EMP3 will also be amended to set out the specific time period, of 12 months in relation to how long the site needs to be marketed for. This is considered to be an appropriate period of time and allows for fluctuations in the market throughout the year. Criteria c) and d) seek to shape development in different ways, criterion c) seeks to prevent non-B class uses from having a negative impact on the day to day operation of adjoining businesses. Whereas criterion d) seeks to prevent the detracting away from the focus on B-class uses in the Safeguarded Employment Areas.

Criterion e) is essential in explicitly stating that proposals for non-B class uses in the Safeguarded Employment Areas should not result in over-concentration of this type of uses, given that these areas have specifically been identified for the importance of B-class uses in these areas.
Officer Recommended Change(s)
A Main Modification is proposed to address these issues. Refer to the Main Modification Schedule MM3

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
14	Surface Water Drainage Assessment Team	8	Flood Risk and Sustainable Water Management						

Reasons/Details of representation
There seems to be an issue with the consultation portal as an error code is displayed. Please see below the LLFA's response to the Site Specific Part 2 Local Plan - Publication Plan Consultation. 1) Section 8 Flood Risk and Sustainable Water Management 8.3 states 'JCS Policy 5 states development should contribute to reducing the risk of flooding and development should incorporate sustainable drainage systems where practicable.' However NPPF (2019) para 163 'Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that: a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location b) the development is appropriately flood resistant and resilient c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;' It is our opinion that the NPPF is a base line requirement and so the Site Specific Part 2 Local Plan should adopt the wording as highlighted above. 2) 8.9 'Major new developments must address surface water drainage requirements as set out in the Northamptonshire Flood Toolkit and local guidance' Change to 'All Major developments must address surface water drainage requirements as set out in the Northamptonshire Flood Toolkit and local guidance'
Proposed Actions/Changes
None.
Officer Response
This wording is already included in the NPPF therefore there is no need for it to be repeated in the SSP2.

Officer Recommended Change(s)
A minor modification is proposed to make the amendment suggested to paragraph 8.9.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
15	Local Resident	Policy ASH1	Ashley Development Principles	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation

I fully support all the proposals and the plan for Ashley Village

Proposed Actions/Changes

None.

Officer Response

Noted.

Officer Recommended Change(s)

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
16	Local Resident	Policy DES2	Opportunity Redevelopment Sites within Desborough	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation

DES2b- With the information that the Lawrences site is to be affordable housing, ahead of this, a full traffic management assessment is required as this development impacts on the other points in DES2. The nearby Gladstone Street already has traffic issues therefore before adding to the problem it should be solved.
Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
17	Local Resident	Policy DES3	Opportunity Environmental Improvement Sites in Desborough	Yes	Yes			Yes	Yes

Reasons/Details of representation
Fully agree the previous comments posted. DES3 b. The B576 at the Lower Street junction suffers from a high number of injury collisions mainly due to traffic travelling too fast on the main road. This junction needs the construction of a mini roundabout to slow traffic down and make it easier and safer for the large number of vehicles that turn in and out of Lower Street to/from the main road. DES3 c. It is very difficult for vehicles turning right from Gold Street into Kettering Road due to the lack of visibility of traffic travelling from the left coming from Harborough Road. A double mini roundabout, also incorporating the High Street junction, would help to improve safety at this location. DES3 d. The B576 itself is a road that suffers from excess speeding and a high injury collision rate so much so that it has been classified as a 'Red Route' in the past. A Traffic Calming Feasibility Study was prepared by Northamptonshire Highways on January 2017 but has not yet been adopted. It's recommendations are excellent and should be implemented at the earliest opportunity.
Proposed Actions/Changes
None.

Officer Response
Noted. The areas identified are areas of opportunity for redevelopment, detailed schemes would need to be developed for these areas.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
18	Local Resident	Policy DES5	Land to the south of Desborough	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation

With planning permission approved, the Desborough public likely to be impacted need to have awareness provided by Kettering Borough Council on when reserved matters is to be discussed and what it contains. This is significant with mitigation required for a site that has 30 % surface water threat which post development will impact on the additional destruction of Tailby Meadow which must be protected.

Proposed Actions/Changes

None.

Officer Response

Noted. Consultation on reserved matters application would be undertaken in accordance with the Council's Statement of Community Involvement.

Officer Recommended Change(s)

No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
----	------------	----------------	------	-----------	-----------	---------------------	---------------------------------	-----------	--------------------

Item 6 Appendix 1

19	Local Resident	2	Spatial Portrait of Kettering Borough	Yes	Yes	Yes	Yes	Yes	Yes
Reasons/Details of representation									
Looking at carbon emissions and the rise of PM2.5, PM 10 and NoX at roadside, why is there no road side monitoring in Desborough (where shortly we will be invaded by construction site vehicles despite the bypass!) ? Do KBC seek to add Desborough monitoring?									
Proposed Actions/Changes									
None.									
Officer Response									
The location of pollution monitoring in the Borough is beyond the remit of the SSP2.									
Officer Recommended Change(s)									
None.									
ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
20	Chairman Rothwell FC Aztec	Policy HWC2	Protection of Community Facilities and Proposals for New Facilities						
Reasons/Details of representation									
Re: Rothwell North Sustainable Urban Extension (SUE) public consultation I am writing on behalf of Rothwell and Desborough's leading community football club Rothwell FC Aztec. The club has over forty years of history within our community and currently has over 350 members and volunteers. We are mainly based at Rothwell's Montsaye Academy with some training sessions held at Desborough leisure centre. The secret of our forty-three-year history lies in the welcome extended to all. Boys, girls, gifted or simply enthusiastic are encouraged not to win at all costs but to develop an awareness of discipline, fair play, tolerance and good sportsmanship. This is all done within a friendly atmosphere, controlled by a team of dedicated local volunteers who give up their own spare time for the benefit of their community. We truly believe our club's existence has a very positive influence on the youth of the district giving guidance and self-control as they grow into more mature members of the Community, they live in. We are proud that our current membership includes the sons and daughters of our former youth players and we make our comments drawing on the extensive knowledge of our community. Our comments									

are drawn in the context of the current public consultation of the proposed Site Specific Part 2 Local Plan (SS2) which closes on 12 th February next. Within SS2 policy HWC2 sets out the Borough’s approach to provision of sports facilities and alludes to the Local Football Facilities Plan’. It is noted that this will not be published prior to the closing date of the current consultation. HWC2 indicates that all major developers should provide a contribution to provision of new sports facilities. One such major development is the Rothwell North Sustainable Urban Expansion (SUE) plan which forms the majority of the as yet unbuilt dwellings required under SS2. As a community sports club centred immediately adjacent to this area we are concerned at certain weaknesses within the plan. It is noted that neither SS2 nor the Rothwell North SUE includes designated provision for sports facilities. While we appreciate that developers of major sites may reasonably require some flexibility in the final location of the sports facility or their contribution to them we strongly believe that the general location and extent of the facility should be included within SS2 and would ask that such provision be included in the plan. We recognise that the provision of these facilities may not necessarily be within the Rothwell North SUE but may be situated within the broader environs of Rothwell. We further note that the extent of the settlement as defined within the Rothwell North SUE is already under pressure due to the development of the Truckstop’ facility immediately south of th e A14 Junction and close to the Town’s Cemetery which already lies to the south of the trunk road. It is arguable that the settlement now includes these areas and the plan should be revised to include them. We are aware that the Borough owns land within the immediate vicinity of the Truck stop and would ask that this be included within SS2 as provision to meet Policy HWC2 and that the improvement necessary to provide this facility should come from the planning agreement for the Rothwell North SUE.

Proposed Actions/Changes

None.

Officer Response

Provision of facilities associated with Rothwell North has been considered through the planning application process.

Officer Recommended Change(s)

A Main Modification is proposed to HWC3 and its supporting text to clarify the status of the Playing Pitch and Sports Facilities Strategies. Refer to the Main Modification Schedule, MM5

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
21	Parish Clerk Cranford Parish Council	Policy CRA2	South of New Stone House, Duck End, Cranford	Yes	Yes	Yes	Yes	Yes	
Reasons/Details of representation									
Policy CRA2- Cranford Parish Council are supportive of this housing allocation site									
Proposed Actions/Changes									
None.									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
22	Parish Clerk Cranford Parish Council	Policy CRA3	Land east of the corner of Duck End and Thrapston Road, Cranford	Yes	Yes	Yes	Yes		
Reasons/Details of representation									
Policy CRA3 Cranford Parish Council are supportive of this area being allocated for Housing									
Proposed Actions/Changes									
None.									

Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
23	Parish Clerk Cranford Parish Council	Policy NEH3	Historically and Visually Important Local Green Spaces	Yes	Yes	Yes	Yes		

Reasons/Details of representation

Policy NEH3- Local Green Spaces Designation. Cranford Parish Council are supportive of the HVI areas and Open Spaces identified in the Historically and Visually Important Local Green Space Background Paper (2015) and updates to the Background Paper in (2016) and (2019) for Cranford and feel these areas are crucially important in maintaining the designation of a conservation village.

Proposed Actions/Changes

None.

Officer Response

Noted.

Officer Recommended Change(s)

None.

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
24	Parish Clerk Cranford Parish Council	Policy CRA1	Cranford Development Principles	Yes	Yes	Yes	Yes		
Reasons/Details of representation									
Policy CRA1. Cranford Parish Council are happy to support the development principles listed in Policy CRA1									
Proposed Actions/Changes									
None.									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
25	Parish Clerk Cranford Parish Council	Policy CRA3	Land east of the corner of Duck End and Thrapston Road, Cranford	Yes	Yes	Yes	Yes		
Reasons/Details of representation									
Policy CRA3 Cranford Parish Council are in support of this area being put forward for future housing allocation									
Proposed Actions/Changes									
None.									
Officer Response									

Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
26	Local Resident	Policy MAW1	Mawsley Development Principles	No	No	No	No	Yes	

Reasons/Details of representation

I am not sure why we appear to be going through this ritual dance each year, I guess until we get bored and submit. Let me be clear, Northampton, Wellingborough and Kettering are all dirty holes, the reason why I moved to Mawsley is for the village and country lifestyle, I do not want it spoilt and congested. Our facilities are already creaking, the village cannot support any more residents. Please leave us alone and peddle your stupid ideas elsewhere. I have no faith in the council to make any sound judgement on any matter.

Proposed Actions/Changes

None.

Officer Response

Noted. The Categorisation of Villages: Background Paper (October 2019) provides a justification for the distribution of housing in the rural area.

Officer Recommended Change(s)

No changes recommended.

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
27	Sport England	Policy HWC3	Sport, Recreation and Physical Activity		No		No	Yes	Yes

Reasons/Details of representation

To ensure conformity with National Planning Policy Framework paragraph 96 and to ensure policy HWC3 is effective, once the Strategies are completed it the findings (any shortfalls of provision etc) and respective recommendations/requirements should be set out within the supporting text of Policy HWC3 and the Infrastructure Delivery Schedule. Where the Strategies identify the need for new provision at the proposed allocated sites the requirement should be set out in the specific policy.

Proposed Actions/Changes

Sport England acknowledges and welcomes the Borough Council undertaking a Playing Pitch Strategy and Sports Facilities Strategy in accordance with National Planning Policy Framework paragraph 96. To ensure conformity with National Planning Policy Framework paragraph 96 and to ensure the policy is effective, once the Strategies are completed its findings (any shortfalls of provision etc) and respective recommendations/requirements should be set out within the supporting text of Policy HWC3 and the Infrastructure Delivery Schedule. Where the Strategies identify the need for new provision at the proposed allocated sites the requirement should be set out in the specific policy.

Officer Response

See below.

Officer Recommended Change(s)

A Main Modification is proposed to HWC3 and its supporting text to clarify the status of the Playing Pitch and Sports Facilities Strategies and to clarify the approach which will be taken to provision of facilities. Refer to the Main Modification Schedule, MM5

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
----	------------	----------------	------	-----------	-----------	---------------------	---------------------------------	-----------	--------------------

Item 6 Appendix 1

28	Sport England	Policy HWC3	Sport, Recreation and Physical Activity	No				Yes	Yes
Reasons/Details of representation									
Sport England welcomes policy HWC3 setting out that the Playing Pitch Strategy (PPS) and Sports Facilities Strategy (SFS) will be a focus for investment. These documents are based on assessment of current and future demand for Kettering Borough. However, Sport England questions the reference to the Local Football Facilities Plan (LFFP), which is not an evidence base document. The LFFP is a local investment plan to deliver the National Football Facilities Strategy. The LFFP only considers football priorities and in certain circumstance this could potentially impact on other sporting activities that take place on a playing field. It is therefore considered that the role of the LFFP should not be given a heightened role over other Strategies prepared by National Governing Bodies.									
Proposed Actions/Changes									
Reference to the Local Football Facilities Plan (2020) should be removed as it is already covered within the policy under plans or strategies prepared by the National Governing Bodies for sport.									
Officer Response									
Noted.									
Officer Recommended Change(s)									
Specific reference to the Local Football Facilities Plan will be removed. Refer to the Main Modification Schedule, MM5									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
29	Sport England	Policy HWC1	Health and Well-being		No			Yes	Yes
Reasons/Details of representation									
The policy as currently drafted fails to set out an approach as to how health and wellbeing of the Borough will be improved through development of existing and new residential sites. The policy would be assisted by making reference to Sport England 's Active Design Principles which will support healthy lifestyles by making physical activity an easy, practical and attractive choice.									

Proposed Actions/Changes
Additional bullet point- Support healthy lifestyles, including through the use of active design principles making physical activity an easy, practical and attractive choice;
Officer Response
It is considered that the principles of active design are adequately addressed by other policies in the development plan, including Policy 8 and 15 of the JCS and Policy HWC3 and NEH2.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
30	Local Resident	Policy MAW2	Land to the West of Mawsley	No	No	No			

Reasons/Details of representation
I would like to express my strong objection to the proposal to build additional homes in Mawsley. My concerns about this proposal are: * The access point would be totally unsuitable - Cransley Rise is too narrow for the volume of traffic that would result from all those extra homes. Plus, the access point would be on a sharp bend so very dangerous. * Everyone living in Mawsley needs a car. The bus service is now very minimal and cannot be relied upon. My husband and I never intended to have two cars, but realised we would have no choice after living here for only two months. In that time my husband had had to use taxis to get to work because there was no bus anywhere near the time required (even standard office hours)... and that was 5 years ago when the service was much better than it is now! * Many residents have pretty much lived on a building site for over ten years - at least give us a break while the village settles Surely no new homes should be built while there are still unadopted roads and drains throughout the village? * Mawsley School has already been extended several times and it would not be possible to do so again. From what I understand, other schools in the area are also at capacity. A friend of mine wanted to move to Mawsley last year but could not get her three sons into the school, so had to move elsewhere. 50 houses could result in a very large number of extra children and we just cannot accomodate them all! * The proposed site is just one field away from Birch Spinney and Mawsley Marsh SSSI . The significant disruption to the area will of course have a negative impact on wildlife in the area and this should not be allowed to happen. * The area in question regularly floods during periods of high rainfall. * Mawsley is far larger than originally intended (by more than 200 homes). Plus, Colin Clayson is planning to build 29 retirement flats near the village centre, so that too should be

Item 6 Appendix 1

considered a contribution to the housing "deficit" in the area. With both of these points considered, I think it's fair to say that Mawsley has contributed far, far more than its fair share!
Proposed Actions/Changes
None.
Officer Response
The issues raised have been considered through the site assessment work, the detail of this is included in the Housing Allocations Background Papers (2012, 2013, 2018 and 2019). Where appropriate, criteria have been included in Policy MAW2 to ensure issues identified through the assessment process are adequately addressed.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
31	Local Resident	Policy LOD1	Loddington Development Principles	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation
I agree with the SSP2 Local Plan proposals for the village of Loddington. We are not a "sustainable community" and are therefore correctly categorised as a Category A (restricted infill village). Since the 2012 consultation the village shop has closed and the limited bus service has been totally discontinued. **** keeps raising the issue of Neighbourhood Plan with the Parish Council but each time residents make it clear that this is not an option. We have rejected all but restricted infill development. Affordable housing options were rejected in 2012. All development outside the village boundary was rejected. As residents we have accepted a total of eight (8) new home developments since 2012. With a village of around 200 houses this seems reasonable to residents. The three HVI open areas listed in SSP2 Local Plan for Loddington are important to maintain the rural character of the village.
Proposed Actions/Changes
None.
Officer Response
Noted.

Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
32	Local Resident	3	Settlement Boundaries	No	No	No	No	Yes	No

Reasons/Details of representation

Location of Development: Settlement Boundaries my representation is specific to Warkton Village. There is good potential to allow limited dwelling development along Windy Ridge. The council cannot provide where the boundary starts or where it ends. The whole of that location is shown as open countryside. If that was the case where are there dwelling houses and businesses there already? We want our children to remain in this locality and the land owners should be allowed to develop some of their own land. In line with my comments above, the residents of that location Windy Ridge wants to develop their own lands with limited development but the council refused to listen. There seems to be no cooperation or the views of residents taken into consideration.

Proposed Actions/Changes

Show proper settlement boundaries that are consistent with the wishes of the local residents. The council seems very inflexible with their approach

Officer Response

The settlement boundaries have been drawn in accordance with a robust set of criteria. The Settlement Boundaries Background Papers (February 2012, April 2018 and October 2019) provide the evidence base and justification for the settlement boundaries shown on the policies maps.

Officer Recommended Change(s)

No changes recommended.

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
33	Specialist Accommodation & Prevention Northants Adult Social Services, Northamptonshire County Council	4	Housing Mix and Tenure	Yes	Yes	Yes	Yes		
Reasons/Details of representation									
<p>NCC welcome the inclusion of it HOPSR modelling data and an ambition to include older people’s housing in development so 50 or more homes. ‘4.22 Policy 30 sets out requirements for housing mix, affordable housing targets and thresholds, requires new dwellings to meet National Space Standards, requires homes to meet National Accessibility Standards, encourages provision to meet specialist requirements of older people, supports proposals for Custom Build developments and states SUEs and other strategic developments should make available serviced building plots.’ Encourages provision is a very low-level of ambition and does not establish any targets against which to measure success. Additionally there is a lack of reference to specialist housing for younger adults, e.g. Transforming Care cohorts, - details of forecast demand are available here https://www.northamptonshire.gov.uk/councilservices/adult-social-care/policies/Documents/Transforming%20Care%20Accommodation%20Plan.pdf Additionally - in the spatial vision for the town and town centre plans, NCC would welcome attention to town centre design focused around age-friendly town principles. This can encourage people to remain active as they age, e.g. clearly signposted, accessible and well located public toilets, benches at regular intervals, drop kerbs, etc. this can help to mitigate against a rapid increase in signs of frailty as we age.</p>									
Proposed Actions/Changes									
None.									
Officer Response									
Noted. The SSP2 identifies areas within the market towns for environmental improvements. The detail of these schemes will need to be developed and could include the type of initiatives listed to help people stay active.									
Officer Recommended Change(s)									

No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
34	Wildlife Trust	Table 8.1	Designated Natural Assets				No		

Reasons/Details of representation

We are pleased to note that this Part 2 Local Plan for Kettering includes a section highlighting the significance of natural capital and green infrastructure assets. Biodiversity is a key theme within green infrastructure. Paragraph 8.13 usefully highlights the existing biodiversity assets (SSSIs, LNR, LWSs, PWV and Pocket Parks) within the Borough as well as the need to restore ecological networks on the landscape scale, particularly within the Nene Valley Nature Improvement Area. However, there are a few modifications to this section, which we would recommend are included to prevent confusion in the interpretation of the Plan and ensure it aligns with the National Planning Policy Framework (NPPF). First, Table 8.1 has the title Designated Natural Assets. Although Local Wildlife Sites are mentioned within paragraph 8.13 they are not included in the table. As there are over 60 of these sites across the Borough it would not be practical to list them all, however, a mention within the table would ensure that they are clearly recognised as an importance natural asset alongside the other designations. At present, it could be interpreted that natural assets do not include Local Wildlife Sites. Another recommendation concerns paragraph 8.15. Whilst we agree that an additional policy within this Part 2 Local Plan may not be necessary due to the existence of policies within the Joint Core Strategy (JCS); there is one key change in national policy which has occurred since the publication of the JCS which we would recommend is included. The NPPF paragraphs 170 and 174 now require developments to provide a measurable net gain in biodiversity. We would recommend that this is demonstrated using a biodiversity metric. The expected Environment Bill will make this requirement statutory. We would recommend that a sentence is added to paragraph 8.15 to cover the use of a biodiversity metric by developments to demonstrate a measurable net gain in biodiversity. Finally, the NPPF in paragraph 174 also states that plans should: 'Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation.' Although this Local Plan includes maps of green infrastructure networks it does not have clear maps illustrating the sites and networks required in the NPPF

paragraph quoted about. We would advise that the development and inclusion of these maps would considerably strengthen this section of the Plan and better align it with the NPPF.
Proposed Actions/Changes
None.
Officer Response
Local Wildlife Sites are clearly identified as sites designated at a local level in paragraph 8.13, there is no need for them to be added to table 8.1. Reference to how a measurable net gain in biodiversity should be calculated would be more appropriately included as part of a review of the Joint Core Strategy as the policy requiring a net gain in biodiversity is included within the JCS. The policies maps show the changes to the adopted policies map. Designated sites of importance for biodiversity will not be altered as a result of the adoption of the SSP2, therefore these have not been shown on the policies maps.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
35	Local Resident	7	Health and Well-being and Community Facilities	Yes	No			Yes	Yes

Reasons/Details of representation
None.
Proposed Actions/Changes
The policy here covers the support and enhancement of facilities by safeguarding of existing facilities....however the policy is ineffective as it does not identify any identifiable remedies that ensures, where criteria are met, how existing facilities are protected....e.g. by declining change of use etc
Officer Response
Facilities will be protected through the application of the policy in determining planning applications.
Officer Recommended Change(s)

No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
36	Local Resident	Policy HWC3	Sport, Recreation and Physical Activity		Yes	Yes	Yes	Yes	Yes
Reasons/Details of representation									
None.									
Proposed Actions/Changes									
Section 7.21 makes reference to the Sports facility Strategy 2019, in addition throughout the section a number of other documents are referred to, namely, section 7.21- the Councils Playing Pitch Strategy(2019, The assessing needs and opportunities for indoor and outdoor facilities (July 2019), however non of these have been available for public viewing so it is not possible to determine if the policy accurately reflects the findings in these papers - in fact an analysis of the Sustainability report has apparently identified elements that do not concur with other referenced papers. Section .23 Supplementary planning doc In order to have a full and open consultation these papers should have been made available to view.									
Officer Response									
See below.									
Officer Recommended Change(s)									
A Main Modification is proposed to HWC3 and its supporting text to clarify the status of the Playing Pitch and Sports Facilities Strategies. Refer to the Main Modification Schedule, MM5									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
37	Local Resident	Policy MAW2	Land to the West of Mawsley						
Reasons/Details of representation									
Mawsley Village RA/174 Housing Development: Comments: * Restricted access to the site via Cransley Rise and existing properties. * Capacity of the pumping station and sewage system and constraints in relation to water and waste water capacity. The South Eastern half of the site has been identified as being at high risk of ground water flooding. * Impact on amenity and light/noise to adjacent properties. * Impact of additional traffic volumes at both entrances from the C31, based on the recent Road Safety Assessment and VAS data retrieval of over 2,000 vehicle activations, in out of the no- through- route road system. * Capacity for additional patients at Mawsley Medical Centre. * Capacity for additional pupils at Mawsley Primary School.									
Proposed Actions/Changes									
None.									
Officer Response									
The issues raised have been considered through the site assessment work, the detail of this is included in the Housing Allocations Background Papers (2012, 2013, 2018 and 2019) .Where appropriate, criteria have been included in Policy MAW2 to ensure issues identified through the assessment process are adequately addressed.									
Officer Recommended Change(s)									
No changes recommended.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
38	Local Resident	Policy RS4	Development in the Open Countryside	No	Yes	No	No	Yes	Yes

Reasons/Details of representation

This policy fails to cater for instances where redundant or disused rural buildings possessing no architectural or historic value that are otherwise suitable for redevelopment are in fact prevented from doing so due to the requirement to retain the original exterior features. It seems counter-productive to require a typical 1960s or 70s agricultural building conversion to housing to be required to continue to retain the exterior appearance of the original 1960s or 70s agricultural building. These sites are often considered to be eyesores located in or close to what is otherwise an attractive village setting.

Proposed Actions/Changes

Policy RS4, or possibly Policy RS5 should allow for demolition in these circumstances to allow redevelopment of the site, especially where the site is located adjacent to a settlement boundary and where redevelopment of the site would enhance its immediate setting, as indicated by NPPF para 79 c). Additionally, adding this provision would free up development sites, typically in the rural villages.

Officer Response

The policy is consistent with paragraph 79 of the NPPF which relates to re-use of redundant or disused buildings not the demolition and redevelopment of these buildings.

Officer Recommended Change(s)

No change recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
39	Local Resident	Table 17.1	Great Cransley	No	No	No	No	Yes	Yes

Reasons/Details of representation

Table 17.1 indicates that Saved Policy 10 covering Cransley and Thorpe Malsor reservoirs is to be replaced by SSP2 Policy NEH2, (Section 8). Saved Policy 10 recognises Cransley and Thorpe Malsor reservoirs as particularly valuable countryside resources. It provides for protection of these reservoirs against most forms of development which are incompatible with the rural nature and quality of these areas. The proposed replacement Policy NEH2 provides for protection for the Borough green infrastructure network described in the Natural Capital and green Infrastructure Section 8 of the SSP2 but fails to include any reference to Cransley and Thorpe Malsor reservoirs. Although a photograph of Cransley reservoir is shown, there is no other reference to the reservoirs. This is a serious omission from the SSP2 as without inclusion, the special protection for these reservoirs could be lost.

Proposed Actions/Changes

The protection afforded by Saved Policy 10 for Cransley and Thorpe Malsor reservoirs should be transferred to a new policy within the SSP2, possibly by an addition to Policy NEH2.

Officer Response

Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.

Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
40	Local Resident	18	Appendix 3 - Policies Maps	No	No	No	No	Yes	Yes

Reasons/Details of representation

Para 13.81 at page 131 makes brief mention of the Great Cransley Conservation area, quote; The Great Cransley Conservation Area Appraisal was adopted in May 1984 ‘, but is not mentioned anywhere else in the SSP2. Neither is there any description of what Conservation Area status means for Great Cransley, particularly with regards to any additional level of protection afforded. The Great Cransley Proposal Map is shown at Figure 18.16, page 198. This map shows the proposed settlement boundary but without showing the conservation area boundary. This contrasts with the current Local Plan dated 1995 where the proposal map for Great Cransley shows both the settlement boundary and the conservation area boundary.

Proposed Actions/Changes

Since the 1995 Local Plan will be replaced by the new Local Plan, it is important that the level of protection afforded to the conservation area is given equal visibility in the SSP2 at Section 13 and importantly, that the boundary map is retained at Appendix 3. This is a serious omission from the SSP2.

Officer Response

The policies maps show the changes to the adopted policies map. Conservation Area designations will not be altered as a result of the adoption of the SSP2, therefore these have not been shown on the policies maps.

Officer Recommended Change(s)

No changes recommended.

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
41	Local Resident	Policy GRC2	Land to the north of Loddington Road, Great Cransley	No	No	No	No	Yes	Yes

Reasons/Details of representation

Housing site RA/146 has been designated for Great Cransley yet there are three key issues that have not been adequately addressed: Is there a need and justification for additional housing in Great Cransley? Would site RA/146 provide a suitable location for new housing? Is site RA/146 suitable for development? First - Is there a need and justification for additional housing in Great Cransley? Para 13.81 states, Consultation identified a need for affordable housing within Great Cransley; to date a Housing Needs Survey has not been undertaken for the village. However, through consultation at the Options stage a need for affordable housing in the village was raised .’ Without a housing needs survey or other up to date evidence of a housing need with indication of housing types and numbers needed, there cannot be evidence-based justification for housing development in a rural village. It is not sufficient to rely on the views of a small number of possibly vocal residents to evidence a housing need. Therefore, RA/146 housing allocation fails to comply with NPPF Para 31, The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.’ . It is noted that Great Cransley Parish Council commented on the Options Paper consultation dated 21 May 2012 indicating that there could be some growth but for affordable housing only and that this could be outside the existing village boundary. However, this was not quantified by indicative housing numbers or timescales. Neither did KBC follow up this suggestion with a housing needs survey in order to justify the parish council comment. Policy GRC2 also fails to comply with JCS Policy 11, part 2 The Rural Areas, item a) Development in the rural areas will be limited to that required to support a prosperous rural economy or to meet a locally arising need, which cannot be met more sustainably at a nearby larger settlement ;’ Great Cransley has very limited facilities and services such that new development would be met more sustainably at any of the several nearby larger settlements. So even if a need for affordable housing had been identified there has been no attempt by KBC to justify why it should be built at Great Cransley instead of at a more sustainable nearby location. Para 13.81 justifies additional housing at Great Cransley on a need for affordable housing and Policy GRC2 designates site RA/146 to provide between 10 and 15 dwellings with a need to provide affordable housing in line with JCS Policy 30. JCS Policy 30 positively encourages SUE development by requiring only 20% of dwellings as affordable and positively discourages development in the rural areas by requiring 40% of dwellings as affordable with a threshold set at 11 or more dwellings. It is quite clear that JCS policy 30 makes housing delivery in the rural areas uneconomic for developers for sites of 11

houses or more where affordable housing becomes a policy requirement. As a result, site RA/146 is almost certain to attract a development of 10 or less dwellings so ensuring that zero affordable houses would be delivered. This has been evidenced by the speculative proposal by Idea Architectural Technology for a development of 10 four-bedroom detached houses, see link. http://idea-at.com/featured_item/greatcransley/ The KBC Housing Allocations Paper dated Feb 2012 at page 9 provides the Stage 1 assessment process. This concludes with the statement ' Sites which are not located within or adjacent to Kettering, Burton Latimer, Desborough, Rothwell (local service centres?) and which are not required for rural affordable housing will be dismissed '. Since it is clear that site RA/146 will not in practice yield any affordable housing, this site should have been dismissed at the beginning of the housing selection process. By designating site RA/146 for a yield of 10 - 15 houses, KBC have simply opened the door for development of market houses only. Second - Would site RA/146 provide a suitable location for new housing? The housing site assessments carried out to date by KBC from the Rural Masterplanning 2012 stage onwards would seem to be based on desktop assessments only. There are failures with the selection process for this site. A physical inspection of the site would have immediately identified the elevation difference between Loddington Road and the field designated as site RA/146. At this point Loddington Road lies in a cutting such that the ground rises immediately and steeply behind the hedge. This height difference varies but rises to approximately 1.5m. Development of the site would require a large amount of earth to be removed to create vehicle access and even then, steep driveways to houses elevated above the road. Site RA/146 frontage is on the inside of a blind bend on Loddington Road. A recent traffic survey has shown that almost half of vehicles passing this point are exceeding the 30mph speed limit with significant numbers exceeding 50mph. To create safe entry and exit points for the new houses the entire hedge would have to be removed with extensive landscaping to create the required visibility. The density of development is also questioned since it is noted how the yield of this site has increased over time. The initial KBC housing allocation assessment 2013 yield was 6 - 8. Since then the yield has increased to the current 10 - 15. The Draft principles for site RA/146 given in the KBC 2012 options consultation document are: ' Development should front onto Loddington Road but be set back in a similar style to adjacent properties, Properties should be spaced to allow for views out to the open countryside to be retained, Boundary treatments to the rear of the properties should allow good visual links to the open countryside and planting should be used to create a soft edge to the village. Use of high close-boarded fences or walls to provide a boundary to the open countryside should be avoided, Density of development should reflect that of adjacent development, Should include affordable housing to meet local needs '. These requirements are taken forward and expanded upon at SSP2 Policy GRC2. The 2 nd principle above now repeats at GRC2 d), 4 th principle above now repeats at GRC2 f) and 5 th principle above now repeats at GRC h). It is clear that the 2 nd and 4 th principles above are not compatible with the 5 th for this site. It is suspected that housing density range has been adjusted to ensure that theoretically, affordable housing could be delivered. However, the lower stated density range of 10 units still allows a developer to get away with no affordable housing in order to make policy GRC2 deliverable. Adjusting the lower end of the yield range from 10 to 11 to give a yield range of 11 to 15 for a rural village development would not be deliverable as discussed above, hence would fail the test of sustainability, as per JCS para 3.7. The reality is that site RA/146 will not deliver affordable housing as presented in policy GRC2 given current Government lack of support funding and JCS policies. If affordable housing is required then a different approach and a different site are needed. Site RA/146 frontage onto Loddington Road measures approximately 95m. The adjacent 95m of Loddington

Road to the south accommodates 7 semi-detached houses, numbers 20 to 32. On the opposite side of the road, 95m of frontage accommodates 6 detached houses, Number 35 to 47. For development density to reflect that of adjacent development then the original proposed yield of 6 - 8 was close to the correct density. The currently proposed density will be far too high and will be out of place with the existing village environment. Development of site RA/146 will have a dramatic impact on views from that stretch of Loddington Road. Currently there are panoramic views from Loddington Road down over open countryside towards Kettering and Burton Latimer, from the houses opposite but especially from the village hall and play area. Any development on site RA/146 will impact on these views. The 2nd draft principle quoted above will thus never be achieved as views would be totally blocked. Additionally, flooding along Loddington Road is a long-standing issue. The root cause is acknowledged to be ground water arising in the area of the village hall directly opposite site RA/146 and at other locations besides the road just south of the village hall. This problem became particularly noticeable after the construction of house numbers 35a and 35b Loddington Road opposite site RA/146 when a hedge and ditch were removed and no adequate provision made for drainage. This ground water seepage combines with surface water runoff creating flooding after heavy rainfall. Dealing with surface drainage only for site RA/146 will likely be insufficient as development of the site poses a similar risk of creating ground water seepage from this other side of the Loddington Road further aggravating the flooding problem. Third - Is site RA/146 suitable for development? Site RA/146 occupies a part of a field bordering Loddington Road and Bridle Way, with the field sloping downhill from Loddington Road. As a result, the residents of the houses backing on to this field are provided with panoramic countryside views. Combined with the topography and village layout, this field brings the countryside into the village in a unique way. This field is also the site of historic settlement and quarrying activities so has archaeological merit, see link: <https://www.british-history.ac.uk/rchme/northants/vol2/pp28-32> As a result, this field is one of the most important visual and historic sites in the village and should be considered for protection instead of development. The field is farmland used for grazing sheep and contains the finest remaining example of ridge and furrow in the Parish. By implication this land will not have been cultivated for several hundred years. This ridge and furrow is extensive, and can be best viewed from Northfield Road where it runs uphill towards Loddington Road. It runs right up to the hedge besides Loddington Road and hence through site RA/146. Developing this site would destroy part of a unique Great Cransley historic asset and would be an act of environmental vandalism. Along the Loddington Road frontage of site RA/146 is an old growth hedge that is currently afforded some statutory level of protection. This is an excellent example of a mature hedgerow composed unusually of mostly mature ivy. The hedge is also well managed by the landowner. Although taken for granted by many residents, this hedge located opposite the village hall and close to the centre of the village forms part of the unique characteristics of Great Cransley. Government criteria for hedgerow protection includes, greater than 20m in length, older than 30yrs, and next to land used for agriculture, see link. <https://www.gov.uk/guidance/countryside-hedgerows-regulation-and-management> Once the land next to the hedge becomes residential, the statutory protection will be lost. Consequently, development of site RA/146 would result in the loss of most or all of the hedge during the development phase, with any remaining remnants of hedge being lost once its protection was removed.

Proposed Actions/Changes

Delete Policy GRC2 and housing site RA/146 for Great Cransley from the SSP2 at Section 13 and from the village map at Section 18.

<p>Officer Response</p> <p>As set out in Chapter 4 of the Publication Plan the housing requirement for Kettering Borough is stated in Policy 29 and table 5 of the North Northamptonshire Joint Core Strategy. A proportion of the requirement for the Rural Area has been met through commitments and completions. The residual requirement as set out in paragraph 4.4 the SSP2 Publication Plan allocates sites to meet this remaining requirement in the rural area, inclusive of a windfall allowance, as well as the other settlements in Kettering Borough. The Housing Land Supply Background Paper (October 2019) sets out the Council’s approach to meeting housing requirements.</p> <p>Those sites which have been allocated in the Publication Plan have been assessed using a set of sustainability criteria as shown in the Housing Allocations Background Papers (2012, 2018 and 2019) and the Housing Allocations Assessment of Additional Sites and Update (2013). As part of this assessment the sustainability and capacity of each settlement was considered alongside the site assessment to ensure that those sites progressed for allocation were the most suitable and proportionate to the size of the existing settlement. The development principles look to ensure that the design and scale of development as well as considerations such as access are considered alongside any technical assessments required at planning application stage.</p> <p>The specific assessment for site RA/146 did not identify any major constraints that could not be overcome through the application of site specific development principles. Although a need for affordable housing was previously identified, without a Housing Needs Survey the need is unable to be determined. Therefore, the site is not allocated specifically for affordable housing and is expected to deliver affordable housing in accordance with Policy 30 of the Joint Core Strategy.</p>
<p>Officer Recommended Change(s)</p> <p>No changes recommended.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
42	Local Resident	General Comments		No	No	No	No	No	No

<p>Reasons/Details of representation</p> <p>The environmental concerns regarding the plans for the existing hedgerows have not been taken into consideration. modest hedgerows can have an outsized influence on the environment and biodiversity, providing habitats for insects birds small mammals that help combat soil</p>
--

erosion and improve water quality. They also act to sequester carbon dioxide up to an estimated 500,000 tons a year. Hedgerows should be maintained and not removed. Loss of countryside view around which the layout of the village was designed, to build in this location takes away an amenity that all villagers share with view over open country. Taking away this amenity is no different to taking away the laying fields or pond Irrevocable loss of wildlife habitat and negative impact on the populations of local birds and animals eg yellow hammer, red kites, field fayres, Waxwings, owls, woodpeckers, reed buntings, linnets and reed buntings, foxes, badgers, deer, bats, monk jack deers Detriment to residential amenity Revision to the Core Spatial Strategy , due to be adopted shortly by Kettering Council will show they have a 5 year land bank Policy 15 of North Northants Core Spatial Policy states that to meet local housing needs 30-40% more houses are needed to Kettering. Mawsley was originally 700 homes, this has been increased already by 300 homes to 1000 an increase of 42%. This proposal would mean a total of 1357 homes which is a total increase of 51% - far in excess of the Core Spatial Policy. It was categorically stated from the beginning of the building of the village that the village would consist of 700 homes. We have taken our fair share of increased development for Kettering Borough Council The need to avoid town cramming and over development The infill expansion on the site undermines the characteristic layout of Mawsley and goes against the original ethos of the village and extends the village beyond the boundary lines unnecessarily One of the unique design features of Mawsley is the design layout and this should be safeguarded. Mawsley was supposed to emulate the development of a typical Northamptonshire village with nooks and crannies, as such constraints on building design, replacement windows and doors, car parking provision to keep cars hidden and off the street support this. If this proposal goes ahead Mawsley will become another suburb of Kettering and become a housing estate rather than a village There is a possibility of developmental creep and urban crawl, the hatched area of the plan was also originally part of the new housing proposal, whilst this has been dropped for now it is not hard to see how a precedent will be set for future infilling New houses increase the strain on police, hospitals, fire and ambulance services Increased flood risk to Malaslea and Birch Spinney, water pools in these fields in the winter and after heavy rain and once this is tarmacked over risk of flooding will be a major concern Little regard appears to have been paid to either the letter or the spirit of the Government's National Planning Policy Framework, and we would like to draw the Council's attention to the aims behind those paragraphs most relevant to Mawsley. Core Planning Principles . Paragraph 17 - planning should empower local people to shape their surroundings, finding ways to enhance and improve the places in which they live their lives. Comments already registered suggest that building on this site would be entirely at odds with the wishes of local residents. - the intrinsic character and beauty of the countryside should be recognised . To allow further housing to be built on the site would degrade it both visually and as a wildlife corridor. Does the Council not recognise this? - planning should contribute to conserving and enhancing the natural environment , planning to build 57 houses on this site would be contrary to this Promoting Healthy Communities Paragraph 74 existing open space! should not be built on, unless !the land is surplus to requirements . With an already increasing population, the land is agricultural and cannot be considered to be surplus to requirements Paragraph 76 - Local communities should be able to identify for special protection green areas of particular importance to them. The objections have made it abundantly clear that this site is treasured. In conclusion, we believe the area under consideration must be rejected on the grounds that it does not accord with the way in which the National Planning Policy Framework is expected to be applied. If additional housing is required in Northamptonshire it would be far preferable to build another new village designed like Mawsley

Item 6 Appendix 1

or consider the brown field sites around Kettering. For all the above reasons we wish to register and you to acknowledge our very strong objection to RA/174. Mawsley was designed to be a village not an urban sprawl. The village has already been extended beyond the original scope and further houses would be counter-productive. The North Northamptonshire Development Company and the Daily Telegraph Best Village Aware cite the design layout of Mawsley as part of its unique creation as a Village rather than a housing estate. It is a village and has not become a rat run for commuters. There is no merit to the proposal and the existing facilities are over stretched. It is a wonderful village with a fabulous community spirit and we feel very strongly it must remain a village and not destroyed with more unwanted housing.

Proposed Actions/Changes

The Local Plan needs to adhere to the government climate advisory body advise regarding hedgerows and maintaining them due to the climate emergency.

Officer Response

The issues raised have been considered through the site assessment work, the detail of this is included in the Housing Allocations Background Papers (2012, 2013, 2018 and 2019). Where appropriate, criteria have been included in Policy MAW2 to ensure issues identified through the assessment process are adequately addressed.

Officer Recommended Change(s)

No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
43	Persimmon Homes Midlands	4	Housing Requirements and Allocations					Yes	Yes

Reasons/Details of representation

2.1 Persimmon Homes Midlands supports the Council's general approach of allocating sufficient land through the SSP2 LP to meet residual housing needs identified in the strategic plan, namely the North Northamptonshire Joint Core Strategy 2016 (NNJCS). The NNJCS controls the broad scale and distribution of housing growth up to 2031. It has been tested at examination, found sound, and it is necessary for the SSP2 LP to conform with the strategic plan in order to be sound itself. In this regard particularly, Persimmon Homes would emphasise the recent findings of the Inspector who undertook the examination into The Plan for the Borough of Wellingborough (PBW). The PBW, now having been examined and adopted, sits under the NNJCS in the same manner the SSP2 LP will once adopted. At paragraph 9 of his report, the Inspector articulated the relationship between the NNJCS and subsequent Part 2 Plans: The scope of Part 2 is to enable the effective

delivery of Part 1 of the Plan - the North Northamptonshire Joint Core Strategy (JCS). The Plan therefore aims to complement the strategic policies of the JCS. Anything outside its scope, such as the future growth of Northampton, is therefore not a matter for this Plan to address. Any strategic challenge to the strategic provisions of the JCS will need to be made when that document is reviewed, and not through Part 2 of the Plan.' 2.2 In coming to this conclusion, the Inspector had regard to the Court of Appeal Judgement in Oxted Residential Ltd v Tandridge District Council [2016] EWCA Civ 414 which states that, in preparing a development plan, the local authority must have regard to any other development plan document already in existence which covers the relevant local plan area. Accordingly, and as concluded by the PBW Inspector at paragraph 11, there was no requirement for him to re-examine the strategic issues already covered by the NNJCS. The same no doubt applies to the Kettering Borough SSP2 2.3 Persimmon Homes Midlands notes that the SSP2 LP, along with completions and commitments in the plan period, delivers 1,353 net housing completions in the current plan period against an NNJCS housing requirement figure of 1,309 including a 10% buffer to allow for flexibility. This is clearly a positive and proactive approach which conforms with the strategic plan. Considering the position as summarised by the PBW Inspector, there is very limited if any scope to legitimately question the general scale or the distribution of housing growth as articulated in the NNJCS. Whilst recognising the need for flexibility and that the housing requirement figures by settlement are a minimum', there is a certain tipping point at which over-allocating land in settlements will distort and therefore conflict with the adopted spatial strategy. This was explained by a Section 78 planning Inspector (appeal reference APP/L/820/W/18/321536) specifically in a North Northamptonshire context with reference to a proposal for 250 dwellings in Desborough. The Inspector stated: 'In this instance the housing provision for Desborough already exceeds the requirement for housing to 2031 by some distance. To further increase it to a point of about 39% supply exceeding requirement would take it, in my judgement, beyond a reasonable point. I therefore regard the proposal as being in conflict with Policy 29 as provision would be out of step with the intentions of the policy.' 2.4 In short there is no need to revisit the strategic decisions made about the broad housing requirement figure and the distribution of that requirement as reflected in the NNJCS. The focus of the SSP2 LP is (and should be) on delivering suitable sites to meet the residual need to the end of the NNJCS plan period. Persimmon Homes Midlands therefore supports the Council's approach articulated in paragraphs 4.1 to 7.

Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
44	Persimmon Homes Midlands	Policy HOU2	Older Persons Housing	No	No			Yes	Yes
Reasons/Details of representation									
<p>2.5 Draft Policy HOU2 relates to older persons housing. It specifies that on sites of 50 dwellings more, or over 1.6ha, the Council will seek the provision of a proportion of dwellings that are suitable to meet the needs of older In determining the precise proportion, type and tenure, the Council will take account of the scheme's viability, evidence of local need, and the scale and location of the site. 2.6 Persimmon Homes Midlands objects to this policy as it is not justified nor is it The effect of the policy is to leave negotiation of the type and scale of older person's housing on qualifying developments to the planning application process. This gives insufficient certainty to stakeholders including developers as well as decision-makers. It is similarly unclear how the threshold relates to any identified quantitative need for such housing or why such a need could not met by existing polices in the NNJCS or positive policies in the SSP2 LP such as Draft Policy HOU3, which stipulates that retirement housing will be supported where it's well-located in respect of services and facilities. 2.7 Where the policy references evidence of local need in its unclear how such need will be measured or how it will be considered as part of the planning application process. Similarly, the policy states that the scale of the site will be considered where the threshold for the policy becoming applicable is clearly stated. 2.8 The policy is supported by 2017 study which came to several conclusions regarding annual Borough-wide housing need for older persons. However, as referenced above, the policy measures proposed are not clearly related to the need figure identified. In addition, the 2017 made several recommendations in terms of how to increase the supply of older persons' dwellings in the county. Support for windfall sites, allocation of redundant commercial uses, and the use of brownfield registers figure among these recommendations and it is considered that these are positive, proactive, practical, and proportionate ways of increasing the supply of older persons' homes. These would be proportionate ways of addressing demand for this sort of housing. Requiring all developments above the qualifying threshold to incorporate an unspecified level of older persons' housing to meet an unspecified need is not a sound approach and needs to be rethought.</p>									
Proposed Actions/Changes									
<p>2.9 In order to make the plan as a whole sound Persimmon Homes Midlands would suggest the deletion of Policy HOU2 or it being rephrased so it encourages sites at or above the threshold to incorporate older persons' homes in common with the approach of Policy 30 of the NNCJS in respect of the SUEs.</p>									

Officer Response
The need for older persons housing is identified in the Strategic Housing Market Assessment (SHMA) Update, 2015 which identified that 56% of the total projected housing growth for Kettering between 2011 and 2031 was for 65+ households. To meet the need identified it will be important for non-strategic sites to contribute towards meeting provision, however Policy HOU2 is flexible to ensure viability of schemes as well as site specific circumstances are taken into account.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
45	Persimmon Homes Midlands	Policy HOU4	Self-Build and Custom Build Housing	No				Yes	Yes

Reasons/Details of representation
<p>2.10 Policy HOU4 requires that housing developments incorporating 50 dwellings or more or 1.6ha or more provide at least 5% of plots as self-build or custom build serviced plots. The policy also says that the provision of the plots will take account of evidence of local need, the nature of the development proposed, and the viability of the development. 2.11 Persimmon Homes objects to Draft Policy HOU4 on the basis that it is not soundly evidenced or justified. There is a disconnect between the threshold and the scale of provision sought when compared to the scale of the identified need for self and custom build plots. The information in the Self and Custom Build Background Paper states that as of March 2019 there were 31 individuals on the self-build register. This is particularly good evidence of the likely scale of demand and the threshold and percentage requirement of the policy seems to far outstrip the likely need for custom and self-build plots. 2.12 The information presented in the background paper breaks down demand for custom and self-build plots by location in the Borough. Most of the demand is in the rural area, but this is the place least likely to deliver custom and self-build plots given that developments which exceed the threshold of 50 dwellings are not likely to come forward in this location. Other locations have virtually no demand for custom or self-build plots particularly in Rothwell where there is zero. 2.13 It's noted that based on the background paper the Council does not recognise the register as a true reflection of demand and that a report by Three Dragons has provided additional sources of evidence to quantify demand uncaptured by the Council's self-build register. This covers a 10-year period from the 2017/18 monitoring year. The paper projects a demand for 66 dwellings per year from years 1 to 5 raising to 72 dwellings per year from years 6 to 10. From the figures reported in the 2017/18 monitoring year to the year immediately following this represents a 229% increase. Whilst the demand for custom and self-build</p>

housing might be higher than what is reflected in the register, there is no evidence to account for such a substantial increase in demand within such a short time. 2.14 Policy HOU4 states that the policy is subject to a local assessment of need. However, the likely scale and distribution of need should be considered at the plan-making stage rather than at the application stage and given the information which forms part of the custom and self-build register, it is not considered that the case for 5% custom and self-build has been made out. 2.15 Persimmon Homes retains its fundamental objection to the principle of delivering custom and self-build housing through large-scale housing developments. The logistics of delivering such developments are complex and having a proportion of custom and self-build on the plots adds to that complexity and thus slows down delivery. Complications include contractors working outside of specified hours, uncompleted dwellings lying next to those which have already been completed and occupied resulting in consumer dissatisfaction, materials stored outside of designated areas, and the potential for dwellings to remain uncompleted for many years. The Council's background paper states that the average lead-in time for the delivery of custom and self-build plots is approximately 3 years which is a significant lag and only serves to underline the difficulties in delivery that these types of units cause on large-scale

Proposed Actions/Changes

2.16 For the above reasons, draft policy HOU4 should be deleted for plan soundness as it is not justified.

Officer Response

The Self and Custom Build Background Paper sets out the approach for determining the contents and subsequent thresholds included in Policy HOU4. It is recognised that the level of demand, as determined by the register in March 2019, as the base date for the aforementioned background paper, does not match the level of potential supply and delivery of self and custom build plots as identified in the Self and Custom Build Background Paper. However, as set out in the background paper the register is unlikely to show the true extent of demand in the borough, as it is reasonable to assume not all interested parties who have interest in building their own home are likely to be on the register. As a result, additional sources of data have been used to model the likely demand over the longer term. The data from the Three Dragons report has been used to calculate this demand over the next 10 years, towards the end of the plan period. It is also recognised that single dwelling schemes have the potential to be self-build or custom build schemes as stated in the Three Dragons report. The amount of single dwellings schemes matches closely to that to the number of entries on the register, however although this is an indication of delivery of self-build and custom build properties, there is no guarantee that these permissions represent self-build and custom build projects. Therefore, given that the evidence presented in the Self and Custom Build Background Paper presents a much larger demand for this type of housing as determined by the register, it is considered that using a threshold and percentage based policy is a proactive mechanism. It is considered that it will deliver a reliable and consistent supply for this type of housing in the long term, based on the potential demand as determined by the Three Dragons report. It also represents a pro-active approach to the delivery of this type of housing in the Borough. Government guidance does not require the specific preferences as indicated through the register, the only requirement of the local authority is that the sufficient permissions are granted in accordance with the level of demand that has been determined by the register.

<p>Whilst the logistical issues relating to the delivery of this type of housing are recognised, it is considered that Policy HOU4 sufficiently addresses these issues, specifically in relation to marketing of plots which remain unsold after 6 months can be built out by the developer. This timeframe is considered reasonable and practicable.</p>
<p>Officer Recommended Change(s)</p>
<p>No changes recommended.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
46	Persimmon Homes Midlands	Policy ROT3	Land to the West of Rothwell					Yes	Yes

Reasons/Details of representation

2.17 Policy ROT3 of SSP2 LP allocates Land to the West of Rothwell for up to 300 These representations are supported by a Site Delivery Statement by Persimmon Homes which illustrates that the site is deliverable for a high-quality scheme of up to 300 dwellings following the principles of the draft policy. In turn, the Site Delivery Statement is accompanied by a variety of technical information and an illustrative Masterplan. 2.18 In conjunction with the technical information and the masterplan, it is evident that the broad development principles and criteria set out in Policy ROT3 can be complied with. Connectivity has been ensured to the Rothwell North development for vehicles, cyclists, and pedestrians and future opportunities to access the land to the south of the site have been retained. 2.19 Any future planning application will be informed by a Landscape Visual Impact Assessment (LVIA) but the illustrative masterplan, whilst still subject to change following further detailed design work, has been informed by the site’s landscape constraints and approximately 36% of the overall site area has been retained as green infrastructure. The green infrastructure link to the west of the site as required by point of draft policy ROT3 has been incorporated into the illustrative masterplan. 2.20 In terms of noise emanating from the surrounding road network, this has been considered in the SDS and the supporting technical note but in brief noise does not pose a fundamental constraint to development of the site and mitigating noise impact has been considered as part of the proposed masterplan with a significant green buffer provided to the A6 as well as the opportunity for future structural planning. 2.21 The transport impacts of the development can be the subject of a Transport Assessment at the planning application stage. A detailed highways technical note supports the accompanying Site Delivery Statement and this states that, based on the information currently available, it is likely that the trips generated by the development of Land West of Rothwell can be accommodated within the existing highways infrastructure which will be upgraded as part of the Rothwell North. 2.22 In terms of

archaeology this has been considered in detail as part of the Desk Based Assessment (DBA) which supports the Site Delivery Statement. In short, there are no fundamental constraints to developing the site in this regard nor are there any constraints posed by above-ground heritage.

2.23 In terms of flooding and drainage there is no fundamental constraints in this regard and the masterplan has made provision to ensure the development meets sustainable drainage objectives and will not increase flood risk elsewhere.

2.24 In terms of viability Persimmon has fully costed the Rothwell North SUE and therefore has a good understanding of build costs and sales values in the local area. Based on this information and the illustrative masterplan Land West of Rothwell is viable for 30% affordable housing.

2.25 Having regard to the above, Persimmon Homes generally supports Policy ROT3 for the allocation of Land West of Rothwell for up to 300 dwellings and offers further comment below in terms of five-year housing supply and the site selection process. However, Persimmon Homes objects to point h. of the policy which states that Land West of Rothwell can only commence development once the Strategic Link Road delivered as part of the Rothwell North SUE is complete because this clause is completely unnecessary. As part of the Rothwell North SUE S106 agreement Persimmon is obligated to deliver the SLR by 250 dwellings. Negotiations are currently ongoing with Kettering Borough Council to lower this trigger further to 150 dwellings and Reserved Matters Approval has already been granted for the SLR. RMA has already been granted for the first phase of Rothwell North comprising 227 dwellings towards the northern portion the Rothwell North site. Given that Land West of Rothwell relies on delivery of the Rothwell North SUE for access and given the way in which Rothwell North will be phased, there is clearly no possibility that Land West of Rothwell would commence prior to delivery of the SLR.

Five Year Housing Land Supply

2.26 Persimmon Homes would note the comments made by some consultees at Regulation 18 stage which included criticism of the Rothwell North SUE's speed of delivery and similarly expressed skepticism about the rate at which Land West of Rothwell would come forward. At this point it should be clear that such criticism was unfounded. Working diligently with Kettering Borough Council and other stakeholders, Persimmon Homes have not only secured outline planning permission for the entirety of the SUE but have also secured Reserved Matters Approval for Phase 1 comprising 227 dwellings and associated Reserved Matters Approval has also been granted for the Strategic Link Road.

2.27 Considering the above, Persimmon Homes considers the projected completions for Rothwell North as set out in the Housing Land Supply Background Paper dated October 2019 to be entirely realistic. The projected completions for Land West of Rothwell are similarly realistic, having regard to the fact that Land West of Rothwell will be accessed via the Rothwell North. Given that the Rothwell North SUE will deliver new homes for the foreseeable future there will be an ample supply of housing land to meet identified needs until Land West of Rothwell comes on stream. This is illustrated in the HLS Background paper which demonstrates a 6.74-year supply of deliverable housing sites from 2019 to 2024. This figure does not incorporate Land West of Rothwell, which the Council assumes will deliver outside of the current five-year period. Additionally, even if 25% of projected housing completions in the Borough were not to occur, the Council would still have a housing land supply of 5.66 years.

2.28 We would also observe that housing land supply in the context of Kettering Borough recently tested in a recent S78 appeal at Land off Braybrooke Road, Desborough (APP/L2820/W/18/3215362). The Decision Letter dated 15 th October 2019 is instructive for several reasons. In particular, the appellant in this case argued for an exceptionally marginal shortfall of 4.99 years and upholding the Council's five-year land supply the Inspector observed: I accept that on major strategic sites it is often the case that development starts at a modest pace but builds up speed over time. Sustainable urban extensions in this case have followed that pattern but

now seem to be coming on stream at a greater pace.’ 2.29 This is certainly the case with the Rothwell North Sustainable Urban Extension where significant progress has been made and continues to be made following the grant of outline planning Reserved Matters Approval for the first phase of some 227 dwellings has been granted. The planning conditions as part of the first RM phase and the outline planning permission are currently being discharged. Persimmon expect the first 20 dwellings to be completed on the site before the end of 2020. 2.30 The S106 agreement pursuant to the outline planning permission requires delivery of the Strategic Link Road by 250 Persimmon Homes is currently in the process of negotiating a deed of variation to the S106 agreement which would see early delivery of the Strategic Link Road by 150 units. Based on the current build programme, this would mean completion of the SLR by March/April 2022 which would in turn align with the Council’s assumptions in the Housing Land Supply background paper. 2.31 The overall rate of delivery assumed for Rothwell North and by extension those assumed for Land West of Rothwell are completely reasonable given the annual completion rates achieved by Persimmon Homes Midlands elsewhere in the Borough, particularly at the Kettering East SUE. In the second half of 2019 until the time of writing in January 2020 Persimmon achieved 67 completions at Kettering East which would again support the Council’s assumptions about build-out rates. Site Selection Process 2.32 The NNJCS identifies a residual housing need in Rothwell. As discussed above and in the accompanying Site Delivery Statement, Persimmon Homes is exceptionally well- placed to meet this need through the delivery of Land West of Rothwell (Site RO/088a) which benefits from a draft allocation in the SSP2 LP for up to 300 units. Land West of Rothwell is the best placed site in the settlement to accommodate a sustainable development in order to meet the town’s residual housing need. 2.33 Persimmon agrees with the assessment in the sustainability appraisal that Land West of Rothwell has the unique advantage of its connectivity with the Rothwell North SUE which will incorporate a variety of services, facilities, and amenities within easy walking distance to benefit future residents as well as providing easy access to the town centre. 2.34 Persimmon notes the commentary in the SA Report regarding other sites promoted in the town. Sites RO/85 and RO/202 are referenced as performing generally well against sustainability objectives but are in multiple ownerships and, based on the information available, are not in the control of a developer in addition to being of an insufficient size to meet the residual housing need in Rothwell as identified by the Council. Given the noted ownership issues and the fact that these are not controlled by a developer, there is no evidence to indicate that these sites would come forward for development any faster than Land West of Rothwell. 2.35 Sites RO/222 and RO/205 lie to the north of the Rothwell and would represent significant encroachment into the open countryside fundamentally altering the settlement’s character. The capacity of these sites is likely to be more than the residual housing requirement for the town even with an appropriate buffer. Notwithstanding those shortcomings, it seems probable that delivering these sites would require significant upgrades to the nearby road infrastructure. 2.36 As such, Land to the West of Rothwell is the most suitable and sustainable site to accommodate the town’s housing need and this decision can be supported with reference to the Sustainability Appraisal’s consideration of alternative sites.

Proposed Actions/Changes

Clause h. is therefore unnecessary and unsound and should be deleted for plan soundness.

Officer Response

Item 6 Appendix 1

Noted. It is considered that clause h of the policy is necessary. It would not be appropriate for the development to come forward without this section of the strategic link road. While the comment demonstrates that this section of the road will be delivered in advance of the allocation this is not a reason to remove the criteria.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
47	Howkins and Harrison	Policy GED4	Old Nursery Site, Grafton Road, Geddington	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation
I act on behalf of the owners of land at the Old Nursery, Grafton Road, Geddington and write to make representations to the Publication Version of the Site Specific Part 2 Local Plan. My clients land is allocated in the emerging Plan under Policy GED4, a housing allocation of up to 10 dwellings. The site has been continually promoted during the preparation of the Part 2 Local Plan, with supporting reports, including a Tree Survey, Flood Risk Assessment and highway details, that show that the site's allocation is robust and deliverable. Having read the wording of Policy GED4, my client wishes to confirm that they have no objections to the requirements set out in the Policy and is content that all relevant information could be delivered in a future planning application to allow the delivery of the allocation. As such, my client fully supports the Publication Version of the Site Specific Part 2 Local Plan.
Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
48	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
<p>The new plan replacing Policy 10 is reducing the protection from development on Cransley and Thorpe Malsor reservoirs. Both are special wildlife sites which need protection from development. I bought Thorpe Malsor Reservoir some 25 years ago for conservation in order to protect the wildlife. The reservoir is surveyed each month by a volunteer from British Trust of Ornithology under the Wetland Bird Survey plan and the records kept and available for perusal. It is a special habitat for wildfowl both overwintering and breeding. The sites should continue to be protected from development.</p>									
Proposed Actions/Changes									
None.									
Officer Response									
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>									
Officer Recommended Change(s)									
None.									

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
49	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
We are concerned that the update to the local plan (SSP2) for the Borough proposes to reduce the protection afforded to Thorpe and Cransley Reservoirs. These are beauty spots on the footpath network so are enjoyed by many in the Borough and are also very important wildlife sites. We believe that Policy 10 should be retained for these very considerable assets.									
Proposed Actions/Changes									
None.									
Officer Response									
Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
50	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
<p>I am concerned to read that the level of environmental protection afforded to Cransley Reservoir is to be reduced and that public access may be increased. As a member of the British Trust for Ornithology I take part in their Wetland Bird Survey (WeBs). This involves me in counting the numbers of the various species of water birds on the reservoir on a specified date each month. This month I counted a total of 248 birds of 15 species. The reservoir is Y shaped, the dam being at the foot of the Y. The two arms are the areas of greatest importance to wildlife (and not only to birds). If public access to the reservoir is increased I suggest that it should be confined to the main body of water near the dam and that admission to the arms should be denied. The reservoir is a wintering site for several species of birds, notably the following ducks: Wigeon, Teal, Gadwall, Pochard, Shoveler, Tufted Duck and Mallard. In some years, Goldeneye also winter on the reservoir. In summer, many birds nest in the vegetation on the banks, including Moorhen, Coot, Great Crested Grebe, Mallard, Mute Swan, Reed Warbler and Sedge Warbler while, in the adjacent woodlands, many common species breed. I think its importance as a local wildlife site needs to be maintained.</p>									
Proposed Actions/Changes									
None.									
Officer Response									
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and</p>									

Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
51	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation
I, as an individual -not as Parish Clerk- state that I wish to retain Policy 10 for the protection of birds and wildlife in the future.
Proposed Actions/Changes
None.
Officer Response
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>

Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
52	Local Resident	Policy BRA1	Braybrooke Development Principles	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation

BRA1 e) Protect and enhance the character of the conservation area and setting . It is hard to conceive that this wild site can be enhanced by development. The conservation has many green spaces and this is another. f) Make adequate provision for off road parking . Limitations of the site mean that additional off-road parking can only be for the dwellings proposed. The site is completely unsuited to the addition of public amenity parking.

Proposed Actions/Changes

None.

Officer Response

Noted. It is not the intention for public amenity parking to be provided within the site.

Officer Recommended Change(s)

No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
53	Local Resident	Policy BRA2	Top Orchard, Braybrooke	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation
BRA2 The outline of the site Top Orchard (RA/128) is shown in Appendix 3 Policies Map Housing Allocation. However the site boundary is inconsistent with a planning applications submitted (KET/2005/0603, amended KET/2010/0171, amended KET/2013/0257: highly significant given that the map included with the approved planning applications shows a projection of land into the access strip effectively halving its width and creating a pinch-point for access to the site from Griffin Road. The matter was raised at the Stoke Albany viewing event on 20.01.20 with a Kettering Officer who appeared unaware of the problem. Site inspections which concluded that access to the site is not overly narrow are thereby likely to have been based on incorrect documentation. There is a policy that states a private drive is limited to 5 dwellings. With regard to the above where planning permission has already been given for 1 new dwelling accessed from the same point as 12 and 14 Griffin Road, this would mean that RA/128 Top Orchard will provide only a maximum of 2 dwellings not 3 as stated. On the Rural Masterplanning Report 2012 Braybrooke, Section 5 SHLAA Findings quote RA/128 'performing poorly in terms of accessibility'. No changes have occurred at the junction of this site with Griffin Road and yet it has now been given a Green assessment by Highways. What evidence can be provided to justify this change in assessment?
Proposed Actions/Changes
None.
Officer Response
The Housing Allocations Background Paper shows the assessment of the site against a range of sustainability criteria. The Council considered that the criteria in Policy BRA1 sufficiently shape future development of the site. The SHLAA reference to the site performing poorly in terms of accessibility relates to the distance to services and facilities rather than access into the site. The access has been assessed based on the site area promoted for development.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
54	Local Resident	2	Spatial Portrait, Vision and Outcomes	No	No	No	No	No	No

Reasons/Details of representation
My representation relates to development at Warkton Lodge Farm. Considering the amount of development going ahead in this area I have been aware that we are not even in the settlement boundary of Warkton yet have been included in Warktons events and registered as Warkton residents for the 30+ years I have been living at Warkton Lodge Farm. We are currently considered to be in Open Countryside which makes it very difficult to develop on our land and as there is considerable development taking place within clear view of the area this makes it very frustrating when trying to improve aspects of our settlement. There seems to be no settlement boundary for a settled group of dwellings which have existed for many years.
Proposed Actions/Changes
Please explain and define settlement boundary on our settlement which I believe currently has more dwellings than Newton which has a defined settlement boundary. We are currently on no mans land yet we are a considerable settled group of dwellings just a stones throw from major developments and the Ise Lodge estate
Officer Response
The settlement boundaries have been drawn in accordance with a robust set of criteria. The Settlement Boundaries Background Papers (February 2012, April 2018 and October 2019) provide the evidence base and justification for the settlement boundaries shown on the policies maps.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
55	Theatres Trust	Policy HWC2	Protection of Community Facilities and Proposals for New Facilities	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation
The Trust welcomes revision which has strengthened this policy in line with the recommendation we made within our comments at the previous stage of consultation.
Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
56	Historic England	General Comments	Site Specific Part 2 Local Plan- Publication Plan					Yes	Yes

Reasons/Details of representation
Following formal announcement of the scheme at the end of March, it would be helpful to embed the Kettering High Street Heritage Action Zone in policy and/or supporting text to provide additional strength.
Proposed Actions/Changes
Historic England would be very happy to assist with wording for an additional town centre policy and/or supporting text and agree by SOCG.
Officer Response
The SSP2 does not cover Kettering town centre. This area is covered by the Kettering Town Centre Area Action Plan (KTCAAP). The KTCAAP will be reviewed once the SSP2 is adopted, this document would be the most appropriate place to include reference to the Heritage Action Zone.

Officer Recommended Change(s)									
None.									
ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
57	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
<p>I write (AS myself) a lifetime resident of Cransley to request that KBC continues to give maximum protection to Cransley and Thorpe Reservoirs under Policy 10. These two reservoirs are essential to the bird life of our two parishes and of course further afield. They provide stopping off points for migrating Birds as well as our indigenous population of Water fowl. In these days it is ever more important that the outgoing Local Authorities do not fall at the last hurdle and hand on to the Unitary Authority a reduced protection standard. The need to protect our Biodiversity and the unique mid Northants flora and Fauna is so important and on my own land in Cransley I have over 60 acres of unfarmed private wildlife areas which form an important part of my life.</p>									
Proposed Actions/Changes									
None.									
Officer Response									
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>									
Officer Recommended Change(s)									

None.									
ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
58	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
<p>I'm writing to you with my concerns regarding the council's proposal to remove the policy 10 plan from Thorpe Malsor and the surrounding area. I have recently taken over the running of the trout fishery located on Thorpe Malsor reservoir and am working towards creating a unique, exclusive business utilising and enhancing the natural beauty and tranquility that the area has to offer. I'm concerned that the removal of Policy 10 would leave vital elements of the protection toward bio and geo diversity in the area susceptible to 'interpretation' towards developments, that may harm the natural balance, green infrastructure and beauty of the area.</p>									
Proposed Actions/Changes									
None.									
Officer Response									
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>									

Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
59	Local Resident	Policy GED3	Geddington South East	No	No	No	No	No	No

Reasons/Details of representation

Having reviewed the information provided the scale of development for up to 11 dwellings is too high for the proposed site. Kettering road is already noise polluted and traffic heavy (despite the by-pass). The entrance to the properties from the main road has not been carefully considered as the access is on a bend making it dangerous for vehicles on that stretch of road. The planners need to ensure that Privacy remains for the existing properties and key vista for the village is retained. The infrastructure of the village was designed to support 700 homes, as per the original plan. There are now approximately 1,000 homes. The infrastructure is struggling to cope with present demand and further development can only exacerbate this situation; 1. The loss of countryside views will have an adverse effect on the value of my property; 1. The spirit throughout the village is fantastic and events at the community centre are well supported and very well attended. For example the recent children's Halloween party sold out quickly leaving a number of children very disappointed. I believe the forthcoming Christmas party has also sold out, no doubt presenting the same issues. Obviously an increase in the number of families is going to create more of these problems; An increase in the number of homes will inevitably increase the traffic within the village which will have an adverse effect on road safety and no doubt further the issues of nuisance parking; The current access point to the field is fairly restricted and those living in its immediate vicinity will experience problems with large vehicles negotiating tight and twisty roads. There are already parking issues in this area I envisage this will create further road safety problems; and Central Government has indicated there is the 'need' for a substantial increase in the number of homes in Northamptonshire. Whether this is true is quite subjective but the negatives this local proposal will bring will far out-way the alleged benefits. Distinct lack of control of speed and traffic number of accidents increased Noise levels are too high already

Proposed Actions/Changes

Reduce the number of dwellings proposed, ensure the properties are set back from the main road to ensure key views are retained. Finally review how the properties will be accessed from Kettering Road as it is on a dangerous bend of the road

Officer Response

The Housing Allocations Background Paper shows the assessment process and the conclusions from this in relation to this site, including an assessment of the access and capacity of the highway. The yield of 11 dwellings of this site as considered suitable for the site. The criteria set out in Policy GED3 adequately shape development of the site.

Officer Recommended Change(s)

No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
60	Local Resident	Policy MAW2	Land to the West of Mawsley	No	No	No	No	No	No

Reasons/Details of representation

Access to the site off Cransley Rise is restricted and on a blind bend. The site is constantly flooded during heavy rainfall and has been underwater since October 2019. With the current climate changing to warmer/wetter winters, this is only going to make matters worse. How will this impact on the existing housing surrounding the site if water is to be channelled elsewhere? More houses will mean more people in the village with more cars on already congested roads. Cars are already parking in alternative streets to where the occupants live. Village only accessible by the C31. This is not designed for any additional traffic. Secondary schools are at capacity with children from the village not be able to get into their nearest Kettering school as considered too far away for placement. Medical centre is operating at its limit. Primary is already extended to its maximum capacity. Lots of children already in the village. Additional traffic will jeopardise safety. Restricted access on a blind bend to accommodate any large site construction vehicles. The village is only accessible by car now. The bus service has been cut to a bare minimum and cannot offer a mode of transport for residents reliant on the bus to take them to and from work. This is the same for school children who would rely on a public bus service to get them to and from school. A proposal for 29 retirement flats was rejected. Why would you propose 50 new houses yet reject retirement flats. During the previous consultations there was a concern around the capacity of the existing sewage system. Nothing has changed so why is this being considered again?

Proposed Actions/Changes

Do not build any more houses in Mawsley. It is already over the original allocated numbers and it has not been designed to accommodate anymore. To summarise I am strongly objecting to this plan and believe that development should take place in deprived town centres rather than on green countryside land that is currently used for effective food production from farming.

Officer Response

Item 6 Appendix 1

The issues raised have been considered through the site assessment work, the detail of this is included in the Housing Allocations Background Papers (2012, 2013, 2018 and 2019). Where appropriate, criteria have been included in Policy MAW2 to ensure issues identified through the assessment process are adequately addressed.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
61	Local Resident	2	Outcomes	No	No	No	No	Yes	No

Reasons/Details of representation
Kettering Borough Council adopted a policy to put the Climate Emergency at the forefront of everything it does. The current plan and proposed outcomes refer to environmental considerations but these are not put first. The plan still envisages carbon growth (albeit "low").
Proposed Actions/Changes
This plan must reflect the need to reduce the carbon impact of our local settlements
Officer Response
Climate change is a strategic issue which will be considered through the review of the North Northamptonshire Joint Core Strategy.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
62	Estate Manager	4	Housing Requirements and Allocations	No	No	Yes	No	Yes	Yes

	Boughton Estates Limited								
--	--------------------------	--	--	--	--	--	--	--	--

Reasons/Details of representation

Housing Requirement 3.4 The housing requirement for Kettering Borough, as set out in the JCS, is 10,400 dwellings in the plan period (2011-2031). This equates to an annual average for 520 dwellings. 3.5 Table 4.1 in the SSP2 sets out the housing requirement for individual settlements in the Borough, and states that there is a requirement to build 480 new homes in Rural Areas between 2011 and 2031. Table 4.2 indicates that there are 223 dwellings in the Rural Areas which have been either completed, are under construction or have planning permission/resolutions to grant planning permission for the period 2011-2019. Table 4.3 recognises a basic residual requirement for 257 homes to meet the JCS requirement for 480 homes in the rural area. 3.6 The NPPF states that to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years (Annex 2: Glossary). It goes on to state that sites which have outline planning permission, a grant of permission in principle, or have been identified on a brownfield register, should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years. 3.7 Paragraph 4.4 states that in addition to allocations, a windfall allowance has also been included as part of the supply. Table 4.3 indicates that an allowance for a windfall of 108 dwellings has been taken into account to meet the need in Rural Areas. 3.8 Paragraph 70 of the NPPF states ‘Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.’ 3.9 There are concerns about the approach adopted by the Council to the proposed use of windfall sites. There is no evidence provided on the windfall allowance in either the SSP2 or any background papers. 3.10 Policy HOU1 ‘Windfall and Infill Development: Principles of Delivery’ provides general support for infill development within settlement boundaries. However, the settlement boundaries are drawn tightly around rural settlements (excluding large gardens) and this will limit the amount of appropriate sites to accommodate the relied upon 108 windfall dwellings. 3.11 In the absence of clear evidence, we do not consider it appropriate that windfall dwellings should contribute to the supply in Rural Areas. 3.12 Paragraph 4.4 states that the SSP2 allocates enough sites to provide for 10% flexibility above the JCS requirement in Kettering, Burton Latimer, Desborough and Rothwell. However this approach has not been taken forward for the Rural Areas. The same approach should be taken across the Borough as a whole and in our view SSP2 will not adequately guard against under delivery in the rural areas unless a 10% flexibility allowance is also allowed for. 3.13 The SSP2 should be providing 528 dwellings in Rural Areas (JCS requirement of 480 homes plus 10% flexibility allowance). With completions and commitments of 223 homes this leaves a residual requirement of 305 homes to be provided by the SSP2. In our view the plan should not rely on windfalls to meet this requirement but should seek to allocate sufficient land to deliver those 305 homes within the plan period. 4.8 The SSP2 should be providing 528 dwellings in Rural Areas (JCS requirement of 480 homes plus 10% flexibility allowance) and as a result should be planning for a residual

requirement of 305 homes in the rural area. 4.9 The SSP2 should not be relying on windfall development to meet the requirement for 528 homes in the rural area and should allocate sufficient land to deliver the residual requirement for 305 homes in the rural area within the plan period.
Proposed Actions/Changes
None.
Officer Response
Evidence on the windfall allowance is included in the Housing Land Supply Background Paper (October 2019). The Housing Land Supply Background Paper sets out the justification for the 10% flexibility allowance and the approach taken in applying this to Kettering, Burton Latimer, Desborough and Rothwell but not the rural area.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
63	Boughton Estates Limited	13	Rural Area General Policies	No	No	Yes	No	Yes	Yes

Reasons/Details of representation
3.14 The plan identifies the rural area of Kettering Borough as that land that is outside of Kettering, Barton Seagrave, Desborough, Rothwell and Burton Latimer (paragraph 13.1). The overarching strategy for development in the rural area is set by Policy 11 of the JCS. 3.15 The plan appropriately recognises that some small scale growth to meet local needs in villages can have positive benefits including supporting local services (paragraph 13.5)
Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
64	Boughton Estates Limited	13	Village Categories	No	No	Yes	No	Yes	Yes

Reasons/Details of representation

Village Categories 3.16 Policy 11 of the JCS does not provide for different categories of village, although it recognises that Part 2 plans may identify a more detailed rural settlement hierarchy based on local evidence in order to guide planning decisions and Neighbourhood Plans. The SSP2 sets out three categories of villages: i, Category A villages: where allocations and small scale infill sites will meet the rural housing requirement; ii, Category B villages: associated with the Boughton Estate and where character and vitality is maintained through designation of sensitive areas where infill development will be resisted and very limited housing numbers are allocated; and iii, Category C villages: where development is not considered to be sustainable. 3.17 Policy RS1 (Category A Villages) designates Geddington as a Category A village. The Estate has land interests in Geddington, at 'Geddington Sawmill', 'Geddington South East' and 'Geddington South West'. 3.18 Geddington contains a range of services and facilities that meet the essential day to day needs of residents. Services include Geddington Primary School, the Church of St Mary Magdalene, a post office, a village hall and several cafes and pubs. 3.19 Geddington is also well served by a network of local roads including Stamford Road which links Geddington with Kettering to the South, and provides access to the A43 to the north. The A43 runs northwest of Geddington and provides a major road connection to Corby and links to the A1 further north. 3.20 In terms of public transport, the nearest train station is Kettering Train Station, located only 3.2 miles to the south. Corby train station is 3.6 miles to the north. The stations provides regular services to London, and Nottingham. In addition to this there is a bus service which runs from Kettering to Corby (No.8) that stops in Geddington. 3.21 Consequently, we agree with the designation of Geddington as a Category A village and as a location that can support housing growth. 3.22 Policy RS2 (Category B Villages) designates Newton as a Category B village. The Estate has land interests at Newton, and has previously put forward a case for allocating land 'South of Dovecote Farm' in the SSP2. 3.23 Whilst we have no objection in principle to Newton being identified as a Category B village our comments on the Newton Development Principles set out in Policy NEW1 are provided below. 4.1 The designation of Geddington as a Category A village through Policy RS1 and Newton as a Category B village through Policy RS2 is supported.

Proposed Actions/Changes

None.

Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
65	Boughton Estates Limited	Policy GED1	Geddington Development Principles	No	No	Yes	No	Yes	Yes

Reasons/Details of representation

Policy GED1 Geddington Development Principles 3.24 Policy GED1 provides a set of principles for development in Geddington. Some of these principles are ‘sought’ from development and in other instances development must ‘ensure’ certain outcomes. In places the policy employs sensible caveats through the use of wording such as ‘where appropriate’. 3.25 Many of the design requirements set out in Policy GED1 are driven by the Council’s Rural Masterplanning Report published in 2012. Whilst we have no significant issue with the findings of the Rural Masterplanning Report it is, at the time of writing, 8 years old and at the point of examination likely to be around a decade old. We consider that there should be scope to explore the continued relevance of the drivers for the policy criteria set out in GED1, and enable the implications of those design requirements to be explored through site specific masterplanning processes with the participation of the applicant and local community as required by the Framework. 4.2 The Estate broadly supports the development principles identified for Geddington through GED1 and for Newton through NEW1.

Proposed Actions/Changes

3.26 With this in mind we are of the view that the GED1 as currently drafted is too prescriptive and lacks the flexibility required by the framework to enable development to respond to relevant circumstances. If adopted in its current form it could have the effect of preventing viable development from coming forward on the allocated sites in Geddington and preventing a constraints based masterplan process being employed to arrive at sustainable development. 3.27 In our view GED1 should be modified to introduce balancing clauses (i.e. where appropriate, where viable etc.) and employ flexible wording (seek, where practicable etc.). GED1 should also refer to the ability for planning applications to be supported by site specific masterplan processes which justify design.

Officer Response
At planning application stage, the criteria would be applied where appropriate to the proposal under consideration. It is not considered necessary for this wording to be added to the policy. A planning application can be supported by a site specific masterplan which justifies the design, the policy does not need to require this.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
66	Boughton Estates Limited	Policy GED2	Geddington Sawmill, Grafton Road, Geddington	No	No	Yes	No	Yes	Yes

Reasons/Details of representation

3.28 Geddington Sawmill is owned by the Estate and we can confirm that there are no known technical issues and that the site is deliverable. There is also a desire to bring development forward quickly which will assist the Council’s housing land supply. As a consequence, our client fully supports its allocation. 3.29 We have commented on GED1 at paragraph 3.24-3.27 above and those comments have a strong relationship with GED2 are equally applicable to the policy wording of GED2. Whilst the Estate broadly supports the requirements set out in Policy GED2 we note the requirements of GED2b to provide clearly defined street enclosure to the west of the site through the positioning of buildings and/or stone boundary walls and GED2g which seeks to protect the existing boundary along Grafton Road and existing trees within the site. 3.30 The interplay of these policy requirements has the potential to restrict the delivery of the allocation. For example, some non-mature trees along the western frontage are almost certainly likely to require removal to enable development to front on to the street. By contrast, trees along the southern boundary can be retained. A tree survey which will assess the quality of existing trees will be submitted as part of any planning application and the policy should provide for the possibility of tree removal being necessary along the site frontage in order to accommodate an appropriate layout. 3.33 There are no known technical issues and, subject to a grant of planning permission, the site is deliverable within 5 years and capable of contributing to the land supply for Kettering. 4.4 The Estate supports the allocation of Geddington Sawmill for housing development (Policy GED2), Geddington South East for housing development (GED3) and Geddington South West for employment development (GED5).

Proposed Actions/Changes
3.31 In our view, GED2 should also be modified to cross reference the requirement for site-specific master planning in GED1 or to introduce balancing clauses (i.e. where appropriate, where viable etc.) and employ flexible wording (seek, where practicable etc.). 3.32 We also note that the wording of GED2 is explicit in identifying the allocation for ‘up to’ 10 dwellings. Whilst the Estate are comfortable with this quantum of development we are mindful of the need for flexibility and it is not commonplace in this respect to see planning policies which set maxima. We consider the policy should be modified with wording such as ‘approximately’ or ‘around’ to enable a masterplan process to be undertaken which arrives at a sensible amount of development having regard to housing need and the size of units desired as well as design requirements. 4.6 Policies GED2 and GED3 should also be modified to cross reference the requirement for site-specific master planning in GED1 or to introduce balancing clauses (i.e. where appropriate, where viable etc.) and employ flexible wording.
Officer Response
Refer to response to rep.65. It is considered appropriate for the policy to identify the site for up to 10 dwellings, this is flexible in allowing the site to come forward for a lower number if the masterplanning process identifies that this is appropriate.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
67	Boughton Estates Limited	Policy GED3	Geddington South East	No	No	Yes	No	Yes	Yes

Reasons/Details of representation
Policy GED3 Geddington South East (RA/109) 3.34 Geddington South East is owned by the Estate and we can confirm that a suitable scheme has been designed to accommodate an easement required by Anglian Water and that there are no adverse odour impacts. There is also a desire to bring development forward quickly which will assist the Council’s housing land supply. As a consequence, our client fully supports its allocation. 3.35 We note that the settlement boundary (and therefore allocation boundary) does not follow any defensible features. In our view the arbitrary line should be repositioned commensurate with the rear garden boundaries at Steele Way to the north east of the allocation, and to run south to the existing south east corner of the allocation as proposed (see Appendix A). This very slightly larger site would provide for a built form and development character which is in-keeping with the current urban fabric and maintain the relationship between the built village and the surrounding countryside. 3.36 As with our comments in respect of GED2 at paragraphs 3.32 - 3.34 above

<p>we consider the policy wording to be overly restrictive with the potential to prevent the delivery of the allocation. We also note that GED3 similarly restricts development to 'up to' 11 dwellings. 3.38 There are no known technical issues and, subject to a grant of planning permission, the site is deliverable within 5 years and capable of contributing to the land supply for Kettering. 4.4 The Estate supports the allocation of Geddington Sawmill for housing development (Policy GED2), Geddington South East for housing development (GED3) and Geddington South West for employment development (GED5).</p>
<p>Proposed Actions/Changes</p>
<p>3.37 Whilst we are pleased to see GED3j reference the need for a masterplan the wording only extends to demonstrating suitable arrangements in respect of the easement and odour impacts. In our view, the policy wording should be modified with wording such as 'approximately' or 'around' and enable a masterplan process to be undertaken which considers all design matters and enables a sensible amount of development to be planned having regard to housing need and the size of units desired as well as design requirements. 4.6 Policies GED2 and GED3 should also be modified to cross reference the requirement for site-specific master planning in GED1 or to introduce balancing clauses (i.e. where appropriate, where viable etc.) and employ flexible wording. 4.7 In the absence of any defensible features the settlement boundary (and therefore allocation boundary) associated with Policy GED3 Geddington South East should be repositioned to maintain the relationship between the existing built form and the surrounding countryside (See Appendix A).</p>
<p>Officer Response</p>
<p>Refer to response to rep.65. It is considered appropriate for the policy to identify the site for up to 11 dwellings, this is flexible in allowing the site to come forward for a lower number if the masterplanning process identifies that this is appropriate. The settlement boundary has been drawn based on the area of the allocation considered through the assessment process. It would not be appropriate to alter the boundary at this stage.</p>
<p>Officer Recommended Change(s)</p>
<p>No changes recommended.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
68	Boughton Estates Limited	Policy NEW1	Newton Development Principles	No	No	Yes	No	Yes	Yes

Reasons/Details of representation

3.40 Paragraph 13.114 of the SSP2 says that the scale of development in Newton is proportionate to its size. It is not clear if this is a reflection on the existing fabric of the village (which would be paradoxical) or a reference to past or proposed development. 3.41 Regardless, there are no allocations proposed at Newton and the settlement limit is drawn relatively tightly around existing residential curtilages. It is our view that a small, proportionate development should be enabled at Newton in order to provide some growth to support the local community, allow for young people connected with Newton to continue to live in the area and also to support the farm shop and cafe. 3.42 The Estate has previously promoted their site to the south of Dovecote Farm as a potential housing allocation for 4 homes. It remains our view that the farm buildings/barns and associated outbuildings could be consolidated or moved to a more suitable site on Dovecote Farm to improve the character and quality of this part of the village and provide four new homes for local people. 3.43 This development could be achieved through a small allocation, or by redrafting the settlement limit to include the land and buildings that comprise the southern extent of the Dovecote Farm complex (See Appendix B). 3.44 It might be noted that whilst the Estate wishes to re-develop the southern part of Dovecote Farm through the provision of new homes, specifically designed to meet need and of a size, scale and orientation that maintains the fabric and character of the area in accordance with the development principles set out in Policy NEW1, there are a number of fall-back positions possible via permitted development rights under Classes Q, R and S of Part 3 of Schedule 2 (changes of use) to the Town and Country Planning (General Permitted Development) (England) Order 2015. 3.45 Subject to a number of conditions and restrictions the agricultural buildings and land in their curtilage at Dovecote Farm could be converted for: i, up to 5 homes under Class Q; i, to a 'flexible use' within Class A1 (shops), Class A2 (financial and professional services), Class A3 (restaurants and cafes), Class B1 (business), Class B8 (storage or distribution), Class C1 (hotels) or Class D2 (assembly and leisure) under Class R; or i, to a state-funded school or a registered nursery under Class S. 3.46 Work undertaken in 2017 demonstrates that traffic generated by a development of four new homes will be lower than that arising from redevelopment at the upper limit of the permitted development rights. The site's allocation for up to 4 dwellings cannot be considered to result in any material increase of traffic through the Newton Road junction. 3.47 To re-iterate, the Estate is of the opinion that a development of 4 new homes would provide a better opportunity to enhance the setting of the village, its Conservation Area and Dovecote House (Grade II listed) whilst providing a level of housing which is in keeping with the existing character of the settlement. 3.49 There are no known technical issues and, subject to a grant of planning permission, the site is deliverable within 5 years and capable of contributing to the land supply for Kettering. 4.2 The Estate broadly supports the development principles identified for Geddington through GED1 and for Newton through NEW1.

Proposed Actions/Changes

3.48 The settlement limit for Newton should be amended to include the southern part of the Dovecote Farm complex or Policy NEW1 and the proposal map should be modified to include an allocation for around 4 new homes (See Appendix B).

Officer Response
The Council acknowledge the fall back positions via permitted development rights. Site NEW1 has been discounted through the site assessment process. The detail of this is set out in the Housing Allocations Background Paper (2012, 2018 and 2019) and the Housing Allocations Assessment of Additional Sites and Update (2013). The settlement boundaries have been drawn in accordance with a robust set of criteria. The Settlement Boundaries Background Papers (February 2012, April 2018 and October 2019) provide the evidence base and justification for the settlement boundaries shown on the policies maps.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
69	Local Resident	Statement 1	Joint Core Strategy Vision	Yes	No	Yes	Yes	Yes	Yes

Reasons/Details of representation
2 - Vision Kettering Borough will have a strong growing economy built upon skilled jobs and opportunities for businesses to grow. A place where high quality new homes are well designed, reflect the characteristics of the local area and provide good access to services and facilities. As Kettering Borough Council passed a motion to formally declare a Climate Emergency, they have and committed to a target of making the area covered by the Borough Council carbon neutral by 2030. As this text makes no reference to houses being environmentally sustainable, it does not comply with this motion.
Proposed Actions/Changes
The text should read: 'Kettering Borough will have a strong growing economy built upon skilled jobs and opportunities for businesses to grow. A place where high quality new homes are well designed, environmentally sustainable, reflect the characteristics of the local area and provide good access to services and facilities.
Officer Response
The vision for North Northamptonshire includes that the area will be a showpiece for modern green living and well managed sustainable development and that it will be an exemplar for construction based innovation and the delivery of low carbon growth. The SSP2 vision builds on this for Kettering Borough and does not need to replicate the strategic vision for the area.

Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
70	Estate Manager Boughton Estates Limited	Policy GED5	Geddington South West, New Road, Geddington	No	No	Yes	No	Yes	Yes

Reasons/Details of representation
4.4 The Estate supports the allocation of Geddington Sawmill for housing development (Policy GED2), Geddington South East for housing development (GED3) and Geddington South West for employment development (GED5).
Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
71	Thorpe Malsor Estate	Policy NEH4	Open Spaces	No			No	No	

Reasons/Details of representation

1. Introduction 1.1 These representations have been prepared on behalf of Thorpe Malsor Estate in respect of their land interests at land west of Short Lane, Thorpe Malsor. This land is a proposed designation as 'Open Space' within the publication draft Part 2 Local Plan. 1.2 We consider however that there is no evidence to support the designation available at time of the consultation and as such it is not justified nor consistent with national policy. Notwithstanding this, the site does not qualify for open space on the basis that it is predominantly arable land with little demonstrable local value. The remainder of the site is formed of allotments, but these are privately run and based on private leasing arrangements. 2. Legal and Policy Context 2.1 The Council has published the Publication version (Regulation 19) Kettering Site Specific Part 2 Local Plan for consultation. This is, by definition, a completed plan which the Council considers is sound and ready for submission to the Secretary of State for Examination. The consultation document outlines the Council intend to submit the Plan in April 2020. 2.2 In relation to the development of new development plan documents, the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) outline the expected approach to be adopted, while the Town and Country Planning (Local Planning) England Regulations 2012 sets the legal framework with associated legislation. 2.3 The NPPF sets out at paragraph 16 that Plans should 'be shaped by early, proportionate and effective engagement between planmakers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees'. 2.4 Paragraph 31 states 'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned', 2.5 Paragraph 35 states 'Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are: a) Positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; b) Justified - an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; c) Effective - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and d) Consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this Framework. 2.6 When submitting a Local Plan, the PPG (Plan Making - Paragraph 034) states 'Local planning authorities must make available each of the proposed submission documents that they intend to submit to the Planning Inspectorate for examination to enable representations to come forward that can be considered at examination, under regulation 19 of the Local Plan Regulations' [our emphasis]. This point is also raised at 1.21 of the Procedure Guide for Local Plan Examinations (June 2019). 2.7 The Town and Country Planning (Local Planning) (England) Regulations 2012 Part 6 Section 17 sets out that proposed submission documents encompasses the following documents. e) 'such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan' 2.8 Regulation 19 (Publication of a Local Plan) of the aforementioned legislation states that 'before submitting a Local Plan to the Secretary of State under section 20 of the Act, the local planning authority must- a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with regulation 35, and b) ensure that a statement of the representations procedure

and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1) 2.9 Section 35 sets out that a document is taken to be made available if it is made for available for inspection in person or by being published on its website 2.10 The Procedure Guide for Local Plan Examinations at 1.8 states 'as a minimum, the evidence base should include all documents referenced in the submitted plan'. Open Space Designation 3.1 The publication Local Plan contains Policy NEH4: Open Spaces. This policy does not appear to have been included in previous iterations of the plan, with no such policy included in the 'Draft Plan for Consultation', which was consulted upon between June and July 2018. It is not considered that the introduction of an entirely new policy and designation at publication stage is appropriate, particularly having regard for paragraph 16 of the Framework which advocates 'early, proportionate and effective engagement'. By definition, this is the Plan the Council intend to submit for Examination and as such it is not clear how the introduction of such a policy late in the Plan making process can allow for proper engagement, not least for landowners who's land is set to be affected by such a designation. 3.2 Notwithstanding the lateness of its introduction, we are highly concerned as to the lack of evidence that supports this designation. Whilst the Council has up to date evidence on 'Historically & Visually Important Open Space', this is a separate designation relating solely to proposed Local Green Space. Local Green Space is a specific designation covered by paragraphs 99-101 of the NPPF. It is entirely separate from the Open Space designation on the publication Plan and the evidence for it does not relate to land designated as Open Space. 3.3 The only evidence published on the Council's website relating to open space available is the Open Space Needs Assessment (2007), which was prepared against the now revoked PPG17, and the Open Space and Allotments (2012) document. The Open Space Needs Assessment is now 13 years old and cannot be reasonably be used to support any designation of land now, particularly given it is a study of needs, which are likely now out of date and secondly it dates prior to the introduction of the Framework. The Open Space and Allotments document is more up to date, though having reviewed the document again it is clear this has not directly informed the designation of land as Open Space in the publication draft. It therefore considered that there is no published evidence available to support the proposed designation. 3.4 Policy NEH4: Open Spaces refers to a document titled the Open Space Strategy (OSS) for Kettering Borough (2019). This document is also referenced at paragraph 8.47 of the reasoned justification. The document however is not publicly available. A search on the Council's website indicates that there is still an ongoing consultation (Appendix 1) in regards to this document and that it was otherwise unavailable. As referenced at paragraph 2.9, the Procedure Guide for Local Plan Examinations is unequivocal that 'as a minimum, the evidence base should include all documents referenced in the submitted plan' [our emphasis]. 3.5 It was queried with Kettering Planning Policy Officers (Appendix 2) whether the Open Space Strategy was the document to support the allocation; or whether there was any evidence to support the allocation beyond this. However, correspondence received from the Council (and appended to these representations) simply outlined that beyond the, as yet unpublished, Open Space Strategy, there is only the Green Infrastructure Delivery Plan published evidence in support of Policy NEH4. On examining this document however, the Green Infrastructure Delivery Plan does not directly influence the proposed Open Space designations. We are therefore unclear on what basis the designations are based, beyond any evidence presumably included in the Open Space Strategy which is not yet available. 3.6 With regards to the process undertaken, we would expect the Council to have gathered

an appropriate evidence base prior to any policies having been written. Paragraph 31 of the Framework confirms that policies should be underpinned by 'relevant and up-to-date evidence'. We would also expect for the Council to enable fair and reasonable consultation on such proposals and evidence base, as set out at paragraph 16 of the Framework. In this case the designation has been introduced at the last available moment and supported by no evidence, with documents referred to in the Policy and supporting text also unavailable. 3.7 If the Council decide to proceed with of the currently proposed Local Plan in April 2020 as currently suggested, we consider NEH4 is unsound in that it is neither justified nor consistent with national policy as set out at paragraph 35 of the Framework. On that basis, Policy NEH4 should be deleted. We do not feel this would unduly impact on the Plan or its strategic aims, not least because this was a policy not deemed necessary until Regulation 19 stage and is a non-strategic policy. There remains the opportunity for local neighbourhood plan groups to develop such designations through forthcoming Neighbourhood Plans. Decision makers would be able to consider the role of the Open Space Strategy and whether it amounted to a material consideration in any decisions. 3.8 If, however this is a policy the Council feels is vital to the integrity of the Plan, the Council are entitled to reconsult at Regulation 19 following the publication of the requisite evidence. 3.9 The Council cannot however, introduce evidence to support the designation between now and the submission of the Plan, or during the Examination itself. The lack of any evidence to support a Local Plan designation is a matter of soundness. The introduction of fundamental evidence, of which there has been no fair opportunity to comment, is in our opinion a legal failure on which there would be compelling grounds for legal challenge. We would consider it disproportionate to risk the entire plan for such a designation and would urge the Council against such an approach. Regulation 19 is clear that submission documents must be available for inspection during the consultation and Part 6 Section 17 sets out that proposed submission documents includes documents considered to be relevant in making the Plan. Clearly if a document forms the evidence by which a designation within the Plan is based, the document must be relevant in the making of the Plan.

Proposed Actions/Changes

3.10 We therefore consider that the publication Plan is unsound in that Policy NEH4 is not justified due to the lack of supporting evidence and not consistent with national policy in the lack of supporting evidence and lack of engagement prior to its inclusion in the draft Plan. The policy should therefore be deleted to ensure that the Local Plan is sound.

Officer Response

Private allotments are included within the open space audit because these make an important contribution to meeting need for allotment provision.

Officer Recommended Change(s)

A Main Modification is proposed to address the issues raised in this response in relation to Policy NEH4. Refer to the Main Modification Schedule, reference number MM6 In respect of the area of allotments identified, this area has been reviewed and a main modification is proposed to the policies map to ensure that the area shown reflects the area used as allotments. Refer to the Main Modification Schedule, reference number MM50

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
72		General Comments	Site Specific Part 2 Local Plan- Publication Plan						
Reasons/Details of representation									
None.									
Proposed Actions/Changes									
<p>Thank you for consulting Northamptonshire County Council Highways on the Site Specific Part 2 Local Plan - Publication Plan Consultation. We note that the Plan is planning for 2,576 additional dwellings over that identified in the North Northants Joint Core Strategy (taking into account completions, commitments, allocations and windfall allowance). Whilst overall it is not expected that this will be cumulatively significant in transport terms due to it being spread across the borough, each development will need to be subject to a transport assessment at a future date to identify the impact on the local road network in the immediate vicinity of the allocations and to identify appropriate mitigation, where required. It is presumed that assessments have been undertaken to ensure that access arrangements are appropriate at each of the allocated sites. The outputs of the spreadsheet transport model work to look at the impact on the highway of housing options in Rothwell and Desborough as part of early option testing identified that the site at Rothwell North/ Land to west of Rothwell will impact on the A14 junction 3 and the A6/Rothwell link road junction. We therefore welcome the wording of Policy ROT3 f. and h. and strongly support a. and b. to encourage active travel. The outputs also identified that the trip generation from the Land to South of Desborough (DE/210) will result in 90 or more additional vehicles at a number of junctions in the AM peak that have already been identified as being overcapacity. The junctions are naturally constrained due to being located within an urban area, however it is expected that mitigation can be achieved within the highway boundary. We therefore welcome the policy wording in DES5 j. and k.</p>									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
73	Thorpe Malsor Estate	Policy NEH4	Open Spaces	No			No	No	

Reasons/Details of representation

Land West of Short Lane, Thorpe Malsor 4.1 Notwithstanding our overriding concerns with the designation as a whole, we would wish to make the following specific comments in relation to the proposed designation of land west of Short Lane, Thorpe Malsor as Open Space as shown in the publication Local Plan (Figure 2 below). 4.2 Firstly, as referenced above we have fundamental concerns as to the late introduction of the designation of our client's land in the plan making process. There were no Open Space designations in the consultation held in 2018 and it is unclear why they were deemed necessary, particularly considering the lack of supporting evidence. The late introduction of this designation is against the requirements of paragraph 16 of the NPPF. We do not consider its introduction at Publication stage constitutes early or effective engagement as by definition this was the Plan the Council intends to submit. Our client and countless other landowners are now wholly prejudiced by this approach. 4.3 Secondly, given the lack of any available evidence we have had to make assumptions on the reasons for the land's designation. The land is not designated in the currently adopted Local Plan (1995), meaning this is a new designation. It is our assumption that the land has been designated as is considered to be allotments, as this is how the land is labelled on proposed policies maps. This is however misleading and does not reflect the actual use of the site. 4.4 The majority of the site is actually used as an arable field, for producing hay/silage, as is clearly demonstrated on Google aerials (see Figure 1). Whilst there are allotments on part of the site, these are limited in nature and private in ownership. The latter being particularly important as unlike statutory allotments, these could be removed as and when the respective leases end. In the circumstance that agreeable terms could not be agreed for the continued lease of the land, then the field could be reverted back to agricultural use under the provisions of section 55 2E of the 1990 Town and Country Planning Act, in which case it would be no different from any of the neighbouring fields. Having regard for this, the Council would need to demonstrate why this land is of higher value than other comparable landholdings. Incorrect mapping labelling the presence of allotments which do not exist does not constitute a valid reason for the designation of land which is only arable land and as such unremarkable in both the immediate and wider localities.

Proposed Actions/Changes

4.5 Having regard for the above we consider the Open Space to the west of Short Lane, Thorpe Malsor should be removed as it is unsound as it is neither justified nor consistent with national policy. These comments are without prejudice to the publication of any additional evidence and we of course reserve the right to update these views in such a scenario.

Officer Response
Please refer to response to Rep 71.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
74	Local Councillor	12	Land west of Rothwell	No	Yes; No	Yes; No	Yes; No	Yes	Yes

Reasons/Details of representation
Rothwell North is well behind schedule for the plan period. No further allocations should be permitted until the Town has absorbed the current volume of housing. Additional housing would need to be considered on the basis of what is planned currently being built out and analysis of the impact on the infrastructure of the town especially transport. The current additional housing proposal flies in the face of national policy for limiting trips to work and shopping to reduce our carbon footprint.
Proposed Actions/Changes
None.
Officer Response
An additional housing allocation is needed to meet housing requirements identified in the North Northamptonshire Joint Core Strategy. The Housing Land Supply Background Paper (October 2019) provides the justification for the number of allocations proposed in each of the settlements.
Officer Recommended Change(s)
No changes recommended.

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
75	Local Resident	13	Ashley	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation

13.27. Ashley Parish Council fully support the proposed plans as proposed by Kettering Borough Council. We would request that all planning applications are considered baring in mind the Village design statement, AVDS. The AVDS has been adopted by Kettering borough Council as a 'material consideration' when dealing with any applications in Ashley. The AVDS goes into detail about the many historical buildings in the village and the pattern of historical growth. Any development should be sympathetic to the AVDS and the principles it lays out. We are pleased this is noted in point 13,27. We wish to stress the importance of the George pub within the village. It is registered as an asset of community value and is our last public house and the villagers strongly wish to keep it open, we are pleased to see it noted in point 13.27.

Proposed Actions/Changes

None.

Officer Response

Noted.

Officer Recommended Change(s)

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
76	Local Resident	Policy ASH1	Ashley Development Principles	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation
additional comments, plus the addition of an area of open green space.
Proposed Actions/Changes
Ashley parish council is not opposed to new housing within the village boundary; however, we feel a mix of housing should be promoted, i.e. affordable starter cottages as well as medium and larger properties. Ashley Parish Council fully support the creation of the three areas designated HVI, HVI001, HVI002, HVI081 and the two areas of open green space in the playground and the church grave yard. Ashley Parish Council requests that the new recreation ground and sports facilities, in the two former fields to the north of the playground up to the top of Church Hill be designated as open green space. Equally that the tennis court, petanque court, football pitch and the cricket net be noted as such on the plan.
Officer Response
See below.
Officer Recommended Change(s)
A main modification is proposed to the policies map to ensure that the areas of open space referred to are identified on the map. Refer to the Main Modification Schedule, reference number MM48

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
77	Local Resident	Policy MAW2	Land to the West of Mawsley	No	No	No	No	Yes	Yes

Reasons/Details of representation
MAW02 / RA/174 As a resident of Mawsley, I wish to object to the proposed housing allocation RA/174 - Land to the West of Mawsley. I object for the following reasons: This will have an adverse effect on the residential amenity of neighbouring properties in Cransley Rise, Malaslea and Birch Spinney. This location is currently agricultural land, and the development of the land into housing would potentially result in additional noise, disturbance, overlooking and loss of privacy in the immediate vicinity. In addition, the orientation of some of the houses in Cransley Rise is such that they are designed to front onto open space. Whilst I appreciate that householders have no right to a view, the enjoyment of this view is an important part of the residential amenity of these properties, and as such, should be protected. One of the unique features of the village is the design layout. The proposal for infill development would materially harm the character of Mawsley and I believe that this is directly contradictory with principle (a) set out in Policy MAW01, that development in Mawsley will 'Be designed to reflect

the distinct character of the village'. Further to the point above, KBC have imposed an Article 4 direction in place in certain areas in Mawsley to 'control works that could threaten the character of an area'. This development is undoubtedly a greater threat to the character of the village than that which the Article 4 direction aims to control. I have concerns about the proposed number of dwellings, in terms of density and possible over-development of the site. There is poor drainage in the vicinity of this site resulting in waterlogging and flooding in existing gardens and public open space when it has been raining heavily. If this development goes ahead the problem will worsen in the immediate area, as the existing site is self-draining. The development may lead to a significant impact upon road safety. The proposed access point for the development is in Cransley Rise which is already a busy and winding road, where access is regularly restricted by parked vehicles. The increase in traffic to a new junction within Cransley Rise and passing along Cransley Rise to and from the junction with School Road will make the situation even worse to the point of being dangerous. For the reasons above, I believe that Cransley Rise is an unsuitable access point for construction traffic. The roads in Mawsley are still not adopted, and therefore the authority is not under any obligation to pay for maintenance. I am concerned that any construction traffic associated with this development may damage the road surface in Cransley Rise and that the responsibility for the cost of repairs will then rest with the frontagers in Cransley Rise. KBC has previously stated that Provision of schools and adequate medical facilities are an important consideration when planning for future growth. The village currently has 930 households, which is an additional 230 over what was originally planned. The local amenities and infrastructure would have been designed to meet the need of the original number of households and they are already overstretched. It is inevitable that a further increase in the number of households in the village will stretch the infrastructure even further. It is unacceptable for primary aged children who are resident in the village to have to go to school outside of the village due to lack of capacity at the village school. The development will not be connected very well to local services such as public transport, since the bus service to the village has been recently reduced. This will inevitably lead to an increase in traffic on the roads as residents have no option other than to drive to leave the village. A poor decision on this proposed allocation could set a precedent for a pattern of development that is not sustainable and could lead to a further expansion of the village. There is very strong feeling in the village against this development, as per the comments for Mawsley on the Site Specific Proposals for Housing Allocations made in 2013. These should be taken into account by KBC when making a decision since it is existing residents who will have to live with the consequences of any decisions. Policy 11 of the Joint Core Strategy states that 'development in the rural areas will be limited to that required to support a prosperous rural economy or to meet a locally arising need, which cannot be met more sustainably at a nearby larger settlement'. Unless evidence can be provided which shows that this proposed housing allocation is actually needed, this proposal directly conflicts with the policy.

Proposed Actions/Changes

None.

Officer Response

The issues raised have been considered through the site assessment work, the detail of this is included in the Housing Allocations Background Papers (2012, 2013, 2018 and 2019) . Where appropriate, criteria have been included in Policy MAW2 to ensure issues identified through the assessment process are adequately addressed.

Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
78	Anglian Water	Policy KET3	Kettering Fire Station, Headlands	Yes	No	Yes	Yes	Yes	Yes

Reasons/Details of representation

As noted in the Council’s assessment of housing sites there is existing Anglian Water infrastructure within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

Proposed Actions/Changes

Add new paragraph to supporting text to read: There is an existing sewer and water main in Anglian Water’s ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewer and water main should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water’s existing assets may be required.’ Add new criterion to Policy KET3: ‘the safeguarding of suitable access for the maintenance of foul drainage and water supply infrastructure.’

Officer Response

See below.

Officer Recommended Change(s)

A Main Modification is proposed to address this issue. Refer to the Main Modifications Schedule, MM10

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
79	Anglian Water	Policy KET4	Land west of Kettering, Gipsy Lane	Yes	No	Yes	Yes	Yes	Yes

Reasons/Details of representation

As noted in the Council's assessment of housing sites there is existing Anglian Water infrastructure within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

Proposed Actions/Changes

Add new paragraph to supporting text to read: There is an existing sewer and water main in Anglian Water's ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewer and water main should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required.' Add new criterion to Policy KET4: 'the safeguarding of suitable access for the maintenance of foul drainage infrastructure.'

Officer Response

See below.

Officer Recommended Change(s)

A Main Modification is proposed to address this issue. Refer to the Main Modifications Schedule, MM12

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
80	Anglian Water	Policy KET5	Glendon Ironworks, Sackville Street	Yes	No	Yes	Yes	Yes	Yes

Reasons/Details of representation
As noted in the Council’s assessment of housing sites there is existing Anglian Water infrastructure within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.
Proposed Actions/Changes
Add new paragraph to supporting text to read: There is an existing sewer in Anglian Water’s ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water’s existing assets may be required.’ Add new criterion to Policy KET5: ‘the safeguarding of suitable access for the maintenance of foul drainage infrastructure
Officer Response
See below.
Officer Recommended Change(s)
A Main Modification is proposed to address this issue. Refer to the Main Modifications Schedule, MM13

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
81	Anglian Water	Policy KET7	Factory adjacent to 52 Lawson Street	Yes	No	Yes	Yes	Yes	Yes

Reasons/Details of representation
As noted in the Council’s assessment of housing sites there is existing Anglian Water infrastructure within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.
Proposed Actions/Changes
Add new paragraph to supporting text to read: There is an existing water main in Anglian Water’s ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located

in highways or public open space. If this is not possible a formal application to divert Anglian Water’s existing assets may be required.’ Add new criterion to Policy KET7: ‘the safeguarding of suitable access for the maintenance of water supply infrastructure.
Officer Response
See below.
Officer Recommended Change(s)
A Main Modification is proposed to address this issue. Refer to the Main Modifications Schedule, MM15

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
82	Anglian Water	8	Flood Risk and Sustainable Water Management	Yes	No	Yes	Yes	Yes	Yes

Reasons/Details of representation

Policy NEH1 as drafted states development proposals should comply with the requirements of Guidance and Standards for surface water produced by Northamptonshire County Council as Lead Local Flood Authority. However the policy does not make reference to relevant documents produced by Anglian Water as sewerage undertaker for the Kettering District Administrative area or the forthcoming water sector wide guidance relating to the adopting of SuDS. The Design and Construction Guidance (DCG) to be introduced from April 2020 sets out water companies approach to the adoption of SuDS features which meet the legal definition of a sewer. As such if an application were to be made to Anglian Water to adopt a SuDS feature which met the legal definition and the required standards outlined in the DCG we would be expected to adopt it. We would ask that developers are also asked that they follow the requirements of Anglian Water’s Surface Water Policy, SuDs Adoption Handbook and Design and Construction Guidance or successor documents. This is important where SuDs features are to be adopted by Anglian Water or it is proposed that surface water is to be discharged to a public sewerage network. We would only accept a surface water connection in exceptional circumstances where it can be demonstrated that there are no alternatives. In addition the expectation is that all development proposals irrespective of scale will incorporate Sustainable Drainage Systems wherever possible as set out in the North Northamptonshire Core Strategy. The supporting text in the Kettering Part 2 Local Plan should be amended for consistency with the requirements of Policy 5 of the adopted Core Strategy.

Proposed Actions/Changes
It is therefore suggested that Policy NEH1 be amended as follows: ‘Have regard to the Flood Toolkit and Local Standards and Guidance for Surface Water Drainage in Northamptonshire, together with the guidance produced by Anglian Water and the water sector (and successor documents), and where appropriate, demonstrate how the proposal has had regard to these documents’ We would also ask that the supporting text of Policy NEH1 be amended as follows: ‘8.9 Major new developments must address surface water drainage requirements as set out in the Northamptonshire Flood Toolkit and local guidance. Development proposals should also address Anglian Water’s surface water policy/guidance and water sector wide guidance relating to the adoption of SuDS (or any successor documents) where SuDS features are proposed to be adopted by Anglian Water . The Council will continue to explore alternative sources of funding to undertake feasibility studies in order to improve our understanding of local flooding issues and identify viable solutions that would alleviate future flooding or minimize the impact. It is acknowledged that the guidance only applies to major schemes however in light of the findings of the Kettering SWMP, stricter requirements on surface water drainage proposals for sites located in areas draining into the CDCs will be required for all development schemes. The particular measures used to reduce flood risk off-site will depend on site specific circumstances and be proportionate to the scale of development. Sites should look to discharge their surface water to as sustainable location as possible. Planning applications involving discharging surface water to foul sewers are unlikely to be supported as a surface water connection will only be accepted by Anglian Water in exceptional circumstances where it can be demonstrated that there are no alternatives.’
Officer Response
See below.
Officer Recommended Change(s)
A Main Modification is proposed to address the issues raised in this response. Refer to the Main Modification Schedule, reference number MM7

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
83	Anglian Water	Policy KET1	Scott Road Garages	Yes	No	Yes	Yes	Yes	Yes

Reasons/Details of representation
As noted in the Council’s assessment of housing sites there is existing Anglian Water infrastructure within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.
Proposed Actions/Changes
Add new paragraph to supporting text to read: There is an existing sewer in Anglian Water’s ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water’s existing assets may be required.’ Add new criterion to Policy KET1:
Officer Response
See below.
Officer Recommended Change(s)
A Main Modification is proposed to address this issue. Refer to the Main Modifications Schedule, MM8

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
84	Anglian Water	Policy KET8	Land to the rear of Cranford Road	Yes	No	Yes	Yes	Yes	Yes

Reasons/Details of representation
As noted in the Council’s assessment of housing sites there is existing Anglian Water infrastructure within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.
Proposed Actions/Changes
Add new paragraph to supporting text to read: There is an existing sewer in Anglian Water’s ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in

Item 6 Appendix 1

highways or public open space. If this is not possible a formal application to divert Anglian Water’s existing assets may be required.’ Add new criterion to Policy KET8: ‘the safeguarding of suitable access for the maintenance of water supply infrastructure
Officer Response
See below.
Officer Recommended Change(s)
A Main Modification is proposed to address this issue. Refer to the Main Modifications Schedule, MM17

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
85	Anglian Water	Policy KET10	Land at Wicksteed Park, east of Sussex Road and Kent Place	Yes	No	Yes	Yes	Yes	Yes

Reasons/Details of representation
As noted in the Council’s assessment of housing sites there is existing Anglian Water infrastructure within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.
Proposed Actions/Changes
Add new paragraph to supporting text to read: There are existing foul and surface water sewers in Anglian Water’s ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water’s existing assets may be required.’ Add new criterion to Policy KET 10: ‘the safeguarding of suitable access for the maintenance of foul and surface water drainage infrastructure.’
Officer Response
See below.

Officer Recommended Change(s)
A Main Modification is proposed to address this issue. Refer to the Main Modifications Schedule, MM20

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
86	Anglian Water	Policy BLA5	Land adjacent to The Bungalow, Higham Road, Burton Latimer	Yes	No	Yes	Yes	Yes	Yes

Reasons/Details of representation

Policy BLA5 Land adjacent to Bungalow, Higham Road, Burton Latimer As noted in the Council’s assessment of housing sites there is existing Anglian Water infrastructure within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required. Add new paragraph to supporting text read: As noted in the Council’s assessment of housing sites there is existing Anglian Water infrastructure within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

Proposed Actions/Changes

Add new paragraph to supporting text to read: There are existing foul sewer in Anglian Water’s ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water’s existing assets may be required.’ Add new criterion to Policy BLA5: ‘the safeguarding of suitable access for the maintenance of foul water drainage infrastructure.’

Officer Response

See below.

Officer Recommended Change(s)
A Main Modification is proposed to address this issue. Refer to the Main Modifications Schedule, MM24

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
87	Anglian Water	Policy BLA6	Bosworth Nurseries and Garden Centre, Finedon Road, Burton Latimer	Yes	No	Yes	Yes	Yes	Yes

Reasons/Details of representation

As noted in the Council’s assessment of housing sites there is existing Anglian Water infrastructure within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.

Proposed Actions/Changes

Add new paragraph to supporting text to read: There are existing foul sewer in Anglian Water’s ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water’s existing assets may be required.’ Add new criterion to Policy BLA6: ‘the safeguarding of suitable access for the maintenance of foul water drainage infrastructure.’

Officer Response

See below.

Officer Recommended Change(s)

A Main Modification is proposed to address this issue. Refer to the Main Modifications Schedule, MM26

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
88	Historic England	Policy TCE4	Residential Development within the Town Centres	No	No		No	Yes	Yes
Reasons/Details of representation									
There is concern regarding potential loss of retail units in town centres, although criteria e is welcomed. Is this policy necessary.									
Proposed Actions/Changes									
Deletion or greater reference to the importance of retail and mixed use at ground floor level.									
Officer Response									
It is considered that the policy and supporting text adequately address the importance of protecting retail and other town centre uses at ground floor level.									
Officer Recommended Change(s)									
No changes recommended.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
89	Anglian Water	Policy ROT3	Land to the West of Rothwell	Yes	No	Yes	Yes	Yes	Yes
Reasons/Details of representation									
As noted in the Council's assessment of housing sites there is existing Anglian Water infrastructure within the boundary of the site. We would ask that this be considered as part of the site design and layout to ensure that we can continue to serve our customers. In the event that there is a need to divert our existing assets a formal application to Anglian Water would be required.									

Proposed Actions/Changes
Add new paragraph to supporting text to read: There are existing foul sewer and water main in Anglian Water’s ownership within the boundary of the site and the site layout should be designed to take these into account. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing sewers should be located in highways or public open space. If this is not possible a formal application to divert Anglian Water’s existing assets may be required.’ Add new criterion to Policy ROT3: ‘the safeguarding of suitable access for the maintenance of foul water drainage and water supply infrastructure.’
Officer Response
See below.
Officer Recommended Change(s)
A Main Modification is proposed to address this issue. Refer to the Main Modifications Schedule, MM??

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
90	Historic England	8	Natural Environment and Heritage	No	No		No	Yes	Yes

Reasons/Details of representation
The supporting text is welcomed, together with the detailed village policies. To provide strength and local detail, a heritage policy(ies) should be proposed, in accordance with paragraphs 20 and 185 of the NPPF, as are also being proposed at East Northamptonshire. The Local Plan Part 2 represents an opportunity to provide detailed separate policies on specific heritage assets such as Conservation Areas, Listed Buildings, Registered Parks and Gardens, Scheduled Ancient Monuments, archaeology and non-designated heritage assets. A policy relating to historic shopfronts would be welcomed. This would future proof the plan, ensuring soundness.
Proposed Actions/Changes
Historic England would be very happy to assist with wording for historic environment policies and agree by SOCG.
Officer Response
National legislation and national and strategic policy provide adequate protection for the Boroughs heritage assets.

Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
91	Clerk – Thorpe Malsor Parish Council	8	Natural Capital and Green Infrastructure	No	No	No	No	Yes	Yes

Reasons/Details of representation

We do not consider this section of Site Specific Local Plan 2 for Kettering Borough sufficiently identifies and seeks to protect all the natural assets and green infrastructure that exist within the Borough. Table 8.1 - Designated Natural Assets Paragraph 8.13 refers to over 60 Local Wildlife Sites but they are not recognised / identified in Table 8.1. As stated in paragraph 8.14, the JCS, particularly Policy 4, seeks to protect, enhance and restore biodiversity assets and we believe the Local Plan should recognise and include these Local Wildlife sites within Table 8.1. The first image which accompanies this section of the plan shows one notable wild life site within the borough, Cransley Reservoir, but it is not a designated natural asset. Green Infrastructure The GI policy for the Borough is not easy to comprehend, on a number of levels: - Paragraph 8.23 is accompanied by a map of the Green Infrastructure Corridors. Not all designated Local Corridors are identified correctly - 9b is not Finedon to Little Addington. - Policy NEH2 states: The integrity of the Borough Level Green Infrastructure Network (BLGIN) as set out in Figure 8.1 of this Plan will not be compromised by new development. It is not clear what this relates to - nothing is labelled 'Figure 8.1' but we understand it is the GI corridor map. The NPPF paragraph 174 states that plans should: Identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation. Whilst this Borough level plan has identified some GI projects for improvement / investment this map does not recognise or map all local wildlife-rich habitats and wider ecological networks. We do not consider either Table 8.1 or Figure 8.1 achieves the aim of the NPPF at local level. Without proper mapping it is impossible to safeguard, manage, enhance or restore them. In this parish, immediately to the west of Kettering, there is a wildlife corridor which includes both Thorpe Malsor and Cransley reservoirs. Cransley Reservoir is a designated LWS and both reservoirs and the surrounding countryside are important sites for biodiversity. They form part of the wider ecological network that stretches down to Pitsford in the south west. The area is not only a rich habitat in its own right but the reservoirs are also a stopping off point for migrating wildfowl. We are extremely concerned that the high level of protection afforded to this area has been removed by superseding Policy 10 with Policy

NEH2. It is no longer identified, mapped or safeguarded despite being one of only 3 notable 'blue infrastructure' water environments within the Borough. Both reservoirs supply and link in to Slade Brook, which is a recognised local borough level GI corridor. We believe this area should be included in the BLGIN. It needs to be recognised and protected.
Proposed Actions/Changes
None.
Officer Response
Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.
Officer Recommended Change(s)
A minor modification is proposed to address concerns raised in relation to Figure 8.1. Please refer to Additional Modifications Schedule, AM11

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
92	Historic England	Policy NEH3	Historically and Visually Important Local Green Spaces	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation
Policy NEH3 is welcomed.
Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
93	Historic England	Policy KET7	Factory adjacent to 52 Lawson Street	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation
Criteria d is welcomed.
Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
94	Historic England	Policy BLA4	Land to the West of Kettering Road, Burton Latimer	Yes	Yes	Yes	Yes	Yes	Yes
Reasons/Details of representation									
The site is within the Conservation Area. Criteria a is welcomed.									
Proposed Actions/Changes									
None.									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
95	Historic England	Policy DES2	Opportunity Redevelopment Sites within Desborough	No			No	Yes	Yes
Reasons/Details of representation									
DE2 relates to a very sensitive site, including the key building within the Conservation Area, the Lawrence Factory. Please refer to our previous advice on the Lawrence Factory. Policy DES2, criteria b does not include reference to its sensitivities, importance as a key building or location within the Conservation Area.									

Proposed Actions/Changes
Criteria b is amended to include reference to the Lawrence Factory, its importance and position within the Conservation Area. Historic England would be happy to agree this change by SOCG.
Officer Response
Policy DES2 includes a list of opportunity redevelopment sites for Desborough and the most suitable redevelopment uses for each of these. Any proposals will be required to consider the impact on the conservation area, through the development management process where existing policies exist to protect the character and setting of the site within the conservation area. Therefore it is not considered necessary for any changes to DES2 to be made.
Officer Recommended Change(s)
No changes are recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
96	Local Councillor	Table 17.1		Yes	Yes	Yes	No		

Reasons/Details of representation
Policy 10 Protects an extremely valuable area of the Borough. It has stood the test of time and it would be entirely wrong to remove and dilute its significance at this time. It is a unique area surrounded by three attractive villages and a network of footpaths which are enjoyed by residents further afield. As Kettering grows and the desire for access to open countryside and stretches of water increases Policy 10 gives significant protection to this area. A specific policy covering the two reservoirs is essential to attract and retain water based leisure facilities and the tranquil nature of the reservoirs and their hinterland. There is no reason to discard this policy which can be moved from the previous local plan to this one without modification or use of resources. Retaining Policy 10 will continue to give confidence that this area is precious and worth identifying as unique and not being diluted into a policy which might give less protection and more scope for modification by random planning applications elsewhere in the Borough.
Proposed Actions/Changes
Recognition of the importance of securing areas of significant rural character. This would not be the case if Policy 10 is set aside.

Officer Response
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
97	Historic England	Policy ROT1	Rothwell Town Centre Development Principles	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation
Criteria h is welcomed.
Proposed Actions/Changes
None.
Officer Response
Noted.

Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
98	Anglian Water	Policy GED3	Geddington South East	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation

None.

Proposed Actions/Changes

None.

Officer Response

Noted.

Officer Recommended Change(s)

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
99	Historic England	Policy ROT3	Land to the West of Rothwell	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation

Criteria g is welcomed. Please also ensure that our previous comments in relation to site RO/088a are taken into account.

Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
100	Historic England	Policy RS2	Category B villages	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation									
Policy RS2 is welcomed.									
Proposed Actions/Changes									
None.									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
----	------------	----------------	------	-----------	-----------	---------------------	---------------------------------	-----------	--------------------

Item 6 Appendix 1

101	Historic England	Policy RS5	General Development Principles in the Rural Area	Yes	Yes	Yes	Yes	Yes	Yes
Reasons/Details of representation									
Criteria i-g are welcomed.									
Proposed Actions/Changes									
None.									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
102	Historic England	13	Rural Area General Policies - Policy ASH1, CRA1, GED1, GRA1, HAR1, LOA1, LOD1, STA1, SUT1, WAR1, WEK1, WES1 and WIL1	No			No	Yes	Yes
Reasons/Details of representation									

For all Village specific development principles policies, the inclusion of a materials criteria is welcomed to ensure the use of historically appropriate materials. However, it must ensure that the use of materials is site specific and specific to its setting within the village to ensure that the criteria is not read as a list of potential materials when in some circumstances one would be preferable to another within the list. Amendment to the criteria to include site specific / village setting specific reference would help to address this issue.
Proposed Actions/Changes
The following wording should be added to the end of the materials criteria ‘dependant on the individual site and its specific setting within the village’.
Officer Response
See below.
Officer Recommended Change(s)
A number of Main Modifications are proposed to address the issue raised in this response. Refer to the Main Modification Schedule, reference numbers MM32, MM33, MM35, MM36, MM37, MM38, MM39, MM40, MM43, MM44, MM45, MM46, MM47

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
103	Historic England	Policy BRA2	Top Orchard, Braybrooke	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation
Criteria c,d,h and I are welcomed.
Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
104	Local Councillor	Policy MAW1	Land to the West of Mawsley		Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation

Mawsley is a new village built from around the year 2000 and completed in its original form around five years ago. The original masterplan was for 750 houses which part way through the development was contested and allowed on appeal and increase in the density within the defined village limits which now has created a village of some 950 homes. The infrastructure and facilities were designed around a village of 750 with the recognition for example of the Doctor's surgery and school that it would be a hub for services for surrounding villages, which it is. The village should be allowed to settle for a period of years, for the community to mature, before consideration of additional housing out with the current village "boundary". The open countryside that cuts into the village at this point is not dissimilar to other villages where open countryside adds to the character and feel of a village. The vision was always for a traditional Northamptonshire Village, not an estate in the open countryside. This has been achieved. "Filling in" this open countryside would be detrimental to the character of the village and give the impression that it is simply an estate in the open countryside. The roads within the village were specifically designed to inhibit speeding and physically (as much as possible) keep traffic at 20 mph (which is the village-wide limit). The access roads to the development are not suitable either for construction traffic or the increase in volume of traffic that additional housing would generate. Many of the original residents of the village have endured the disruption of construction traffic and the disturbance to their lives caused by the final building. It would seem unreasonable at this time to create additional disruption to residents. Furthermore both Broughton and Mawsley have received significant growth within the current plan period whilst unfairly in my opinion Geddington, a village of similar size has received and has planned significantly less housing requirement in this SPP2. Whilst it is not a given, Geddington has been bypassed and has facilities which could and would benefit from additional housing, which happens in many cases where a bypass has been built. In a simple trade off between an additional 55 houses in Mawsley or Geddington there are greater benefits in allocating in a village which has had significant public funds invested in a bypass. Equally locations in Geddington are largely accessed from the old A43 directly onto a former A road rather than through an established residential area. I have said at this point before that the distribution of housing in Broughton and Mawsley is unfair and less practical than would be the case in Geddington. My suggestion is that this additional development in Mawsley is not well located or well considered in relation to other options available in a similar sized village and should be deleted from the plan being considered.

Proposed Actions/Changes
None.
Officer Response
The issues raised have been considered through the site assessment work, the detail of this is included in the Housing Allocations Background Papers (2012, 2013, 2018 and 2019). Where appropriate, criteria have been included in Policy MAW2 to ensure issues identified through the assessment process are adequately addressed.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
105	Historic England	Policy CRA1	Cranford Development Principles	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation
Criteria e is welcomed.
Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
106	Historic England	Policy GED1	Geddington Development Principles	Yes	Yes	Yes	Yes	Yes	Yes
Reasons/Details of representation									
Criteria d, h, i and j are welcomed.									
Proposed Actions/Changes									
None.									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
107	Historic England	Policy GED2	Geddington Sawmill, Grafton Road, Geddington	Yes	Yes	Yes	Yes	Yes	Yes
Reasons/Details of representation									
Criteria e and f are welcomed.									
Proposed Actions/Changes									
None.									

Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
108	Local Councillor	Policy BRA1	Braybrooke Development Principles	Yes	Yes	Yes	Yes		Yes

Reasons/Details of representation
Fully Support the inclusion of RA/128 Top Orchard Braybrooke as indeed was the conclusion recommended by the 1995 Plan Inspector that it would benefit from a sensitive development and that the defined village limits place this area as part of the village of Braybrooke. The policy is in my opinion sound and will create a very attractive development. Support the principles created in the policy for BRA02.
Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
109	Historic England	Policy GED3	Geddington South East	Yes	Yes	Yes	Yes	Yes	

Reasons/Details of representation
Criteria a is welcomed.
Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
110	Historic England	Policy GED4	Old Nursery Site, Grafton Road, Geddington	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation
Criteria h and i are welcomed.
Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
111	Anglian Water	Policy NEH2	Green Infrastructure	Yes	No	Yes	Yes	Yes	Yes

Reasons/Details of representation

Anglian Water is supportive of the objectives of Policy NE2 but has some comments about how it would be applied particularly for any major development proposals relating to water and water recycling infrastructure. Reference is made to major development providing a net gain of green infrastructure in the district through on-site provision or off-site contributions to green infrastructure. In our earlier comments we had raised concerns that Policy ENV01 (now NEH 2) does not define how this requirement would be applied to development proposals within the Borough. As currently drafted it appears to apply all major developments including those proposed by Anglian Water as an infrastructure provider as defined in the Development Management Procedure Order 2015. It remains unclear what form contributions would take particularly for developments that would not be expected to have a recreational impact.

Proposed Actions/Changes

It is therefore proposed that Policy NEH2 be amended as follows: 'a. Major development will deliver on-site and/or make off-site contributions to achieve a net gain of green infrastructure in accordance with the Aims and Objectives set out in the Kettering Green Infrastructure updated documents). Any contributions would be proportionate to scale and nature of proposals including whether there is a need for recreational access.'

Officer Response

These issues would be considered at planning application stage, it is not considered necessary for this wording to be added to the policy.

Officer Recommended Change(s)

No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
----	------------	----------------	------	-----------	-----------	---------------------	---------------------------------	-----------	--------------------

Item 6 Appendix 1

112	Historic England	Policy GRA1	Grafton Underwood Development Principles	Yes	Yes	Yes	Yes	Yes	Yes
Reasons/Details of representation									
This policy is welcomed.									
Proposed Actions/Changes									
None.									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
113	Historic England	Policy GRC1	Great Cransley Development Principles	Yes	Yes	Yes	Yes	Yes	Yes
Reasons/Details of representation									
Criteria c is welcomed.									
Proposed Actions/Changes									
None.									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
114	Historic England	Policy STA2	Land to the south of Harborough Road, Stoke Albany						
Reasons/Details of representation									
Criteria a is welcomed.									
Proposed Actions/Changes									
None.									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
115	Local Councillor	13	Braybrooke						
Reasons/Details of representation									
Braybrooke To include the redundant farm buildings to the north of RA/128 within the defined village limits "boundary". Access from Newland Street in the north and via the Old Rectory Driveway from the East. In 1995 the redundant buildings were recognised as not contributing to the environment. The Local Plan Inspector recommended that the village boundary should be drawn to include the buildings and therefore making a presumption for removal and redevelopment. The buildings have been put forward for development for housing since 1990 and have remained available for development since that time. Access is retained and approved by the Highway Authority and a									

sensitive development to the surrounding environment building would enhance the conservation area. The building have no economic use beyond their original purpose (built as part of the then working farm). They are not in open countryside and are well located within the confines of the village and thus are an exception to the redundant building policy elsewhere in this plan. The Local Planning authority are well aware that this area has been and is available for inclusion in the housing supply for the last 30 years.
Proposed Actions/Changes
None.
Officer Response
The settlement boundaries have been drawn in accordance with a robust set of criteria. The Settlement Boundaries Background Papers (February 2012, April 2018 and October 2019) provide the evidence base and justification for the settlement boundaries shown on the policies maps.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
116	Historic England	13	Policy HAR1, Policy LOA1, Policy LOD1, Policy MAW1, Policy NEW1, Policy PYT1, Policy RUS1, Policy STA2, Policy SUT1, Policy THM1, Policy WAR1, Policy WEK1, Policy	Yes	Yes	Yes	Yes	Yes	Yes

			WES1 and Policy WIL1						
Reasons/Details of representation									
The policies are welcomed.									
Proposed Actions/Changes									
None.									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
117	Historic England	Policy WES2	Home Farm, Weston by Welland	Yes	Yes	Yes	Yes	Yes	Yes
Reasons/Details of representation									
Criteria a is welcomed.									
Proposed Actions/Changes									
None.									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
118	Historic England	18	Appendix 3 - Policies Maps					Yes	Yes

Reasons/Details of representation

It would be helpful to show the location of Broughton RPAG on the map.

Proposed Actions/Changes

None.

Officer Response

Noted.

Officer Recommended Change(s)

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
119	Historic England	18	Appendix 3 - Policies Maps	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation

The Historically and Visually Important Local Green Space designations are welcomed.

Proposed Actions/Changes

None.

Officer Response

Noted.

Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
120	Natural England	Policy DES5	Land to the south of Desborough						

Reasons/Details of representation

We appreciate that, regarding DE/210, Policy DES5 still includes a requirement for a strategy to manage Tailby Meadow Nature Reserve for the long-term. However, we advise that Policy DES5 requires the Council to ensure that a suitably worded condition is provided, when full permission is granted, for a Construction Environmental Management Plan (CEMP). This is to ensure measures to prevent sediment pollution in the River Ise are detailed and then delivered. We advised within our 27 July 2018 letter that priority habitats should be identified within your plan. We note that the MG4 grassland i.e. flood plain meadow associated with Tailby Meadow is not identified within the Plan, which is disappointing. The importance of this grassland deserves recognition in your plan, especially because there less than 1500ha of it remaining in the whole of England. Regarding DE/210, section 11.3.90 of the SA states that 'effects ought to be well known and possible to mitigate'. Therefore, it is critical that the LPP2 does consider the importance of MG4, and provide a requirement for a CEMP.

Proposed Actions/Changes

None.

Officer Response

The need for a condition requiring a Construction Environmental Management Plan will be considered through the planning application process. Criteria i requires an assessment of the impact on biodiversity and ecology and provision of mitigation where required.

Officer Recommended Change(s)

No changes recommended.

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
121	Natural England	Policy TCE2	Proposals for a Medium Sized Foodstore						
Reasons/Details of representation									
Natural England are pleased that Policy TCE2 includes our advice provided on 27 July 2018 (Our Ref: 250421) regarding GI corridors, within point (e).									
Proposed Actions/Changes									
None.									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
122	Natural England	Policy NEH1	Local Flood Risk Management Policy						
Reasons/Details of representation									
We are pleased that a section on flood risk and sustainable water management has been included, as well as policy NEH1.									
Proposed Actions/Changes									
However within Q4 paragraph 2 of our 27 July 2018 response we feel our following advice still needs to be included. 'We advise that to ensure the plan is sound and compliant with para's 20, 171 and 175c of the revised NPPF that wording is included in the SSP2									

that: Ensures development firstly avoids impacts on designated sites, and that the policy follows the avoid, mitigate, compensate hierarchy; protects and enhances the River Ise and Meadows SSSI from adverse impacts (including direct and indirect impact pathways of development). In particular, Natural England would support a policy within SSP2 which states that increased sediment [and nutrient] loading upstream of River Ise and Meadows SSSI will be avoided.'
Officer Response
Policy 4 of the Joint Core Strategy sets out the principle of refusing development where significant harm cannot be avoided mitigated or compensated. It is not necessary to repeat this in the SSP2.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
123	Natural England	Policy KET9	McAlpine's Yard, Pytchley Lodge Road						
Reasons/Details of representation									
None.									
Proposed Actions/Changes									
We note that South Field Farm Marsh SSSI and Slade Brook, which are important ecological assets, are not mentioned with respect to KE/184a. We advise that they are.									
Officer Response									
The Slade Brooke is referenced in paragraph 9.23.									
Officer Recommended Change(s)									
A minor amendment it proposed to update the supporting text to make reference to South Field Farm March SSSI. Refer to the Additional Modification Schedule, reference numbers AM16									

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
124	Natural England	General Comments	Site Specific Part 2 Local Plan- Publication Plan						
Reasons/Details of representation									
None.									
Proposed Actions/Changes									
Biodiversity Net Gain is not explicitly defined within the plan, or committed to. We advise your authority that Biodiversity Net Gain should have its own policy, and that the type of net gain being referred to is clarified throughout the Plan. We advise this particularly in light of the SA conclusions, which rely on the provision of biodiversity net gain to conclude the plan will achieve a 'significant positive effect'.									
Officer Response									
Policy 4 of the JCS requires a net gain in biodiversity. This does not need to be repeated in the SSP2.									
Officer Recommended Change(s)									
No changes recommended.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
125	Natural England	General Comments	Site Specific Part 2 Local Plan- Publication Plan						
Reasons/Details of representation									
None.									
Proposed Actions/Changes									

Biodiversity Net Gain is not explicitly defined within the plan, or committed to. We advise your authority that Biodiversity Net Gain should have its own policy, and that the type of net gain being referred to is clarified throughout the Plan. We advise this particularly in light of the SA conclusions, which rely on the provision of biodiversity net gain to conclude the plan will achieve a 'significant positive effect'.
Officer Response
Policy 4 of the JCS requires a net gain in biodiversity. This does not need to be repeated in the SSP2.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
126	Natural England	General Comments	Site Specific Part 2 Local Plan- Publication Plan						

Reasons/Details of representation
The protection of soil resources or Best and Most Versatile land is not mentioned within the plan. We again advise this is included, since it is a requirement of the NPPF.
Proposed Actions/Changes
The protection of Best and Most versatile agricultural land has been taken into account through the site assessment process.
Officer Response
The protection of Best and Most versatile agricultural land has been taken into account through the site assessment process.
Officer Recommended Change(s)
No changes recommended

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
127	Natural England	General Comments	Site Specific Part 2 Local Plan- Publication Plan						
Reasons/Details of representation									
None.									
Proposed Actions/Changes									
The Plan also does not mention how it will protect priority species, or prioritise development towards brownfield sites. We again advise this is included, since it is a requirement of the NPPF.									
Officer Response									
Policy 4 of the JCS sets out the approach to protection of priority species and Policy 6 of the JCS prioritises the re-use of previously developed land. There is no need for the SSP2 to repeat these policies.									
Officer Recommended Change(s)									
No changes recommended.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
128	Natural England	Policy NEH2	Green Infrastructure						
Reasons/Details of representation									
None.									
Proposed Actions/Changes									

We welcome the commitment in NEH2 regarding new GI. However we advise the wording 'where achievable' is removed.
Officer Response
This wording is necessary as it will not always be possible for this to be achieved.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
129	Natural England	Policy MAW2	Land to the West of Mawsley						

Reasons/Details of representation
None.
Proposed Actions/Changes
We are pleased that SANGS are mentioned within LP Policy MAQ2 (I) as a potential mitigation measure in response to our comments on the allocation of RA/174. However, we do advise that the wording 'this could include' is removed. As we wrote in 2018, the SANG is a minimum requirement at this location to protect Birch Spinney and Mawsley Marsh SSSI. Further, MAW2 will also require a commitment to provide a CEMP within the policy. Note, the watercourses and drains associated with this SSSI may be sensitive to development, and any potential for impact need to be investigated.
Officer Response
MAW2 I has been worded flexibly to ensure mitigation is informed by the assessment required to be undertaken.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
130	Local Resident	Policy MAW2	Land to the West of Mawsley	No	No	No	No	No	

Reasons/Details of representation

1) Development in Rural areas will be limited to that which will support the rural economy or meet a locally arising need that cannot be met more sustainably at a nearby larger settlement. (JCS policy 11) Neither of these objectives have been shown to be the case in Mawsley. 2) Some small scale growth to meet local needs in villages can have positive benefits. These can include allowing people who have lived in, or grown up in, a village to remain in that area. (The role of villages 13.5) The need for growth in Mawsley to meet the needs of existing residents is unlikely at present, due to the village being in it's infancy i.e no one has lived in or grown up in the village so are unlikely to be looking to downsize etc. Needs may change in the future but in present time there is no need for growth. 3) Small scale development may be permitted in villages where this will not exceed the capacity of the infrastructure and services. (The role of villages 13.3) The capacity of existing infrastructure is not sufficient as this is not a small scale development: - The scale of this development is large and the existing schools do not have the capacity or room for extention. - The bus service is extremely limited. - The medical center also at its limit. - Lack of sewerage capacity not addressed. - All residents need cars, due to poor services to the village, the Scale of development and extra cars it will bring to the village will overburden the existing access point especially off Cransley rise to the proposed development. - Roads not yet adopted by council. - The area is a flood zone and due to increasingly unpredictable weather and increased rainfall flood zones are needed, building on them can only increase the problem of floodwater. 4) The scale of development in individual villages is led by locally identified employment, housing, infrastructure and services requirements, as well as the form, character and setting of the village (Role of villages 13.6). There does not appear to be any consideration to the existing form character and setting of the village. The fact Mawsley is a new village seems to suggest that any increase in size is acceptable but any increase needs to be proportionate and considered as to it's need. The village size has already increased from the original intention - The settlement boundary appears to have been extended to include the proposed development? The layout of the village is considered a unique feature and as such the proposed infill will intrinsically harm it the unique character of the village. (Maw 13.1) - Consideration needs to be given to SSSI close to proposed development site. - Area of scrubland needs to be maintained and enhanced. Soft boundaries to countryside and open areas between houses need to be maintained. Specified density may be such that this is unachievable. - Existing built area of Cransley rise and Birch Spinney should not be extended beyond at all (RA/174 13.106) , the word significantly needs removing. (MAW2)

Proposed Actions/Changes
The plan needs to be reduced in size and take into consideration the need by existing residents and their families of which at the moment there is no evidence. The lack of infrastructure needs addressing. Consideration and respect need to be giving to Mawsly's village status. At the moment this is being ignored. The unique features of the village need to be maintained and enhanced with any development. Existing built area of Cransley rise and Birch Spinney should not be extended beyond at all (RA/174 13.106) , the word significantly needs removing. (MAW2)
Officer Response
The Categorisation of Villages: Background Paper (October 2019) provides a justification for the distribution of housing in the rural area. The issues raised have been considered through the site assessment work, the detail of this is included in the Housing Allocations Background Papers (2012, 2013, 2018 and 2019).Where appropriate, criteria have been included in Policy MAW2 to ensure issues identified through the assessment process are adequately addressed.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
131	Natural England	General Comments	Site Specific Part 2 Local Plan- Publication Plan - Habitats Regulations Assessment						

Reasons/Details of representation
1. The HRA conclusion in section 6 (page 26) is based on the assumption that golden plover fly 4km away from the SPA. However, it is known that golden plover can fly up to 15-20km away from the SPA. Therefore impact needs to reasonably assessed using this distance criteria. Until this assessment has taken place, we disagree with the conclusions of the HRA, and advise that your justifications are revised. 2. This information comes from Natural England's evidence-based Impact Risk Zones. The IRZs covered in our guidance aims to protect the SSSIs and their designated bird populations, as afforded by Part II of the Wildlife and Countryside Act 1981 (as amended) and

through the Conservation of Species & Habitats Regulations 2017 (as amended); for those SSSIs that are also classified as Special Protection Areas (SPAs). Note that two factors are taken into consideration when deciding on appropriate IRZs for SSSIs designated for bird populations: the Potential Impact Distance of development and the extent of Functionally Linked Land used by designated bird populations.
Proposed Actions/Changes
None.
Officer Response
The SSP2 is a part 2 plan and sits beneath the North Northamptonshire Joint Core Strategy (JCS) which is the Part 1 Local Plan. An HRA was completed for the JCS. The 4km zone used in the HRA for the SSP2 was chosen to match the JCS HRA where the use of that zone was agreed with Natural England.
Further advice has been sought from Natural England and an update will be provided at Committee.
Officer Recommended Change(s)
None

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
132	Natural England	General Comments	Site Specific Part 2 Local Plan- Publication Plan - Sustainability Appraisal						

Reasons/Details of representation
Within Table 11.6 ‘summary of effects’, we disagree with the ‘score’ for biodiversity because: (a) Biodiversity net gain is not explicated defined or committed too within the Plan. A specific overarching policy for biodiversity net gain is required within the Plan. (b) Natural England disagree with the conclusions of the HRA (c) As indicated above, there are policy wording changes and additions that are required to ensure all policies are sound.
Proposed Actions/Changes

None.
Officer Response
The SSP2 needs to be read alongside the North Northamptonshire JCS which is the Part 1 Local Plan. JCS Policy 4 requires a net gain in biodiversity and Policy 19 a net gain in Green Infrastructure, policy NEH2 also sets a requirements for net gain in GI. The score for biodiversity is therefore considered to be appropriate.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
133	Natural England	19	Appendix 4 - Infrastructure Delivery Schedule						

Reasons/Details of representation
We are aware of concerning phosphate levels regarding the Ise SSSI. We note that Appendix 4 of the Publication Plan suggests there may be an borough-wide update on the North Northamptonshire detailed water cycle study from 2009, however when this will be undertaken is unclear.
Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
134	Natural England	Policy DES5	Land to the south of Desborough						
Reasons/Details of representation									
We are pleased that Policy DE/210 includes a requirement for a Surface Water Drainage Assessment - we advise that relevant policies are updated when new strategic water cycle information is available.									
Proposed Actions/Changes									
None.									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
135	Local Resident	Policy MAW2	Land to the West of Mawsley	No	No	No	Yes	Yes	Yes
Reasons/Details of representation									
The plan does not take into account the original concept of the village layout. The village now has over 900 dwellings and that should not be increased for st least 50 years									
Proposed Actions/Changes									
None.									

Officer Response
The Categorisation of Villages: Background Paper (October 2019) provides a justification for the distribution of housing in the rural area.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
137	Carter Jonas LLP	Policy KET4	Land west of Kettering, Gipsy Lane	Yes		Yes	Yes	Yes	Yes

Reasons/Details of representation
<p>Peterborough Diocesan Board of Finance (PDBF) owns the land included within Site Allocation Ref. KET4: Land west of Kettering, Gipsy Lane. PDBF supports the proposed allocation and requests that it is retained unchanged in the final version of the Kettering Site Specific Part 2 Local Plan. The site benefits from an extant outline planning permission for residential development. PDBF is in the process of selling the site. It is considered that Site Allocation KET4 is consistent with the four tests of soundness. The reasons to support Site Allocation KET4 are provided below. The land included within the Site Allocation KET4 is a commitment because it has an extant outline planning permission for 350 dwellings. In summary, a planning application (Ref. KET/2015/0551) for 350 dwellings was submitted in 2015 and reported to Planning Committee in 2017. The application was recommended for approval but Planning Committee deferred making a decision on the application pending a further assessment of off-site highway improvement works. PDBF submitted an appeal in 2017 (Appeal Ref. APP/L2820/W/17/3177505). In 2018 the appeal was allowed, with the Inspector concluding that the proposed junction improvements would effectively mitigate the adverse impacts at the junctions. The appeal decision considered all aspects of the proposed development and concluded that it would be acceptable subject to conditions; a completed S106 Agreement was submitted during the appeal process. The principle of development at the site for 350 dwellings was established through the appeal process. The date of the appeal decision was 21st February 2018, and Condition No.2 requires an application for the approval of reserved matters to be made within 3 years from the date of the permission i.e. before 21st February 2021. It is normal practice for emerging local plan documents to identify sites with planning permission as a commitment, and to include a site specific policy for those larger sites with outline planning permission against which future applications can be considered. Therefore, the decision to include a site specific policy for KET4 is justified. The application and appeal processes considered all of the potential impacts of the proposed development. Policy KET4 includes criteria so that significant impacts are addressed; it is noted that all of these impacts are addressed in conditions or the S106 Agreement for the outline planning permission. The</p>

relevant policy criteria and related conditions are listed as follows: residential amenity - see Condition No.5; noise mitigation measures - see Condition No.23; surface water flow paths - see Condition No.14; site specific flood risk assessment - see Condition No.14; ecological management plan and additional surveys - see Condition Nos.17 and 18; highway access and junction improvements - see Condition No.26; and, design and character - see Condition No.5. There is no specific condition requiring a net gain in biodiversity, although it is anticipated that ecological enhancements would be provided as part of the ecological management plan that is required through Condition Nos.17 and 18, and in any event Paragraph 170 of the NPPF now requires net gains in biodiversity to be demonstrated as part of development. The affordable housing requirement for the proposed development is contained in the S106 Agreement for the outline planning permission. The Sustainability Appraisal for the Part 2 Local Plan demonstrates that the site (referred to as Site Ref. KE/011) scores well against most sustainability objectives e.g. mostly green and amber. The assessment of the site acknowledged that the proposed development has outline planning permission, and as such significant adverse impacts had been identified and suitable mitigation measures are provided. It is noted that the site scores 'severe constraint - red with two crosses' for cultural heritage related sustainability objectives. The cultural heritage constraint relates to archaeology. However, Condition No.12 of the outline planning permission requires a written scheme of investigation to be submitted and approved prior to the commencement of development, in order to enable any archaeological remains on the site to be recorded. Therefore, it has been determined at planning application stage for the proposed development that mitigation measures are possible to address impacts on cultural heritage at the site, and as such the findings in the Sustainability Appraisal that this issue is a 'severe constraint' is not correct and should be amended. In addition, the site is located within the town boundary of Kettering, which is identified as a Growth Town in the North Northamptonshire settlement hierarchy and a focus for new housing because it is a sustainable location for development - see Policies 11 and 29 of the North Northamptonshire Joint Core Strategy (adopted July 2016). Table 1 which supports Policy 11 (of the North Northamptonshire Joint Core Strategy) expects development requirements to be met through the re-use of previously developed land, sustainable urban extensions and smaller greenfield sites at the Growth Towns including Kettering; the decision to allocate Site Ref. KET4 would be consistent with this approach. Furthermore, Site Ref. KET4 Land West of Kettering is included within the Council's Housing Land Supply Background Paper (dated October 2019) as a site that contributes towards the housing land supply during the short and medium term. As such, the site contributes towards the Council being able to demonstrate a five year housing land supply. The landowner is progressing a sale to a house builder with completion targeted in spring 2020. It is anticipated that a reserved matters application will be forthcoming thereafter. In conclusion, it has been demonstrated through the planning application process and the Sustainability Appraisal that the site is suitable for the proposed development, and since development has not started it would be appropriate to allocate the site in the Part 2 Local Plan. The site is suitable, available and deliverable for the proposed development specified in Policy KET4. If appropriate a Statement of Common Ground could be prepared between the Council and PDBF to confirm that Site Allocation KET4 is suitable for allocation in the Part 2 Local Plan.

Proposed Actions/Changes

No changes are needed in respect of Policy KET4, and it is requested that this policy and the associated site allocation are retained.

Officer Response

Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
138	Wacoal Europe Ltd	Policy DES3	Opportunity Environmental Improvement Sites in Desborough	Yes	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation

We represent Wacoal Europe Ltd and have been asked to respond to this consultation on their behalf. Wacoal Europe Ltd are a UK based supplier of high quality, fashion conscious lingerie and bra-sized swimwear stocked in over 5,000 retailers including national and independent stores, as well as online, in more than 30 countries. Whilst they have regional offices in London, Paris (France), Lyon (France), Krakow (Poland), New York (USA), Boston (USA), and Melbourne (Australia), Wacoal Europe Ltd.'s global head office and prime distribution facility faces onto Rothwell Road, Desborough Wacoal's Desborough premises comprise their main global distribution facility. Given the number of delivery vehicles that need ready access to their site on a daily basis, Wacoal are conscious of the impact on their business, direct or indirect, of changes to the road network and particularly the use, capacity, operation, signalling or layout of the B575 or any changes thereto. This includes any changes in capacity or use that could increase the likelihood for traffic incidents that could impede or curtail the use of the B576 and specifically servicing access to their premises. A restricting factor for Wacoal is the fact that larger commercial deliveries can only access their premises from the national road network via a single route through the centre of Desborough. This is the route from the A6, via the B575 Harborough Road and then Rothwell Road. The reason being the 7.5 tonne weight restrictions placed upon the local road network surrounding Wacoal Europe Ltd.'s Desborough premises (principally to the B575 Rothwell Road south of its junction with Pioneer Avenue and also to Gold Street/ Braybrooke Road). Wacoal would be opposed to any narrowing of the B576, or the reduction in carriage width at any of the various road junctions along the B576 within Desborough. The reason being that any narrowing will increase the proximity of larger delivery vehicles to other road users, particularly cyclists. Wacoal's view is that this will increase the potential risk of collisions and so threaten their business. Similarly, were the road to be narrowed, this would make travel along this stretch of the B576 less attractive to cyclists; in contract to KBC's desire for a multi-modal shift away from car transport. As regards cyclists,

<p>Wacoal's preference would be for a distinct cycle way to be provided on the route of the B576 but not part of, and physically separated from the current carriageway. This would link the current cycle paths to the north of the railway bridge in Desborough with the cycle route from Rothwell which currently ends at the bridge over the River Ise. Wacoal would also challenge some of the comments made as part of this consultation supporting requests for a narrowing of the B576: There appears to be insufficient evidence of major traffic incidents. Wacoal have not been provided with evidence that a narrowing of the road would have prevented the minor incidents recently recorded north of their premises.</p>
<p>Proposed Actions/Changes</p>
<p>None.</p>
<p>Officer Response</p>
<p>The intention of Policy DES3 is to provide opportunities to create a more attractive town centre. These opportunities were identified in the Desborough Urban Design Framework. The detail of these schemes needs to be developed and would take into account potential impacts of any scheme on the road network.</p>
<p>Officer Recommended Change(s)</p>
<p>No changes recommended.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
139	Wacoal Europe Ltd	Policy DES6	Land adjacent to Magnetic Park, Harborough Road, Desborough	Yes	Yes	Yes	Yes	Yes	Yes

<p>Reasons/Details of representation</p> <p>Policy DES6 We represent Wacoal Europe Ltd and have been asked to make representation on their behalf. Wacoal Europe Ltd are a UK based supplier of high quality, fashion conscious lingerie and bra-sized swimwear stocked in over 5,000 retailers including national and independent stores, as well as online, in more than 30 countries. Whilst they have regional offices in London, Paris (France), Lyon (France), Krakow (Poland), New York (USA), Boston (USA), and Melbourne (Australia), Wacoal Europe Ltd.'s global head office and prime distribution facility faces onto Rothwell Road, Desborough Wacoal's Desborough premises comprise their main global distribution facility. Given the</p>

<p>number of delivery vehicles that need ready access to their site on a daily basis, Wacoal are conscious of the impact on their business, direct or indirect, of changes to the road network and particularly the use, capacity, operation, signalling or layout of the B575 or any changes thereto. This includes any changes in capacity or use that could increase the likelihood for traffic incidents that could impede or curtail the use of the B576 and specifically servicing access to their premises. A restricting factor for Wacoal is the fact that larger commercial deliveries can only access their premises from the national road network via a single route through the centre of Desborough. This is the route from the A6, via the B575 Harborough Road and then Rothwell Road. Respectively Rothwell Road (south of Pioneer Avenue), Braybrooke Road (from its junction with Harborough Road to the edge of the town), Stoke Road, Pipewell Road and Rushton Road (where it passes through Rushton) are all weighted restricted routes (to 7.5 tonnes). Consequently, whilst these restrictions remain, vehicles exceeding 7.5 tonnes seeking to access Desborough may do so only via Harborough Road and Brampton Wood Road (the latter being a somewhat narrower road compared to Harborough Road). So a closure of Harborough Road has the potential to create problems with deliveries not just for Wacoal but for businesses generally within Desborough. Whilst Wacoal would support the designation of this site for employment, they believe that the access arrangements for the site need to be carefully considered to minimise, so far as is possible, the risks of any traffic incidents particularly given that the weight restrictions elsewhere increase the possibility that any collision on Harborough Road could involve a larger vehicle. Consequently Wacoal believe that, in designating this site for employment, a condition should be placed upon developers such that they will be required to place a median barrier on the centre line of the carriageway to prevent any right turns into or out of the development from the B576. Vehicle should instead have to effect left turns to enter or exist the site, using the traffic islands to the east and west to change direction.</p>
<p>Proposed Actions/Changes</p>
<p>None.</p>
<p>Officer Response</p>
<p>Northamptonshire County Council highways has been consulted through the site assessment process. They have not identified the mitigation proposed as a requirement. Therefore, it is not considered appropriate to include a criteria requiring the proposed mitigation. Through the planning application process detailed assessment would be undertaken to ensure that the proposed assess to the site does not have an unacceptable impact on the highway network.</p>
<p>Officer Recommended Change(s)</p>
<p>No changes recommended.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
140	Shoosmiths LLP	Policy NEH3	Historically and Visually Important Local Green Spaces	No			No		
Reasons/Details of representation									
<p>These representations relate specifically to the designation of HVI028 as Historically and visually important Local Green Space under policy NEH3 and are made on behalf of the owner of land that is subject to that designation. Consistent with the reasons given and amplified in representations previously made by and on behalf of our client: HVI028 is contrary to paragraph 100 on the National Planning Policy Framework (NPPF) concerning the designation of Local Green Space; HVI028 does not meet the requirements of NPPF, paragraph 100 (b); it is not demonstrably special to the local community nor does it hold particular local significance. It does not possess particular beauty, historic significance, recreational value, tranquillity or richness of wildlife. HVI028 is therefore not justified; NPPF, paragraph 101 dictates that policies for managing development within a Local Green Space should be consistent with those for Green Belts. Development on a Local Green Space would therefore be prohibited except in very special circumstances. In this respect, HVI028 would only serve to restrain sustainable patterns of development within Loddington that (but for Policy NEH3 and HVI028) would accord with the Plan as a whole. The designation of HVI028 as Local Green Space is based on an assessment that it is "a key open space in the setting of the village and for numerous listed buildings. It provides views to the Grade II Listed Church and creates the rural character for the village". However, in so far as that is correct (which is not admitted), the settings of the listed buildings and of the village as a whole is already afforded sufficient and appropriate statutory protection by virtue of their listing and the designation of the Loddington Conservation Area.</p>									
Proposed Actions/Changes									
The deletion of HE1028									
Officer Response									
<p>The Historically and Visually Important Local Green Spaces have been identified through a robust assessment process. The Historically and Visually Important Local Green Space Background Papers (September 2015, June 2016 and October 2019) provide the evidence base and justification for the Historically and Visually Important Local Green Space identified on the policies maps.</p>									
Officer Recommended Change(s)									
No changes recommended.									

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
141	King West	13	Policy MAW2	Yes	Yes	Yes	Yes	Yes	Yes
Reasons/Details of representation									
None.									
Proposed Actions/Changes									
None.									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
142	Local Resident	Table 8.1	Designated Natural Assets					Yes	Yes
Reasons/Details of representation									
<p>8.1 Problems have been identified with our bodies of water being polluted. Public campaigns can be conducted alongside practical measures to try and improve the quality of the water. The potential shortage of water identified in this document needs to be tackled. Also, a project would be welcomed as part of which residents can contribute in person or financially to the planting of trees. I propose planting a new tree for every resident born in the Kettering area, with the parents receiving a certificate and an approximate location of the tree. This system is already in operation in Wales, where it has been proven to be successful. The fact that 'climate change' is not mentioned anywhere is probably not unlawful, but it gives cause for concern. Particularly since the statement that there are no problems with air quality was based on incorrect figures which have recently been corrected. The corrected figures show that there are air quality problems in the</p>									

town centre. We cannot take it for granted that these measurements will decline. Although exhaust fumes may become gradually cleaner, the volume is increasing due to increasing traffic flows and the growing population in general. Public transport and cycle lanes are crucial to remedy this proven risk to public health.
Proposed Actions/Changes
None.
Officer Response
Noted. Policy 9 of the JCS requires new residential development to incorporate measures to limit water use.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
143	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation
Section 8: protection of water bodies. I am concerned to find out that the protection of wildlife in Cransley reservoir may be reduced. We need to protect our wildlife.
Proposed Actions/Changes
None.
Officer Response
Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently

protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
144	Local Resident	6	Town Centres						
Reasons/Details of representation									
6 Town centres - there should be community centres in every ward. There is no community centre in Pipers Hill Ward.									
Proposed Actions/Changes									
None.									
Officer Response									
Noted. Policy HWC2 provides support for proposals for new community facilities.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
145	Local Resident	7	Health and Well-being and						

			Community Facilities						
Reasons/Details of representation									
There is no mention of Climate Change in the plan. This is a huge oversight. Climate change poses a big risk to the public. It should have an impact on how we approach electric vehicle charging points, monitoring air quality, installing cycle paths and walkways, providing storage space for bikes in new developments, etc.									
Proposed Actions/Changes									
Noted.									
Officer Response									
Paragraph 2.16 sets out how the plan will contribute towards outcome 2 of the JCS – adaptability to climate change.									
Officer Recommended Change(s)									
No changes are recommended.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
146	Local Resident	4	Housing					Yes	Yes

Reasons/Details of representation									
4 Housing requirements: more emphasis should be placed on ground heating pumps. For groups of council houses, ground heating pumps should be the default source of energy, also as a flagship project for other developments. Special advice and support should be available for developments incorporating ground heating pumps. There could be a public awareness campaign to promote them.									
Proposed Actions/Changes									
None.									
Officer Response									
Noted.									
Officer Recommended Change(s)									

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
147	Local Resident	8	Flood Risk and Sustainable Water Management						

Reasons/Details of representation

Concerted efforts should be made to clean and maintain our water bodies. Also to look into finding a new way to store water reserves, as suggested in the plan. Sufficient attention should be given to this since water shortages would have drastic implications.

Proposed Actions/Changes

None.

Officer Response

Noted.

Officer Recommended Change(s)

Noted.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
148	Hanwood Park LLP	9	Kettering and Barton Seagrave	No	No	No	No	Yes	Yes

Reasons/Details of representation

Paragraph 9.1 of the Plan provides the context for housing delivery requirements to be provided within Kettering Borough during the plan period up to 2031. It states: 'The housing requirement for the town is set out in the North Northamptonshire Joint Core Strategy is 6,190 in

the period 2011-2031. The majority of this growth will be provided through the Kettering East Sustainable Urban Extension, known as Hanwood Park.’ This statement acknowledges that the growth in Kettering is heavily reliant upon the delivery of Hanwood Park. Whilst it is acknowledged that development is well underway and there is a current extant outline permission, numerous reserved matters approvals and other consents for the housing delivery on site, the Council is aware that the time period to submit reserved matters on this permission expires on 31st March 2020. Our client has committed to a Planning Performance Agreement (‘PPA’) with the Council to agree to the submission of a new outline planning application largely based upon the current permission to allow for the continued delivery of the Hanwood Park development and all its associated housing, employment, infrastructure and other benefits. However, despite this and the Council’s reliance upon the development (e.g. for future housing delivery, 5-year housing land supply and other reasons) our client is surprised and disappointed that there is no associated allocation and Hanwood Park-site-specific policy included within the emerging Plan. For the reasons set out, our client considers that this should be remedied as soon as possible, for the Plan to be effective, deliverable and be ‘sound’. In addition, the justification for the housing trajectory as indicated in Appendix 1 of the SSP2 is unclear. Table 16.1 of the Plan shows a total of 3,525 completions on the Kettering East SUE between 2019/2020 and 2030/2031. However, the housing trajectory commits to the delivery of 5,500 homes by 2031. Since 856 dwellings of those commitments have already been approved, delivered or are in the process of being delivered, this would indicate a remainder of 4,644 dwellings (not 3,525 as suggested). This should be amended and clarified in the Plan.

Proposed Actions/Changes

In order to meet the tests of soundness in the NPPF, we would request the inclusion of an allocation, inclusion on the Proposals Map and additional housing site-specific policy in Section 9 of the Plan, identifying the Kettering East SUE (Hanwood Park) and seeking to support and reinforce the housing, employment, education, leisure, community and associated infrastructure commitments associated with the on-going development of the site. Whilst significant efforts are underway to ensure timely reserved matters are submitted and approved for the continuation of Phase 1 delivery at Hanwood Park, and for the ‘renewal’ of the outline planning permission, there is currently no planning policy ‘hook’ or justification to ensure the principles of the development endure in the emerging Plan and support any future applications, which are vitally important for the delivery of Hanwood Park as a sustainable urban extension to the town.

Officer Response

The Kettering East SUE is a strategic site, the SSP2 only deals with non-strategic sites. A policy relating to this site would need to be considered through a review of the North Northamptonshire Joint Core Strategy. The Housing Trajectory is based on figures provided by Hanwood Park for the first five years and on the trajectory agreed through the JCS for the remaining period to 2031. These do not total 5,500 as it is anticipated that the development will continue to be built out beyond 2031.

Officer Recommended Change(s)

No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
149	Hanwood Park LLP	5	Employment Allocations	No	No	No	No	Yes	Yes
Reasons/Details of representation									
<p>No additional employment allocations for Kettering are stipulated in the SSP2. Notwithstanding this, the North Northamptonshire Joint Core Strategy 2011-2031 (JCS), in addition to the Council relying on the housing numbers of this site, relies on the provision of employment parcels at Hanwood Park to justify employment floorspace and thereby ensure sustainable development across Kettering. Policy 23 of the JCS specifies a job creation target of 8,100 for Kettering Borough in the period 2011-2031, the scale and mix of which will be supported by the committed SUEs, including Hanwood Park. The Employment Land Review and Allocation Background Paper (as referred to in Paragraph 5.21) projects a total of 42,400 sqm of floorspace to be provided at the Kettering East SUE within the plan period up to 2031, yet the KBC SSP2 fails to make explicit how this will be achieved. There is no adequate or effective policy to safeguard the employment supply at the Kettering East SUE.</p>									
Proposed Actions/Changes									
<p>Therefore, as indicated above, a Hanwood Park site-specific policy for Hanwood Park is essential to support the development of on-site employment, and to achieve the JCS target. Therefore, in order for the Plan to be effective and 'sound', our client considers that a site-specific allocation and policy should be included within the Plan and referred to within Section 5 of the SSP2.</p>									
Officer Response									
<p>The Employment Allocations Background Paper sets out the Council's approach to employment allocations in the plan period, 2011-2031 covered by the Site Specific Part 2 Local Plan. Hanwood Park is a strategic site and therefore will not be considered for allocation in the Site Specific Part 2 Local Plan and this matter should be dealt with through the future review of the North Northamptonshire Joint Core Strategy.</p>									
Officer Recommended Change(s)									
None.									

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
150	Hanwood Park LLP	Policy NEH4	Open Spaces	No	No	No	No	Yes	Yes

Reasons/Details of representation

Hanwood Park LLP also note reference to the Kettering Open Space Strategy (OSS) in paragraphs 8.45-8.47 and Policy NEH4. However, the Open Space Strategy has not yet been published or available to view as part of the evidence base for the Local Plan and so in light of this, HPL fail to see how Policy NEH4 can be considered to be justified, effective or positively prepared and therefore fails the test of soundness.

Proposed Actions/Changes

HPL request that this document is published as part of the evidence base in the interests of transparency and consider that the policy cannot be justified without the appropriate evidence base.

Officer Response

See below.

Officer Recommended Change(s)

A Main Modification is proposed to address the issues raised in this response. Refer to the Main Modification Schedule, reference number MM6

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
151	Home Builders Federation Ltd	Policy BLA6	Bosworth Nurseries and Garden Centre,	No	No	No	No	Yes	Yes

			Finedon Road, Burton Latimer						
Reasons/Details of representation									
It is noted that in Policy BLA6 there are more than one criterion references to affordable housing provision, which are not consistent. Criterion (d) includes the provision of a minimum of 30% affordable homes whilst Criterion (h) provides 30% of dwellings as affordable housing in accordance with Policy 30 of the adopted NNJCS.									
Proposed Actions/Changes									
Before the SSPP2 is submitted for examination, Policy BLA6 should be amended to delete Criterion (d) and retain Criterion (h).									
Officer Response									
See below.									
Officer Recommended Change(s)									
A Main Modification is proposed to remove criteria d. Refer to the Main Modification Schedule, reference number MM27									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
152	Home Builders Federation Ltd	Policy HOU2	Older Persons Housing	No	No	No	No	Yes	Yes

Reasons/Details of representation									
Under Policy HOU2, on sites of 50 or more dwellings, the Council will seek the provision of a proportion of dwellings that are suitable to meet the needs of older people. The precise proportion, type and tenure will be determined by taking account of the viability of the scheme; evidence of local need; and the scale and location of the site. It is not necessary for the SSPP2 to re-address issues dealt with in the adopted NNJCS. Any local detail set out in the SSPP2 should not duplicate policies adopted in the NNJCS. Policy 30 : Housing Mix and Tenure of the adopted NNJCS sets out the strategic approach for provision of a mix of dwelling sizes and tenures to meet the housing needs including specialist forms of housing for older people. New development on allocated SUEs and strategic sites are also encouraged to make specific provision for specialist housing requirements for older persons including sheltered and extra care accommodation. Policy HOU2 is repetitive. All households should have access to different types of dwellings to meet their housing needs. The Council's focus should be ensuring that appropriate sites are allocated to meet the needs of specifically identified groups. The SSPP2 should ensure that suitable sites									

are available for a wide range of types of development across a wide choice of appropriate locations. Furthermore the 2019 NPPF states that policies should be clearly written and unambiguous so that a decision maker knows how to react to a development proposal (para 16d). The Council's proposed policy approach on the proportion, type and tenure of older persons housing is somewhat vague, which causes uncertainty for developers. If the policy is to be effective, the Council should provide further clarification of its requirements, which should be justified by supporting evidence on the housing needs of older people.
Proposed Actions/Changes
Before the SSPP2 is submitted for examination, Policy HOU2 should be amended or preferably deleted.
Officer Response
The need for older persons housing is identified in the Strategic Housing Market Assessment (SHMA) Update, 2015 which identified that 56% of the total projected housing growth for Kettering between 2011 and 2031 was for 65+ households. HOU2 does not duplicate policy 30 of the JCS. To meet the need identified for older persons housing it will be important for non-strategic sites to contribute towards meeting provision, however Policy HOU2 is flexible to ensure viability of schemes as well as site specific circumstances are taken into account.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
153	Home Builders Federation Ltd	Policy HOU4	Self-Build and Custom Build Housing	No	No	No	No	Yes	Yes

Reasons/Details of representation
Under the Self Build & Custom Housebuilding Act 2015, the Council has a duty to keep a Register of people seeking to acquire self & custom build plots and to grant enough suitable development permissions to meet identified demand. The NPPG (ID: 57-025-201760728) sets out ways in which the Council should consider supporting self & custom build. These are :- developing policies in the Plan for self & custom build ; using Council owned land if available and suitable for self & custom build and marketing such opportunities to entrants on the Register ; engaging with landowners who own housing sites and encouraging them to consider self & custom build and where the landowner is interested facilitating access to entrants on the Register ; and working with custom build developers to maximise opportunities for self & custom housebuilding. It is noted that Policy 30 of the adopted NNJCS provides support / encouragement for self & custom build schemes and requires a percentage of such plots on SUEs and strategic allocations. The HBF is supportive of proposals to encourage self &

custom build for its potential additional contribution to overall HLS therefore the HBF is supportive of Policy HOU5 : Single Plot Exception Sites for Custom and Self-Build. The HBF is not supportive of restrictive policy requirements for the inclusion of self & custom build housing on residential development sites, which only change housing delivery from one form of house building to another without any consequential additional contribution to boosting housing supply. The HBF object to Policy HOU4, which states that :- Housing developments of 50 or more dwellings should provide 5% of plots to be made available as self-build or custom build serviced plots. This provision will take account of evidence of local need, the nature of development proposals and viability. Serviced building plots, which have been appropriately marketed at a prevailing market value, not sold after 6 months can be built out by the developer. The provision of serviced plots for self & custom build on residential development sites of 50 or more dwellings should not be sought. This policy requirement seeks to place the burden for delivery of self & custom build plots onto developers contrary to national guidance, which outlines that the Council should engage with landowners and encourage them to consider self & custom build. The Council's proposed policy approach should not move beyond encouragement by seeking provision of self & custom build plots on residential development sites of 50 or more dwellings. All policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned. The Council's Self & Custom Build Register alone is not a sound basis for setting a specific policy requirement. As set out in the NPPG, the Council should provide a robust assessment of demand including an assessment and review of data held on the Council's Register (ID 2a-017-20192020), which should be supported by additional data from secondary sources to understand and consider future need for this type of housing (ID 57-0011-20160401). The Council should also analyse the preferences of entries as often only individual plots in rural locations are sought as opposed to plots on larger housing sites. It is also possible for individuals and organisations to register with more than one Council so there is a possibility of some double counting. The Register may indicate a level of expression of interest in self & custom build but it cannot be reliably translated into actual demand should such plots be made available. The Council's supporting evidence is set out in Self-Build and Custom Build Housing Background Paper dated August 2019. As at March 2019, there were 31 entries. All indicated a preference for individual serviced plots. Of locations sought 34.5% were in Kettering, 17% were in Burton Latimer, 3.5% were in Desborough and 49% were in Rural Area. By July 2019, only 41 people were entered on the Council's Register. The level of modelled demand (714 dwellings between 2019 - 2031) in the Three Dragons Report (Custom and Self Build Demand Assessment Framework December 2018 in Appendix 1) represents an aspiration, which should not be considered as a strict target or a primary source in determining demand. Between 2015/16 - 2017/18, the demand on the Council's Register was met by the granting of permissions of single dwelling schemes on an annual basis. Against minimal demand, there is a potential over supply of self & custom build plots from the Council's windfall site allowance of 621 dwellings, Policy HOU5, SSPP2 allocations, KTCAAP allocations not currently benefiting from planning permission and sites only currently benefitting from outline planning permission. The Council's policy approach should be realistic to ensure that where self & custom build plots are provided, they are delivered and do not remain unsold. It is unlikely that the allocation of self & custom build plots on housing sites of 50 or more dwellings can be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on a housing site from both a practical and health & safety perspective it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. If

demand for plots is not realised, there is a risk of plots remaining permanently vacant effectively removing these undeveloped plots from the Council's HLS. There is no such deduction from the Council's estimation of its HLS. Where plots are not sold, it is important that the Council's policy is clear as to when these revert to the original developer. It is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible from the commencement of development. The consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. There are even greater logistical problems created if the original housebuilder has completed the development and is forced to return to site to build out plots which have not been sold to self & custom builders. The 2019 NPPF states that policies should be clearly written and unambiguous so that a decision maker knows how to react to a development proposal (para 16d). The requirement for appropriate marketing at prevailing market value is vague, which causes uncertainty for developers. If the policy is to be effective, the Council should provide further clarification of its requirements, which should be justified by supporting evidence. As well as on-site practicalities any adverse impacts on viability should be tested. It is the Council's responsibility to robustly viability test the SSPP2 in order that the cumulative impact of infrastructure, other contributions and policy compliant requirements are set so that most development is deliverable without further viability assessment negotiations at planning application stage and the deliverability of the SSPP2 is not undermined. The Whole Plan Viability Assessment SSPP2 dated December 2019 by Aspinall Verdi does not test the financial impact of Policy HOU4. The Council is also reminded that self & custom build are exemption from Community Infrastructure Levy (CIL) contributions and affordable home ownership provision as set out in national policy. On housing sites of 50 or more dwellings, fewer dwellings are eligible to make contributions towards infrastructure and affordable housing, which may have detrimental impacts. The Council may have aspirations for self & custom build but this should not be pursued at the expense of delivering affordable housing.

Proposed Actions/Changes

Before the SSPP2 is submitted for examination, Policy HOU4 should be deleted. There is insufficient evidence in the Self Build Register to demonstrate significant demand in the Borough, the proposed site threshold is unjustified and policy wording is unclear, which will be ineffective.

Officer Response

The Self and Custom Build Background Paper sets out the approach for determining the contents and subsequent thresholds included in Policy HOU4. It is recognised that the level of demand, as determined by the register in March 2019, as the base date for the aforementioned background paper, does not match the level of potential supply and delivery of self and custom build plots as identified in the Self and Custom Build Background Paper. However, as set out in the background paper the register is unlikely to show the true extent of demand in the borough, as it is reasonable to assume not all interested parties who have interest in building their own home are likely to be on the register.

As a result, additional sources of data have been used to model the likely demand over the longer term. The data from the Three Dragons report has been used to calculate this demand over the next 10 years, towards the end of the plan period. It is also recognised that single dwelling schemes have the potential to be self-build or custom build schemes as stated in the Three Dragons report. The amount of single dwellings schemes matches closely to that to the number of entries on the register, however although this is an indication of delivery of self-build and custom build properties, there is no guarantee that these permissions represent self-build and custom build projects. Therefore, given that the evidence presented in the Self and Custom Build Background Paper presents a much larger demand for this type of housing as determined by the register, it is considered that using a threshold and percentage based policy is a proactive mechanism. It is considered that it will deliver a reliable and consistent supply for this type of housing in the long term, based on the potential demand as determined by the Three Dragons report. It also represents a pro-active approach to the delivery of this type of housing in the Borough. Government guidance does not require the specific preferences as indicated through the register, the only requirement of the local authority is that the sufficient permissions are granted in accordance with the level of demand that has been determined by the register. Whilst the logistical issues relating to the delivery of this type of housing are recognised, it is considered that Policy HOU4 sufficiently addresses these issues, specifically in relation to marketing of plots which remain unsold after 6 months can be built out by the developer. This timeframe is considered reasonable and practicable.

Officer Recommended Change(s)

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
154	Director Armstrong Rigg Planning on behalf of Weetabix	Policy EMP1	Safeguarding Employment Land	No	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation

Until publication of this version of the Kettering Local Plan, the Weetabix site was not allocated or protected by a site-specific employment policy. We are informed that this change was justified by the findings of the Employment Allocations Background Paper (August 2019). Without any discussion with my client, the report assesses the site (Site KE11) and notes that 'the units on the estate are generally bespoke

and if occupiers vacate, it may be difficult to find new occupiers to take the place'. In terms of opportunities to extend, the review notes that there is 'an opportunity to expand to the north of the estate' and confirms that this is the only option given the constraints on the remaining boundaries. The constraints to achieving such extension are noted as 'land ownership and planning constraints'. If the Council had spoken to Weetabix they would have been informed that they had bought the land to the north (known as the expansion land) with the prime purpose of expanding existing operations or to accommodate new business. The expansion land is key to Weetabix' ability to be able to secure the long-term future of the site and the current employee numbers (700+). Given the dated appearance of many of the buildings, this expansion land will be required in the future to be able to accommodate the relocation/replacement of existing facilities. It may also be required to locate new facilities on site such as a new factory or processing plant. If the expansion land is not included with the allocation or enabled to become part of it, it could affect the long-term future of Weetabix. Without the certainty of the expansion land being included as part of the allocation, the council are not providing one of their largest employers the certainty they need for the future.

Proposed Actions/Changes

Positive discussions have taken place with the Council since Weetabix have been aware of the proposed allocation. Whilst our preference is for the inclusions of the expansion land with the allocation, the Council have offered to amend the wording of the policy EMP 1 to take account of our concerns as follows: It is recognised that there may be circumstances where parts of employment sites need to be redeveloped or expanded to enable existing businesses to grow and/ or modernise. In these circumstances the preparation of Development Briefs/ Masterplans which inform proposals for the future development of the employment site will be supported. Where an extension is proposed to an existing employment area to enable an existing business to expand or modernise, and the proposed expansion area is located immediately adjacent to a safeguarded employment area but outside the settlement boundary, consideration will be given to the degree of conflict the proposal has with policies which seek to protect the open countryside, and the potential benefits of the proposal in terms of retention and enhancement of employment provision and impact on the local area. The Council then seeks to retain the original policy text unaltered before concluding with the additional text below: Where proposals for the expansion or modernisation of a safeguarded employment site involve the redevelopment or extension of a site, the preparation of a Development Brief/Masterplan, which informs proposals for the future development of safeguarded employment areas, will be supported. Extensions to existing employment areas which are immediately adjacent to safeguarded employment areas will be assessed taking into account the degree of conflict with Policy RS4. Following discussions with Weetabix these proposed changes to the policy are the minimum which we can agree to. We hope to agree a Statement of Common Ground with the Council for presentation to the Local Plan Inquiry. We also propose to prepare and agree a development brief for the whole site, including the expansion land with the Council in advance of the Local Plan Inquiry In addition to the above and to ensure the delivery of the expansion land, the draft settlement boundary should be changed as shown on the drawing attached. The Council are recommending that the current northern boundary of the Weetabix site should be extended as planning permission was granted for a new building in 1998 in part of the expansion land. This amendment is justified as satisfying principles 1, 2(b) and 2(c). Whilst we welcome this amendment, we have reviewed these principles (as set out in the Background paper: Settlement Boundaries (Update) April 2018) and we believe that there is a strong case for the whole of the expansion land being included in the

Item 6 Appendix 1

<p>settlement boundary as set out below: Principle 2(a) The whole site is in the ownership of Weetabix and is planned to be included within the main site. The Council's evidence notes that is the only option for expansion and have already approved planning permission in this area. Principle 2(b) Whilst not consisting of built form, it is an essential element of the Weetabix business. Principle 3 - The whole of the expansion land is separated from the open countryside with existing built form to the south and east, a railway line and strategic employment to the west and the A14 large scale warehouses to the north. As such the site is 'contained and visually separated from the open countryside'.</p>
<p>Officer Response</p>
<p>A Main Modification is proposed to add the additional wording proposed by the Council. Refer to the Main Modifications Schedule, MM1. The settlement boundaries have been drawn in accordance with a robust set of criteria. The Settlement Boundaries Background Papers (February 2012, April 2018 and October 2019) provide the evidence base and justification for the settlement boundaries shown on the policies maps.</p>
<p>Officer Recommended Change(s)</p>
<p>No changes recommended to the settlement boundary.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
155	P R Kettering Ltd c/o Ellandi LLP	2	Vision	No	No	No	No	Yes	Yes

<p>Reasons/Details of representation</p> <p>Draft SSP2 includes visions for the town centres of Rothwell, Desborough and Burton Latimer as follows: 'Rothwell town centre will be an attractive thriving historic town. The focus will be on protecting and preserving the historic core and enhancing the vitality and viability of the town centre. Desborough town centre will be regenerated to create a focus for shops and facilities within an enhanced environment. Burton Latimer town centre will have an improved offer of shops and facilities with an enhanced environment'. No such vision is provided for Kettering Town Centre. This is presumably because it is outlined to an extent by the JCS (Page 26): 'Kettering will be the largest retail centre and its vibrant town centre, regarded for being characterful, distinctive and fun, will provide a focus for its surrounding market towns and villages'. There is also a separate development plan document for Kettering Town Centre, namely the Kettering Town Centre Action Plan (KTCAAP). There has however been a significant passing of time since the adoption of the JCS in July 2016 and the KTCAAP in July 2011 - since this time, the need for town centres such as Kettering to evolve and adapt to challenges, brought about by structural shifts in the retail market, has become all the more pressing. There are also new local challenges for Kettering Town Centre to contend with such as the</p>
--

opening of Rushden Lakes. How to address these challenges has been the topic of much debate in recent years. However, one thing that the majority agree on is that there is a need to diversify uses in town centres to address a surplus in retail floorspace (and resulting vacancies) and meet an increased consumer demand for a wider mix of uses in town centre locations. An example of recent commentary in respect of this matter is the Future High Streets Fund - Call for Proposals (December 2018) document. This accompanied national Government's Future High Street Fund announcement in December 2018 and recognises that the speed of structural change on the high street has left several vacant or under-used spaces in town / city centres. It points to evidence which shows that high streets with a wide choice of retail services alongside well-designed and planned residential and office space are more resilient to these changes and are adapting more successfully. In contrast, it notes that high streets that rely heavily on traditional retail have found it harder to adapt to these changes and tend to be the ones that are struggling. The NPPF 2019 (Para 85) is also clear that planning policies should support the role that town centres play at the heart of local communities, by taking 'a positive approach to their growth, management and adaptation'. This includes defining a network and hierarchy of town centres and promoting their long-term vitality and viability by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters (Para 85 (a)). To this end, we consider it necessary for Draft Policy SSP2 to redefine and clarify its vision for Kettering Town Centre such that it aligns more readily with the NPPF 2019, responds to structural change on the high street and corresponds with wider Council initiatives such as the Kettering Town Centre Delivery Plan (KTCDP, 2018-2025)). Indeed, unlike the JCS vision, which primarily focuses on Kettering's role as a retail centre, the KTCDP (which builds upon the vision that Kettering Town Centre should be a vibrant place at the heart of the community that is characterful, distinctive and fun) recognises that although town centres are still important shopping places, they are also important places for people to live, work and enjoy leisure time. It goes on to state that this rich mixture of usage builds successful safe and adaptable and resilient town centres and that Kettering must: 'encompass the wider view of the Town Centre as a community hub or civic heart, incorporating health, housing education, arts, entertainment and work as well as a strong evening offer for families, young people and the older generations.' Finally, the KTCDP recognises the need to address the various issues which continue to impact on the health of the Town Centre: changes in shopping habits and patterns; opening of Rushden lakes Phase 1 in 2017 and further phases through 2018/19; the distinction of Kettering from its near neighbouring towns such as Corby, Market Harborough etc; the slower than expected pace of development in East Kettering, but not on other developments in the Borough; growth of leisure & entertainment expectations; growth of Town Centre living options; and austerity as it affects public and private sector investment. It is these issues that should be recognised and addressed by a refined vision for Kettering Town Centre and built upon through a review of the KTCAAP in due course.

Proposed Actions/Changes

In view of the above, we consider it would be beneficial for the Draft SSP2 Vision to incorporate a refined vision for Kettering Town Centre. This vision would continue to promote Kettering Town Centre as a focus for the surrounding market towns (and as the focus for retail uses) but also recognise the need for it to diversify in a way that responds to rapid changes in the retail and leisure industries. It would also allow the Centre to adapt following the opening of Rushden Lakes (which has served to divert trade from the Centre) and to address a

growth in demand for leisure and entertainment options in town centre locations. Finally, it would set the tone for a revised Area Action Plan for the Town Centre (we note that Para 6.2 of the draft SSP2 states that a review of the KTCAAP will take place once the SSP2 is adopted; this review will consider the changing role of Kettering town centre as a result of changes in shopping habits).
Officer Response
It is considered that it would be more appropriate for the vision for Kettering Town Centre to be reviewed through a review of the Kettering Town Centre Area Action Plan rather than the SSP2 as the issues raised will be considered in detail through the review of the AAP.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
156	P R Kettering Ltd c/o Ellandi LLP	Policy EMP3	Non Employment Uses (non-B use class) in Safeguarded Employment Areas	No	No	No	No	Yes	Yes

Reasons/Details of representation
Draft Policy EMP3 sets out a series of criteria that would apply where non-employment uses in Safeguarded Employment Areas are proposed. We do not take issue with these criteria, however, to avoid any misunderstanding, it would be beneficial to state that such proposals must also comply with other policies in the development plan. For example, proposals for ancillary retail, caf�� or leisure uses must comply with Draft Policies TCE5 and TCE6.
Proposed Actions/Changes
See above - an additional criterion is needed which makes clear that proposals for ancillary nonemployment uses in Safeguarded Employment Areas must also comply with other relevant policies in the development plan. This could be made clear in the Policy / supporting text through the inclusion of the following statement: 'Proposals for non-employment uses in Safeguarded Employment Areas

must also comply with other policies in the development plan'. This approach has been used elsewhere in the draft Plan (for example Paras 10.7, 11.7, 12.7 and Draft Policies BRA2 and MAW2).
Officer Response
A Main Modification is proposed to address the issues raised. Refer to the Main Modification Schedule, MM2.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
157	P R Kettering Ltd c/o Ellandi LLP	Policy EMP4	Live Work Units	Yes	Yes	Yes	Yes	Yes	Yes
Reasons/Details of representation									
N/A - we support the revision to Draft Policy EMP4 (further to our representation dated 31 July 2018 (Comment ID: 162)).									
Proposed Actions/Changes									
N/A - we support the revision to Draft Policy EMP4 (further to our representation dated 31 July 2018 (Comment ID: 162)).									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
158	P R Kettering Ltd c/o Ellandi LLP	6	Town Centres	No	No	No	No	Yes	Yes
Reasons/Details of representation									
<p>We would reiterate our previous representation dated 31 July 2018 (Comment ID: 163) that the evidence base underpinning JCS is now out of date; not least because in the intervening period, Rushden Lakes has come forward with further improvements planned (see pending East Northants Application Ref: 19/01092/FUL). There have also been substantial changes to shopping habits and retailer requirements nationally. The retail study supporting the JCS was published in October 2014 and relied upon household surveys undertaken in 2010/11. In light of this, there is a question mark over the reliability of the evidence base underpinning the adopted JCS comparison goods retail floorspace capacity figures for Kettering and therefore whether it is appropriate to refer these at Para 6.3 (although we do support the fact that such retail development will be directed to the Town Centre).</p>									
Proposed Actions/Changes									
<p>So as not to the delay the adoption of the SSP2, we request that this Paragraph be amended to acknowledge that there is an urgent need to revisit retail floorspace capacity figures and to commit to doing so in the near future (ideally as part of the review of the Kettering Town Centre Area Action Plan).</p>									
Officer Response									
<p>An updated retail assessment will be undertaken to inform the review of the Joint Core Strategy and Kettering Town Centre Area Action Plan.</p>									
Officer Recommended Change(s)									
<p>No changes recommended.</p>									

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
159	P R Kettering Ltd c/o Ellandi LLP	6	Town Centres	Yes	Yes	Yes	Yes	Yes	Yes
Reasons/Details of representation									
We support the commitment to undertake a review of the Kettering Town Centre Area Action Plan (which is now over 8 years old) once the SSP2 is adopted. We note that this review will consider the changing role of Kettering Town Centre as a result of changes in shopping habits and would request that this is underpinned by an updated retail and town centres study.									
Proposed Actions/Changes									
N/A									
Officer Response									
Noted.									
Officer Recommended Change(s)									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
160	P R Kettering Ltd c/o Ellandi LLP	Policy TCE2	Proposals for a Medium Sized Foodstore	No	No	No	No	Yes	Yes

Reasons/Details of representation
Proposals for a medium size food store serving the Rothwell and Desborough catchment should also be required to undertake a retail impact assessment. This is because the evidence base that underpins the identified need for such a food store can no longer be considered reliable. Indeed, the retail study supporting the JCS was published in October 2014 and relied upon household surveys undertaken in 2010/11 - since this time, convenience goods shopping patterns, like comparison goods patterns, have changed significantly. In the absence of an update to the retail capacity study, further qualitative justification is required. There is also a need to consider changes to convenience goods provision in the catchment since the household survey was conducted (the fact that Rushden Lakes does not meet local daily needs is insufficient in this regard).
Proposed Actions/Changes
In the absence of an update to the retail capacity study, further qualitative justification is required. There is also a need to consider changes to convenience goods provision in the catchment since the household survey was conducted (the fact that Rushden Lakes does not meet local daily needs is insufficient in this regard).
Officer Response
Support for a medium sized food store in Rothwell or Desborough is established in the JCS, policy TCE2 sets out criteria to be applied to any proposals which come forward. Through the review of the JCS a retail needs assessment will be undertaken, the findings of which would be a material consideration.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
161	P R Kettering Ltd c/o Ellandi LLP	Policy TCE5	Application of the Sequential Test and Locally Set Impact Assessment Threshold	No	No	No	No	Yes	Yes

Reasons/Details of representation
--

<p>TCE5 We continue to object to the wording of Policy TCE5 as it provides insufficient clarity as to what proposals would be required to undertake a sequential assessment. Indeed, if the Council insists on including developments that would be exempt from the application of the sequential test (which in our view is unjustified as the NPPF only refers to small scale rural offices or other small scale rural development being exempt- Para 88), then it must ensure there is no room for misinterpretation. By this we mean references to ‘small-scale’ proposals must be defined / quantified (for example, proposals for less than 180 sqm). Also, please be advised that the draft Policy refers to Section 2 of the NPPF - the relevant section is now Section 7. TCE6 We support the revision to Draft Policy TCE6 which now states that in some instances, proposals falling below the defined thresholds will still require an impact assessment, where it is evident that cumulative impacts are likely to give rise to significant harm. TCE5 & 6 - DEFINITION OF LOCAL CENTRES Notwithstanding the Council’s response to our previous representation dated 31 July 2018 (Comment IDs: 165 & 166) (Appendix 2g of the Planning Policy Committee Pack - Town Centres), we remain concerned that neither the JCS or the SSP2 seek to define the scale and composition of the local centres that would be considered appropriate for the Borough’s proposed SUEs. Without such a definition, we are concerned that proposals which have the potential to have a significant adverse impact on Kettering Town Centre, or which would be better located in the Town Centre (allowing for a degree of flexibility as is required by the NPPF), could be permitted without the necessary scrutiny. We therefore maintain that the scale and composition of the proposed local centres should be defined and a requirement for an impact and sequential assessment be specified where a proposal for a local centre as part of a SUE exceeds a defined threshold.</p>
<p>Proposed Actions/Changes</p>
<p>Policy TCE5 must define what is meant by ‘small scale’ and refer to Section 7 of the NPPF, not Section 2. Moreover, the scale and composition of the proposed SUE local centres should be defined and a requirement for an impact and sequential assessment be specified where a proposal for a local centre exceeds a defined threshold.</p>
<p>Officer Response</p>
<p>It is considered that it would be too prescriptive to set a specific size threshold for ‘small-scale’ as this could be different depending on the individual circumstances of a proposal. An Additional Modification is proposed to update the reference to the relevant section of the NPPF. Refer to the Additional Modification Schedule, AM7</p>
<p>Officer Recommended Change(s)</p>
<p>None.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
162	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
<p>I would like to retain Policy 10, the protection it gives Cransley and Thorpe reservoirs. The reason being that these reservoirs have been protected up until now by Policy 10 which has been retained in the Local Plan since 1995 as it is widely agreed that these reservoirs are an important wildlife resource in our area. They are also beauty spots, close to Kettering and are connected by the footpath network. They are also part of an important wildlife corridor that stretches from Mawsley Marsh (a SSSI) to Cransley Reservoir (a Local Wildlife Site) and onto Thorpe Reservoir. Wetland birds (both migratory and British residents) are able to use this interconnecting resource for feeding, nesting and raising young. Policy 10 has stood the test of time, has been accepted and valued as an important planning policy tool and is much needed, going forward, to protect a very significant part of our local green infrastructure.</p>									
Proposed Actions/Changes									
None.									
Officer Response									
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities.</p> <p>Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
163	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
<p>I wish to comment on Policy NEH2, which has apparently replaced the original Policy 10. Cransley Reservoir is a magnificent site. It is very important to wildlife. The views across it from Northfield Road, and from the public footpath across the dam are a joy to behold. It is also used by a Sailing Club. The site of a dozen or so sails travelling across the water enhances the view. Of course sail boats are non-polluting. Stand on the dam and watch the sunset, or stand there and feel the breeze on a windy day whilst watching the water birds, and 'listening' to the silence, there is no better place in Kettering Borough. Local wildlife corridor 8 passes over the Reservoir. You will know from planning applications that have been made by the current and previous owners, that both have attempted to use the Reservoir for commercial gain. The site was recently put up for sale, and was marketed as having 'Development Opportunities' This unique and valuable asset to the Borough, should be protected. Policy NEH2, does not offer the same level of protection as Policy 10. I urge the Borough Council to reinstate Policy 10.</p>									
Proposed Actions/Changes									
None.									
Officer Response									
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities.</p>									

Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
164	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation
Please reconsider your proposals to potentially compromise the environmental protection afforded to the above by retaining policy 10 and not enforcing NEH2, with the consequential potential to further erode the countryside I had the benefit of enjoying, thus depriving future generations of the joys of rural Britain.
Proposed Actions/Changes
None.
Officer Response
Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and

Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
165	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation
It has just been brought to my attention that our Local Plan SSP2 is being updated. As a resident of Loddington for over 20 years I have a keen interest in my local area and am horrified to discover that the most stunning part of my community seems to have been overlooked. Cransley Reservoir is visible from my property. It is the most beautiful asset in our area and I am lucky to be able to benefit from its glory every single day. I am quite shocked to discover that going forward, if the current proposed documents are passed, that both Cransley and Thorpe Malsor Reservoirs will lose their current planning protection. The reservoirs are a haven for wildlife and we are lucky enough to be able to enjoy their beauty by walking the public footpaths and partaking in the recreational activities of fishing and sailing currently on offer. Such peaceful and rural green sites are rare and need protection from development. Please amend the current proposed documentation and retain Policy 10. These reservoirs deserve to remain protected, help us preserve them for future generations to enjoy.
Proposed Actions/Changes
None.
Officer Response
Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2

Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.

Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
166	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation

I am aware our Local Plan (SSP2) is being updated. Policy 10 has worked well for these reservoirs. Having lived in Loddington for over 12 years and enjoyed walking around Thorpe and Cransley Reservoir many times. The abundance in bird and wildlife must be protected and our local green infrastructure.

Proposed Actions/Changes

None.

Officer Response

Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered

acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities.

Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.

Officer Recommended Change(s)

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
167	Henry H Bletsoe & Son	Policy CRA2	South of New Stone House, Duck End, Cranford	Yes	Yes	Yes	Yes		Yes

Reasons/Details of representation

None.

Proposed Actions/Changes

None.

Officer Response

Noted.

Officer Recommended Change(s)

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
168	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
<p>I am writing to express my disappointment in the proposed Local Plan. The exclusion of Cransley and Thorpe Malsor Reservoirs seems short sighted and is of concern. I am a local farmer and I work tirelessly to preserve the natural environment. As my farmland borders the Cransley Reservoir I am seeking reassurance that the proposed documents will be amended to protect this area of outstanding beauty and wildlife. Both local reservoirs are assets which need protection. Development of these areas should be strongly controlled to ensure no harm is caused. Point 3.46 of Policy 10 states " The disused reservoirs of Cransley and Thorpe Malsor are particularly valuable countryside resources". As far as I am concerned nothing has changed and this is still the case! Please help to protect them from the dangers of intensification and ensure both reservoirs survive for future generations by retaining Policy 10.</p>									
Proposed Actions/Changes									
None.									
Officer Response									
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>									
Officer Recommended Change(s)									
None.									

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
169	Henry H Bletsoe & Son	Policy CRA3	Land east of the corner of Duck End and Thrapston Road, Cranford	Yes	Yes	Yes	Yes		Yes
Reasons/Details of representation									
None.									
Proposed Actions/Changes									
None.									
Officer Response									
Noted									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
170	Henry H Bletsoe & Son	Table 4.3		No	No	No	No		Yes
Reasons/Details of representation									
<p>Objection to Table 4.3 1. We object to the Council's analysis of how the required housing land supply directed by the Joint Core Strategy (JCS) should be addressed in terms of allocations within the Site Specific Part 2 Local Plan (SSP2). In particular we object to the housing provisions for the rural areas set out in Table 4.3 which rely on windfall development to fulfil the JCS minimum requirements. The Table identifies a need to deliver 108 dwellings through windfall development within the plan period to meet what would otherwise be a shortfall in rural housing provision. Whilst the Plan indicates that additional rural housing may be delivered in other ways, it would be inappropriate to</p>									

<p>account for this when making housing allocations. Furthermore, the use of a windfall allowance is only justified where there is compelling evidence that this will deliver a reliable supply. 2. In seeking to justify their use of a windfall allowance, the Council have prepared a Housing Land Supply Background Paper which sets out its rationale for rural housing windfall provision at Appendix 4b. In analysing historic windfall provision the Council rightly disregard a number of large windfall sites outside of settlement boundaries which have come forward in previous years and which would not come forward under current policy. They do however include a larger windfall site in Braybrooke within the settlement boundary which would similarly not be a commonplace occurrence. We feel that the Plan should not rely on similar sites coming forward in the current plan period. Discounting these larger sites, within the last 10 years and with the exception of 2008/09 which seemed to generate an unusually high level of windfall development, there have only been two years where the level of windfall development has reached the level allowed for in years 4-10 of the plan period. 3. We believe therefore that the allowance made for windfall development to meet the housing requirement for the rural areas is overly ambitious and certainly falls short of the requirement in the NPPF to demonstrate compelling evidence of a reliable source of housing supply. We feel that an analysis of historic rates of windfall development would suggest a more reliable delivery of perhaps 8 dwellings per annum and on this basis the SSP2 is not making ample provision for rural housing within the plan period. This could be addressed through the inclusion of an additional site or sites and this representation will address one such site which would be suitable for consideration.</p>
<p>Proposed Actions/Changes</p>
<p>None.</p>
<p>Officer Response</p>
<p>The Housing Land Supply Paper (October 2019) provides the justification and evidence for the windfall allowance made. The approach taken is in accordance with the NPPF and provides an analysis of past trends, expected future trends and considers market conditions. The approach taken is considered to be robust and justified. In the most recent monitoring year 2018/19 21 dwellings were delivered on windfall sites in the rural area.</p>
<p>Officer Recommended Change(s)</p>
<p>No changes recommended.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
171	Henry H Bletsoe & Son	Policy PYT2	Two fields on the outskirts of Pytchley	No	No	No	No		Yes

Reasons/Details of representation

1. We object to the Housing Allocation proposals for Pytchley set out in Policy PYT2 of the Publication Site Specific Part 2 Local Plan for Kettering. The Policy proposes the allocation of land on Isham Road Pytchley for the provision of up to 8 residential dwellings. The site is located at the eastern end of the village beyond the village boundary identified in the 1995 Local Plan. The policy sets out the following parameters for development: Development will: a. Provide on-site turning, to enable access direct access from frontages of Isham Road; b. Respect the pattern of built form along Isham Road, and therefore linear in nature and set back from Isham Road; c. Include an assessment to determine the extent and scale of potential archaeological features; and d. Ensure plot sizes are of similar size, including gardens of adjoining properties on Isham Road. e. Provide a Surface Water Drainage Assessment to demonstrate that SuDS are being used to ensure that the development is safe and does not increase flood risk to any adjacent land. The SSP2 is being prepared alongside an emerging Neighbourhood Plan for the village of Pytchley. The site in Isham Road is similarly identified as a housing allocation in the Neighbourhood Plan mirroring the proposals in the SSP2. However the allocation of this land for development in both plans does not match the objectives of either plan, nor does it address the particular needs of the local community. Policy PYT1 of the SSP2 specifies the development principles which will apply in Pytchley as follows: Development in Pytchley will: a. Reflect the character of the historic core b. Ensure that the gap between Pytchley and Kettering is maintained c. Front onto and abut the street or where set back, stone walls should be used to continue the sense of enclosure d. Reflect the hierarchy of streets in the historic core, with narrow informal streets which create a pedestrian friendly environment e. Contribute towards the following identified improvements to the village i. Improvements to the recreation ground ii. The creation of a safe pedestrian/cycle route to Kettering iii. Traffic calming Whilst a number of the development principles can be addressed through the process of detailed design, the development of the Isham Road site is not consistent with the principle of maintaining the gap between Pytchley and Kettering as it will involve further eastward expansion of the village beyond the current extent of the village boundary. Similarly there is nothing within Policy PYT2 to suggest that this allocation should contribute towards any of the improvements which are identified as being required in the village. Because of the proposed scale of the housing allocation, there is no necessity that the scheme should be subject to a S106 obligation and therefore the ability to deliver any off site improvements such as those identified in Policy PYT1, and which will be exacerbated by further development in the village, will be lost. The allocation is likely to lead to the further development of relatively unaffordable market housing in the village, which will contribute to further pressures on existing facilities and amenities. The emerging Neighbourhood Plan also identifies various issues which need to be addressed within the village and which were identified as a result of consultation with the community through the Neighbourhood Plan process. In particular the following issues were identified as being of concern: 1) A lack of low cost starter units. 2) Existing recreational facilities at a premium and concern about the quality of existing play facilities. 3) Issues with on street parking. Again there is nothing in Policy PYT2 to suggest that the Isham Road allocation could, or should, address these problems. Because of the scale of the development, it is again likely to fall below the level at which a S106 Planning Obligation would be needed and will therefore not be required to deliver any affordable housing or open space provision. There is similarly no ability to deliver improvements to existing play facilities or address the village parking problem. As such there is inconsistency between Policy PYT1 and Policy PYT2 of the SSP2 and also inconsistency with the emerging Neighbourhood Plan. The policies will therefore fail to

deliver the core objectives of the National Planning Policy Framework (NPPF) which seeks to deliver ‘a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities’. In particular it states that Local Authorities should ‘identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand’. There is nothing within Policy PYT2 to demonstrate how the Isham Road allocation will address local demand, and it is our view that the allocation will specifically fail to address the needs identified in the Neighbourhood Plan which points to a lack of low cost starter units. In the rural areas the NPPF says specifically that ‘to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities’. There is nothing in our opinion within Policy PYT2 and the Isham Road allocation which demonstrates that housing development on this site, at the scale identified, will deliver any benefit to the village and certainly will not help enhance or maintain the vitality of the community, but instead contribute further to the problems which have been identified through the Neighbourhood process.

Proposed Actions/Changes

Alternative Site - Land off Stringers Hill Pytchley We act on behalf of the owners of the land identified edged in red on the plan which is located at the heart of the village, accessed off Stringers Hill. This is a discrete land parcel owned by a family trust and is approximately 9 acres in size. It is grazed by a local farmer but is not a viable land holding in its own right. Whilst we do not advocate development on the entire area, we do believe that the land parcel should be treated as an entity for development purposes and as such there is the opportunity to create areas of open space within the site, both formal and informal, to enable public access and enhance the recreational offer of the village. Public footpaths run along the eastern and southern boundaries of the site, enhancing the site’s integration into the village and offering outward recreational access from the site. Existing trees and hedgerows within the site can be retained to further enhance the recreational provision and a small brook running through the site can be utilised as a focus for a linear belt of informal open space running north-west to south-east through the site and linking Stringers Hill to public footpath GW2. We would anticipate the provision of a more formal area of play space within any development which should include provision of children’s play facilities. There is also potential within any development to provide off road parking facilities particularly for those properties in Stringers Hill and Lower End. The location of the site at the heart of the village offers the unique opportunity to deliver a contained and integrated form of development and one which will maintain the compact character of the settlement rather than promoting outward linear expansion. New residents will have immediate access to existing village amenities such as the School, Pub, Village Hall and Church, by foot, and a design led approach to development would ensure that development is complimentary to and compatible with the conservation area, within which a northern portion of the land falls. We would propose a scale of development in the region of 30 units for the site. This would include a mix of house types and sizes to meet all needs but would include a proportion of starter units. It would also include the required level of affordable housing specified in the Joint Core Strategy, being 40%. The specific tenure mix would be determined by specific needs assessment, but with the anticipation that a range of tenures will be delivered in line with NPPF requirements. This additional growth for the village of Pytchley would be compatible with its status and size and would contribute towards meeting a shortfall in rural housing provision across the Borough which we believe will arise as a result of an over-reliance on windfall provision.

Officer Response
Land off Springers Hill, Pytchley was considered and discounted through the site assessment process. The detail of the site assessment process is set out in the Housing Allocations Background Papers (2012, 2018 and 2019), the Housing Allocations Assessment of Additional Sites and Update and the Rural Masterplanning Report (2012). It was considered that the site would have unacceptable impact on landscape and character of Pytchley as the scale was too large given the size of the settlement and its character. Other constraints identified included highway access, accessibility and the capacity of water sewage infrastructure. The level of growth proposed in Pytchley is considered to be proportionate to the size of the settlement and the range of facilities and services the village. This was considered through the site assessment process when looking at sites individually as well as a whole when deciding on recommendations to take to Planning Policy Committee. The Categorisation of Villages: Background Paper (October 2019) provides the justification for distribution of housing in the rural area.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
172	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation
Why is it necessary to change Policy when it has been effective and proven to work perfectly well. The new proposals as set out below are flawed as they do not include Cransley and Thorpe Malsor Reservoirs. Both these reservoirs have been protected up until now by Policy 10 which has been retained in the Local Plan since 1995 as it is widely agreed that these reservoirs are an important wildlife resource in our area. They are also beauty spots, close to Kettering and are connected by the footpath network. They are also part of an important wildlife corridor that stretches from Mawsley Marsh (a SSSI) to Cransley Reservoir (a Local Wildlife Site) and onto Thorpe Reservoir. Wetland birds (both migratory and British residents) are able to use this interconnecting resource for feeding, nesting and raising young. Policy 10 has stood the test of time, has been accepted and valued as an important planning policy tool and is much needed, going forward, to protect a very significant part of our local green infrastructure. In short this is a big 'watering down' of planning protection for these two reservoirs. It shows a picture of Cransley Reservoir but doesn't even mention it in the list of assets and Thorpe Reservoir or its paramount importance for future generations

Proposed Actions/Changes
None.
Officer Response
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities.</p> <p>Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
173	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation
<p>I have just become aware of the above and with some surprise, given that you must be aware of the illegal occupation adjacent to the reservoir and the ongoing planning applications appeals etc. Surely this consultation should have been brought to the notice of the Parish Councils concerned? I apologise if this did happen. And given the above, it would be entirely inappropriate and premature to consider any interference or change to policy 10 and the protection it affords the disputed areas. As to the proposed revisions, I object most strongly to any weakening of the protections policy 10 provides to the wildlife and areas of Cransley and Thorpe reservoirs. In particular interfering with the wildlife corridor from Mawsley Marsh to Cransley and Thorpe Reservoirs would have a devastating effect on the wildlife In this area and</p>

altering the ecosystem permanently. Those protections were put in place in 1995. As a result wildlife have flourished there so that there is now a greater need for those protections not a lesser one. Please ensure that interested parties are kept informed.
Proposed Actions/Changes
None.
Officer Response
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities.</p> <p>Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
174	Gladman Land	General Comments	Site Specific Part 2 Local Plan- Publication Plan - Sustainability Appraisal	No	No	No	No	No	No

Reasons/Details of representation

Flexibility allowance 3.2.1 The NNJCS sets a housing requirement of 10,400 dwellings to be delivered over the plan period. Through the preparation of the SPP2 the Council has applied a 10% flexibility allowance to the housing requirements for each settlement and additional housing allocations to provide a total supply of 12,976 dwellings over the plan period. This results in an additional 1,584 dwellings above the 10% flexibility factor. 3.2.2 At paragraph 5.3.7 the SA considers that it would be unreasonable to provide a higher housing flexibility allowance than 10%. It states: 'To increase flexibility further, and prepare for beyond the plan period, the choice and amount of housing sites could be increased further beyond 10% However, this approach is considered to be unreasonable for the following reasons: - The preferred approach already provides land to accommodate an additional 1584 dwellings above a 10% flexibility allowance. - There is no evidence to suggest that higher levels of delivery are necessary to achieve the JCS targets or to secure a 5-year supply of housing.' 3.2.3 The above statement is clear that to increase flexibility further the choice and amount of housing sites could be increased further beyond the 10%. However, assessment against various percentages have not been undertaken despite the fact that additional allocations demonstrate the Council is able to deliver a higher buffer. It is unclear therefore how the Council have arrived at the decision that a higher buffer of sites is an unreasonable option when this has not been tested through the SA process. 3.2.4 Gladman consider that the Plan is jeopardising the delivery of meeting the borough's housing needs in full due to the reliance on Sustainable Urban Extensions (SUEs) to deliver the majority of the borough's housing requirement. As will be highlighted in section 5.1 of these representations, whilst Gladman do not object to the principle of development of the NNJCS allocations, it is clear that these sites have failed to come forward as previously anticipated. This trend is likely to continue and additional allocations beyond those already proposed will be necessary to ensure the deliverability of the Local Plan. Site Assessment alternative sites 3.2.5 Gladman has significant concerns with the assessment of reasonable alternatives for the allocation of additional housing land. The Council has not considered land at Braybrooke Road as a reasonable alternative for housing. Instead, the site was considered under site ref: D7 - Land at Humphrey's Lodge for employment use. This is despite the fact that Gladman has been promoting the site for residential development since January 2018. 3.2.6 In *Ashdown Forest Economic Development LLP v Secretary of State for Communities and Local Government* [2015] EWCA Civ 681 it was said: 'In *Heard v Broadland District Council* (cited above), at paragraphs 66-71, Ouseley J held that where a preferred option - in that case, a preferred option for the location of development - emerges in the course of the plan-making process, the reasons for selecting it must be given. He held that the failure to give reasons for the selection of the preferred option was in reality a failure to give reasons why no other alternative sites were selected for assessment or comparable assessment at the relevant stage, and that this represented a breach of the SEA Directive on its express terms. He also held that although there is a case for the examination of the preferred option in greater detail, the aim of the Directive is more obviously met by, and it is best interpreted as requiring, an equal examination of the alternatives which it is reasonable to select for examination alongside whatever may be the preferred option.' (emphasis added) 3.2.1 It is therefore essential that the SPP2 is accompanied by a clear audit trail to set out how the assessment of all potential sites for residential allocation has been undertaken. Any such process must be explicit, transparent and robustly justified within the Council's proportionate evidence base. This evidence must clearly set out what common factors have been considered and the resultant outcome for each site in reaching a robust planning judgment on site selection. It is essential

therefore that interested parties are able to fully understand why certain sites proposed for allocation and others are not. 3.2.2 In this regard, we would highlight the Inspector’s note to Telford & Wrekin Council during the Examination of its Local Plan⁴. Here, the Inspector made reference to the requirements of the site selection process: ‘10. Clearly, the detailed selection of sites for allocation involves an element of planning judgment. However, that judgment needs to be both explicit and transparent. In short, there needs to be a clear ‘audit trail’ that shows how the final decisions were arrived at, and what factors were taken into account in making such decisions.’ 3.2.3 The SA is obliged to give adequate reasons for selection of particular options as ‘reasonable alternatives’, and reasons for rejecting those options it did reject. The current SA and associated Site Assessment evidence base does not do so in consideration of the current preferred options. The SA in its current form fails to explain why land off Braybrooke Road was not included as a reasonable alternative for residential development given that it was subject to a live planning application.

Proposed Actions/Changes

Gladman consider the SA should be revisited to test the Plan’s ability to deliver an increased buffer of sites. The SA in its current form fails to explain why land off Braybrooke Road was not included as a reasonable alternative for residential development given that it was subject to a live planning application. Gladman consider that it is necessary for the housing sites within the SA to be reassessed in this regard.

Officer Response

The SA clearly sets out why it was not considered reasonable to increase the flexibility allowance above 10%. In addition to this the Housing Land Supply Background Paper (October 2019) provides further justification for the approach taken to the flexibility allowance. In Desborough both housing allocations included in the SSP2 have planning permission. The Housing Land Supply Background Paper provides detail of the supply of sites in Desborough. This demonstrates that the supply in Desborough is significantly in excess of the JCS requirement plus 10% flexibility allowance. Therefore there is not a need for additional sites in Desborough to be identified in the SSP2.

Officer Recommended Change(s)

No changes recommended

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
175	Gladman Land	Policy LOC1	Settlement Boundaries	No	No	No	No	No	No

Reasons/Details of representation

4.2.1 The above policy states that settlement boundaries will be used to interpret whether proposals are within or adjoining settlements for the purposes of Policies 11 and 13 of the Joint Core Strategy (JCS) and Policies RS1 and RS2 of the SPP2. Land located outside settlement boundaries will be considered open countryside. 4.2.2 Gladman are concerned with the proposed approach as it provides no flexibility for the Council to respond to changes in circumstance over the plan period e.g. unable to demonstrate a five year housing land supply. In addition, this policy adds nothing to the policies contained in the JCS nor does it provide sufficient clarity and consistency in how proposals outside of development boundaries will be assessed. Whilst Policy LOC1 refers to policies within the JCS and SPP2, it is unclear which policies or considerations regarding specific elements of those policies would apply. 4.2.3 Gladman consider the Council's approach to development beyond the settlement boundary is far too restrictive and leads to conflicts with the Framework and may result in delivery problems over the course of the plan period due to the significant reliance of SUEs as identified in the NNJCS to deliver the majority of the Council's housing needs. 4.2.4 Indeed, development outside of any defined settlement boundary will be treated as open countryside where development will generally be restricted and limited to development in only a narrow set of circumstances. Gladman consider that the Council's approach needs to be reworded to provide a more flexible approach and the following wording is suggested which broadly reflects that of Policy HOU5 of the Ashford Local Plan which was found sound at examination: 'Proposals for residential development adjoining or close to the existing built up confines of any named settlement will be acceptable... provided that each of the following criteria is met: a) The scale of development proposed is proportionate in size of the settlement and level, type and quality of day to day service provision currently available, and commensurate with the ability of those services to absorb the level of development in combination with any planned allocations in the Local Plan and committed development in liaison with service providers; b) The Site is within easy walking distance of basic day to day services in the nearest settlement and/or has access to sustainable methods of transport to access a range of services; c) The development is able to be safely accessed from the local road network and the traffic generated can be accommodated on the local and wider road network without adversely affecting the character of the surrounding area; d) The development is located where it is possible to maximise the use of public transport, cycling and walking to access services; e) Conserves and enhances the natural environment and preserves or enhances any heritage assets in the locality; and f) The development (and any associated infrastructure) is of a high-quality design and meets the following requirements; i) It sits sympathetically within the wider landscape; ii) It preserves or enhances the setting of the nearest settlement; iii) It includes an appropriately sized and designed landscape buffer to the open countryside; iv) It is consistent with local character and built form, including scale, bulk and the materials used; v) It does not adversely impact on neighbouring uses or a good standard of amenity for nearby residents; vi) It would conserve biodiversity interests on the site and/or adjoining area and not adversely affect the integrity of international and nationally protected sites in line with Policy.'

4.2.5 The scale of development would however need to be considered in the context of individual settlements and the services and facilities they contain together with the role they play with regards to the wider rural hinterland. Adoption of the policy wording outlined above would provide greater scope for windfall development in rural areas of the Borough to support the continued vitality of these areas and provide greater scope in accommodating sustainable development proposals should the SUEs fail to come forward as anticipated. 4.2.1 Indeed, a similar approach was taken in the Inspector's Report to the

<p>South Derbyshire Local Plan Part 2 (September 2017) which recommended main modifications relating to similar issues. It stated at paragraph 21: ‘Nevertheless, to ensure the effectiveness of the Plan to adapt to rapid change which might lead to a shortfall in housing land supply, main modifications are necessary to Policy BNE5 (MM36) and its explanatory text (MM37). These modifications include and justify a new criterion (iii) in the policy to allow for development outside of settlement boundaries where it would be unavoidable, such as the Council being unable to demonstrate a 5-year land supply. Such an amendment would add an appropriate degree of additional flexibility to the Plan to adapt to changing circumstances and meet the district’s development needs, in a way which would be consistent with sustainable development, without compromising the overall spatial strategy of the Plan.’</p>
<p>Proposed Actions/Changes</p>
<p>None.</p>
<p>Officer Response</p>
<p>The settlement boundaries have been drawn in accordance with a robust set of criteria. The Settlement Boundaries Background Papers (February 2012, April 2018 and October 2019) provide the evidence base and justification for the settlement boundaries shown on the policies maps. Settlement Boundaries provide a clear distinction between the open countryside and the built up form of settlements. The use of settlement boundaries is in conformity with the NPPF. The SSP2 allocates sites to meet the Borough’s housing requirements plus a flexibility allowance in Kettering and the Market Towns. The Housing Land Supply Background Paper (October 2019) demonstrates that sufficient flexibility has been provided to ensure that housing requirements are achieved.</p>
<p>Officer Recommended Change(s)</p>
<p>No changes recommended.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
176	Gladman Land	Policy HOU1	Windfall and Infill Development: Principles of Delivery	No	No	No	No	No	No
<p>Reasons/Details of representation</p> <p>4.3.1 Similar to the concerns raised in response to Policy LOC1 above, Policy HOU1 only relates to windfall and infill development within settlement boundaries and is silent on what forms of development would be considered acceptable beyond these artificial limits.</p>									

Proposed Actions/Changes
4.3.2 Gladman reiterate the concerns already raised and consider additional flexibility should be provided by the SPP2 to allow consideration of sustainable development opportunities across the Borough that are located outside of settlement boundaries but are well related to settlement.
Officer Response
The SSP2 allocates sites to meet the Borough’s housing requirements plus a flexibility allowance in Kettering and the Market Towns. The Housing Land Supply Background Paper (October 2019) demonstrates that sufficient flexibility has been provided to ensure that housing requirements are achieved. Policy RS4 sets out the approach to development in the open countryside.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
177	Gladman Land	Policy HOU2	Older Persons Housing	No	No	No	No	No	No

Reasons/Details of representation
4.4 Policy HOU2: Older Persons Housing 4.4.1 The above policy requires provision of a proportion of dwellings that are suitable to meet the needs of older people on all sites of 50 dwellings or more or 1.6ha. 4.4.2 In principle, Gladman support the Council’s efforts to ensuring suitable provision is made to meet the needs of older people over the plan period. However, it is entirely unclear how the Council has arrived at the decision of all sites of 50 dwellings or more to provide a proportion of dwellings for older people. 4.4.3 Despite the need for older persons accommodation, there are challenges to those in this development sector and the economics of this type of accommodation are substantially different from that of general needs housing. In summary, the differences are higher build costs associated to specific design requirements and features to better suit the needs of older people, the requirement to provide a significant floor area for shared facilities, which are not saleable, and a lack of phasing and other sales issues such as no units can be sold until communal areas are complete which means substantial capital outlay before any return is received.
Proposed Actions/Changes
A requirement for all housing developments above 50 dwellings to accommodate older person risks jeopardising the delivery of sustainable development opportunities to meet housing needs. Accordingly, it is recommended that greater flexibility is provided, and the following

wording is put forward for the Council’s consideration: ‘The Council will seek to encourage the provision of a proportion of dwellings that are suitable to meet the needs of older people.’
Officer Response
It is considered that the policy is sufficiently flexible to take into account the concerns raised without the proposed wording.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
178	Policy Gladman Land	Policy HOU4	Self-Build and Custom Build Housing	No	No	No	No	No	No

Reasons/Details of representation
4.5.1 The above policy requires housing developments of 50 or more dwellings or with a site area of 1.6ha or more, should provide 5% of plots to be made available as self-build or custom build serviced plots. 4.5.2 Whilst it is noted that these serviced plots can revert to market use after a period of 6 months, it is unclear why this policy is being pursued when the housing register as of July 2019 only contains 41 interested persons. Whilst this may indicate an interest in this type of housing it cannot be reliably translated into actual demand should self-build/custom build housing be made available and clearly indicates the lack of interest in this form of housing. 4.5.3 Whilst it is supported that the Council should be seeking to encourage the delivery of this form of development, there are difficulties associated with self-build housing as part large housing sites in terms of potential health and safety concerns and also the practical difficulties in terms of aligning their development with construction activity of the site. This form of development should therefore be at the discretion of the developer, rather than forming part of the overall housing mix of individual schemes.
Proposed Actions/Changes
4.5.4 Although the principle of allowing sites to revert to market housing after a period of 6 months is supported, this is likely to result in a consequential delay in development of those plots coming forward due to the limited interest of this form of housing. Accordingly, the policy should be modified, and the following wording is put forward for consideration: ‘Proposals for self-build and custom build housing will be supported in suitable locations. The Council will actively maintain a register of interest and prospective self and custom build house builders.’

<p>Officer Response</p> <p>The Self and Custom Build Background Paper sets out the approach for determining the contents and subsequent thresholds included in Policy HOU4. It is recognised that the level of demand, as determined by the register in March 2019, as the base date for the aforementioned background paper, does not match the level of potential supply and delivery of self and custom build plots as identified in the Self and Custom Build Background Paper. However, as set out in the background paper the register is unlikely to show the true extent of demand in the borough, as it is reasonable to assume not all interested parties who have interest in building their own home are likely to be on the register. As a result, additional sources of data have been used to model the likely demand over the longer term. The data from the Three Dragons report has been used to calculate this demand over the next 10 years, towards the end of the plan period. Therefore, given that the evidence presented in the Self and Custom Build Background Paper presents a much larger demand for this type of housing as determined by the register, it is considered that using a threshold and percentage based policy is a proactive mechanism. It is considered that it will deliver a reliable and consistent supply for this type of housing in the long term, based on the potential demand as determined by the Three Dragons report. It also represents a pro-active approach to the delivery of this type of housing in the Borough. Whilst the logistical issues relating to the delivery of this type of housing are recognised, it is considered that Policy HOU4 sufficiently addresses these issues, specifically in relation to marketing of plots which remain unsold after 6 months can be built out by the developer. This timeframe is considered reasonable and practicable. Policy 30 of the Joint Core Strategy provides support for self and custom build housing and therefore Policy HOU4 seeks to introduce a policy mechanism to see the delivery of this type of housing to the meet the demand not only required by the register but that recognised through the work undertaken by the Three Dragons.</p>
<p>Officer Recommended Change(s)</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
179	Gladman Land	Policy EMP1	Safeguarding Employment Land	No	No	No	No	No	No

Reasons/Details of representation

4.6.1 Gladman support the inclusion of the above policies, which recognise the importance of safeguarding and maintaining employment land uses at Desborough. These policies combined clearly serve as a reminder that these locations play an integral part to Desborough's

local economy and that of the Borough . As such, it is considered that Desborough is capable of accommodating further residential development which will assist the continued operation of these employment areas for future generations.
Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
180	Gladman Land	Policy NEH3	Historically and Visually Important Local Green Spaces	No	No	No	No	No	No

Reasons/Details of representation

4.7.1 The above policy proposes to allocate a number of sites as ‘Historically and Visually Important Local Green Spaces (LGS) ‘ and considers these areas as demonstratively special and of particular local significance. The policy further states that the Council will seek to protect and preserve these areas from development that would harm their function, visual openness and their local and/or historical importance. 4.7.2 Gladman does not consider that the approach taken is positively prepared or consistent with national policy as it seeks to protect land surrounding such designations. Indeed, this is highlighted at paragraph 11.15 of the SPP2 which relates to Policy DES5. It states: ‘The site also lies immediately adjacent to an area allocated as Historically and Visually Local Green Space (HVI) known as ‘The Damms’. Therefore as set out in Policy DES5, below, development in this, or in close proximity to this area is resisted and the impact on the area on the allocation site must not detrimentally impact the character and setting of the area designated as HVI.’ (emphasis added) 4.7.3 The approach taken is clearly not in accordance with the requirements of national policy as the designation of land as LGS only relates to the land which is designated and not adjacent land which has no significance. 4.7.4 The designation of land as LGS is a significant policy designation and effectively means that once designated it provides protection that is comparable to that of land located within the Green Belt. As such, the Council needs to ensure that the proposed designations are capable of meeting all three tests required by paragraph 100 of the Framework which states: ‘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.’ (emphasis added) 4.7.5 Gladman has reviewed the proposed LGS put forward by the Council and the associated evidence base and is concerned regarding the lack of a methodical approach to inform the selection of sites. Indeed, a number of sites appear to be extensive in size, either individually, or in comparison to the site of the settlement. Whilst Gladman appreciate that neither the NPPF nor the PPG specify what is considered to be an extensive tract of land, this issue is commonly considered through the neighbourhood plan examination process. In this regard, Gladman highlight a number of decisions which have considered this issue: - The Seldlescombe Neighbourhood Plan Examiner’s Report⁵ recommended the deletion of a LGS measuring approximately 4.5ha as it was found to be an extensive tract of land. - The Oakley and Deane Neighbourhood Plan Examiner’s Report⁶ recommended the deletion of a LGS measuring approximately 5ha and also found this area to be not local in character. Thereby failing to meet 2 of the 3 tests for LGS designation. - The Alrewas Neighbourhood Plan Examiner’s Report⁷ identifies that both sites proposed as LGS in the neighbourhood plan to be extensive tracts of land. The Examiner in this instance recommended the deletion of the proposed LGS which measured approximately 2.4ha and 3.7ha. - The Freshford and Limpley Neighbourhood Plan Examiner’s report⁸ identified that the six LGS proposed did not meet the criteria required by the Framework either collectively or individually. Indeed, the Examiner identified that the combination of sites comprised of extensive tract of land. The Examiner also considered that the protection of fields to ‘prevent agglomeration between the settlement areas’ is not the purpose of Local Green Space designation’. - The Eastington Neighbourhood Plan Examiner’s Report⁹ recommended the deletion of three LGS (16ha and 2ha) considered to be extensive tracts of land. The third proposed LGS was deleted due to the lack of evidence demonstrating its importance a significance to the local community. - The Tattenhill and Rangemore Neighbourhood Plan Examiner’s Report¹⁰ recommended the deletion of two LGS comprising of 4.3ha and 9.4ha. - The Norley Neighbourhood Plan Examiner’s Report¹¹ identified a total of 13 LGS where proposed for designation. The Examiner in that instance recommended at paragraph 4.98 that the ‘identification of these extensive tracts of agricultural land was contrary to NPPF policy’ and recommended that the policy should be deleted. The proposed LGS measured in the range of 1ha - 4.3ha. - The Malpas and Overton Neighbourhood Plan Examiner’s Report¹² recommended the deletion of policy LC4 which included a total of 42 LGS. The Examiner identified that ‘a number of identified sites do not meet one or all of these requirements.’ With regard to the third criteria the Examiner recommended that sites 16, 17 and 40 be deleted as they are ‘relatively extensive tracts of countryside’. The size of these sites ranged from 3.4ha - 16ha.

Proposed Actions/Changes

4.7.6 Whilst information has been prepared by KBC in an attempt to justify the proposed LGS, it is notable that a number of sites cover extensive tracts of land. In this regard, Gladman recommend the Council consider the findings of the above examiner’s report and reconsider its methodology and assessment of land against the three tests required for designation before submitting the SPP2 for examination.

Officer Response

Policy NEH3 does not seek to protect land surrounding the designations.

<p>Policy DES5 relates to a specific area of HVI with particular characteristics which in this case mean that development in close proximity of the HVI should not detrimentally impact on the character and setting of the HVI.</p> <p>All sites identified as Historically and Visually Important Local Green Space meet the requirements of the NPPF. The Council does not consider that any of the sites identified are extensive tracts of land. The justification and evidence for the designation of these areas of land is set out in the Historically and visually Important Local Green Space Background Papers (2015, 2016 and 2019)</p>
<p>Officer Recommended Change(s)</p>
<p>No changes recommended.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
181	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
I am writing regarding Policy 10, and wish this policy to remain in place.									
Proposed Actions/Changes									
None.									
Officer Response									
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities.</p>									

Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
182	Gladman Land	Policy NEH4	Open Spaces	No	No	No	No	No	No

Reasons/Details of representation

4.8.1 The above policy relates to the protection of existing open spaces and to providing investment for the provision of new open spaces. The policy states to achieve these goals, development proposals will be made in accordance with the Open Space Strategy for Kettering Borough (2019), or any subsequent update and the Open Space Developer Contributions SPD. 4.8.2 As currently worded, Policy NEH4 is not consistent with the requirements of national policy. Gladman take this opportunity to remind the Council that SPDs cannot be used as a fast track means to set policies and should not be prepared with the aim of avoiding the need for examination or reinventing existing planning policy which should be examined. Indeed, SPDs are not subject to the same degree of examination and consultation as policies contained in local plans and therefore should only provide additional information to those bringing forward development proposals across the borough. The NPPF 2019 confirms this where it defines SPDs as: 'documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary Planning Documents are capable of being a material consideration in planning decisions but are not part of the development plan.'

Proposed Actions/Changes

4.8.3 As such, this policy should be modified so that development proposals have regard to SPDs rather than requiring strict adherence to such documents.

Officer Response

A Main Modification is proposed to clarify the approach being taken to open space. Refer to the Main Modifications Schedule, MM6

Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
183	Gladman Land	Policy RS1	Category A villages	No	No	No	No	No	No

Reasons/Details of representation

4.9.1 The above policies relate to rural villages across the borough. Gladman reiterate the comments made in response to Policy LOC1 and the need for greater flexibility. The Government expects local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to afford to live where they grew up. It is clear that improving the availability and affordability of homes in rural areas is vital for sustaining rural communities, alongside action to support jobs and services. There are opportunities for the plan to go further to support a good mix of sites and meet rural housing needs, especially where scope exists to expand settlements in a way which is sustainable and helps provide homes for local people. This is especially important in those rural areas where a high demand for homes makes the cost of housing a particular challenge for local people. As such, Gladman consider that the level of development allocated to villages should be a meaningful contribution to ensure the ongoing vitality and viability of the rural settlements and should take a flexible and positive approach to supporting new sustainable development opportunities, recognising that the level of development considered acceptable in these locations should take account of their needs and ability to support further sustainable growth.

Proposed Actions/Changes

None.

Officer Response

The SSP2 allocates land in the rural area to meet local needs. The Categorisation of Villages Background Paper (October 2019) sets out the approach taken to distributing housing in the area. The distribution of housing was informed by detailed site assessments and a rural masterplanning approach.

Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
184	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation

I have today been made aware that changes to the existing policy 10 document are being considered. These policies are there to protect the countryside and the wildlife that resides within these areas. With all the development taking place across the country and destruction of significant important areas it is imperative that those who have the powers to maintain the protection for these sites do indeed protect them. With the above in mind I would strongly object to changes of policy on Mawsley Marsh (a SSSI) and Cransley and Thorpe Reservoir (local wildlife sites) and that they remain protected vigorously and hope you will do everything within your powers to make sure this happens.

Proposed Actions/Changes

None.

Officer Response

Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities.

Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.

Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
185	Gladman Land	Policy RS4	Development in the Open Countryside	No	No	No	No	No	No

Reasons/Details of representation
 4.10.1 Gladman reiterate the comments made in response to Policy LOC1.

Proposed Actions/Changes
 None.

Officer Response
 Noted.

Officer Recommended Change(s)
 None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
186	Policy Planner Gladman Land	4	Housing Trajectory	No	No	No	No	No	No

Reasons/Details of representation
 5.1.1 The tests of soundness required by paragraph 35 of the Framework outline that the SPP2 must be found to be positively prepared, justified, effective and consistent with national policy. Gladman have significant reservations regarding the ability of the Council's Sustainable Urban Extensions (SUEs) to deliver at the new suggested rates. 5.1.2 Gladman consider the Council's assumptions made in respect of the

housing trajectory risks the deliverability of the SPP2 (and the local plan as a whole) and will inevitably lead to further housing land supply problems in the future. Undertaking a comparison between the Council's position contained in the NNJCS, SPP2 and intervening AMR reports reveals a significant shift in the Council's position on all assumed delivery rates as detailed at Appendix 1 of these representations. The Council's position demonstrates a shift in the anticipated delivery rates of the NNJCS and have now been increased in the later years of the plan period from those shown in the previous NNJCS housing trajectory. In addition, the AMR reports published in the intervening period also illustrate and serve to demonstrate that anticipated delivery on site has shifted each year. Indeed, it is noted that the delivery of Desborough North and Rothwell were expected to commence in 2015/16 and 2016/17 respectively, but delivery on these sites has yet to commence.

5.1.3 Gladman remind the Council that the definition of 'deliverable' has been updated as part of the changes to the NPPF. The NPPF now places the onus on local planning authorities to demonstrate that sites within their housing land supply are capable of coming forward within the next five years. In order to count towards the five-year supply, the previous Framework was vague in defining what 'deliverable' meant which resulted in contradicting appeal decisions culminating in the St Modwen Judgment¹³. The NPPF 2019 introduced a new definition of what is considered deliverable. It states: 'To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular: a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is a clear evidence that housing completions will begin on site within five years.'

5.1.4 Given the above, it is apparent that clear evidence is required to demonstrate that committed sites are deliverable, can deliver homes in the next five years and will come forward as anticipated.

5.1.5 The delivery on SUEs in Kettering is falling below 75% of the NNJCS trajectory and requires immediate action from the LPA to correct it. Indeed, given the strategic scale and specific nature of many of the proposals within the Council's commitments, it will be vitally important for the Local Plan to provide a clear contingency against its overall requirement to take into account the fact that such proposals will invariably deliver at a slower rate than originally envisaged through the examination of the NNJCS as demonstrated above. Accordingly, Gladman reiterate the need for additional policies to be included by way of modification that take a responsive and flexible approach to sustainable development at the edge of sustainable settlements to ensure positive action can be taken where monitoring indicates that a five year housing land supply is unlikely to be maintained. The inclusion of a meaningful contingency is common practice in plan making and would greatly assist in supporting the demonstration of the plan's soundness at examination.

5.1.6 In considering the sites proposed for allocation within the SPP2, Gladman wish to highlight the presentation given by the Director of Planning at DCLG at the Home Builders Federation Planning Conference in 2015. Figure 1 below shows that 10-20% of permissions do not materialise into a start on site and that the permission in effect 'drops out' It provides multiple reasons for this occurring and highlights a clear need to plan for the granting of permissions on more units than are required to be completed to meet housing needs.

Proposed Actions/Changes
5.1.7 Given the above, it therefore stands to reason that the buffer proposed may fall away and SUEs may further stall and place the Council in a precarious situation where they are unable to demonstrate a housing land supply. In order to secure the deliverability of the Plan in full, Gladman consider that KBC must take the following steps. The Plan’s strategy must allow for additional flexibility so that sites not identified through the Plan are capable of coming forward to accommodate any slippage in the predicted delivery of the Council’s delivery rates that are likely to occur. This will also aid the Council in delivering additional housing above the minimum housing requirement, both in the mix and location of sites proposed.
Officer Response
The Council acknowledges that the SUE’s have been slower in coming forward than envisaged in the JCS. However significant progress has been made in the delivery of the SUE’s with a number of parcels at Kettering East being built out, preliminary work has begun on site at Rothwell North and Desborough North is progressing towards the submission of reserved matters applications. The Housing Land Supply Background Paper (October 2019) provides evidence for the housing trajectories provided for these sites. The updated definition of ‘deliverable’ has been used when assessing whether sites should be included in the first five years of the plan period. The Council has taken a proactive approach to ensuring that it can maintain a five-year housing land supply and this is reflected in the approach taken in the SSP2, including the 10% flexibility allowance which makes provision above the JCS housing requirements. The Council’s proactive approach is apparent in the results of the Government’s housing delivery test which were 129% for 2018 and 130% for 2019.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
187	Gladman Land	11	Housing Site Policies - Desborough	No	No	No	No	No	No

Reasons/Details of representation
6.1.1 The Council will be aware of Gladman’s land interests in Desborough on land off Braybrooke Road. A site location plan is included at appendix 2 of these representations. 6.1.2 The site was subject to a planning application and included the following: Up to 245 residential dwellings including 30% affordable housing delivered in accordance with planning policy; Structural landscape planting and the retention and positive management of key landscape features; 5.97ha of formal and informal open space (over 43% of the gross site outline

<p>application area); New access arrangements including footway links and highway improvements to Braybrooke Road; and A comprehensive surface water drainage scheme. 6.1.3 Whilst the application was dismissed at appeal, the Inspector’s Report clearly identifies no technical issues relating to development in this location. This 13.57ha site presents an ideal opportunity to create a sustainable, distinctive residential development to the west of Desborough and is capable of delivering both market and affordable housing to meet current and future housing needs. dwellings. 6.1.4 The proposal represents a logical extension in a sustainable location with access to a good range of local services and facilities. It is envisaged that the site can provide biodiversity net gains by retaining existing vegetation as much as possible and additional planting throughout the site in addition to areas of public open space to the benefit of both existing and future residents.</p>
<p>Proposed Actions/Changes</p>
<p>6.1.5 The site is available and achievable for the delivery of 245 dwellings. Given the issues raised in section 5 of these representations, this site should be considered for allocation within the SPP2 to allow for flexibility in the Council’s housing land supply. Gladman are keen to work with the Council to bring this site forward as a high quality residential development and invite the Council to contact us in this regard.</p>
<p>Officer Response</p>
<p>In Desborough both housing allocations included in the SSP2 have planning permission. The Housing Land Supply Background Paper provides detail of the supply of sites in Desborough. This demonstrates that the supply in Desborough is significantly in excess of the JCS requirement plus 10% flexibility allowance. Therefore there is not a need for additional sites in Desborough to be identified in the SSP2.</p>
<p>Officer Recommended Change(s)</p>
<p>No changes recommended.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
188	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation

We are very concerned that the SSP2 Local Plan is trying to replace Policy 10 with NEH2. Policy 10 was designed to give extra protection to two very significant natural habitats in our area, Cransley and Thorpe Reservoir. Policy 10 has been in place since 1995 and has stood the test of time. It has been widely respected by local people and planning committees. NEH2 is a more general policy and it doesn’t even mention the two reservoirs as natural assets at all! There is a picture of Cransley Reservoir inferring its significance but it is not listed in any

of the tables or in the text. Policy 10 should be retained. Table 8.1 lists SSSIs, Local Geological Sites, Protected Wildflower Verges and Pocket Parks but no County (Local) Wildlife Sites. Kettering General Hospital is listed but not Cransley Reservoir which has been a County (Local) Wildlife Site since 1994 (and a Prime Site before that). Both Cransley and Thorpe Reservoir provide essential habitats to some important wetland birds including little grebes, great crested grebes, pochard, gadwall, shoveler and wigeon. Very rare visitors including the Great White Egret have also been spotted. The marshland on the NW arm of Cransley Reservoir is home to other rare birds including reed warblers, sedge warblers, reed buntings, willow warblers, black caps and yellow hammers. These are all declining species in the UK. The wetland vegetation is a very important resource according to the Northants Wildlife Trust. Yet these two habitats are considered less important than that found at Kettering General Hospital? This makes no sense! At the very least the County (Local) Wildlife Sites should be listed in Table 8.1. Just because there are 60 of them is no reason to leave them out of the list of green assets completely. They could be listed as an appendix to Table 8.1 and put immediately below the table. And where would this leave Thorpe Malsor Reservoir? It is a significant wetland habitat that may not at present be a County Wildlife Site but is still a beautiful wildlife reserve that is an integral part of a green infrastructure corridor that stretches from Mawsley Marsh to Cransley Reservoir and on to Thorpe Malsor Reservoir. Wildlife, particularly wetland birds benefit enormously from this interconnecting resource. It is also a habitat which was considered important enough to have its own Policy in the past. What has changed? It doesn't even get a mention in the new NEH2 . Habitats like this should get more protection now than in the past not less. In Appendix 2 table 17.1 it lists Policy 10 Cransley and Thorpe Malsor Reservoir being replaced by NEH2 - this is inaccurate as neither are covered in NEH2!! To conclude: Policy 10 should be retained as it has been since 1995. Table 8.1 in the NEH2 should list all County (Local) Wildlife Sites otherwise it is simply an inaccurate list of green assets in the Borough. Thorpe Malsor Reservoir should get a mention in the text of NEH2 as an important wetland habitat which is interrelated and connected to a local SSSI and County Wildlife Site.

Proposed Actions/Changes

None.

Officer Response

Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities.

Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.

Officer Recommended Change(s)

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
189	Local Resident	Policy LOC1	Settlement Boundaries						

Reasons/Details of representation

In addition to our concern with Policy 10 we also note that Policy 7 has been reworded in a way that ‘waters down’ planning protection in the countryside. policy 7 ‘planning permission for development within the open countryside will not be granted except where otherwise provided for in this plan’. Is being replaced by LOC1 ‘development in the open countryside is carefully managed to safeguard the intrinsic character and beauty of the countryside’. What is the legal definition of ‘intrinsic character and beauty’? It is too vague. LOC1 needs to be far clearer. Surely we should be tightening controls on building in our green countryside spaces in the light of global concern for Climate Change and Habitat Loss, not relaxing the controls! This is illogical in 2020. To conclude: LOC1 should be much clearer and robust in its attempts to protect our open countryside or it could be subject to abuse in the future.

Proposed Actions/Changes

None.

Officer Response

Policy LOC1 defines settlement boundaries which provide a clear distinction between the build form of a settlement and the open countryside. Policy RS4 sets out the circumstances in which development may be acceptable in the open countryside. It is considered that this provides a clear approach to development in the open countryside.

Officer Recommended Change(s)

No changes recommended.

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
190	Local Resident	General Comments	Site Specific Part 2 Local Plan- Publication Plan						

Reasons/Details of representation

Thorpe Malsor Village/Parish Plan We ask that this document, put together in 2012 by a number of hardworking village volunteers be listed in the appropriate place within the emerging updated Local Plan. We were assured back in 2012 that the Council would adopt any plans that villages managed to produce and we assumed that this had already been done for Thorpe Malsor. The Plan highlights what villagers cherish about our special village and want their comments and their voices recognised. Thorpe Malsor's Village Plan should be listed with other Parish Plans and Village Design Statements as was promised to the village back in 2012.

Proposed Actions/Changes

None.

Officer Response

The Thorpe Malsor Village Plan has not been adopted by the Council as informal policy. The Council are in discussions with representatives of the Parish Council to review the document but until such as time as a review has taken place it is not possible to make reference to the document in the SSP2.

Officer Recommended Change(s)

No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
191	Cranford Estates	Policy CRA2	South of New Stone House,	No	No	No	No	Yes	Yes

			Duck End, Cranford						
Reasons/Details of representation									
<p>1.1 On behalf of our client Cranford Management we object to the wording of proposed Policy CRA1. 1.2 The policy is a wholly unrealistic and is not effective in its wording nor justified. Part a) of the policy advises that ‘development will seek to deliver affordable housing to meet an identified local need’. Presumably development unrelated to new housing would not be expected to seek to deliver affordable housing, whereas the policy as drafted infers this. The policy therefore lacks clarity and is ineffective. The policy also does not consider the deliverability or viability of affordable housing in the village as a standalone scheme. 1.3 Part b) appears as a shopping list of enhancements to the village including a play area and various public realm improvements. The phrase ‘maximising the bridge’ at part iv) is ill-defined and no further guidance is given in the supporting text as to how this is achieved. It is noted the bridge has a deep cutting either side with extremely narrow footways. Without further clarification or justification the text is unclear as to what ‘maximising’ involves. Nor does the Rural Masterplanning report give any guidance. The text also refers to maximising the gully (next to the bridge) which is the line of the former railway line. This area is small there is no public access to it and is steeply sloping in two directions (as a gully). It currently offers a well treed area and a biodiversity refuge. Again not clarification is given as to what is this area is expected to deliver through its ‘maximisation’.</p> <p>1.4 Part c) advises development in Cranford will be referenced to Scattered Rural Character Areas as identified in the Rural Masterplanning report. The date of the report is not identified in the policy however the only report that emerges from a search in the Council’s web pages is dated 2012. This is an evidence base document divided into ‘Borough-wide principles for rural development’ and ‘Village-by-village analysis and development principles’. There does not seem to be a section on Historic Traditional and Scattered Isolated Rural character areas as is suggested in emerging policy CRA1. The policy therefore lacks clarity and is not effective. In addition, the Rural Masterplanning report as a 2012 document is dated and already 7 years behind the submission version of the plan. The document was intended as an evidence base to inform policy and not become policy in its own right. It has not been consulted on independently. It has not been updated since the Issues consultation on the plan in March 2009 and does not take account of the comments made to the Options consultation in 2012. The reference to this document is unjustified and should be deleted. The relevant references are to emerging Policy RS5 General Development Principles in the Rural Area and the remaining policies in the chapter covering Cranford (on which further comments on these are made in our separate representations). 1.5 Part d) requires ‘Use a limited palate of materials of local limestone, and thatch or slate’. This requirement is too restrictive and does not allow for localised variation or different types of building.</p>									
Proposed Actions/Changes									
<p>1.6 A preferred wording of policy CRA1 would be; Policy CRA1 Cranford Development Principles Development in Cranford will be supported where: a. Seek to deliver affordable housing to meet any remaining identified local need; a. It delivers affordable housing either within the identified settlement boundary or adjoining it in accordance with an up-to-date local housing needs survey. Developments may incorporate private market housing where a viability assessment demonstrates this would be necessary to bring forward the affordable housing. b. It</p>									

facilitates Facilitate , where appropriate, the following identified improvements to the village by : i. Creation of a children’s play area. ii. Improvements to the High Street with measures to soften or narrow the highway, calm traffic and improve the public realm. iii. Introduce appropriate tree planting to the south side of the High Street. iv. Enhancement of gateways into the village from the west and particularly the east, potentially maximising the bridge and gully at Duck End (south) over the former railway line as a landmark feature. v. Introduction of street treatments and street furniture appropriate to the historic and rural context. c. Take their design, character and materials cues from the character of Historic Traditional and Scattered Isolated Rural character areas, as identified in the Rural Masterplanning report; d. Use a limited palate of materials of local limestone, and thatch or slate; ec. It Reflects the scale, mass, form, height and density of the historic pattern of development; fd. It Protects important public views, particularly those of St Andrew’s Church and Cranford Hall; and ge. It does not result in the loss of historic front gardens for structures or car parking. h. Introduce street treatments and street furniture appropriate to the historic and rural context, for example, setts for kerbs and bonded pea shingle for path and road surfaces, and retain and, where necessary, enhance original features such as the water hydrants.

Officer Response

Criterion a) of Policy CRA1 is considered sufficient in setting out the need for further development in Cranford to deliver affordable housing to meet any remaining need. The approach to development outside of the settlement, with regards to the delivery of affordable housing is already set out in Policy 13 of the Joint Core Strategy and therefore the need to replicate this here is not required. Criterion b) is considered to provide sufficient clarity of the requirement for development to assist in facilitating the list of identified improvements, where appropriate. No changes are required. In relation to criterion b. iv), the references to the bridge and gully on Duck End (south) over the former railway line as a landmark feature, were sourced from the Rural Masterplanning Report and the Cranford Conservation Area Appraisal. There is no reason as to why the findings of these reports should be removed from Policy CRA1 as they continue to be considered as important opportunities to create/ enhance landmark features in Cranford. Criterion c), d) and h) provide sufficiently clarity on shaping development in the village regards to principles based on design, character and materials and more specifically street treatments and street furniture. Therefore no amendments to this set out of criteria will be made.

Officer Recommended Change(s)

No changes recommended.

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
192	Cranford Estates	18	Appendix 3 - Policies Maps	No	No	No	No	Yes	Yes

Reasons/Details of representation

1.1 On behalf of our client Cranford Management we object to the section of the publication Plan - Site Specific Part 2 Local Plan relating to the identification of land referenced HVI080 at Cranford which then comes under Policy NEH3 - Historically and Visually Important Local Green Space. 1.2 The policy seeks to preserve the openness of areas designated as Historically and Visually Important Local Green Space (HVI land) and specifically to prevent development on such designated land only in exceptional circumstances. 1.3 Our objection relates to part of the land under designation HVI080 which is notated on the Cranford Proposals map Figure 18.13. 1.4 Whilst we fully support and accept the principle of protecting green open space where this is important to the setting of historic buildings or where it is important to a Conservation Area character, we do strongly feel that this should not be a blanket approach where large swathes of land are given this designation when they do not make a specific local contribution in this regard. 1.5 The Planning Practice Guidance advises that, 'If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.' Cranford has a designated Conservation Area and an accompanying Conservation Area Character Statement. The village is set within open countryside to which restrictive policies are applied and the land is therefore already protected as necessary through policy designations and no further benefit would be gained by additional designations. 1.6 Paragraph 100 of the National Planning Policy Framework (2019) itself sets criteria for the designation of Local Green Space and advises 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), tranquility or richness of its wildlife; and c) local in character and is not an extensive tract of land. 1.7 With regard to the criteria above whilst the land is 'reasonably' close to community the arable field has no recreational value, ecological value or any significant historic value. The arable field has no particular landscape beauty and is not covered by any landscaped designation. Its visual appearance is dominated by the backdrop of local authority housing which itself is out of character with the historic village. The arable field off Top Dyson has no public access. 1.8 Whilst it is understood that important views within the Conservation Area should be maintained as should the setting of listed buildings, the blanket designation of the arable field under reference HVI080 does not appear to fall within the guidelines for designation. There is limited public access to the land under HVI080. A footpath crosses the land south west to north east, to the south of the brook but the land to the north is entirely without public access. It is notable that the examples of green spaces appropriate for Local Green Space designation as given in the PPG are all types of open space to which public access is available. (PPG para 013 states 'For

example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis'). 1.9 In addition paragraph 99 of the NPPF advises that the designation of land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes. Our representations to the housing policies for Cranford question the deliverability of the two sites allocated to deliver the housing needs identified for Cranford village. 1.10 As regards the protective designation covering land labelled HVI080, whilst we would accept that the land to the south of the brook affords views towards the village and particularly the church from the footpath, the land to the north of the brook (the arable field) principally provides views across it from the public highway to the ribbon development of former local authority housing to the north which are not part of the historic settlement form. There are no views of the Listed Church or Hall from the arable field. 1.11 The justification for the designation of HVI080 in the Sites Specific Proposals Local Development Document - Historically and Visually Important Open Space Background Paper September 2015 accepts (at page 11) that the area for designation is 'relatively large'. In terms of its particular significance locally the justification on page 11 comments that the land provides views of Cranford Hall Park land but as commented above this is only where there is public access to the south of the brook. The further summary on page 41 adds that the site provides views of the church (not previously mentioned on page 11) but again this is only from the southern part of the site. The page 41 summary refers to the land as within the village but also refers to it as land outside the village boundaries which is an obvious contradiction. 1.12 There are other areas of open space within the Conservation Area boundary which are not proposed to be further covered by an HVI designation some of which have a greater historic significance such as ridge and furrow. The designation of HVI open space in respect of Cranford is not therefore consistent. The arable field which forms the northern part of HVI080 is a modern construct and historic maps indicate it was first enclosed in 1900 with the houses along Top Dyson shown as partially constructed on the 1958 O.S. map and completed on the 1970 O.S. map. 1.13 On 28 November 2019 a report was considered by Kettering Borough Council Planning Policy Committee Members setting out the responses to the Site Specific Part 2 Local Plan - Draft Plan consultation. The Members were asked to endorse the officer responses set out in the comments schedule to be taken in to account in the production of the Pre-submission Plan. 1.14 The assessment for Cranford village is set out in the report as follows:- '2.14 Cranford (Appendix 1i and 2i) Five supporting comments were received and four neither objecting nor supporting. There was some support for the two proposed affordable housing allocations identified; however there was also some objection and two new sites were promoted for consideration. There was also support for the Historically and Visually Important Local Green Space identified but also an objection. Issues relating to the water recycling centre were raised.' 1.15 Appendix 1i referenced in the extract above comments in relation to the proposed alternative sites put forward by our client as follows:- 'The proposed allocations in Cranford have been assessed and it is considered that these are of a sufficient scale and represent an opportunity to deliver affordable housing in Cranford in accordance with the Housing Needs Survey.' 1.16 As set out above and in our separate representations we question the suitability and deliverability of the sites identified. 1.17 The supporting Appendix 2i provides the following response to our client submissions: 'In relation to this designation of HVI080, both the Historically and Visually Important Open Space Background Paper (September 2015) and a subsequent update in June 2016 set out the Council's approach the designation of this site as Historically and Visually Important Open Space. This included recommendations put forward by a third party and the site has been

<p>subsequently identified in the SSP2.' Response - the assessment of our objection to the inclusion of the norther part of HVI080 in the 2015 and 2016 documents are inadequate. In the 2015 assessment referred to above it is commented, 'The site provides views to Cranford Hall parkland and is important to the setting of the village'. Any views are not public view and in any event these factors are covered by Conservation Area policies. In the 2016 update at page 16 the officer justification for retaining the land as HVI is that it is 'important to the context of the village' and 'is a fundamental part of the village' but makes no further explanation why it is considered so and why this does not apply to every field or paddock around the village. It is further commented it creates a setting for the village structure, but this is not a reason for designation under HVI as is covered under Conservation Area policy. It is acknowledged that this site is not publicly accessible. Public access is not a requirement of the HVI designation. Response - agreed but under paragraph 100 of the NPPF for designation the land should be demonstrably special and hold local significance. In our view this has not been demonstrated in any of the Council's assessments.</p>
<p>Proposed Actions/Changes</p>
<p>1.18 We therefore object to the extent of HVI designation as it applies to the northern part of the Cranford site reference HVI080. Its inclusion within Policy NEH3 is insufficiently justified by the Council's assessments and should be excluded from this policy designation.</p>
<p>Officer Response</p>
<p>In relation to this designation of HVI080, both the Historically and Visually Important Open Space Background Paper (September 2015) and a subsequent update in June 2016 set out the Council's approach the designation of this site as Historically and Visually Important Open Space. This included recommendations put forward by a third party and the site has been subsequently identified in the SSP2.The concerns in relation to the northern part of the site were considered when the site was looked at again in 2016 following the 2015 consultation. However it was concluded that the northern part of the site is important to the context of the village and should not be removed from the site boundary. The importance of this part of the site is recognised as it provides a connection between Cranford St. John and Cranford St. Andrew as well providing a setting for the village structure. This clearly demonstrates the local significance of HVI080. It is acknowledged that this site is not publicly accessible. Public access is not a requirement of the HVI designation. It is therefore considered that given the extent of assessment of the site which clearly demonstrate the need to include the entirety of HVI/080 as a proposed Historically and Visually Important Local Green Space the site will be progressed as such and as mentioned above.</p>
<p>Officer Recommended Change(s)</p>
<p>None.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
193	Cranford Estates	Policy CRA2	South of New Stone House, Duck End, Cranford	No	No	No	No	Yes	Yes

Reasons/Details of representation

1.1 On behalf of our client Cranford Management we object to the section of the publication Plan - Site Specific Part 2 Local Plan relating to Cranford Housing Site Policies covering paragraphs 13.47 to 13.55 and Policies CRA2 and CRA3. 1.2 Paragraph 13.47 of section on Cranford Housing Site Policies refers to the two allocated sites in Cranford as Rural Exception schemes which can be supported by private market housing to ensure deliverability and viability. We support this approach as in real terms this is likely to be the only way affordable housing is to be provided to the village to support its identified housing needs. 1.3 However, we disagree that the two sites allocated are either appropriate or viable and therefore not deliverable. As such the plan is not positively prepared as it fails to provide a strategy which, as a minimum, seeks to meet the area's assessed needs. The Plan is also not effective as we question the deliverability of the sites identified. The key points we would raise with the Inspector in this regard are as follows:- The site identified under Policy CRA2 - South of New Stone House, Duck End, Cranford (RA/170) is allocated for 5 or 6 dwellings. It is not clarified in the Policy if the 5 or 6 dwellings will be supported by additional private market housing or whether the estimated capacity includes any supporting market housing. As a site at 0.17 ha with surface water flooding issues the extent of which are as yet undetermined the site capacity is limited, the viability of providing affordable housing on such a small site is questioned. Proposed Policy CRA2 in our view demonstrates that the proposed allocation is far from constraint free and is insufficiently evidence-based to achieve an allocation. The proposed Policy requires a Level 2 Strategic Flood Risk Assessment for the site as well as a sequential approach to design options. The site is at high risk of surface water flooding due to its valley bottom location close to the brook. This may render the quantum of development on the site unachievable and unviable to provide affordable housing. Both policy CRA2 and CRA3 require the built development to be in local limestone stone and thatch or slate. Again we question the viability of very this restrictive pallet of materials in the context of the small schemes whether there are other constraints to be addressed. It is known that RSLs will not accept thatch. Both of the sites under Policy CRA2 and CRA3 have been proposed for allocation since circa 2010 and a decade later no further supporting information appears to have been prepared to demonstrate that these sites are in fact achievable and deliverable. Our concern is that the two sites have no realistic commitment to be delivered and hence the housing need identified by the Parish Council will not be met. The allocation of sites that have no impetus to be delivered block the opportunity for other deliverable sites to meet the identified need. 1.4 We also disagree that in so far as the allocations proposed for Cranford are concerned we consider these not to be justified in the context of an appropriate strategy, when considered against the reasonable alternatives and

therefore not consistent with national policy to enable the delivery of sustainable development in accordance with the policies in the NPPF for the following reasons. Our representation to the Site Specific Part 2 Local Plan - Draft Plan (consulted on in Summer 2018) set out our objection to the allocation of the housing sites now proposed for Cranford. This case was set out in full and is attached herewith as Appendix 1. In previous consultations in respect of the draft version of the plan on behalf of our clients we have proposed two alternative sites for development to deliver housing including land at Top Dyson and land at Duck End. Kettering Borough Rural Masterplanning Report 2012 is intended to under-pin the plan as an evidence base document. However, neither the site at Top Dyson nor our client's land at Duck End were considered in this evidence base document which has not been updated. The Kettering Borough Rural Masterplanning Report predates the Options plan consultation of 2012 (to which our clients responded), the Housing Allocations Plan consultation of 2013 (to which our clients responded). The Housing Allocations Assessment of Additional Sites and Update report of 2013 seeks to analyse the two sites now proposed for allocation sites RA/170 (Duck End) and RA/173 (Thrapston Road) together with our clients proposed allocation at Top Dyson then identified as RA/205. In our view the assessment is highly flawed. Please refer to our review of this at Appendix 2. 1.5 On 28 November 2019 a report was considered by Kettering Borough Council Planning Policy Committee Members setting out the responses to the Site Specific Part 2 Local Plan - Draft Plan consultation. The Members were asked to endorse the officer responses set out in the comments schedule to be taken in to account in the production of the Pre-submission Plan. 1.6 The assessment for Cranford village is set out in the report as follows:- '2.14 Cranford (Appendix 1i and 2i) Five supporting comments were received and four neither objecting nor supporting. There was some support for the two proposed affordable housing allocations identified; however there was also some objection and two new sites were promoted for consideration. There was also support for the Historically and Visually Important Local Green Space identified but also an objection. Issues relating to the water recycling centre were raised.' 1.7 Appendix 1i referenced in the extract above comments in relation to the proposed alternative sites put forward by our client as follows:- 'The proposed allocations in Cranford have been assessed and it is considered that these are of a sufficient scale and represent an opportunity to deliver affordable housing in Cranford in accordance with the Housing Needs Survey.' 1.8 The supporting Appendix 2i provides the following response to our client submissions: 'Both of the sites that have been promoted have yet to be considered for allocation at any stage during work on the SSP2.' Our response - this is evidentially untrue as the Top Dyson site was assessed by the Council in 2013 as set out above and the alternative Duck End site was submitted at the draft plan stage. 'The sites that have been included as draft housing allocations have been included to address the identified need for affordable housing in the village and are supported by the Parish Council.' Our response - the alternative sites are proposed for the same function. The Local Plan is intended to be an evidence-based plan allocating the most appropriate and deliverable site. The Parish has the opportunity through the Neighbourhood Plan to allocate sites it may prefer. 'Site assessments of the sites have been undertaken and it has been agreed by Members of Planning Policy Committee that these sites should be allocated. It is acknowledged that both sites are somewhat disconnected from the village, although this was outweighed by the provision of affordable housing. As a result the two sites included in the Draft Plan will continue to be progressed and both of the promoted sites on Duck End and Top Dysons will not be considered any further.' Our response - this is not a true assessment of why the sites should be discounted if they are locationally preferable with fewer constraints than those that are proposed or allocation. 'The two sites identified in the Plan provide sufficient housing to meet the

affordable need and no further allocations are required in the village'. Our response - the alternative sites were proposed as substitutes not as additional sites and we question whether there is a real intent to deliver the sites proposed for allocation. 'In relation to this designation of HVI080, both the Historically and Visually Important Open Space Background Paper (September 2015) and a subsequent update in June 2016 set out the Council's approach the designation of this site as Historically and Visually Important Open Space. This included recommendations put forward by a third party and the site has been subsequently identified in the SSP2.' Our response to the identification of HVIOS in relation to HVI080 is under a separate representation. 1.9 The report is not a full assessment of the alternative sites as reasonable alternatives. It is merely dismissive of the suggested alternatives in favour of those that have already been assessed and are proposed for allocation. In this respect the plan is not justified as an appropriate strategy, when considered against the reasonable alternatives and based on proportionate evidence. The reason(s) for rejecting the site at Duck End is not even mentioned. 1.10 The Top Dyson site by comparison to those proposed for allocation has been subject a highway study to consider access arrangement and suggested layouts have been drafted. The site can also deliver one of the 'shopping list' items of draft policy CRA1, a play space for children, as well as a car park for the village hall to alleviate dangerous roadside parking along Grafton Road. 1.11 The Duck End site proposed by our client is better connected to the village than the Duck End site as a proposed allocation. It abuts the settlement boundary and can be linked by a roadside footway, unlike the proposed site. 1.12 The proposed allocation at Duck End is in a location beyond the pavement running alongside Duck End and the access to the site is beyond a narrow bridge over the brook yet there is no requirement in the policy for a highway assessment nor a requirement to support connectivity when the site has already been accepted by the Council to lack connectivity to the village. In this regard the proposed allocation is not consistent with national policy and does not enable the delivery of sustainable development in accordance with the policies in the NPPF. 1.13 The site at Thrapston Road is equally disconnected from the settlement. Its vehicular access can only be on to High Street at which point there is no footpath alongside this busy road out of the village. The 8 to 10 houses proposed will be physical disconnected from the village and its residents are less likely to be fully integrated to the village community as a result.

Proposed Actions/Changes

We support the following changes to make the plan compliant Deletion of policies CRA2 and CRA3 and their replacement with the following policies:- Policy CRA2 Land at Duck End, Cranford Land at Duck End is allocated for housing development and will provide between 8 to 10 dwellings. Development proposals for the site will: a. seek to deliver affordable housing to meet identified need and be supported by private market housing; b. be supported by a heritage impact assessment to demonstrate how the design of the proposal will preserve the setting of nearby heritage assets and the character of the conservation area; and c. include a traditional palate of materials and will respond to the local vernacular. d. Provide a Surface Water Drainage Assessment to demonstrate that SuDS are being used to ensure that the development is safe and does not increase flood risk to any adjacent land. Policy CRA3 Land at Top Dyson, Cranford Land at Top Dyson is allocated for housing development and will provide between 10 and 12 dwellings. Development proposals for the site will: a. seek to deliver affordable housing to meet identified need and be supported by private market housing; b. Ensure the site is connected to the village through improvements to the highway, including footways and traffic calming in accordance with the requirements set out by NCC Highways; c.

Item 6 Appendix 1

Include attractive design which could be considered as a gateway to the village with appropriate consideration for the character of Cranford and its Conservation Area; d. include a traditional palate of materials and will respond to the local vernacular. e. Provide a soft landscaped car park for use the village and village hall and small play area. f. Provide a Surface Water Drainage Assessment to demonstrate that SuDS are being used to ensure that the development is safe and does not increase flood risk to any adjacent land.

Officer Response

The Housing Allocations Background Paper sets out the Council's approach to the allocation of housing sites in the Borough. The two proposed allocations have been through the site assessment process and have been considered suitable for housing. The contribution that these sites make allow for the fulfilment of the housing requirement for the rural area of Kettering Borough, as set out in Policy 29 of the North Northamptonshire Joint Core Strategy.

Officer Recommended Change(s)

No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
194	Buckleuch Property	5	Employment	Yes	No	No	Yes	Yes	Yes

Reasons/Details of representation

This representation has been prepared by DLP Planning Ltd, on behalf of our client, Buckleuch Property (Kettering) Ltd, in response to the current consultation on the Publication Version of the Kettering Site Specific Part 2 Local Plan. Our client welcomes the opportunity to be involved in the creation of policies that will form part of the statutory Development Plan for Kettering Borough. It is prepared in the context of our client's land ownership at Kettering Business Park and Kettering North, the latter which is allocated in the North Northamptonshire Joint Core Strategy (July 2016) (Policy 36) for a minimum of 40ha of Use Class B1 (Business), Use Class B2 (General Industrial) and small scale Use Class B8 (Storage and Distribution), along with approximately 3ha of Use Class D2 (Assembly and Leisure). To confirm, the Boughton Estate owns part of the Kettering North site, as well as surrounding land. Buckleuch Property also owns part of the site and represents the commercial property interests of the Buckleuch Group, whilst Buckleuch Property (Kettering) Ltd represents its interests at Kettering, including those at Kettering Business Park. The Buckleuch Group / Boughton Estate has a track record of delivering high quality development across Kettering, including Kettering Business Park. The development of land at Kettering North will deliver a high-quality business park, which is in a sustainable location, adjoining the existing built up area of Kettering Business Park and Kettering. Our client has

been actively involved in the preparation of planning policy in Kettering Borough, having made representations to the previous stages of the Site Specific Part 2 Local Plan and also the Joint Core Strategy. These representations have regard to the National Planning Policy Framework (NPPF, 2019) which sets out the four tests that must be met to enable Local Plans to be considered sound: Positively Prepared: Providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs, and informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development; Justified: An appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; Effective: Deliverable over the plan period, and based on effective joint working on crossboundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and Consistent with National Policy: Enabling the delivery of sustainable development in accordance with the policies in the Framework. Comments focus on the Employment Chapter (Chapter 5), in particular, draft Policies EMP1 and EMP3 and supporting text paragraphs 5.20 to 5.23. Draft Policy EMP1 (Safeguarding Employment Land) The Joint Core Strategy (2016) provides policy criteria for safeguarding existing employment areas. The role of the Part 2 Local Plan should therefore be to identify the specific areas that should be designated as safeguarded employment areas. North Kettering Business Park is identified in draft Policy EMP1 as a safeguarded employment area, which is supported. Notwithstanding this, it is considered the policy wording should cross-refer to draft Policy EMP3 (Non-Employment Uses (non-B use class) in Safeguarded Employment Areas). Currently draft Policy EMP1 confirms the identified employment areas will be safeguarded for B1 (Business), B2 (General Industry) and B8 (Storage or Distribution). Draft Policy EMP3 however infers that uses which are ancillary to the employment use are also acceptable in safeguarded employment areas (this should be made clear - see comments below). Draft Policy EMP1 should therefore confirm that non-B class uses, which are ancillary to the employment uses, are also acceptable in safeguarded employment areas. Suggested wording is outlined in the next section. Draft Policy EMP3 (Non-Employment Uses (non-B use class) in Safeguarded Employment Areas) Whilst the aims of this policy are supported, it is considered that in order for it to be positively prepared, amendments to the wording are required. The policy should be clear in that it should first confirm that uses which are ancillary to the employment use are acceptable in safeguarded employment areas. It should then go on to set out the criteria for non-ancillary uses. Suggested wording is outlined in the next section. Employment Allocations - Paragraphs 5.20 to 5.23 The Government is committed to ensure that the planning system supports sustainable economic growth and productivity, and creates the conditions in which businesses can invest, expand and adapt (NPPF, paragraph 80). The Joint Core Strategy seeks to increase the self-sustainability of North Northamptonshire by providing additional jobs to reduce the area's reliance on out-commuting. Policy 23 identifies an overall job creation target of 8,100 new jobs between 2011 and 2031. The Sustainability Appraisal (December 2019), at paragraph 5.2.21, confirms that completions, sites with planning permission and strategic allocations identify sufficient land for employment to meet the requirements set out in Policy 23 for B-class jobs. However, a review of the employment market provision was undertaken by Aspinall Verdi (November 2018), concluding that there is a need to consider provision for smaller scale general industrial sites, alongside the strategic employment allocations. Given the above, it is therefore considered the principle of allocating additional employment sites to complement the strategic employment sites identified in the Joint Core Strategy (i.e. including Kettering North), to provide choice and opportunity in the supply of employment sites, is a sound approach. By providing a mix of

<p>strategic allocations and smaller employment allocations in terms of their size, location and suitability for various employment uses, there will be a range of employment opportunities available over the Plan period to ensure the required level of jobs can be delivered. Notwithstanding the support for this strategy, it is important to note that the Kettering North strategic allocation, adjacent to the existing North Kettering Business Park, is considered to be available and deliverable for development in the short term. Indeed, a planning application for the development of Phase 1 of the site is due to be submitted shortly and our client is committed to bring forward the remaining phases. The Part 2 Local Plan should therefore continue to make clear that the strategic allocations identified in the Joint Core Strategy (i.e. including Kettering Business Park), are important sites which will make a significant contribution towards job creation in the Borough.</p>
<p>Proposed Actions/Changes</p>
<p>To ensure that the Local Plan is sound in relation to employment matters, we suggest that the wording of draft Policies EMP1 and EMP3 is amended as follows (additions in bold): Draft Policy EMP1 (Safeguarding Employment Land) ‘The following employment areas, identified on the proposals map, will be safeguarded for B1 (Business), B2 (General Industry) and B8 (Storage or Distribution): North Kettering Business Park Telford Way Industrial Estate, Kettering Pytchley Lodge and Orion Way Industrial Estate, Kettering Kettering Parkway Northfield Avenue, Kettering Desborough Industry (including Magnetic Park) Latimer Business Park, Burton Latimer Station Road, Industrial Estate, Burton Latimer Eckland Lodge, Desborough In accordance with Policy EMP3 (Non-Employment Uses (non-B use class) in Safeguarded Employment Areas), non-B class uses, which are ancillary to the employment uses, will be supported. Within safeguarded employment sites the modernisation of buildings will also be supported.’ Draft Policy EMP3 (Non-Employment Uses (non-B use class) in Safeguarded Employment Areas) ‘Within the Safeguarded Employment Areas as defined in Policy EMP1, proposals which include non-B class uses, which are ancillary to the employment uses, will be supported. Proposals which include non-employment uses within the Safeguarded Employment Areas as defined in Policy EMP01, which are not ancillary to existing employment uses, will: a. Provide evidence to show the site has been marketed at a reasonable price and period, as well demonstrating that there is no realistic prospect of the proposal site being used for an employment use b. Provide evidence to demonstrate that employment use on the site would no longer be viable c. Be suitable in the location in which it is proposed and ensure that it does not impact current and future operations of adjoining businesses d. Not undermine the existing employment uses and adversely affect the character of the area e. Not result in an over-concentration of non B-class uses within a Safeguarded Employment Area f. Not adversely affect the supply of employment opportunities within a Safeguarded Employment Area’</p>
<p>Officer Response</p>
<p>See below.</p>
<p>Officer Recommended Change(s)</p>
<p>Main Modifications are proposed to address the issues raised in this comment. Refer to Main Modification Schedule, MM1</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
195	Tata Steel (UK) Limited	11	Desborough						
Reasons/Details of representation									
<p>This representation relates to DE/063 - Land off Pipewell Road. We support the reinstatement of this site within the settlement boundary following our representation to the draft plan. This site is subject to an outline application (ref. KET/2018/0623), which has a resolution to grant subject to the completion of the s.106 agreement. The wording of the s.106 is now agreed and by the time the Part 2 Plan is submitted for examination outline planning permission should have been formally granted. In light of the very advanced stage of the outline application, we can see no reason not to include this land as a residential allocation. There is nothing in the Core Strategy that suggests the housing target for Desborough is a maximum and we consider the site would contribute to the site 5-year housing land supply. This approach would be consistent with the proposed allocation of DES4, which is at the same stage in the outline application process. Further to the above, we can confirm that the owner has entered into an exclusivity agreement with Lovell (a house builder). The sale of the site has been agreed and the exclusivity period allows for Lovell to undertake their detailed due diligence. We anticipate the sale will be complete before the hearing sessions commence. Lovells due diligence will include discussion with the Council and contact has already been made to set up the initial meeting. We would welcome the opportunity to discuss the wording of the policy for this site with Officers.</p>									
Proposed Actions/Changes									
Add a policy to the plan, which allocates site DE/063 - Land off Pipewell Road, Desborough for residential use.									
Officer Response									
<p>The SSP2 includes this site within the settlement boundary as the site has planning permission. Site DE/063 was discounted as a potential housing allocation due to unresolved issues regarding the capacity of the one way railway bridge in close proximity to the site. Those sites which have been identified as allocations in the SSP2 are sufficient to fulfil the residual housing requirement for Desborough. The Publication is accompanied by a Housing Land Supply background paper setting out additional information on the Council's housing trajectory and five year land supply position. The SSP2 will allocate sufficient sites to meet housing requirements identified in the JCS in accordance with the spatial strategy set out in the JCS. A policy does not been included for this site.</p>									
Officer Recommended Change(s)									
No changes recommended.									

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
196	Tata Steel (UK) Limited	11	Desborough						
Reasons/Details of representation									
<p>This representation relates to DE/064 - Land off Pipewell Road. This follows our representations to the previous consultations in relation to the earlier versions of the Part 2 Plan. We can confirm that this site remains available and that the landowner would actively look to bring the site forward should it be determined through the Part 2 Plan process that additional sites are needed to meet the housing need for Desborough or the Borough as a whole. With the site located on the edge of Desborough, which is identified as a Market Town, it is in a sustainable location to make up a shortfall in housing sites. Our previous representations confirm why we consider this site should be considered deliverable. This position has been improved with the sale of DE/063 to Lovell, a housebuilder, which means that this site would form an extension of this initial phase. We would expect a full application to follow the allocation and commencement to start on site shortly after the grant of planning permission. We would also expect certain efficiencies as a result of combining the sites.</p>									
Proposed Actions/Changes									
Add a policy to the plan, which allocates site DE/064 - Land off Pipewell Road, Desborough for residential use.									
Officer Response									
<p>Site DE/064 has been discounted through the site assessment process. A robust assessment of sites has been undertaken, this is set out in the Housing Allocations background papers (2012, 2018 and 2019) and the Housing Allocations Assessment of Additional Sites and Update (2013). In Desborough both housing allocations included in the SSP2 have planning permission. The Housing Land Supply Background Paper provides detail of the supply of sites in Desborough. This demonstrates that the supply in Desborough is significantly in excess of the JCS requirement plus 10% flexibility allowance. Therefore there is not a need for additional sites in Desborough to be identified in the SSP2.</p>									
Officer Recommended Change(s)									
No changes recommended.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
197	Harris Lamb	Policy NEH3	Historically and Visually Important Local Green Spaces	No			No		197

Reasons/Details of representation

Our objection relates to the late inclusion of HVI057a on the edge of Burton Latimer. The proposed designation in this regard is a new addition to the pre-submission plan, with the site previously not even being included in the list of potential sites for designation in any of the following: Option Paper in 2012; the Background Paper in 2015; or the update to the Background Paper in 2016. We firmly consider that the evidence now published does not justify either the sudden and very late consideration of the site as a potential HVI designation or the subsequent conclusion that a designation is justified in accordance with the provisions of Paragraph 100 of the National Planning Policy Framework. We also note this conclusion is contrary to the Council's own consideration of the site immediately to the southeast (i.e. HVI072). The designation should therefore be removed. The reasons for this strong objection in relation to the proposed designation of HVI057a are as follows: 1. The site in question did not even make it onto the initial list of potential sites to be considered for a HVI designation in the 2012 option paper or the 2015 Background Paper. Consequently, even when the broadest range of sites were being considered in the initial stages the Council still did not even identify HVI057a as a site that warranted the initial assessment to see if it made the criteria for a HVI designation. We can only take from this that at that time it was self-evident to the Council that this site would not meet the criteria and so was dismissed as a potential site for assessment. 2. The site adjoins parcel HVI072, which was a site that did make the list for the initial rounds of assessments in 2012 and 2015. This site was dismissed on both occasions because it did not meet the criteria. This site was then re-evaluated in 2019 as a result of a single consultation response to the draft plan (the same consultation response that trigger the assessment of my client's site). However, it was concluded again not to meet the criteria for a HVI designation. The reason being its modern urban context and limited visibility. We support the council's conclusion in relation to the adjoining site, which is consistent with their assessment of other sites; however, we cannot reconcile why the site in my clients ownership has somehow leap frogged the adjoining site in terms of importance, from being deemed less important by virtue of its exclusion from the initial assessment to now being more important by virtue of its inclusion with the HVI designation. When considered against HVI072, HVI057a has a stronger urban context, is less visible and ultimately less sensitive than HVI072. HVI057a has new residential developments adjoining the north eastern and north western sides the sites, which not only form a stronger urban context, but reduce the visual impact from the limited short distance views available of the site. The new residential development to the north west also extends further to the west than HVI057a and so HVI057a is contained in this context and does not extend beyond the extent of the existing town. 3. A Planning Application was submitted in 2017 for the land in my

client's ownership. This application was accompanied by a Landscape and Visual Impact Assessment (Appendix 1), which concluded that this site could accommodate the proposed residential development without adversely affecting landscape character or having an adverse visual impact. It demonstrates that the site has limited visibility within the wider landscape and is not sensitive to change. The council raised no objection to the conclusions within the submitted Landscape Visual Impact Assessment in their consideration of the application and, whilst harm was identified by virtue of the impact on the intrinsic beauty of the countryside, when clarification was sought from the Planning Officer post determination it was clarified that if the principle of residential had been acceptable then this concern would also be overcome (Appendix 2). So the Council's current assessment is also at odds with its consideration of this planning application. 4. The reason stated for now deciding to consider my clients site at this late stage in the process is the presence of a single representation to the Draft Plan consultation. This was the third consultation in relation HVI designations and only one representation was received to this effect. This is not the basis for such a significant change in the council's position in relation to this site and does not demonstrate that criteria b) for the designation of LGS in Paragraph 100 in the National Planning Policy Framework has been met. Criteria b) states Local Green Spaces should be demonstrably special to the local community and hold a particular local significance. With only one representation being received across three consultations and with this representation be just a single line querying whether sites known as HVI057a and HVI072 should be included, it is evident that the local community do not have any strong feelings about this site or the adjoining site. The only other representation of note to the Draft Local Plan was from Burton Parish Council; however, this is not in support of the HVI designation. Instead it questions the need to considering HVI designations in the first instance given the other designations already included in the plan. Consequently, there is no evidence available to suggest that the Criteria b) of Paragraph 100 has been met. Summary We consider the proposed designation of HVI057a is not supported by Paragraph 100 of the National Planning Policy Framework. This site does not have local significance or value and has a strong urban context. It is contained by new residential developments on two side, which have already irreversibly altered the sites context and users experience of it, and the Public Right of Way is protected by other legislation. Consequently, we object to the proposed designation of HVI057a and request its removal from the plan.

Proposed Actions/Changes

Proposed designation HVI057a should be removed from the plan.

Officer Response

HVI057a was put forward for inclusion as an area of HVI through the consultation on the Site Specific Part 2 Local Plan – Draft Plan consultation. The Historically and Visually Important Local Green Space: Background Paper (Update October 2019) provides a robust justification for the designation of this area of land as HVI.

Officer Recommended Change(s)

No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
198	Robert Dixon Ltd	5	Employment						

Reasons/Details of representation

This representation relates to land at the north western end of Pytchley Lodge Road (see attached) (the Site). This Site is owned by Robert Dixon Ltd. It consists of two dated industrial buildings with associated yard area. The Site is to be vacated soon and with the context of the Site having recently changed significant / proposed to be changed significantly with the introduction of allot of residential neighbours immediately to the north west and south west, it is considered this is going to significantly impact of the future industrial operation of this Site and the Part 2 Plan presents the opportunity to change the designation of the Site in acknowledgement of this change of context. Thereafter we request the site is allocated for residential development to complement its new neighbours. Access to the proposed residential site would be secured through Thurston Drive and only an emergency service access would be retained to Pytchley Lodge Road. Located in Kettering it is within one of the four Growth Towns identified in the North Northamptonshire Joint Core Strategy (NNJCS) and a sustainable location for a residential development in this context. In terms of its employment neighbours, it adjoins the Salvation Army depot and some Environment Agency offices. These provide more residential compatible uses and a more appropriate buffer to the residential developments to the north west and south west than the current industrial units current on the Site. The Employment Land Review (ELR) identifies the Pytchley Lodge Road and Orion Way Industrial Estate is identified as being dated, but well occupied. It is proposed to be safeguarded, apart from McAlpine's Yard which is identified as a potential mix use site, with a mix of residential and a light industrial buffer in the south eastern part of the site to the Industrial estate beyond. In the Part 2 Plan this translates to a predominately residential scheme with just one hectare (gross) of light industrial and up 217 dwellings on the remainder of the site. This will result in a strong residential context to the south west of the Site. The change in the context of the site to the north west is a result of planning permission KET/2014/0593, which is under construction. This will result in 40 dwellings immediate adjacent to the boundary of my client's site. Combined these residential sites will provide a strong residential context to the site and, as identified above, undermine its continued industrial operation. In considering the impact of removing the removal of the employment designation of the site, we note that demand for units of this size identified in the ELR, however, we also note that this demand predominately relates to new build / good stock, which this is not.

Proposed Actions/Changes

Remove the Site from the area safeguarded for employment Allocate the Site for residential development.

Officer Response
The Employment Allocations Background Paper informed by the Employment Land Review undertaken by Aspinall Verdi sets out the approach to safeguarded areas in the Borough. It is considered those proposed, including Pytchley Lodge Road, are justified and sufficiently evidenced in these documents. The Housing Allocations Background Paper sets out the Council's approach to housing allocations in the Borough. It is evident that the Council has identified sufficient land to meet the minimum requirements as set out in Policy 29 of the North Northamptonshire Joint Core Strategy. No further housing allocations are required in Kettering.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
199	Harris Lamb	10	Burton Latimer						

Reasons/Details of representation
This representation relates to Land off Gardener Road, Burton Latimer (see attached for site plan). This follows representations to the previous consultations in relation to the earlier versions of the Part 2 Plan. We can confirm that this site remains available and that the landowner would actively look to bring the site forward should it be determined through the Part 2 Plan process that additional sites are needed to meet the housing need at a Borough or Town level. With the site located on the edge of Burton Latimer, which is identified as a Market Town, it is in a sustainable location to make up a shortfall in housing sites. Our previous representations confirm why we consider this site should be considered deliverable/developable.
Proposed Actions/Changes
Add a policy to the plan that allocates the site known as Land off Gardener Road, Burton Latimer for residential use.
Officer Response
The site was previously considered by the Council and discounted as a housing site allocation (referred to as site BL051 in the SSPLDD Housing Allocations Background Paper – February 2012), due to lack of safe access to the site and impact on biodiversity and inclusion of Burton Latimer pocket park within the site boundary. Since then a planning application (KET/2017/0902) for 84 dwellings was refused because development of the site would not accord with the settlement hierarchy or sustainable development objectives of the spatial vision for the area.

Item 6 Appendix 1

The council is able to demonstrate a 5 year supply of housing. The allocations in the SSP2 fulfil the remaining residual housing requirement when existing completions and commitments are taken into account. The Housing Land Supply Background Paper (May 2018) provides information on the need for housing allocations in Burton Latimer. This demonstrates sufficient sites have been identified in Burton Latimer to meet housing requirements plus a flexibility allowance.

Officer Recommended Change(s)

No changes recommended

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
200	Tata Steel (UK) Limited	4	Housing	No	No	No	No		

Reasons/Details of representation

This representation relates to the Housing Supply Background Paper, as referenced in Chapter 4 of the Publication Plan, with a specific focus on the commentary on the monitoring triggers in the North Northamptonshire Joint Core Strategy (NNJCS) and the Council's performance against these - Paragraphs 3.13-3.15. In this context, we note that the title to this subsection in referring to 'Triggers' rather than 'Trigger', acknowledges there is more than one monitoring trigger in the NNJCS, but commentary is only provided on the 25% monitoring trigger. There is no reference to the second trigger (see 9.18 in the NNJCS) in this Paper, which relates to the performance of the SUEs against the trajectory in Annex A of the NNJCS. There is also no reference to the SUE trigger in the Publication Plan or the AMR, and there does not appear to be anything in the public realm that shows that Council have been monitoring the SUE trigger as required. Furthermore, these documents do not include the breakdown of the completion data for each year on a site by site basis to date for us to consider how the Council has performed in this regard. This data is fundamental for a number of reasons and should be published. The breakdown of completions is not only important to see how the Council has performed against the SUE trigger, but would also sets the wider context for considering how realistic the predicted completion rates going forward are and it would also enable us to consider how successful past predictions on delivery rates have been. The evidential burden in relation to 'deliverable' sites has increased since the adoption of the NNJCS and it is anticipated that further Position Statements will be produced in due course to evidence predicted delivery rates. Looking back at the past will provide a steer as to the level of scrutiny that should be applied to these statements. The inclusion of the SUE trigger in the NNJCS was a result of the numerous concerns raised by the development industry during the examination of the NNJCS. In the Planning Inspectors report he concluded these concerns had merit and that a monitoring trigger should be included so that if the SUEs, as

Item 6 Appendix 1

<p>an important part of the house supply, faltered that the strategy could be reconsidered at that time. It is evident from the data available that the SUEs in Kettering Borough Council have not delivered as predicted, but the lack of data provided in this regard means it is not possible to comment further at this time. The absence of the breakdown of past completions undermines the transparency of the process and does not allow for a full review of the Part 2 Plan and its relationship with the NNJCS.</p>
<p>Proposed Actions/Changes</p>
<p>A site by site and year by year breakdown of the completion figures since the start of the plan period should be provided. A review of the SUE monitoring trigger should be provided and appropriate commentary/actions stated if required.</p>
<p>Officer Response</p>
<p>The SUE trigger has been monitored. This monitoring was reported to the Joint Planning Committee at its meeting on the 25th July 2019 under agenda item 5.</p>
<p>Officer Recommended Change(s)</p>
<p>No changes recommended.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
201	Local Resident	18	Appendix 3 - Policies Maps	No	No	No	No		No

<p>Reasons/Details of representation</p> <p>Settlement Boundary for Harrington I believe this boundary is unjust as it completely excludes the properties to the east of the village on the Rothwell Road. In doing so, it has closed off several minor development areas. The restricted infill policy has left no where for affordable houses or smaller retirement properties to be built in the village. Having lived and worked in the Parish for most of my life on a rented farm in Thorpe Underwood, I would wish to remain in the Parish when I retire and have the opportunity of building a small retirement property in Harrington on a piece of land called "The Woodyard" situated between Appleton Farm & Windridge on the roadside. I consider this piece of land is completely within the village boundary. Previous sale documents describe the piece of land as "useful building plot" and it is where the White Bear Public House formerly stood. Being a country person, I would not wish to retire away from what I've known all my life and live in a town.</p>

Proposed Actions/Changes
None.
Officer Response
The settlement boundaries have been drawn in accordance with a robust set of criteria. The Settlement Boundaries Background Papers (February 2012, April 2018 and October 2019) provide the evidence base and justification for the settlement boundaries shown on the policies maps.
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
202	Tata Steel (UK) Limited	4	Housing	No	No	No	No		

Reasons/Details of representation
<p>We consider that the Council has not provided the evidence to demonstrate a supply of deliverable or developable sites contrary to the provisions of Paragraph 67 of the Framework and the evidential requirements of the PPG. We have reviewed the Housing Land Supply Background Paper 2019 and reference is made to the type of evidence that the Council's has considered to determine whether sites should be considered deliverable or developable and what delivery rates can be justified thereafter. However, none of this evidence has been provided for us to review. Without this evidence, major sites with outline permission, proposed allocations and sites on the brownfield register cannot be considered as deliverable and a 5 year supply would not exist. The types of evidence needed are identified in the PPG Para 007 Ref Id 68-007-20190722. This evidence will also be essential in determining when the first completions are likely to be and assist in determining realistic delivery rates thereafter. In producing this evidence, it is important that the appropriate level of scrutiny is applied to the evidence to ensure that the figures represent a robust and realistic prediction based on the various factors relevant to that site. It is not sufficient, for example, to say this is what the developer / landowner has said. We have seen through the trajectory in the NNJCS and the Joint Position Statements prepared in support of the NNJCS that for all the proposed SUEs that the predictions in terms of the starts on site and the delivery rates were overly optimistic. This demonstrates that careful scrutiny is needed in relation to the available evidence. We have previously identified the difficulties being experienced with attracting a developer to delivery Desborough North. To our knowledge this remains the case. In relation to Kettering East, this has split into 9 entries in the trajectory. When these are combined this results in the</p>

<p>following predicted completions, which are substantially higher than those predicted through the NNJCS (a maximum figure of 280 in a year was previously predicted) for the next 5 years: 2019-20 152 2020-21 337 2021-22 425 2022-23 355 2023-24 294 It is important when reviewing the evidence available for these sites that they are not considered in isolation and they are considered collectively as well. The reason being that delivery rates on sites will reflect the demand from the market. The more outlets that are added to a site, the greater the competition and the slower the delivery rate per outlet. There is clear evidence available that the completions predicted for Kettering East are well in excess of what have been delivered on other SUEs in North Northamptonshire and across the country in a variety of market areas. We would expect the evidence provided to demonstrate why this site is going to break new ground and deliver at these substantial rates.</p>
<p>Proposed Actions/Changes</p>
<p>The evidence to support the conclusions in relation to the following need to be published for review: which sites meet the definition of deliverable / developable, what needs to be done to secure completions on a site, the date completions will commence, and the predicted delivery rates thereafter.</p>
<p>Officer Response</p>
<p>The Housing Land Supply Paper (October 2019) provides evidence of the deliverability/ developability of sites identified in the site schedule, this sets out how the timescales for delivery and build out rates have been determined and provides a justification for the approach taken. The Council has worked closely with site promoters in preparing the site schedule.</p>
<p>Officer Recommended Change(s)</p>
<p>No changes recommended.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
203	Local Resident	8	Natural Environment and Heritage						

<p>Reasons/Details of representation</p> <p>I refer to the above policy which I understand is up for renewal. I would like to object to any changes regarding the Cransley and Thorpe Malsor reservoirs. This is an important wildlife area and should be protected. They are natural beauty spots and habitats for the Kettering area as a whole.</p>
<p>Proposed Actions/Changes</p> <p>None.</p>

Officer Response
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
204	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation
<p>I have received information to the effect that Policy 10 is to have important changes made to it in the near future, to the detriment of our local wildlife and community. As you are aware, Policy 10 has been in the Local Plan since 1995, and proved useful in protecting the very necessary natural wildlife corridor in this area. I understand that both Cransley and Thorpe reservoirs will be adversely affected by these changes too, and this is a great concern us and the community. Both my wife and I would like to express our opposition to these changes, as we feel that any 'watering down' of protections to both reservoirs and wildlife is against the interests of the people, environment, and our community.</p>

Proposed Actions/Changes
None.
Officer Response
Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
205	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation

I refer to the above policy, which is part of the local plan SSP2. Until now, both Cransley and Thorpe Malsor reservoirs are important wildlife resources in this area and are well-known beauty spots. In fact, they are linked by the countryside footpath network, which is part of an important wildlife corridor that stretches from Mawsley Marsh to Cransley reservoir to Thorpe Malsor reservoir. Wetland birds are able to use this interconnected resource for breeding and nesting. This includes both migratory and British birds. Policy 10 can be classed as an important, much needed tool to protect our countryside and wildlife: it is vital that this remains in place in any changes to the local plan.

Proposed Actions/Changes
None.
Officer Response
Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
206	Local Resident	18	Appendix 3 - Policies Maps	No	No	No	No	Yes	Yes

Reasons/Details of representation
We act on behalf of **** and we are writing to object to the Settlement Boundary at Weston by Welland where the boundary line has been amended to the rear of The Lane, Weston by Welland. We have reviewed the background paper titled Settlement Boundaries (Update) issued in April 2018 and specifically the comments regarding Site Reference 7, The findings/conclusions state: Use of land has not significantly changed since at least 2000. There is no relevant planning permission. The land has an economic relationship and visual link with the open countryside Exclusion from the land from the settlement boundary accords with principles 1 and 3 (d), Please see the enclosed Plan accompanying this Representation, and whilst we agree that the section highlighted yellow meets the principles set out by the Local

Authority in determining where the boundaries should be drawn, we do not agree that the area highlighted orange accord with the principles. We therefore suggest that the boundary should be reappraised and amended as shown red on the enclosed plan. We specifically comment that there is a strong boundary, as shown red on the enclosed plan, and in the enclosed photographs which should represent the settlement boundary in this location. This boundary is a clear demarcation between open countryside and the built up framework of the settlement. The land in question forms a part of a residential dwelling and the boundary forms the continuous edge of the built up framework/residential dwellings. We do not agree that the proposed change in this location accords with principle 1 or principle 3(d) of the Settlement Boundary Defining Principles and comment as follows: Principle 1 - The boundary will be defined tightly around the built up framework and where possible Will follow defined features such as walls, hedgerows and roads. The proposed boundary change does not follow the defined hedgerow feature and cuts into the built up framework of the settlement in an illogical form. Our suggested alternative would maintain a continuous and logical line. Principle 3 Boundaries will Exclude - (d) - large gardens and other open areas which are visually open and relate to the open countryside rather than the settlement We accept that the land forms garden land, but it is not a particularly large garden and it is not visually open with a relationship to the open countryside rather than the settlement. The clear boundary line which we suggest as an alternative route for the settlement boundary forms the visual barrier between the open countryside and the built framework of the settlement We request that the Inspector visits the site and we would be grateful to be kept informed of the progress of the Examination.

Proposed Actions/Changes

None.

Officer Response

The Settlement Boundary Background Paper (Update April 2018) sets out the defining principles which have been used to define the proposed settlement boundaries in the SSP2. These are referenced below, in relation to the site. The land in question is included within the existing settlement boundary for Weston by Welland which was set out in the 1995 Local Plan. However in a review of these settlement boundaries, which has been used to define new settlement boundaries, this area of land has been excluded in accordance with principles 1 and 3(d). It is considered that the exclusion of this area of this land from the proposed settlement boundary, is justified and will not be amended as a result of these comments.

Officer Recommended Change(s)

No changes recommended.

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
207	Local Resident	18	Appendix 3 - Policies Maps	No	No	No	No	No	No

Reasons/Details of representation

Harrington HVI021 There are two separate fields under separate ownership. The smaller "L" shaped field situated SW of "The Falls" is totally separate to the larger area. The owners of the small field were never contacted by the Borough Council regarding the decision to designate this area as an HVI. I contest this decision most strongly as there are limited views, as there is only a small road frontage between a house and a tall hedge. The Land Registry clearly shows ownership details and yet Kettering Borough Council failed to consult owners regarding this matter. The road frontage area is a potential building plot for a starter or retirement home

Proposed Actions/Changes

The HVI directive needs removing from the smaller field

Officer Response

The Council consulted all landowners about the HVI designations in October 2015, the comments received through this consultation were considered in the Historically and Visually Important Local Green Space Background Paper – Summary of Landowner and Town/ Parish Council Consultation and Site Assessment Update (June 2016).

Officer Recommended Change(s)

No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
208	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation
We have received information regarding the possible change to Policy 10 and I am writing to request that Policy 10 is retained for Cransley Reservoir and Thorpe Malsor and the protection that it gives to these areas. This is an area of important environmental and wildlife activity, a naturally beautiful area, and would be hugely damaging to the local area if lost. There should be no reasons allowable that would lead to this area being damaged or the local wildlife lost and Policy 10 is essential to help protect this area.
Proposed Actions/Changes
None.
Officer Response
Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
209	Pytchley Estate Settlement 1996	18	Appendix 3 - Policies Maps	No	No	No	No	Yes	Yes

<p>Reasons/Details of representation</p> <p>1.1 On behalf of our client Pytchley Estate Settlement 1996 we object to the section of the Publication Plan- Site Specific Part 2 Local Plan related to Figure 18.22 specifically related to the settlement boundary and proposed Green Infrastructure (GI) Corridor at Home Farm Pytchley. 1.2 This representation does not object to the principle of GI Corridors, however this representation seeks to amend the settlement boundary for Pytchley to include Home Farm to enable the site to provide a net biodiversity gain. 1.3 Figure 18.22 shows that Home Farm is partially excluded from the Settlement Boundary and that the southern part of Home Farm is included as being within the Broughton to Pytchley Borough Level GI Corridor which follows an existing public footpath as shown described in Table 8.2. Figure 18.22 can be found within Appendix A. 1.4 The land at Home Farm which is within the GI Corridor includes a number of large agricultural buildings and section of hardstanding and does not include an existing green infrastructure. It is therefore argued that Home Farm does not currently positively contribute to the goals set out in paragraph 8.17 of the SSP2 Local Plan especially in regard to contributing towards a net gain in biodiversity. 1.5 As well as this, we believe that the inclusion of land and buildings at Home Farm is neither in accordance with the NPPF definition of Green Infrastructure, help to achieve the JCS Outcome 3- Distinctive Environments that Enhance and Respect Local character and enhance biodiversity or is in accordance with Policy 19 of the JCS. Consistent with National Policy 1.6 The NPPF defines Green Infrastructure as: 'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.' 1.7 Home Farm is a former agricultural farmyard which comprises a number of large agricultural buildings and a large section of hardstanding. We therefore consider that Home Farm does not presently meet the NPPF definition as it cannot be considered to be comprise a 'multi-functional green space' nor does the current site arrangement. 1.8 It is therefore the inclusion of Home Farm Pytchley as part of the GI Corridor is not consistent with national policy and therefore the plan is not sound. Effective 1.9 The inclusion of Home Farm as part of the GI Corridor does not currently help to meet the JCS Outcome 3: Distinctive Environments that Enhance and Respect Local Character and Enhance Biodiversity. This outcome states: 'The Plan sets out a framework for retaining the area's distinctiveness, by maintaining and enhancing landscape and townscape character. It promotes an integrated approach to biodiversity management and a net gain in Green Infrastructure, strengthening links between the countryside and the towns.' 1.10 The current inclusion of Home Farm as part of a Borough Level GI Corridor does not contribute to outcome 3. The site does not include any existing green infrastructure and because the site mainly consists of large agricultural buildings and hardstanding, it is unlikely that the site could provide biodiversity improvements as set out in paragraph 8.17 of the SSP2 Local Plan unless re-development of the site is permitted. It is therefore our view that the plan is not currently effective and therefore the plan cannot be considered to be sound.</p>

<p>Proposed Actions/Changes</p> <p>Required Amendment 1.11 We believe that to enable Home Farm to positively impact upon local green infrastructure the site should be incorporated into the settlement boundary for Pytchley. This would allow re-development of the site as an infill site which would enable net biodiversity gain to be achieved contributing to meeting outcome 3 and policy 19 of the North Northamptonshire Joint Core Strategy and paragraph 8.17 of the SSP2 Local Plan. Appendix B shows our proposed settlement boundary amendment. 1.12 Home Farm Pytchley has previously been proposed to Kettering Borough Council as a potential housing development site. Within the Housing Allocations-</p>
--

Assessment of Additional Sites and Update (2013) paper it was stated that 'RA/176: Land at Butchers Lane, Pytchley' (now referred to as Home Farm Pytchley) was discounted as a potential housing allocation due to 'Access Constraints'. However consented planning application ref: KET/2013/0006 for the re-development of part of Home Farm included a new access road. The construction of this access road has removed these access constraints for the redevelopment of Home Farm. 1.13 The site was also put forward as part of the Summer 2019 consultation as a potential housing site, however the officers response stated that previous consultations had highlighted access issues. It is therefore our belief that Kettering Borough Council failed to re-evaluate the site as the new access road consented as part of KET/2013/0006 has overcome access issues. Conclusion 1.14 In summary this representation does not object to the principle of the proposed GI Corridor, however it does seek to amend the settlement boundary to enable Home Farm to be re-developed which would present opportunities to provide a net gain to biodiversity on the site and provide a multifunctional green space for the enjoyment of the residents of Pytchley.

Officer Response

Settlement boundaries are used to make a distinction between the open countryside and the built form of settlements and provide certainty over where development is likely to be acceptable. The settlement boundaries have been drawn in accordance with a robust set of criteria. The Settlement Boundaries Background Papers (February 2012, April 2018 and October 2019) provide the evidence base and justification for the settlement boundaries shown on the policies maps. This area is not included within the existing settlement boundary for Pytchley and has not been included within the proposed settlement boundary in accordance with principle 3c) of the Settlement Boundary Defining Principles in the Settlement Boundary Background Paper (Update) April 2018. This excludes isolated development, which is physically or visually detached from the settlement, including farm buildings. Two amendments has been made in relation to the site to the north, which have been made in accordance with principle 2a), given that the site has planning permission. The principle ensures existing commitments for built development are included within the proposed settlement boundary.

Officer Recommended Change(s)

No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
210	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation
As residents of Thorpe Malsor for the last 32 years, my wife and I would like to register our disapproval of the proposed replacement of Policy 10 with NEH2. Thorpe Malsor and Cransley reservoirs are areas of outstanding natural beauty and as committed conservationists, we consider the implementation of Policy 10 would have a considerable detrimental effect on the flora and fauna. Policy 10 has been an operational success during the last 25 years and proved to be a very successful important planning and policy tool and certainly needs to be retained.
Proposed Actions/Changes
None.
Officer Response
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities.</p> <p>Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
211	Mather Jamie	Policy ROT3	Land to the West of Rothwell	No	No	No	No	Yes	Yes

Reasons/Details of representation

On behalf of our clients, Parker Strategic Land, and further to our previous representations made in 2016, I write to promote the above site for inclusion in the emerging Site Specific Part 2 Local Plan (SSP2) for Kettering Borough. A plan identifying the proposed allocation and the Council's standard representation form are attached to this letter. The land forms 7.86 Hectares of well-enclosed rectangular fields to the North of the town and East and North-East of the cricket club. There is an existing track off Desborough Road alongside the former garage site (currently in use as a car wash) that currently provides access to the land. The former garage site is within the control of our client and a new access can be established across the land to access the land at Rothwell North. There are some mature boundary hedges and trees and the land is enclosed to the North by an 80-metre belt of mixed woodland for most of the length of the site boundary. There is a ridge running East-West through the site and a public right of way runs North-South through and beyond the site. As you are aware, the site directly adjoins the allocated Rothwell North urban extension and has previously been favourably assessed by the Borough Council; the 2011 Strategic Housing Land Availability Assessment (SHLAA) identified the site as developable and to be considered as part of the allocated urban extension. As recognised by the Borough Council and set out in the emerging SSP2 there is strong historic and current Development Plan support for further development at Rothwell. The former Northamptonshire Structure Plan identified Rothwell as a strategic development area and the first and current North Northamptonshire Joint Core Strategies both reiterate this role for the town. Our clients support the vision for Rothwell set out in the emerging SSP2 including the aspirations to enhance the vitality and viability of the town centre. It is our view that these aspirations can only realistically be delivered if sufficient residential development is enabled at Rothwell to support expenditure in the town centre. On behalf of our clients we strongly contend that the residential allocations proposed in the emerging SSP2 will not deliver the accompanying vision. As drafted, the emerging SSP2 identifies a housing need for Rothwell of 1,190 dwellings to be delivered within the plan period up to 2031. Our clients consider the approach to delivery of housing at Rothwell to be unsound for two principal reasons. Firstly, emerging SSP2 is too rigidly applying the housing targets set out in the adopted Joint Core Strategy (JCS). The JCS was adopted in 2016 and takes no account of the Government's standardised methodology for determining objectively assessed housing need. SSP2 therefore seeks to provide insufficient housing in Kettering Borough as a whole. Secondly, SSP2 sets out that, of the 1,190 dwellings needed at Rothwell, only 300 have been completed in the eight years of plan period to date. The emerging plan relies extremely heavily on the 700 committed dwellings proposed at the allocated Rothwell North urban extension which does not yet have any reserved matters consents and is running significantly late on projected delivery timescales. We contend that Rothwell North does not meet the definition of deliverable as set out in Government guidance and that, should development come forward at all, the limited access options provided for will prevent development at the rate envisaged in the emerging plan. It is apparent from the emerging SSP2 as drafted that the Borough Council recognise the vulnerability of delivery at Rothwell. In order to meet the shortfall of housing provision at the town the Council has sensibly identified an additional residential allocation of 300 dwellings through proposed policy ROT3 - Land to the West of Rothwell. Our clients support the principle of an additional allocation at Rothwell for the reasons set out above, however we strongly object to the proposed allocation ROT3 as the wrong site has been chosen in order to effectively enable delivery. The supporting text to proposed policy ROT3 states that the site will come forward later in the plan period because access to the site is dependent on the delivery of phase 3 of the

allocated urban extension. This site is less sustainable than the site promoted by our clients for a variety of reasons but, most importantly, the dependency on access through another site makes the allocation ineffective and undeliverable within the plan period. For these reasons the approach of emerging SSP2 is unsound and the land at Rothwell North promoted by our client should be allocated to address this shortcoming. We are able to confirm on behalf of our clients that the land is developable and deliverable and can be brought forward in association with the allocated Rothwell North urban extension. It would be our clear intention to work closely with the adjoining landowners to coordinate the design and layout of development in order to link the two sites and provide a second major access to the whole. It is, however, important to note that the delivery of the site is not dependent on the allocated site as we are able to provide our own independent access. Our clients have been promoting this site for some years and technical survey work has demonstrated that there are no major constraints to development. In line with the Council's previous assessments there is nothing that we are aware of that would preclude this land being readily available for development to meet the needs of Rothwell, Kettering Borough and wider North Northamptonshire. As set out in our previous representations, the proposals for the land would comprise housing and supporting infrastructure, extensive open space and landscaping. A housing density of 30 dwellings per hectare would yield approximately 200 dwellings and is eminently capable of delivering the Borough Council's aspirations for housing mix and affordable housing. We would be very pleased to work with the Council proactively to bring this site forward as an allocation in the emerging plan.

Proposed Actions/Changes

None.

Officer Response

This site has been considered through the site assessment process and discounted as a potential housing site. The site identified in ROT3 performed better against the site assessment criteria than this site. Detail of the site assessment process is set out in the Housing Allocations Background Papers (2012, 2018 and 2019) and the Housing Allocations Assessment of Additional Sites and Update (2013). Reserved Matters applications have been granted at Rothwell North and preliminary work has begun on site. The Housing Land Supply Background Paper demonstrates that sufficient land has been allocated at Rothwell to meet the JCS requirement plus a 10% flexibility allowance. No further allocations are required in the town.

Officer Recommended Change(s)

No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
212	RDC Development Consultants	4		No	No	No	No		
Reasons/Details of representation									
<p>We have previously submitted representations to the Draft Version of the Part 2 Local Plan. In doing so we identified that the SUEs were not delivering at the rate predicted and raised our concerns about what these means about delivering the housing target for Desborough and for the Borough, and what this means for the 5 year housing land supply. Our concerns in relation to the deliverability of Desborough North SUE remains, with little to no progress on this site since our previous representations. We are also aware that the other SUEs are not delivering at the rate predicted in the North Northamptonshire Joint Core Strategy. However, insufficient information has been published by the Council at this stage in order to allow a proper review of progress to date. Similarly the insufficient information / evidence has been published to determine whether a 5 year supply of 'deliverable' sites exist or whether a sufficient number of sites exists (with the additional flexibility as identified) to meet the housing need identified in the North Northamptonshire Joint Core Strategy. For example: The trajectory does not provide a site by site and year by year breakdown of the completions to date; There is no reference to the SUE monitoring target and how the Council has performed against this; The evidence that the Council states has been considered to show sites are deliverable does not appear to have been published; and Evidence has not been published to demonstrate why the influx in predicted delivery rates on Kettering East is justified. Without this information our concerns remain. We also remain of the view that where the Council cannot demonstrate a 5-year supply of deliverable site or a sufficient supply to meet the housing need across the remainder of the plan period that other sites will need to be allocated. In accordance with Core Strategy, these allocations should be focused on the Growth and Market Town's, which includes Desborough. My clients site is located on the edge of Desborough and has previously been given reference DE/067. As explained in our previous representations this site is subject to an outline application. Whilst concerns currently exist in relation to the principle of development due to the location of the site outside the settlement boundary, we maintain that the site is otherwise deliverable in accordance with our previous representation and our submissions through the outline application. Should it be determined that additional sites are needed, then the landowner remains committed to its delivery and a revised application would be submitted for approval, before disposing of the site to a housebuilder. In this context we consider completions could be achieved within the next 5 years.</p>									
Proposed Actions/Changes									
Add a policy to the plan that allocates the site known as Land off Harrington Road, Desborough for residential use.									

Officer Response
<p>The Council acknowledges that the SUE's have been slower in coming forward than envisaged in the JCS. However significant progress has been made in the delivery of the SUE's with a number of parcels at Kettering East being built out, preliminary work has begun on site at Rothwell North and Desborough North is progressing towards the submission of reserved matters applications. The Housing Land Supply Background Paper (October 2019) provides evidence for the housing trajectories provided for these sites. The updated definition of 'deliverable' has been used when assessing whether sites should be included in the first five years of the plan period.</p> <p>The SUE trigger has been monitored. This monitoring was reported to the Joint Planning Committee at its meeting on the 25th July 2019 under agenda item 5. The Council has taken a proactive approach to ensuring that it can maintain a five-year housing land supply and this is reflected in the approach taken in the SSP2, including the 10% flexibility allowance which makes provision above the JCS housing requirements. The Council's proactive approach is apparent in the results of the Government's housing delivery test which were 129% for 2018 and 130% for 2019. In Desborough both housing allocations included in the SSP2 have planning permission. The Housing Land Supply Background Paper provides detail of the supply of sites in Desborough. This demonstrates that the supply in Desborough is significantly in excess of the JCS requirement plus 10% flexibility allowance. Therefore there is not a need for additional sites in Desborough to be identified in the SSP2.</p>
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
213	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation
<p>I am writing to you with the upmost concern regarding the Local Plan, in particular Policy 10 potentially being replaced with NEH2. I have a major issue with the planning protection for both Cransley and Thorpe Reservoir. I am sure you are already aware of the Intentional Unauthorised Traveller Development on Cransley Road, Loddington, adjacent to the Reservoir and the ongoing Planning & Appeal processes. Therefore to weaken any planning protection over the reservoir would be catastrophic with potential devastating effects Policy 10 document is there to protect the wildlife & countryside that is located in and around these areas. Both Cransley & Thorpe Reservoirs have been protected up until now by Policy 10 which has been retained in the Local Plan since 1995. The reservoirs are an important wildlife</p>

resource in our area, they are beauty spots, close to Kettering and are connected by the footpath network. In conclusion, I would like to strongly object to changes of the Policy on Mawsley Marsh (a SSSI) and Cransley Reservoir (Local Wildlife Site) & Thorpe Reservoir and they continue to remain protected. We need these policies in place to protect a very significant part of our local green infrastructure. Please ensure you do everything in your power to make this happen & that all interested parties are kept informed.

Proposed Actions/Changes

None.

Officer Response

Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities.

Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.

Officer Recommended Change(s)

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
214	Pytchley Estate Settlement 1996	Policy NEH4	Open Spaces		No	No	No	Yes	Yes

Reasons/Details of representation

1.1 On behalf of our client Pytchley Estate Settlement 1996 we object to the section of the publication Plan- Site Specific Part 2 Local Plan related to Policy NEH4 specifically in regard to the village of Mawsley. 1.2 Paragraph 8.47 states that the Open Space Strategy (OSS)

provides the Council with a robust evidence base and within Policy NEH4 it stated that: 'to achieve the goals above the following requirements will be made in accordance with the Open Space Strategy for Kettering Borough (2019) (or any subsequent update)' 1.3 However the Open Space Strategy for Kettering Borough (2019) cannot be found within the collection of background papers for the Site Specific Part 2 Local Plan nor can it be found on the Planning Policy A - Z webpage. It has also been confirmed verbally during a telephone call with **** (Planning Policy Officer at Kettering Borough Council) that the Open Space Strategy for Kettering Borough (2019) has not yet been published. 1.4 As the publication draft Site Specific Part 2 Local Plan includes proposed Open Space designations without publicly making available the evidence basis, it could be argued that the emerging Policy NEH4 and proposed open space designations were not based on an evidence basis. Thus, the plan is not justified and therefore cannot be deemed to be sound. 1.5 Background Paper: Open Space and Allotments (2012) specifically relates to assessing the criteria for Historically and Visually Important Open Space (HVI) and allotment provisions within the Borough. It is therefore considered that this background paper should not be considered to form the evidence basis for Policy NEH4 as it is not in accordance with paragraph 31 of the NPPF which states that: 'the preparation and review of all policies should be underpinned by relevant and up-to-date evidence This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned'. 1.6 It is therefore considered that background paper Open Space and Allotments (2012) is not 'focused tightly on supporting and justifying the policies concerned' in regard to Open Spaces (excluding HVI's and allotments) and therefore should not be considered to form the evidence basis for policy NEH4. We therefore believe that the Publication draft is not consistent with national policy and therefore the plan cannot be found to be sound. Mawsley 1.7 Mawsley is a category A village with a large number of services and amenities including but not limited to a primary school, medical centre and community centre. Mawsley is one of the largest villages within the Borough and is defined as a Category A village and therefore is a sustainable location for development. It is therefore felt that the Open Space designations shown on Figure 18.20 would prohibit future growth of Mawsley. 1.8 Without the ability to consider the evidence base for the Open Space designations it is difficult to understand the justification for the proposed Mawsley Open Spaces especially when reviewing the proposed designations within other Category A villages where Open Spaces have been designated within the heart of the villages rather than around the settlement boundary.

Proposed Actions/Changes

1.9 We therefore consider that prior to the submission of the SSP2 Local Plan to the Secretary of State, that an additional public consultation should be carried out once the Open Space Strategy for Kettering Borough (2019) is published. Until this is carried out, we consider the plan not to be sound.

Officer Response

See below.

Officer Recommended Change(s)

A Main Modification is proposed to policy NEH 4 and its supporting text to clarify the status of the open space strategy. Refer to the Main Modification Schedule, MM6 The identified open spaces in Mawsley are existing open spaces which have been identified through the audit of open space

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
215	Pytchley Estate Settlement 1996	13	Broughton	No	No	No	No	Yes	Yes

Reasons/Details of representation

1.1 On behalf of our client Pytchley Estate Settlement 1996 we object to the section of the Publication Plan- Site Specific Part 2 (SSP2) Local Plan related to the lack of specific planning policies related to the village of Broughton. 1.2 Broughton is a category A village with a large number of services and amenities including but not limited to a primary school, village hall and two convenience stores. Broughton is also considered to be the second largest village within the rural area and due to being located in close proximity to Kettering the village is considered to be a sustainable location for development. 1.3 Within the previous version of the Draft SSP2 Local Plan which was consulted upon in Summer 2018, Policy BRT01 set out development principles for Broughton. Additionally, allocations were made for housing (Policy BRT02) and Historically and Visually Important Local Green Spaces (HBI011 and HVI052). At the time when the Summer 2018 consultation was carried out Broughton had an advanced Neighbourhood Plan however it had not yet become a 'made' plan. 1.4 In the time between the Draft SSP2 Summer 2018 consultation and the current consultation, Broughton Neighbourhood Plan was 'made' and therefore is considered to form a part of the Development Plan. Broughton Neighbourhood Plan includes a 5-7 unit housing allocation on a site referred to as BT Exchange Church Street. 1.5 As a consequence to the Broughton Neighbourhood Plan becoming made, Kettering Borough Council have taken the decision that specific Broughton related policies and designations within the village would be removed, stating on page 107 of the Publication draft: 'Broughton Neighbourhood Plan and Broughton Neighbourhood Development Order were formally 'made' at the Executive Committee meeting on 17th October 2018. These provide policies which shape development in Broughton until 2031. Please refer to the Broughton Neighbourhood Plan for planning policies specific to Broughton.' 1.6 Although Broughton Development principles are covered within policies are included within the made Broughton Neighbourhood Plan, it is our view that within the SSP2 Local Plan that housing allocations should be made in Broughton. 1.7 Broughton is a sustainable settlement which would be able to provide additional housing to meet the rural housing need for Kettering Borough Council authority area. The previous version of the SSP2 Local Plan contained an allocation for 20 dwellings within Broughton, whereas within the made Broughton Neighbourhood Plan only contains an allocation for 5-7 dwellings. We therefore consider that additional housing allocations should be considered within the SSP2 Local Plan within Broughton. 1.8 The Housing Land Supply Background Paper (2019) discusses how 11 housing allocations have been made in the rural area as part of the SSP2 Local Plan which cumulatively would deliver 149 dwellings. It is proposed that the remaining rural housing

supply for the plan period will come through rural windfall development (total 108 dwellings). 1.9 We recognise that historically rural windfall sites have delivered a consistent number of houses however windfall sites are a finite resource and therefore possibilities for infilling have and will continue to diminish resulting in a significantly slower delivery. To assume that windfall sites in the rural areas will continue to be developed at a rate similar to the historic rate would be inappropriate given that the 'easy win' sites have already been developed. It is likely that future windfall sites will be more constrained and come forward at a significantly slower rate especially due to the tightly defined settlement boundaries for rural settlements within the SSP2 Local Plan. 1.10 Appendix 4b of the Housing Land Supply Background Paper (2019) provides the evidence base for the rural windfall allowance, however much of this evidence is based on historic windfall figures and current trends rather than expected future trends and is therefore not consistent paragraph 70 of the NPPF and therefore the plan is considered to not be consistent with national policy. 1.11 We also believe that the plan cannot be considered to be justified as the rural housing delivery has not been based on reasonable evidence justifying future windfall delivery, therefore the SSP2 Local Plan is not justified, thus we believe that the plan is not sound.

Proposed Actions/Changes

1.12 To reduce the reliance on rural windfall development we propose that additional housing allocations should be made within the most sustainable rural locations to reduce the reliance on windfall sites. 1.13 Representations were submitted on behalf of our clients as part of the Draft Plan Summer 2018 consultation which promoted land rear of 18-20 Glebe Road as a housing allocation. The site is well related to the existing settlement of Broughton and its infrastructure and is bound to its south and west by existing residential development. We are of the view that this site should be allocated as a housing development site within Broughton. 1.14 The site is not designated as Existing Open Space or Local Green Space within the made Broughton Neighbourhood Plan which could prohibit development and it is our view that the allocation of land rear of 18-20 Glebe Road as a housing allocation would reduce the Council's reliance on windfall development to contribute to the Borough's rural housing supply.

Officer Response

Broughton Neighbourhood Plan is part of the Development Plan and therefore no policies have been included within the Publication Plan for Broughton. No further allocations are required in Broughton to meet the housing requirement set out in Policy 29 of the North Northamptonshire Joint Core Strategy. The Housing Land Supply Paper (October 2019) provides the justification and evidence for the windfall allowance made. The approach taken is in accordance with the NPPF and provides an analysis of past trends, expected future trends and considers market conditions. The approach taken is considered to be robust and justified. In the most recent monitoring year 2018/19 21 dwellings were delivered on windfall sites in the rural area.

Officer Recommended Change(s)

No changes recommended.

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
216	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
<p>I would like to have on record that I would like KBC to retain Policy 10, with the protection it gives to Cransley and Thorpe Malsor reservoirs. I believe that it would be a huge mistake to lessen the protection of our Local Wildlife Site between Cransley and Thorpe Malsor reservoirs. This area is much valued by local inhabitants as part of the 'green infrastructure' of our county. I apologise for being late in asking you to include my name in the list of objectors to the proposed change. Thank you for your time.</p>									
Proposed Actions/Changes									
None.									
Officer Response									
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
217	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
Having just had this brought to my attention I would like to state that I would like to retain Policy 10 in order to protect the natural environments of our local reservoirs. I am a resident of Loddington. Please let me know if you need any further information from me.									
Proposed Actions/Changes									
None.									
Officer Response									
Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
218	Wicksteed Charitable Trust	Policy KET10	Land at Wicksteed Park, east of Sussex Road and Kent Place	Yes	Yes	Yes	Yes	Yes	Yes
Reasons/Details of representation									
<p>2.1 The Wicksteed Charitable Trust consider that the Kettering Borough Council Site Specific Part 2 Local Plan (Publication Plan Consultation) has been prepared in accordance with the National Planning Policy Framework (NPPF) and the Joint Core Strategy. This ensures a deliverable plan that continues the sequential and hierarchical approach set out through the Joint Core Strategy and will meet the needs of the Borough. For the delivery of new housing the Plan seeks to meet the objectively assessed housing need for the Borough, enabling the SSP2 Local Plan to be considered sound when considered against the content of Section 3 of the NPPF. 2.2 However, housing requirements are identified as minimums, and the opportunities to offer residential development over and above this level should be viewed as an additional benefit to ensuring the continued delivery and completion of housing. For this reason, although not considered unsound, greater flexibility is argued to be beneficial to the delivery of housing allocation KE/033a, including the potential for the provision of a higher level of dwellings. The suggested alterations and associated benefits are considered in Section 3 below.</p>									
Proposed Actions/Changes									
<p>3. SUGGESTED ALTERATIONS TO POLICY KET10 3.1 The Wicksteed Charitable Trust support the allocation of land at the Park for housing through Policy KET10. An additional clause has been added into paragraph 9.30 in the latest version, explicitly stating that the proposed development 'will help deliver the improved access, habitat restoration, educational and recreational opportunities to this new extension to Wicksteed.' These aims tie in with the philosophy of the Trust and its desire to maintain and enhance the heritage asset and environment, so is not in itself objected to. However, its inclusion places greater onus on the delivery of the benefits to which some concern is raised in respect of financial viability. The current allocation would struggle to unlock all of the possible benefits to the Park and wider area that are identified, whereas a larger development would enable all of the benefits noted in Policy KET10 to be delivered in the widest possible terms. 3.2 The key aspects are considered in more detail below, but in essence the ability to provide some flexibility to the policy in how it is delivered and the potential for additional housing above the suggested allocation would ensure greater benefits to this significant community asset of the Borough and its future expansion. This positive feedback to the community should be seen as a good opportunity to be captured within the Local Plan. Policy KET10 Clause (f) Amendment 3.3 Clause (f) of Policy KET10 stated: f. Be supported by a Transport Statement that will inform the proposal and ensure: i. it addresses access into the site off Sussex Road ii. it includes suitable</p>									

measures to mitigate the impact of additional traffic generated (with particular reference to capacity constraints along the Pytchley Road). 3.4 The proposed land allocation as denoted on the Kettering South West Proposals Map (reference KE/200, but also titled KE/033a by the Council within the evidence base) of the SSP highlights the allocation to adjoin two existing public highways: Sussex Road and Essex Place. Either or both of these could be used to provide access to the allocated site, with both feeding back to the Patrick Road junction with Pytchley Road to the west. The location of these access points is shown on the annotated plan attached as Appendix 2. 3.5 The ability to use either or both highways for access to the Wicksteed Park allocation would offer flexibility to the layout and function of the development. This should be viewed as a positive alteration to the Plan. This alteration could be captured through any of the following amendment to this sub-clause: 1. Removal of clause (f) (i) in its entirety, given that the only access points are to the west of this land; or 2. Rewording of clause (f) (i) to 'it ensures the provision of access into the site in accordance with adopted highway standards' 3. Rewording of clause (f) (i) to 'it addresses access into the site off Sussex Road and/or Essex Place' 4. Rewording of clause (f) (i) to 'it addresses access into the site utilising the Patrick Road junction with Pytchley Road'. 3.6 Whilst all four options are considered an improvement, the Wicksteed Charitable Trust's preference is for option 4. There is no intention to exceed existing capacities of the highway network. Policy KET10 Addendum Text: Maximising Development Potential and the Delivery of KET10 (k) 3.7 The Trust is a non-profit making organisation which reinvests all profits back into Wicksteed Park in order to continue to maintain and improve its function as a recreational, heritage, educational and ecological destination. The provision of housing on part of its land to unlock enhancement to the Park and improvements to physical links with the wider area is a unique opportunity and one that should be taken forward in a manner that maximises the deliverability of the resultant benefits. As outlined above, a larger allocation is considered important to ensure all objectives of Policy KET10 are able to be delivered, with a particular focus on clause (k). Benefits of a larger site 3.8 Policy KET10 seeks to allocate 1.07 ha of land at Wicksteed Park on the basis that 4.4 hectares of land to the south-east of the parkland will be incorporated into this public open space. However, there is scope to allocate a larger parcel of land (circa 3 - 3.5 ha for 100 - 110 dwellings) whereby the parkland will still increase in overall scale without any harm to the historic core of the Park. It would however offer significantly higher reinvestment opportunities for the Park. This would benefit the whole of the parkland, proposed rejuvenation works and ecological and biodiversity enhancements for parts of the retained land and links to the green corridor/ecological areas to the south. 3.9 Through early consultations and housing allocation options, a larger site at Wicksteed Park was proposed and discounted in 2012 by the Council on the basis of harm of the Park/loss of compensatory open space provision. However, additional information and clarification is now available to be able to support a potential larger allocation/development site. The form of the parkland, proposed allocation site and suggested potential larger site are shown in Appendix 1. 3.10 The key logic streams for enlarging the allocation are: - Any infrastructure work costs, such as sewers and highway upgrades, would essentially be the same, or very similar, for a scheme of 35 and 108 units. This means that the 'cost per unit' outlay would be significantly lower for a larger scheme. This would allow more of the land value to be retained by the Trust to be reinvested entirely into the parkland, as well as increasing the overall value that can be captured. - The land identified for development is beyond the historic Park and garden area (see Appendix 3 for confirmation of the Listed Park and Garden), and forms part of a marginalised grassland area, set between the existing housing and the Park's campsite. The larger site would incorporate a more logical allocation that incorporates this whole section of land without harm to the function or form of Wicksteed

Park. - The land in question does not form part of the main vistas from the Listed Building in the heart of Wicksteed Park. Development on this land would not therefore harm the setting of this heritage asset. - The ecological value of the larger site is low, being part of the same field as the proposed allocation to which it has been recognised by the Council to be of little ecological value. - Wicksteed Park forms part of a local green corridor connecting Wellingborough to Corby via Kettering. This is outlined on the Green Infrastructure Plan and Table 8.2 on pages 62 and 63 of the SSP. The Ise Valley Partnership has assessed this link and the specific land that contributes to this corridor. A copy of this plan is attached as Appendix 4. This excludes the land to the west of the Wicksteed Park campsite; also known as the suggested larger allocation site. The land could therefore be developed without harming this green infrastructure link. 3.11 All of the above points are borne out of examination of the Wicksteed Park Landscape Masterplan (see Appendix 8). 3.12 The current allocation is seeking to incorporate and enhance the ecological value of the 4.4 hectares of land identified as 'A' on the plan attached at Appendix 1. Whilst this would clearly offer considerable benefits to the quantity and quality of open space and habitats provided by creating an enhanced wetland area, it would be marginalised within the context of the Park as a whole. In contrast, by allowing a larger development site, it would offer the ability to bring into play a greater opportunity. 3.13 Wicksteed Park has a dedicated Community and Heritage Manager (CHM) who has a role to protect and enhance the function and quality of the parkland whilst identifying opportunities to enhance it where feasible and viable. The opportunities identified by the CHM for financial investment as a result of a larger allocation/development site is set out in full in Appendix 5. Summarising the CHM's position, the key benefit would be to expand the core of the Park, which currently incorporates the great lake, land to the north-west of the lake focused around the Listed Building and the historic waterpark to the north-east of the lake. The land to the south, identified as areas B and C on the Wicksteed Charitable Trust ownership plan (see Appendix 1) is very much marginalised, such that it is rarely used by visitors or for educational purposes. By bringing the fishing lake, meadow and wetlands (Areas A, B and C) into the main circulation areas of Wicksteed Park through the provision of new and improved pathways and links, along with enhancement of these biodiversity areas would enable the community and education team to develop new learning activities for schools, colleges, HEIs and communities to learn about native habits, flora and fauna, as well as exploring the landscapes in a heritage context. This would include creation of a viewing hide and building upon the learning programme of bat identification and mini beast activities already delivered within other parts of the Park. It would also allow the possible construction of a Saxon/Iron-age roundhouse/outdoor classroom for an immersive education experience, linked to the Scheduled Ancient Monument to the north-east of the Park. 3.14 These elements would relate to around 12 hectares of land (Areas A, B and C - see Appendix 1) and positively link the various elements of the Park together, as well as connecting the parkland to the ecological areas to the south. This includes two areas of Site of Special Scientific Interest (SSSI - identified on the plan attached as Appendix 1), which although not under the ownership of the Wicksteed Charitable Trust would allow better connectivity of the ecological areas and physical footpath links, including connectivity to the old railway line that runs in an east/west direction to the south of Area A and SSSI1. The improved connectivity of these ecological areas directly dovetails with Kettering Borough Council's Green Infrastructure Delivery Plan (March 2018) which identifies within the current project lists the 'creation of a linear park on the Ise Brook between Wicksteed Park and South Field Farm Nature Reserve to create links between communities, improve biodiversity and water quality.' (see Appendix 6 for extract). This also dovetails to the information released by Wicksteed Park in respect of this aim and the

joint working of the Trust with the Environment Agency, River Nene Regional Park, the Wildlife Park and local authorities (see Appendix 7). The potential to deliver on these additional spaces and enable connectivity would ensure all these ecological objectives can be delivered.

3.15 Craft Pegg has undertaken a Landscape Masterplan for Wicksteed Park (dated 2017). The enlarged site and potential enhancements to the remainder of the Park have been formulated from the strengths, weaknesses and opportunities identified through the Landscape Masterplan. A copy of this Masterplan is attached as Appendix 8, but overall recognises the ability to deliver improvements to the parkland and wider planting (including trees) in the Trust estate (see Appendix 1 for ownership extent) through grants and monies generated. Key elements of the Masterplan to highlight include:

- Section 1.3: Hydrology The land on the western part of the Park is located outside the floodplain. This includes the allocation site on land within Flood Zone 1.
- Section 1.5: Existing Masterplan Dating from 2012, this set out the Conservation Management Plan for Wicksteed Park. This highlights the South Field, which includes the proposed allocation land (and any enlargement would be located), for the potential use as a rally and car boot area and associated parking.
- Section 2.3: Access and Connectivity Popularity for walking the Ise and lake have emerged and could be developed further. Regular access is taken from the dismantled railway line to the south; this access presents risks to site security and user risk in crossing the Slade Brook bridge parapet. The acquisition of the southern water meadow (Area A on the plan in Appendix 1 to this representation) is noted to be a good time to address this route and assist in developing a more formal route along the Ise through the Park.
- Area C: South Field This incorporates the proposed allocation. It is recognised to have been subject to very little development over the centuries. It has been formerly used as a pitch and putt golf course, with evidence still visible. The south-western area has also been used for the deposition of dredge material from the lake restoration. The western perimeter is noted as being little used and presenting a visually poor edge to the site and an unkempt boundary. It is recognised as an opportunity to provide some residential development to rectify western boundary issues and incorporate more appropriate visual boundaries as part of any works.
- Area I: Arboretum and Meadows Incorporating Area C as annotated on the plan at Appendix 1 to this representation, it corresponds to the 'meadows' element of this landscape area. This highlights the meadow as pasture/arable land and is of 'limited recreation use' with the intention to continue to hold it as grazing land 'until it can be programmed for greater recreational or educational use'.
- Area J: Wetlands and River Incorporating Areas A and B as annotated on the plan at Appendix 1 to this representation, the recently acquired triangle of land (Area A) is seen as an opportunity to extend the Park's ecological remit. Sensitive works to this are noted to include increasing flood storage capacity, increase ecological potential with an aim to create ecological diversity to SSSI standards, and create new footpath connections.

3.16 The aims of objections of Policy KET10 (k) therefore dovetail with the Wicksteed Park Landscape Masterplan; appropriate financial resources are, however, needed in order to ensure its complete deliverability. Reassessment of the larger site

3.17 Whilst the benefits of a larger development at Wicksteed Park can be identified, it is recognised that the acceptability of a larger site needs to be considered. The larger site was initially considered through the 2012 Housing Allocations Background Paper. Extracts of this assessment, along with the criteria against which it was based is attached as Appendix 9. A further Housing Allocations Background Paper (Update) in October 2019 considered a smaller allocation at Wicksteed Park (labelled as KE/200). This document is attached as Appendix 10. The scoring system between the two assessments varies marginally, with the 2019 incorporating a three option scoring system (positive, neutral or negative) whilst the 2012 assessment incorporates single and double

positive and negative options as well as neutral impact stance. 3.18 The 2012 and 2019 assessments for the Wicksteed Park sites are set out below, along with the suggested reassessment for the larger site given the additional information now available. The differences where noted are highlighted red and are then explained below. 3.19 Seven elements are highlighted as being amended from the 2012 scheme for the same sized scheme. The justification for these changes is set out below. a. Health The proposal has the ability to provide additional open space, sports and recreation facilities to offset the area to be lost. The 4.4 ha of land will still enlarge the Park, whilst the suggested works to Areas B and C as well (see plan in Appendix 1) extend the area to be effectively opened up to the public overall to 12 ha. Both 'proposed' figures exceed the circa 3 - 3.5 ha that would be constructed on resulting in a net benefit in both quantity and quality of facilities. Against the Council's assessment criteria, it therefore is graded as '-'. b. Landscape The Ise Valley Partnership Assessment (see Appendix 4) outlines the important land to the green infrastructure corridor along the Ise Valley. This explicitly excludes the suggested larger allocation site. Craft Pegg have undertaken a Landscape Masterplan for Wicksteed Park (see Appendix 8). Dating from 2017, this highlights the character of the land as part of the 'South Field' to be rough grassland with little historic or ecological merit (see sections 1.5 and C South Field). This highlights the low landscape quality and importance of the site, whilst it is embedded within the urban environment. This includes poor boundary treatment to the existing housing to the west and the opportunities to enhance the repositioned perimeter to the Park if development was forthcoming. Key views from the Park and central Listed Building in Wicksteed Park are not in the direction of the developable land, all indicating that the land should be considered to have medium, if not low, sensitivity to development. This reflects the recent 2019 LPA assessment of the smaller site, which fundamentally forms part of the same rectangular parcel of land with no clear delineation between the two options or difference in the appearance. This represents a substantive shift compared to the 2012 assessment. Any reinvestment into the remaining land would offer the ability to also enhance the appearance of the open spaces and habitats, furthering the positive visual setting possible. c. Cultural Heritage The site in question is marginalised within Wicksteed Park, has no historic association with the core parkland area and as such is excluded from the Grade II Parks and Garden Listing (see Appendix 3). Likewise, it is located peripherally to the key views of the Listed Building including the Captains Lounge over the centre of the Park. Development of this section of land would not block any key views into or out of the Park/heritage assets, but would look to screen industrial buildings to the south by introducing a foreground vegetative screen as part of a larger development. Other than evidence of some ridge and furrow on the ground, no archaeological significance is expected (as indicated in the Council's 2019 assessment of the smaller allocation). In contrast to the consideration of the negative impacts upon the setting of the heritage assets, the development would secure much needed funds to enable the protection and enhancement of these assets, including improvements to the facilities in the Park and restoration of the Captain's Lounge within the Listed Building. These would have substantial benefits to the heritage assets, which can be captured fully due to the nature of the Charitable Trust. In line with the 2019 assessment, a strong positive enhancement to cultural heritage is recognised to exist. d. Built Environment: Settlement Character As identified through the Wicksteed Park Landscape Masterplan, the quality and character of the land in question is low, with poor boundary treatment to the existing development to the west. There is scope to incorporate any positive attributes on the site (notably trees), as well as the provision of new, more sensitively and appropriately designed boundary treatment to the retained parkland to enhance its integration into the built environment. These should be considered to offer a neutral impact, reflecting the

conclusion of the Council's 2019 Assessment, given that it would only be additional unused grassland that is lost. e. Soil and Land: Agricultural Land The site in question is not in agricultural use. It has not been used for agricultural purposes since the Park was established, and there is no expectation that it would be in the foreseeable future if not developed. As such, the proposal would score positively against this point, ensuring the highest-grade agricultural land is not lost as a result of this proposal. This reflects the 2019 score provided by the Council. f. Infrastructure: Drainage There is an expectation that some infrastructure will need to be installed on the site but not 'extensive' as per the negative description of this assessment classification. The 2019 Assessment identifies capacity in the existing system for both foul and surface waters, so this criterion should still be considered positive for a larger development. There is no intention for this development to exceed the carrying capacity of the existing drainage infrastructure. Some infrastructure will be required for foul sewers, but no more than that generally associated with developments. In this instance though, there is scope for on-site infiltration (if possible) and failing this, to discharge surface waters into a number of ponds and wetlands under the same ownership, with these connecting to water courses. Discharge of surface waters outside of the public sewers should be seen as a positive, and certainly not the significant negative of the 2012 Assessment. g. Deliverability Given that the site was not being taken forward in 2012 by the Council, no timescale was placed on the delivery of housing. However, the 2019 Council Assessment indicates the site is developable within the next five years. It can be confirmed that the Trust is intending to bring the site forward as soon as possible post-allocation, and thus the same would also be true for a larger scale development. 3.20 The updated assessment, based upon additional information that is not available, highlights the ability to provide a sustainably located scheme that does not negatively impact upon the character or appearance of the area, and has no obvious infrastructure or capacity constraints. On balance, the positive attributes that would stem from the proposal extend significantly beyond more housing, reflecting the ability for the additional monies generated for the Trust capable of being reinvested in a number of projects that will enhance the function and quality of the Park, as well as link new wetland and ecological areas into the SSSIs to the south, adding to the network of spaces and interconnectivity. The scale of modification to the housing numbers would not unbalance the deliverability across the Borough, whilst still complying with the hierarchical approach set out in the Joint Core Strategy. 3.21 Whilst not wishing to delay the Local Plan process, Wicksteed Charitable Trust wish to suggest that in respect of Policy KET10 and its ability to deliver all of the benefits to the community, two alterations should be considered. The first relates to the overall scale of development, with two suggested alternative wordings provided: 1. Increase the overall housing requirement and allocation scale to include up to 3.5 ha of land and 100 - 110 dwellings in place of the 1.07 ha and 30 - 35 dwelling figures; or 2. Include an additional paragraph at the end of the policy indicating: 'Additional land for housing may be supported as part of this development, provided it still complies with clauses a - p above and delivers additional open space enhancements and compensatory measures commensurate to the scale of the development proposed.' 3.22 Either of these alternative wordings would offer greater flexibility to the scale of development and thus the resultant benefits that could be captured and delivered to Wicksteed Park and the public by proxy. 3.23 Secondly, if either of the above alternative wording options are to be incorporated, to reflect the additional benefits that would be delivered, it is suggested that clause (k) is modified to the following (additional words are underlined for clarity): (k) Be supported by a scheme to deliver improved access, habitat restoration, education and recreational opportunities to the 4.4 ha farmland extension and associated underused landscape areas (strategically located at the south east part of the

Park to mitigate the loss of open space to residential development) 4. CONCLUSIONS 4.1 Wicksteed Charitable Trust consider the Kettering Borough Site Specific Policies Part 2 Local Plan document to be sound. Nonetheless, minor alteration to the wording of clause f (i) of Policy KET10 would offer greater flexibility and deliverability of this allocation. Increasing the scale of the development allocated within Policy KET10 to up to 3.5 hectares and 100 - 110 dwellings would also significantly increase the benefits that could be made to Wicksteed Park and the associated public benefits through enhancement and connectivity of the parkland and new ecological and wetland areas to the south. It is hoped that these modifications, and the resultant benefits to the community are considered thoroughly as part of the Examination. 4.2 Reflecting the suggested amendments, Wicksteed Charitable Trust requests attendance at the relevant examination stage Hearings.

Officer Response

The Council recognises that there may be benefits of a larger scheme than that allocated which would enable the provision of wider benefits to the park. At this stage further information is required before a larger scheme could be fully assessed. However it is proposed that additional wording is added to the supporting text to make reference to how an application for a larger area would be considered. A Main Modification is proposed to address this. Refer to the Main Modification Schedule, MM21

Officer Recommended Change(s)

A Main Modification is proposed to the wording of criteria f (i) to address the issue raised. Refer to the Main Modification Schedule, MM21

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
219	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation

I would like to retain policy 10 as both cransley and Thorpe malsor reservoirs are important stretches of water for many wildfowl, and also cransley reservoir provides a lovely walk along it's public footpath all year round. I live in Broughton and regularly walk this footpath

Proposed Actions/Changes

None.

Officer Response
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities.</p> <p>Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
220	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation
<p>Re: POLICY 10 As you will be aware our Local Plan (SSP2) is being updated. I am very concerned about the proposed changes to the planning protection for both Cransley and Thorpe Reservoir. The new proposed Local Plan is replacing Policy 10 with NEH2. This is a big 'watering down' of planning protection for these two reservoirs. Both these reservoirs have been protected up until now by Policy 10 which has been retained in the Local Plan since 1995 as it is widely agreed that these reservoirs are an important wildlife resource in our area. They are also beauty spots, close to Kettering and are connected by the footpath network. They are also part of an important wildlife corridor that stretches from Mawsley Marsh (a SSSI) to Cransley Reservoir (a Local Wildlife Site) and onto Thorpe Reservoir. Wetland birds (both migratory and British residents) are able to use this interconnecting resource for feeding, nesting and raising young. Policy 10 has stood the test of time, has been accepted and valued as an important planning policy tool and is much needed, going forward, to protect a</p>

very significant part of our local green infrastructure. I would like to strongly urge that the proposed changes are not implemented and that the current Policy 10 is retained thereby protecting these vital wild life and leisure resources.

Proposed Actions/Changes

None.

Officer Response

Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.

Officer Recommended Change(s)

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
221	Cransley Sailing Club	8	Natural Environment and Heritage						

Reasons/Details of representation

On behalf of the 220 members of Cransley Sailing Club, we wish Kettering Borough Council to continue with the same principles as adopted under Policy 10 in the future with regards to the protection from development (built or otherwise) in the environs of Cransley Reservoir. Since 1892 this has been a wildlife haven and the sailing club and fishermen and local landowners have maintained this

wonderful habitat for all to enjoy either on or around the water. Thousands have and continue to enjoy this reservoir and ANY relaxation of the regulations relating to development that would allow inappropriate schemes to be passed will permanently damage this fragile ecosystem. We therefore strongly urge Kettering Borough Council to continue with the protection of this Reservoir in the same vein as Policy 10.
Proposed Actions/Changes
None.
Officer Response
Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
222	Loddington Parish Council	8	Natural Environment and Heritage						

Reasons/Details of representation
Loddington Parish Council has looked through this document and could see no particular changes for our village. It has now however been brought to our attention by Thorpe Malsor Parish Council that there is a major issue with the planning protection afforded to both Cransley and Thorpe Reservoir. Both these reservoirs have been protected up until now by Policy 10 which has been retained in the Local Plan since 1995 as it is widely agreed that these reservoirs are an important wildlife resource in our area. Policy 10 has stood the test of time, has been accepted and valued as an important planning policy tool and is much needed, going forward, to protect a very significant part of our local green infrastructure. The new proposed Local Plan replaces Policy 10 with NEH2. Loddington Parish Council would like to retain Policy 10 in order to protect Cransley and Thorpe reservoirs and object most strongly to any weakening of the protections policy 10 provides to the wildlife and areas of Cransley and Thorpe reservoirs.
Proposed Actions/Changes
None.
Officer Response
Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.
Officer Recommended Change(s)
None.

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
223	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
<p>I would like to retain policy 10 for the benefit of the protection it gives to Cransley and Thorpe reservoirs. These are areas of vital importance to wildlife and of considerable value to local residents like myself. I meet many, many people walking in the area who take a keen interest in the resident and migratory birdlife, the wild animals encountered on almost every walk, the flora and the incredible scenery. Any reduction in the protection offered to these areas would be scandalous. Policy 10 seems to have been working quite well for the last 25 years and I can see no benefit in discarding it.</p>									
Proposed Actions/Changes									
None.									
Officer Response									
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
224	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
Hi it's been brought to my attention that policy 10 is being taken away, after reading all the details I feel strongly that it should be kept in place. We have to protect our wildlife, that planet is in desperate need of our protection. Please keep policy 10 in									
Proposed Actions/Changes									
None.									
Officer Response									
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities.</p> <p>Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>									
Officer Recommended Change(s)									
None.									

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
225	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
I would like to object to the change to policy no 10 regarding Cransley & Thorpe Malsor reservoir. Not only is it a haven for wildlife in our area, it is also a fantastic beauty spot. My family & I are keen bird watchers & walk around both areas on many occasions. It also helps with many peoples mental health allowing them to get out in our local area in the fresh air, freeing their mind & totally getting away from it all. I would like it to remain in place with no changes.									
Proposed Actions/Changes									
None.									
Officer Response									
Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
226	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
<p>I assume that you are aware that there is an illegal occupation at Cransley Road, adjacent to the reservoir, that is grinding its way through ongoing planning applications, appeals etc. With this ongoing activity I am absolutely stunned that there are proposed revisions to Policy 10 that weakens its protection to the wildlife and areas of Thorpe and Cransley reservoirs. These protections have worked for many years and is demonstrated by the fact that wildlife has flourished, I would have expected any proposed revisions to enhance and strengthen Policy 10 not weaken them. With the ongoing illegal occupation I find it remarkable that Kettering BC would even entertain, let alone action, weakening Policy 10.</p>									
Proposed Actions/Changes									
None.									
Officer Response									
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
227	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
I would like to register my opinion that the local plan should give our two important reservoirs, Cransley and Thorpe Malsor, the same protection going forward as they have now under Policy 10. As a local resident I enjoy these wild areas and they are strategically important for over wintering wildfowl.									
Proposed Actions/Changes									
None.									
Officer Response									
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities.</p> <p>Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>									
Officer Recommended Change(s)									
None.									

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
228	Rosconn Strategic Land	Policy STA2	Land to the south of Harborough Road, Stoke Albany	No	Yes	Yes	Yes	Yes	Yes

Reasons/Details of representation

Rosconn Strategic Land (RSL) represent the owners of the land to the south of Harborough Road, Stoke Albany and fully support the site's allocation under Policy STA2 and confirm that the site is suitable, available and achievable for housing development. A series of detailed surveys and assessments of the site have been undertaken, the results of which have demonstrated that there are no insurmountable constraints to delivery of the site during the plan period. The allocation of the site to meet housing needs within Stoke Albany contributes towards creating more sustainable rural communities as emphasised by paragraphs 77 and 78 of the NPPF. As previously identified by the Council when choosing to allocate sites within Stoke Albany (5th June 2019, Planning Policy Committee, Paragraph 2.10) the majority of rural growth is proposed away from the northern villages of the Borough, the allocation of suitable land within Stoke Albany assists in redressing this geographical imbalance. The allocation will also be in accordance with paragraph 78 of the NPPF which highlights that development in one village may support services in a village nearby, in this case villages more constrained villages such as Wilbarston where no allocations are proposed. RSL intends to progress with an immediate planning application in view of the site's suitability for housing development. In line with NPPF paragraph 39 RSL has undertaken pre-application enquiries with the Council through the formal pre-app service, carried out public consultation with the local community and engaged with the Parish Council. As part of the preparation of this application which has been influenced by a number of factors including new information and updated consultee responses this has raised the need for minor amendments to the Policy to ensure that it is justified as outlined within this representation. Policy STA2 sets out twelve site specific development requirements, these are on the whole considered to be appropriate and achievable. As previously stated RSL has undertaken pre-application engagement with the Borough Council through the pre-app service, along with engagement with the local community and Parish Council. As a consequence, RSL would consider the below Minor Modifications to the Policy necessary to ensure the Policy is justified. Criterion (g) sets out the requirement to provide open space as well as allotments on the southern part of the site, adjacent to the A427. RSL has carried out initial consultation with the local community and Parish Council which has indicated that previous evidence identifying a need for allotments within the village is now out of date and adequate provision exists elsewhere in the village. Consequently, sub criteria (g) should be amended to delete reference to allotments. Criterion (c) sets out the requirement for a combined parking and vehicle speed survey on Desborough Road. As part of Northamptonshire Highways pre-application advice response,

the LHA have since clarified that they do not require a speed survey to be undertaken at the junction near White Horse Inn. Accordingly, criterion (c) should be deleted. The Policies Map for Stoke Albany Figure 18.24 shows the amended Settlement Boundary to include the entire land parcel to be consistent with the proposed allocation. Due to factors including new information such as the lack of demand for additional allotments which has arisen from community engagement, this could result in a significant area of residual land within the site that is not required to meet the allocation policy objectives. RSL would be content for this residual area to be omitted from the allocation and therefore remain outside the settlement boundary. NPPF paragraph 16 c) states that plans should be shaped by early and effective engagement between plan-makers and various stakeholders, in addition paragraph 16 d) states that policies are clearly written and unambiguous, so it is evident how the decision maker should react to development proposals. These minor amendments to the Policy will ensure the allocation is in accordance with paragraph 16 sub criterion (c) and (d) so that any subsequent decision-making against Policy STA2 is unambiguous. SA for the Kettering Site Specific Part 2 Local Plan Comments The Sustainability Appraisal accompanying the Local Plan has confirmed the site is suitable for housing and can be brought forward with only limited negative impacts. The sustainability appraisal whilst providing a high-level assessment nonetheless is considered to underestimate the site's (RA/221) sustainability when assessed against the scoring criteria and other alternative sites within the village. In addition, the limited negative impacts identified apply to nearly all potential allocations within the Rural Areas. RSL consider the Sustainability Appraisal assessment of certain criteria should be amended as per the following comments to more accurately reflect the site's credentials. Contaminated Land - The site is currently scored as a 'Neutral impact' (site is unstable or contaminated land but could be mitigated). A Phase 1 Geo-Environmental Assessment has been undertaken as part of the application preparation, copies of which can be made available. This has identified no significant contaminative site usage and development of the site is not expected to have a significant environmental impact. Accordingly, the site should score a 'Double Positive' as it meets the criteria 'Site is not unstable or contaminated land'. Capacity of Highway - The site is currently scored as a 'Neutral Impact' (capacity limited or insufficient capacity but constraints can be overcome). As part of the response to the pre-application submission Northamptonshire Highways have not raised any capacity concerns in relation to development of the site. Accordingly, site should be scored as a 'Double Positive' as it meets the criteria 'sufficient capacity no constraints'. Capacity Infrastructure - The site is currently scored as a 'Neutral Impact' (capacity limited or insufficient but constraints can be overcome). As part of the allocation evidence base the Council has stated (Item 6 Appendix 1b - Stoke Albany, Kettering Planning Policy Committee 26th February 2019) that Anglian Water when assessing potential site allocation options within Stoke Albany confirmed 'Anglian Water confirm both potential housing sites are not constrained by the capacity of water infrastructure or drainage, and confirm that local issues reported through the public consultation resulted from blockages and not hydraulic overload caused by capacity issues. Any proposed development within the village will be considered in consultation with Anglian Water and will be required to provide adequate drainage. As a result, there is no evidence available to demonstrate that the proposed housing allocations within the village will exacerbate existing issues.'. Existing Water Mains, Sewer, Telecoms, Gas and Electric services are located on Harborough Road and no infrastructure constraints are envisaged. As such the site should be scored a double positive.

Proposed Actions/Changes
Policy STA2 Criterion (c) to be deleted. Policy STA2 Criteria (g) should be amended to delete reference to allotments. The Policies Map for Stoke Albany Figure 18.24 be amended to reflect the site boundary as shown in Location Plan Drawing Reference 3430.100 Revision B.
Officer Response
See below.
Officer Recommended Change(s)
Criterion c) of Policy STA2 will be deleted, reference to allotments in criterion g) will be amended to make reference to local need. The site boundary and settlement boundary will be amended to reflect the attached plan. Main Modifications are proposed to address this. Refer to the Main Modification Schedule, MM41 and MM49

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
229	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation
We are extremely concerned that Policy 10 of the Local Plan is to be replaced with NEH2. Policy 10 has stood the community in good stead since 1995, it is a very important policy in that it protects not only the countryside but also local and migratory wildlife. This policy protects both Cransley and Thorpe Malsor Reservoirs, both of which are extremely important amenities in the local countryside. Enough of our beautiful countryside has been eroded for a variety of reasons and we believe that the time has come to make a stand against further loss. Please retain Policy 10 of the Local Plan.
Proposed Actions/Changes
None.
Officer Response
Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2

Item 6 Appendix 1

Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.

Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
230	Northamptonshire County Council Education	General Comments	Site Specific Part 2 Local Plan- Publication Plan						

Reasons/Details of representation

The County Council welcomes the emphasis in the Plan on delivering key infrastructure in order to support growth during the Plan period, as set out in the Infrastructure Delivery Schedule. Ongoing collaboration on the IDS between partners will be required to ensure it is regularly reviewed and updated. The County Council supports the recognition in Section 14 of the vital role of infrastructure in supporting delivery of the Plan. This must be supported through the appropriate use of planning obligations in delivering key infrastructure, and acknowledgement of the County Council's adopted Planning Obligations Framework and Guidance, in order to provide clarity to local authorities, developers and communities as to what level of developer contributions may be expected of new developments. It is noted that the Plan identifies a number of additional potential sites for housing allocations across both the urban and rural areas, in order to meet the target established within the North Northamptonshire Joint Core Strategy (JCS), to provide a suitable land supply buffer, and in order to address an historic shortfall in delivery. Ongoing consultation with the county council will therefore be required to ensure that infrastructure, including Education infrastructure, is appropriately planned for and delivered to meet the continued needs of growth and to support delivery of any strategic developments. In accordance with the county council's adopted Planning Obligations Framework, all planning applications for major development (ie applications for more than 10 units) will be assessed for their impact on County Council-led infrastructure, and Section 106

obligations where appropriate will be required in order to mitigate the impact of housing growth on existing services and facilities. Education Infrastructure and Facilities 1. As the Local Education Authority for the county of Northamptonshire, the County Council has a statutory responsibility for ensuring the sufficiency of provision for all pupils of school age across Early Years, Primary, Secondary and Sixth-form Education, as well as pupils with Special Educational Needs & Disabilities. 2. It is the County Council's role to plan, commission and organise school places in a way that promotes the raising of standards, manages supply and demand, and creates a diverse infrastructure. The County Council's 'School Organisation Plan 2016-2021 - Local Places for Local Children' (SOP) provides the framework for meeting these objectives, providing accommodation for school places that is high quality, fit for purpose, provides value for money and ensures flexibility to respond to changes in need. 3. The SOP has recently been updated for the period 2018-2023, and its evidence base and strategic priorities, should at all stages inform the strategic direction for provision of Education Infrastructure across the county. 'Planning for Schools Development (2011)' a joint policy document prepared by the Secretary of State for Education and Secretary of State for Communities and Local Government, sets out the Government's commitments to planning and delivery of state-funded schools and should also be taken into account in supporting the implementation of the policies in the Plan. 4. New housing development creates additional demand for existing and new education provision. Across Northamptonshire 80,000 additional new homes are expected to be built by 2031. These are likely to lead to approximately 24,000 additional Primary aged pupils and 16,000 Secondary and Sixth Form pupils. 5. The recently published 'Securing developer contributions for education (April 2019)' sets out the best practice guidance for local authorities and developers when considering the impact of new housing on education infrastructure and firmly establishes Government's expectation that developer contributions are fundamental to contributing towards school places required as a direct result of new housing development. 6. Since 2010, the County Council has invested £230m in the schools estate in Northamptonshire; its Capital Strategy 2018-23 identifies a further £360m of investment that is required to meet the anticipated demand for school places in the county and ensure that the County Council continues to meet its statutory obligations. 7. A number of new schools have been identified as required for the Kettering area in the period to 2031. This new provision relates largely to the specific demand generated by new housing delivery coming forward throughout the plan period, however there is also an urgent identified need to provide additional capacity at Secondary Education level in the interim, to meet the existing demand in the borough arising as a result of significant population growth and housing development to date, and proposals are currently being progressed to deliver these, including extensions to existing schools. The County Council will work with the local authority and with the ESFA to bring these forward. 8. The new housing allocations proposed throughout the Plan are therefore expected to place an increased pressure on Education infrastructure and provision in the across the Kettering borough area. In some instances, this may require additional facilities and infrastructure to be delivered, however the County Council will continue to monitor capacity and pupil generation forecasts across the existing schools estate, and assess the ability of these to adapt, expand and/or enhance existing provision where possible to mitigate the impact of development. In circumstances where existing schools are unable to expand on their current sites (for example due to constrained boundaries or ground conditions), then alternative sites may need to be identified for relocation or additional provision. In addition, planning obligations towards school transport may be required from new development when located in areas unable to accommodate the increased demand. This will be assessed on a case by case basis. 9. The County Council remains committed to working

closely with all interested parties, to ensure that capacity across these areas can be monitored and delivered, in order to meet the statutory obligations of the County Council to provide sufficiency of school places. Fire and Rescue 10. Northamptonshire Fire and Rescue Service (NFRS) has identified that new developments and associated infrastructure within Northamptonshire equates to an increase in population as well as traffic movements. This will inevitably lead to an increase in the spread of community risk which places additional demands on Fire and Rescue Service resources to ensure safe places are maintained, consistent with national Government expectations and guidance. 11. NFRS sets out its criteria for responding to incidents within its Standards of Operational Response (SOR). The standards outline how the Service will respond to different incident types which fall within its statutory responsibilities under the Fire and Rescue Services Act 2004. The projected collective growth of the county will impact on the Service's ability to maintain Standards of Operational Response. For example: 12. Increased community risk from fire: It is important to note that fire and rescue service provision is made on the basis of mitigating risk. In this regard, national and local statistics show that residential properties pose the highest risk to life from fire related incidents. Initial target attendance times for life risk incidents have been agreed at 8 minutes from time of call to arrival at scene on 75% of occasions, and it is this target that the county needs to maintain going forward. 13. Increased community risk from road traffic collisions (RTC): Under the Fire and Rescue Services Act 2004, Northamptonshire Fire and Rescue Service have a statutory responsibility to respond to Road Traffic Collisions (RTCs). 14. The impact of growth on NFRS is not limited to that within actual residential and commercial developments. Additional growth will create an increase in vehicles and traffic movements that will lead to an increase in risk and activity for the Service. Coupled with an increase in linear growth the Service will need to implement resources accordingly to ensure response standards to RTCs are maintained. 15. The demands on fire and rescue resources as a result of collective growth manifest themselves in a variety of forms, dependent on the scale and nature of the proposed development, including the need for the Service to: i, introduce new types of fleet (e.g. smaller 'rapid response' initial intervention vehicles); ii, add new bays to existing fire stations to accommodate additional vehicles; iii, relocate or provide new response facilities (e.g. fire stations); iv, introduce new types of equipment; v, reduce risk and demand through the provision of fire suppression systems (sprinklers) in appropriate developments 16. Inclusion of 'KET3 - Kettering Fire Station, Headlands' proposes the relocation of Kettering Fire Station to an alternative location, in order to release the existing site for housing development. It is strongly advised that further discussion be undertaken with Northamptonshire Fire & Rescue regarding this Policy, in order to identify, secure and deliver an appropriate alternative site for the Fire Service, and that the Policy be amended to reflect that replacement facilities must be in place prior to the redevelopment of the site to ensure standards of service can be maintained. 17. Furthermore, where there is a direct impact on infrastructure provision relating to new housing development, developer contributions towards Fire and Rescue service buildings and equipment will be required through s106 planning obligations. The County Council will work with developers, the local planning authority and Northamptonshire Fire and Rescue to respond on site specific requirements as new planning applications come forward, and to identify opportunities for strategic infrastructure improvements to meet growing demand. Libraries 18. Where a new development will generate additional need and library space requirement, the County Council requires contributions towards the costs of providing new, extended and/or improved library facilities to support the delivery of growth and to ensure that established national and local levels of service delivery can be maintained. 19. The County Council has adopted the National Library Tariff formula produced by the

Museums Libraries and Archives Council (MLA). This includes: i. A minimum standard of 30 sq metres of new library space per 1,000 Population. ii. A construction and initial equipment cost on a per sq metre basis (adjusted to reflect Northamptonshire building costs), based on BCIS building costs for public libraries. 20. Where there is a direct impact on infrastructure provision relating to new housing development, developer contributions towards Library facilities, services, buildings and equipment will be required through s106 planning obligations. The county council will work with developers, the local planning authority and the Library service (including community-managed libraries) to respond on site specific requirements as new planning applications come forward, and to identify opportunities for strategic infrastructure improvements to meet growing demand. Broadband 21. The vision for the county to be at the leading edge of the global digital economy. To meet this challenge the County Council has set an ambitious target of 40% full fibre connectivity across Northamptonshire by December 2023. To deliver on this, it is essential that new developments (both housing and commercial) are served by high quality full fibre networks. Access to the speeds, 1 gbps or faster, delivered by this technology will bring a multitude of opportunities, savings and benefits. It also adds value to the development and is a major selling point for potential residents and occupiers. 22. Building further on this, the County Council is keen to encourage wider adoption of the approach, as recently outlined in the Government consultation document 'New Build Developments: Delivering gigabit-capable connections (October 2018)', which sets out proposals to require developers and operators to provide delivery of 'full fibre' connectivity to new build development. Whilst recognising that analysis of the consultation responses is still ongoing, the County Council recommends consideration of the proposals contained within the consultation document. In addition, there should also be acknowledgement of the need to improve mobile connectivity in the borough including increased coverage of 4G and enabling 5G access. This will have implications in terms of development. 23. In order for the commercial communications market to be able to deploy to these new build areas, measures must be introduced at the earliest opportunity. This will provide the required specification to enable fibre connectivity for all new developments in respect to receiving superfast broadband services. For further information on the project please visit www.superfastnorthamptonshire.net Concluding comments The County Council welcomes the development of the Plan and opportunity to comment on this Regulation 19 version, and remain committed to working with Kettering Borough Council and other partners in relation to the sustainable delivery of infrastructure provision. In terms of other infrastructure requirements for which the County Council has a statutory responsibility, such as Highways, S106 obligations for these would be handled directly by their respective areas within the Council. I would therefore suggest it may also be useful to liaise with these departments directly to ascertain any requirements over and above those mentioned here. Continued engagement is welcomed with KBC, particularly as the Plan is progressed and as the County Council's adopted Planning Obligations Framework and Guidance (2015) document is updated. This will ensure that current priorities and policies of the County Council and KBC are aligned in relation to the planning and delivery of new education infrastructure and the ability to secure appropriate developer contributions through Section 106 to effectively mitigate the impact of development.

Proposed Actions/Changes

None.

Officer Response

Noted. The Council will continue to work with NCC to ensure infrastructure is appropriately planned for.

Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
231	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation

We would like to retain Policy 10, the protection it gives Cransley and Thorpe reservoirs. They are beauty spots, close to Kettering and are connected by the footpath network. They are also part of an important wildlife corridor that stretches from Mawsley Marsh (a SSSI) to Cransley Reservoir (a Local Wildlife Site) and onto Thorpe Reservoir. Wetland birds (both migratory and British residents) are able to use this interconnecting resource for feeding, nesting and raising young. Policy 10 has stood the test of time, has been accepted and valued as an important planning policy tool and is much needed, going forward, to protect a very significant part of our local green infrastructure.

Proposed Actions/Changes

None.

Officer Response

Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities.

Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.

Officer Recommended Change(s)

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
232	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation

Both these reservoirs have been protected up until now by Policy 10 which has been retained in the Local Plan since 1995 as it is widely agreed that these reservoirs are an important wildlife resource in our area. They are also beauty spots, close to Kettering and are connected by the footpath network. They are also part of an important wildlife corridor that stretches from Mawsley Marsh (a SSSI) to Cransley Reservoir (a Local Wildlife Site) and onto Thorpe Reservoir. Wetland birds (both migratory and British residents) are able to use this interconnecting resource for feeding, nesting and raising young. Policy 10 has stood the test of time, has been accepted and valued as an important planning policy tool and is much needed, going forward, to protect a very significant part of our local green infrastructure. Too much of our countryside is at risk and having enjoyed and both of these have been an integral part of my life for 50 years and is something which needs to be retained for future generations to enjoy too. Please think long and hard about changing these areas.

Proposed Actions/Changes

None.

Officer Response

Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered

acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities.

Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result

Officer Recommended Change(s)

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
233	Hallam Land Management Ltd	4	Housing	No	No	No	No	No	No

Reasons/Details of representation

The Site Specific Part 2 (SSP2) Local Plan fails to demonstrate specific, deliverable sites for years one to five of the plan period contrary to Paragraph 67 of the National Planning Policy Framework (NPPF). The North Northamptonshire Joint Core Strategy (JCS) (Policy 28) seeks to provide a total of 40,000 new homes between 2011 and 2031 and there is a requirement for Kettering Borough to deliver a minimum of 10,400 homes during this period. JCS Policy 29 states that this development will be accommodated in line with the spatial strategy. As Table 4.1 of the SSP2 outlines, the majority of development is directed to Kettering (6,190 dwellings) with smaller development at Burton Latimer (1,180 dwellings), Desborough (1,360 dwellings) and Rothwell (1,190 dwellings). The remaining dwellings are to be accommodated in the rural area. The adopted JCS allocates strategic housing sites of 500 dwellings plus. This includes the East Kettering SUE (5,500 dwellings) carried over from the 2008 Core Strategy, and smaller SUE's at Rothwell and Desborough in Kettering Borough (700 dwellings each). The role of the SSP2 Local Plan is to allocate smaller scale housing sites to meet the remaining housing requirement, plus a 10% flexibility allowance. In total, therefore, Kettering must deliver a minimum of 11,392 homes (10,400 + 10%). The Housing Land Supply Background Paper (HLSBP) (Table 19 and Para 3.12) claims that Kettering Borough Council can demonstrate a five year housing land supply of 6.74 years, based on a housing requirement which excludes the 10% flexibility allowance, and only applies a 5% buffer (in accordance with NPPF para 73). However, the adopted JCS (Para 9.6) states that monitoring will be undertaken using a 25% buffer, to provide an early warning of housing land supply running short. In such circumstances where a five year housing land supply cannot be demonstrated using a 25%

buffer, this triggers corrective action by the LPA in order to boost supply. We would suggest the best means to boost supply would be through allocating additional small scale sites within the Part 2 Plan. The Council's five year housing land supply using the 25% buffer supply falls to 5.66 years. In this scenario, the five year housing requirement increases to 3,602, compared with an identified supply of 4,080, which leaves only a surplus of 478 dwellings over the 5 year period (2019-2024). The difference between being able to demonstrate a five year supply is therefore only 478 dwellings which can easily disappear with slippages in projected delivery rates. The identified supply is very dependent on the three SUEs and, as set out in Hallam's August 2018 representations to the Draft SSP2 Local Plan, there remain concerns around the anticipated delivery rates at the Kettering East, Desborough North and Rothwell North strategic sites. Kettering East SUE is expected to deliver 1,565 dwellings in the first five years of the SSP2 Local Plan, which represents 37% of the Council's total five year housing supply. The Council has not produced details of annual completions as part of the evidence base, but a paper considered by the North Northamptonshire Joint Planning Committee at its 25/07/19 meeting shows that completions were significantly below the JCS requirement in each of the previous three years. The figures produced for the joint Planning Committee are summarised below:

Year	Adopted JCS Requirement	Kettering East SUE Completions	Completions against requirement (%)
2016/17	120	29	24%
2017/18	180	124	69%
2018/19	220	132	60%

Against this starting point, the SSP2 Local Plan assumes what we consider to be an unrealistic step change in completions at the Kettering East SUE, from 132 per annum in 2018/19, to 337 per annum in 2020/21, and then 425 per annum in 2021/22. Year Anticipated Completions 2019/20 152 2020/21 337 2021/22 425 2022/23 357 2024/25 294 The 'Justification' column of Sites Schedule in the HLSBP states that the build out rates quoted have been provided by the developer. The Council's evidence base does not comment or provide evidence that the assumed rates can be achieved. This is a concern in view of experience of large SUE projects and research undertaken on the build out rates associated with large scale sites. For instance, the 'Start to Finish Study' (NLP, 2016) noted that the annual average build for sites over 2,000 dwellings was 161 dwellings per annum, because the number of outlets that can be accommodated is often limited. Quite apart from the ability for Kettering East to deliver the units at the predicted rate, it is questionable whether the local housing market would be able to absorb the new dwellings and sustain the build out rates being relied upon. The HLSBP Site Schedule indicates that the three parcels on which development has started will be completed during 2019/20. The Table also shows that only 167 plots have detailed planning permission and that the remaining 4,644 plots at Kettering East still require detailed reserved matters approval. This includes parcels R21 and R22, where reserved matters submissions were due to have been made in January 2020 but appear to have been delayed. It is also noted that Condition 2 of the outline planning permission requires that all reserved matters submissions be made within ten years of the permission date, and so by 1st April 2020. An additional requirement to seek planning permission would delay the delivery of individual parcels and their contribution to housing supply, unless reserved matters are submitted by this date. There are also concerns about the delays to the other strategic site allocations at Desborough North and Rothwell North which are also important components of the Council's five year housing land supply position. The Desborough North SUE (700 dwellings) has also been significantly delayed. Outline planning permission (reference KET/2011/0235) was granted on 25/04/2014. Whilst a recent non material amendment approval was authorised construction to keep the permission alive, planning conditions still need to be discharged before the construction of dwellings can begin. The Rothwell North SUE (700 dwellings) has also been significantly delayed and no dwellings have

been delivered yet. It is very unlikely that the outstanding actions (discharge of relevant conditions and delivery of primary infrastructure) will be completed by 31st March 2020 in order to enable completions this year. The SSP2 Local Plan reliance on these 3 strategic sites within its five year housing land supply means that the SSP2 Local Plan fails to demonstrate specific, deliverable sites for years one to five of the plan period contrary to Paragraph 67 of the NPPF.

Proposed Actions/Changes

We request that additional site allocations are made to boost housing supply in accordance with the requirements of the JCS (paragraph 9.6) and maintain a deliverable 5 year supply of housing land in accordance with the NPPF. To assist in delivery, additional small scale allocations should be made in locations that are consistent with the Spatial Strategy, and which are a reliable source of market and affordable housing completions, such as Burton Latimer. Specifically, it is requested that land south of Higham Road in Burton Latimer is allocated for approximately 160 dwellings and retirement living accommodation (including 30% affordable housing) to increase the supply of affordable housing. Burton Latimer is an attractive location for residential development and has consistently been able to deliver both market at affordable housing. Burton Latimer was the only settlement that delivered its housing target from the Core Spatial Strategy 2008, and recent planning permissions on land north of Higham Road are under construction with no delays to housing delivery. Historically there have been no concerns about viability at sites in Burton Latimer, and development in the town has been able to deliver 30% affordable housing, as demonstrated by the recent developments to the north of Higham Road. This contrasts to the 20% starting affordable housing target at the SUEs including Kettering East, Desborough North and Rothwell North. Land to the south of Higham Road is an appropriate location for residential development and is immediately available for development. The site is controlled by Hallam Land Management Limited, who are actively promoting it for residential development. As such, the site will be able to deliver homes early in the plan period and contribute to the Council's five year housing land supply. The site relates well to the existing settlement and is an appropriate and logical extension against the existing residential development focused along Higham Road. Engagement with some of the members of the Burton Latimer Town Council has highlighted the potential benefits associated with the development of this site, including the delivery of housing for older people, the expansion of the Burton Latimer Medical Centre, the provision of green infrastructure and an enhancement to public open space. There is also scope for the site to help deliver highway enhancements that have been identified by the Town Council. The North Northamptonshire SHMA Update 2015 and the Study of Housing and Support Needs for Older People Across Northamptonshire (March 2017) identified a significant need for housing for older people of a variety of types of accommodation. The proposed development can include a parcel of land for retirement living, which could include accommodation for a nursing home, supported living and/or retirement apartments. It is noted that none of the proposed allocations for Burton Latimer (BLA4, BLA5 and BLA6) include housing for older people and so the site will help to meet local needs. Burton Latimer Medical Centre is now fully occupied, and there is no internal space available for expansion and no capacity to expand into the car park without the loss of parking spaces. The recent permitted residential developments to the north of Higham Road will create additional pressure on the capacity at the Medical Centre in the near future. The proposed development of land to the south of Higham Road could provide land to enable the capacity of the Medical Centre to increase, and an area of the site is set aside for this purpose. It is anticipated that an additional four consulting rooms could be provided within the expanded building, the existing pharmacy

could be relocated within the Medical Centre and an additional 44 car parking spaces could be provided at the site. The proposed development includes a significant amount of green infrastructure to provide open space and natural green space in the south eastern part of Burton Latimer, and provide connections to the wider green infrastructure network. This is described in the Concept Layout Plan and Green Infrastructure Plan submitted with these representations, and includes additional allotments for approximately 14 to 21 plots with associated facilities. It is considered that the delivery of green infrastructure, in conjunction with residential development at the site, will make a significant contribution to the green infrastructure network in a location where recent developments have struggled to make a significant and co-ordinated contribution. As set out in the August 2018 representations, the site is deliverable and is controlled by a developer who is actively promoting the site for residential development. There are no significant constraints to development at the site. The site is not affected by ecology designations and the majority of habitats are considered to be of local value only. Potential landscape and visual impacts can be addressed through the design of the scheme. The site is within Environment Agency Flood Zone 1 and so subject to low flood risk. The land is capable of incorporating sustainable urban drainage measures to reduce existing run-off rates from the site and improve water quality. A suitable site access can be achieved and the road network is able to support the development without the need for significant highway interventions. There is also an opportunity for highway improvements to help reduce the need for HGV traffic access through the town centre and along Higham Road, as identified by the Town Council. These potential highway improvements are still under investigation. The site benefits from existing public transport services along Higham Road and can add to the viability of these services. The site is well connected in terms of footway and cycleway access to Burton Latimer Town Centre.

Officer Response

The flexibility allowance is added to Kettering and the Market Towns not the rural area, this approach is justified in the Housing Land Supply Background Paper (October 2019). The flexibility allowance is different to the buffer used to in five year land supply. In accordance with the NPPF a 5% buffer has been applied for this purpose. The Council acknowledges that the SUE's have been slower in coming forward than envisaged in the JCS. However significant progress has been made in the delivery of the SUE's with a number of parcels at Kettering East being built out, preliminary work has begun on site at Rothwell North and Desborough North is progressing towards the submission of reserved matters applications. The Housing Land Supply Background Paper (October 2019) provides evidence for the housing trajectories provided for these sites. The updated definition of 'deliverable' has been used when assessing whether sites should be included in the first five years of the plan period. The Council has taken a proactive approach to ensuring that it can maintain a five-year housing land supply and this is reflected in the approach taken in the SSP2, including the 10% flexibility allowance which makes provision above the JCS housing requirements. The Council's proactive approach is apparent in the results of the Government's housing delivery test which were 129% for 2018 and 130% for 2019. The allocations in the SSP2 fulfil the remaining residual housing requirement when existing completions and commitments are taken into account. The Housing Land Supply Background Paper (May 2018) provides information on the need for housing allocations in Burton Latimer. This demonstrates sufficient sites have been identified in Burton Latimer to meet housing requirements plus a flexibility allowance.

Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
234	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation

to the revised protection that is proposed for Cransley and Thorpe Malsor reservoir, under policy 10. The protection that Policy 10 provides in what is widely agreed an important wildlife resource in our area, has helped these beauty spots to flourish. They are part of an important wildlife corridor that stretches from Mawsley Marsh (a SSSI) to Cransley Reservoir (a Local Wildlife Site) and onto Thorpe Reservoir. Wetland birds (both migratory and British residents) are able to use this interconnecting resource for feeding, nesting and raising young. The ecology of the whole area could easily change if it isn't protected. At the present it is a beautiful part of our local green infrastructure. The new proposed Local Plan is replacing Policy 10 with NEH2 which could see a drastic reduction of planning protection for these two reservoirs. It is my belief that diverse ecological areas like this and areas of such natural beauty must be protected for the pleasure of generations to come

Proposed Actions/Changes

None.

Officer Response

Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities.

Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.

Officer Recommended Change(s)

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
235	Local Resident	8	Natural Environment and Heritage						

Reasons/Details of representation

I live In Thorpe malsor, with my husband and three children. We hear that our Local Plan is going to be updated and Policy 10 potentially replaced. We don't know much about the political side of it, but we love the reservoirs near here and walk down to cransley reservoir several times a week. There are incredible wild birds on both reservoirs and we are concerned, particularly with the large amount of development in Kettering, that these will be under threat. The walks and wildlife are is not just enjoyed by locals, but many people from Kettering and Corby who drive here to enjoy it. We urge you to do whatever you can to give every protection possible to these wonderful natural habitats and certainly not decrease the protection.

Proposed Actions/Changes

None.

Officer Response

Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities.

Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.

Officer Recommended Change(s)

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
236	Northamptonshire County Council - Archaeology	8	Natural Environment and Heritage						

Reasons/Details of representation

Could you explain why it was not felt necessary to have a specific heritage policy ? Is this because you feel that the JCS Policy 2 (Historic Environment) and the NPPF are sufficient ? Heritage 8.33- I did wonder if the text could be modified to reflect the range of heritage within Kettering Borough. I have provided some suggested wording below although this is only a suggestion you may wish to change it but I feel that section 8.33 does need to be broader in scope. Many sites of historic and/or archaeological interest have been found across the Borough. The Historic Environment Record (HER) contains information which demonstrates the diversity of archaeological activity within Kettering Borough. Recent archaeological investigations within the area have identified a high density of of mid-late Iron Age and Roman settlement, particularly around Kettering and down the Ise Valley. A small undefended small Roman town was located within the northern part of Kettering. A roman burial site is also present to the west of the Roman town. It is unfortunate that 19 th Century quarrying and residential housing have removed much of the evidence although pockets of survival do exist. The settlement appears to be a focus for iron smelting and possibly pottery manufacture. The town lay within a nationally important wider iron producing landscape. Evidence of settlements and villas have been found at various locations including around Kettering and Burton Latimer. In the late Saxon and early medieval period the royal estate centre of Rothwell overshadowed Kettering. In the 13 th the prosperity of the town increased as a result of being at the convergence of a number of important roads. Rothwell was a major royal estate centre in the late Saxon period and a probable old minster serving a wide parochia, although in the early Saxon period the princely burial site and possibly also a defended residence was at the adjacent settlement of Desborough. In the second half of the 17th century Kettering saw a further substantial development in response to the re-establishment of woollen cloth production in the town. However the woollen industry collapsed in the late 18th century and Kettering

Item 6 Appendix 1

appears to have experienced a period of relative stagnation in the later 18th and earlier 19th century, although the boot and shoe industry did to a limited extent take the place of the woollen industry. In the last two decades of the 19th century Kettering became the second largest town in Northamptonshire. Due to the growth of the boot and shoe and the iron industries.
Proposed Actions/Changes
None.
Officer Response
Paragraph 8.36 explains why it is not considered necessary to have a specific heritage policy in the SSP2. The proposed wording provides a useful summary, but it is not considered necessary to include this level of detail within the plan
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
237	Northamptonshire County Council - Archaeology	Policy DES2	Opportunity Redevelopment Sites within Desborough						

Reasons/Details of representation
In relation to the conversion of (b) the Lawrence's Factory site - an opportunity for mixed use or residential development (DE2). I would hope that DES1 (j) Give priority to the retention and conversion of historic buildings and buildings of local significance would be a major consideration as it should be in relation to all identified buildings of historic and local interest whether designated or not. This is the role of local lists.
Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
238	WS Planning & Architecture	Policy MAW2	Land to the West of Mawsley	No	No	No	Yes	Yes	No

Reasons/Details of representation

The Local Plan is considered unsound as the land proposed to be allocated for housing in Mawsley (RA/174) does not perform as well as land previous identified under RA/115. The pre text to Policy MAW2 identifies one benefit of the proposal which would include joining two stubs of cycle way to the north and south of the site (Para 13.107). Para 13.109 identifies the deficiencies of the site in terms of surface water flow paths which flow across the site and the south-eastern half of the site is at high risk from groundwater flooding which will need to be assessed through a detailed site-specific Flood Risk Assessment and mitigated against through site design. Put simply we still do not know if the site can be developed given the uncertainties identified regarding flooding. In addition, the site is not required to provide any other community benefit save the fact that the site would help to meet the Council's Housing demand. Policy MAW2 sets out a number of principles for the land which are all capable of being achieved on land proposed for development at RA/115 which has no flooding issues and is more closely located to the centre of the village and local services. The Council have not required any specific community benefit in the list of Criterion identified for Policy MAW2. WS Planning & Architecture have prepared a planning application following a pre-application meeting with the Local Planning Authority in 2017. The application includes detailed information relating to Planning Policy, Design & Access and is supported by an Arboricultural Report, Drainage Strategy Report and Schematic Drainage Layout, Ecology Surveys, Environmental Noise Survey, Flood Risk Assessment, Landscape and Visual Impact Assessment, Phase 1 Geo-Environmental Desk Study Report, Transport Assessment, Travel Plan and Utilities Report. The application will be submitted in Spring 2020. A location plan is provided at WS Appendix 1 identifies the site in question. An existing site plan is provided at WS Appendix 2. A proposed site plan is provided at WS Appendix 3. A copy of the Local Plan Proposals Map for Mawsley (Figure 18.20) is also provided at WS Appendix 4. This plan has been annotated with the site layout proposed for RA/115. The benefits of allocating site RA/115 are set out below: Provision of market and policy compliant affordable housing to meet local need Provide a policy compliant housing mix Provision of 0.5ha of additional allotments for the use of Mawsley Allotment Association A total of 5 parking spaces to serve the new allotments A total of 9 parking spaces to serve the Community Hall to the north of the site including 2 disabled parking spaces Provision of additional outside play area for Mawsley Day Nursery Provision of a separate playground for use of existing and future residents is also proposed Wildlife area including wildlife pond,

wetland and infiltration pond Significant level of additional public open space We have made a number of representations highlighting the deficiencies of RA/174 given that the site is known to have issues with Surface Water Flooding.
Proposed Actions/Changes
The Council should reconsider the allocation of land at RA/174 given the substantial community benefits provided by the proposed development of land at RA/115.
Officer Response
Site RA/115 has been considered and discounted through a robust site assessment process. The detail of this is contained in the Housing Allocations Background Papers (2012, 2018 and 2019) and the Housing Allocations and Assessment of Additional Sites and Update (2013).
Officer Recommended Change(s)
No changes recommended.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
239	WS Planning & Architecture	13	Mawsley	No	No	No	Yes	Yes	No

Reasons/Details of representation
The Local Plan is considered unsound as the Council have not carried out the correct assessment within their Sustainability Appraisal. Paragraph 7.3.36 of the SA states the 'RA/115 has not been allocated due lack of access to highway and concerns regarding infrastructure'. The Council have no evidence regarding the purported lack of access to highway and concerns regarding infrastructure. WS Planning & Architecture have prepared a planning application following a pre-application meeting with the Local Planning Authority in 2017. The application includes detailed information relating to Planning Policy, Design & Access and is supported by an Arboricultural Report, Drainage Strategy Report and Schematic Drainage Layout, Ecology Surveys, Environmental Noise Survey, Flood Risk Assessment, Landscape and Visual Impact Assessment, Phase 1 Geo-Environmental Desk Study Report, Transport Assessment, Travel Plan and Utilities Report. The application will be submitted in Spring 2020. A location plan is provided at WS Appendix 1 identifies the site in question. An existing site plan is provided at WS Appendix 2. A proposed site plan is provided at WS Appendix 3. A copy of the Local Plan Proposals Map for Mawsley (Figure 18.20) is also provided at Appendix 4. This plan has been annotated with the site layout proposed for RA/115. The proposed benefits of allocating site RA/115 are set out below: Provision of market and policy compliant affordable housing to meet local need Provide a policy

<p>compliant housing mix Provision of 0.5ha of additional allotments for the use of Mawsley Allotment Association A total of 5 parking spaces to serve the new allotments A total of 9 parking spaces to serve the Community Hall to the north of the site including 2 disabled parking spaces Provision of additional outside play area for Mawsley Day Nursery Provision of a separate playground for use of existing and future residents is also proposed Wildlife area including wildlife pond, wetland and infiltration pond Significant level of additional public open space The proposed development of land at RA/115 seeks to incorporate significant community benefits which have long been made aware to the Council including a pre application submission in 2017. The proposal will have a positive effect on liveability as it would support the deliverability of housing. The proposal will have a positive impact on health, wellbeing and biodiversity through the provision of additional nursery playspace, allotments and playground within the development along with public openspace and wildlife area. The proposal would have a positive economic effect on the village especially given its close proximity to the Village Centre. The Council have proposed the allocation of site RA/174 without the provision of any additional allotments as required in Para 11.2.73 of the SA. With regard to the SA topic the proposal would be as follows With regard to the SA topic the proposal would be as follows The Council's previous assessment demonstrates that site RA/115 scored higher than site RA/174 in terms of 'Accessibility to Facilities'. Furthermore, the Council identified that site RA/174 is constrained by heavy rain field floods during winter, which site RA/115 is not. However, the Council identified that, in comparison to site RA/174, site RA/115 lacked in terms of 'Community' and 'Access to Highway'. It is not considered that the Council carried out their assessment fairly where the application site has the potential to provide a range of facilities for the local community. Furthermore, an appropriate access road and access to the local highways network can be achievable, as demonstrated within the preapplication submission and forthcoming application (See site layout at WS Appendix 4). The application site should be assessed in line with the Council's assessment of the land to the west of Mawsley. The Council's assessment of Site RA/174 on Page 123 is erroneous for a number of reasons. Site RA/174 is given 2 green ticks for Community whereas RA/115 is Amber. The community benefits identified above far outweigh the bike link proposed by RA/174. Site RA/115 does not have severe constraints regarding Cultural Heritage Site RA/115 performs better than RA/174 regarding Settlement Character, especially given the community benefits and location of the site immediately adjoining the Village Centre. Site RA/115 does have Access to Highway Site RA/174 should not have two ticks for Drainage given the flooding and drainage issues that haven't been resolved. The revised total for site RA/115 should be "14 ~ 8 X 2 X 1"</p>
<p>Proposed Actions/Changes</p>
<p>The Council should reconsider the allocation of land at RA/174 given the substantial community benefits provided by the proposed development of land at RA/115.</p>
<p>Officer Response</p>
<p>Site RA/115 has been considered and discounted through a robust site assessment process. The detail of this is contained in the Housing Allocations Background Papers (2012, 2018 and 2019) and the Housing Allocations and Assessment of Additional Sites and Update (2013).</p>
<p>Officer Recommended Change(s)</p>
<p>No changes recommended.</p>

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
241	Environment Agency	Policy KET9	McAlpine's Yard, Pytchley Lodge Road	No			No		Yes

Reasons/Details of representation

Unsound Policy KET9, McAlpine's Yard, Pytchley Lodge Road The Strategic Flood Risk Assessment (SFRA) Level 1 for this allocation contains insufficient evidence to justify the allocation of this mixed use development (residential and employment development) as the risk of reservoir flooding is unknown. Strategic Flood Risk Assessment Level 1 - The Kettering Strategic Flood Risk Assessment (SFRA) Level 1, published in August 2019, identifies all of the sites that have been reviewed in terms of flood risk within Kettering Borough. This site was identified as requiring additional work before allocation as it is partly within Flood Zone 2, has been affected by flooding incidents in the past, and is entirely at risk of reservoir breach flooding. We have concerns that the risk of flooding is not fully understood and therefore allocating this site is premature. The SFRA Level 1 has identified this site as requiring a Level 2 Strategic Flood Risk Assessment (SFRA) to establish the risk of flooding and inform the allocation of this site. There is a Level 2 SFRA for Kettering, which was published in April 2010, however this was for the Town Centre only and this site is not included within that boundary. National Planning Policy Framework - The NPPF sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced. Para 31 states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. The NPPF (paragraphs 155-161) and National Planning Practice Guidance (NPPG) (flood risk and coastal change section) recommends a staged process for the development of SFRA's to enable the detail of the assessment to be related to the risk posed by new development. A Level 1 SFRA is required to provide the LPA with flood risk information to apply the sequential test. Where it is clear that proposed development and infrastructure is not able to be accommodated in accordance with the sequential test, taking account of the flood vulnerability category of the intended use, then a more detailed Level 2 SFRA is required to facilitate the application of the exception test. NPPG - Paragraph: 014 (Reference ID: 7-014-20140306) of flood risk and coastal change guidance advises that: 'The failure of a reservoir has the potential to cause catastrophic damage due to the sudden release of large volumes of water. The local planning authority will need to evaluate the potential damage to buildings or loss of life in the event of dam failure, compared to other risks, when considering development downstream of a reservoir. Local planning authorities will also need to evaluate in Strategic Flood Risk Assessments (and when applying the Sequential Test) how an impounding reservoir will modify existing flood risk in the event of a flood in the catchment it is located within, and/or whether emergency draw-down of the reservoir will add to the extent of flooding'. Paragraph 006 (Reference ID: 7-006-20140306) in respect of reservoir undertakers also states that: local planning authorities should discuss their proposed site allocations with reservoir undertakers to: o avoid an intensification of development within areas at risk from reservoir

<p>failure, and; o ensure that reservoir undertakers can assess the cost implications of any reservoir safety improvements required due to changes in land use downstream of their assets. We are not aware that these discussion have taken place or that evidence is available to confirm the undertaker is satisfied that the site should be allocated. Breach analysis must be undertaken to assess the probability and consequence of flooding on the site following failure of the upstream reservoir(s). This analysis should detail the speed, depth and duration of flooding. This is required to fully inform the Sequential and Exception Tests to ensure that flood risk is fully taken into account when considering allocation and that any development proposed is capable of being made safe for its lifetime. Breach analysis of Kettering Leisure Village reservoir is required, with a review of failure in series for the other upstream reservoirs (Thorpe Malsor and Cransley). The views of the reservoir panel engineer should be sought regarding failure in series. If failure in series is possible, detailed analysis will be required. Paragraph: 058 (Reference ID: 7-058-20140306) of flood risk and coastal change guidance, states that 'Local planning authorities are also advised to consult with the owners/operators of raised reservoirs, to establish constraints upon safe development'. The draft Level 1 SFRA advised that this site had failed to pass the sequential test and a Level 2 SFRA would be required. The published Level 1 SFRA (which the Environment Agency were not consulted on) advises that this site had passed the sequential test however no evidence has been provided demonstrating this. We are pleased a sequential approach has been applied to the site, in accordance with Policy 5 of the North Northamptonshire Joint Core strategy, i.e. residential development in flood zone 1 and employment in flood zone 2 (in respect of fluvial flooding), however, the issue of reservoir flooding has not been addressed, and no evidence of the application of the Sequential Test has been provided, which is relevant to flooding from all sources. We note that Policy KET9 requires a Level 2 SFRA to assess the risk of flooding from the nearby reservoirs. It is our view that it is not appropriate to allocate a site and require that the evidence base to justify its allocations is provided post adoption of the plan/policy. As stated above, NPPF Paragraph 31 requires all policies to be underpinned by relevant and up-to-date evidence. As it currently stands, there is insufficient evidence to determine if this site is developable.</p>
<p>Proposed Actions/Changes</p>
<p>Given the sites close proximity to a reservoir, it is premature to include this site as an allocation. The Level 1 SFRA identified this site at risk of flooding from a reservoir. In particular, the SFRA states that the 'site is entirely at risk from Cransley Waters, Thorpe Malsor and Slade Brook Balancing Reservoirs. Given proximity of the site to Slade Brook Balancing Reservoir, warning time is likely to be minimal'. There is no evidence (e.g. Level 2 SFRA or site specific flood risk assessment) to demonstrate that the Exception Test can be met and the proposed development can be made safe. In the absence of the Level 2 SFRA or site specific flood risk assessment, this allocation should be removed.</p>
<p>Officer Response</p>
<p>Additional information has been provided by the site promoter and further advice has been sought from the Environment Agency. An update will be provided at committee.</p>
<p>Officer Recommended Change(s)</p>
<p>None</p>

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
242	Environment Agency	4	Housing	No			No		
Reasons/Details of representation									
None.									
Proposed Actions/Changes									
We note that numerous policies throughout the document state that proposals will: 'Be supported by a contaminated land and land stability investigation and appropriate mitigation scheme to address any identified contamination, ensuring that there are no unacceptable risks to human health'. We recommend that this should be '...no unacceptable risks to human health and the natural environment'. This is to ensure that the potential risk posed to controlled waters (surface waters and groundwater) are also appropriately assessed.									
Officer Response									
See below.									
Officer Recommended Change(s)									
A Main Modification is proposed to address the issues raised in this response. Refer to the Main Modification Schedule, reference number MM9, MM11, MM14, MM16, MM18, MM19, MM22, MM23, MM25, MM42									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
243	Berrys	Policy LOC1	Settlement Boundaries	No	No	No	Yes	No	Yes
Reasons/Details of representation									
This representation is submitted on behalf of our client in support of the alteration of the Grafton Underwood settlement boundary to include land at The Manor House, Brigstock Road, Grafton Underwood, Northamptonshire NN14 3AA. This representation is made to Kettering Borough Council in response to the Publication Version consultation as part of its emerging Site-Specific Part 2 (SSP2) Local Plan. As per									

the requirements of the Kettering Borough Council, this representation is made specifically in relation to emerging Policy LOCI and the related Figure/Map 18.15 (relating to the proposed Grafton Underwood Settlement Boundary) of the Publication Version of the emerging Site-Specific Part 2 (SSP2) Local Plan. It is considered that the , as proposed, complies with the Duty to Co-operate. However, it is not considered that the Publication Version of the Local Plan is legally compliant or sound, as explained below: Objection is raised to the Kettering Borough Council's decision to exclude residual residential curtilage land (including outbuildings and garden land) at The Manor House, Brigstock Road, Grafton Underwood from the proposed village settlement boundary. It is considered that the Local Plan is not legally compliant or sound, particularly with regard to whether it has been positively prepared, or is justified, effective, or consistent with national planning policy. The site is an edge of settlement location to the east of Brigstock Road which abuts the main built-up framework of Grafton Underwood on the eastern side of the village. The site comprises a residual part of a self-contained and single residential curtilage, which includes garden land and two residential outbuildings. The site extends to approximately 0.24 hectares in total. It is of fundamental importance to note that the site is defined by an extensive, abundant mature hedgerow along its northern, southern and eastern boundaries. The subject land is demarked by a small post and rail fence and the boundary of a private tennis court (within the same ownership as the subject land) along its western boundary. The land shares a close functional and visual relationship with the garden land to the west because the subject land comprises part of the single, self-contained garden. The Council's Background Paper Settlement Boundaries (Update) was published in April 2018 and comprises part of the Council's evidence base to inform the preparation of the emerging Site-Specific Part 2 (SSP2). It is noted that the updated Background Paper Settlement Boundaries included a methodology for drawing settlement boundaries. Attention is drawn to the fact Principle 2 of the methodology states that the Council will prepare settlement boundaries which include 'curtilages which are contained and visually separated from the open countryside'. The subject land wholly conforms with this principle. The land is wholly contained and visually separated by a mature and extensive hedgerow along its eastern and southern boundaries. It is therefore evident that the site is well defined, wholly contained and visually separated from the from the open countryside to the east. The subject land therefore complies with Principle 2 of the Councils' methodology and should be included within the Grafton Underwood settlement boundary. Moreover, within the Background Paper Settlement Boundaries' findings/conclusions with regard to the site, the Council notes that 'Other parts of the garden covered by the CLUED and separated by post and rail fence and should be excluded from the settlement boundary as development of the site would have a harmful impact on the character and structure of the settlement boundary'. It is considered that this approach is illogical and inconsistent with the fact that part of the same garden land has been include within the settlement boundary. To ensure that the proposed Local Plan is sound, the entire area of garden land (including both the existing land within the settlement boundary and the identified residual subject land) should be included within the settlement boundary. Attention is also drawn to the planning and development history of the site, which is a material issue. The Council acknowledges that the tennis court has been present on site since prior to 2000. A Certificate of Lawful Use was granted by the Council in 2014 for use of the entire extent of garden for use as ancillary garden land and as a tennis court to The Manor House. It therefore seems illogical and inconsistent of the Council to only include part of this land within the proposed settlement boundary. This is evidently unjustified and unsound as the entire ancillary area is lawful garden land. The land is classified as previously developed land. Recent case law has held that private residential

<p>gardens outside of larger built-up areas are defined as previously developed land. Although the site forms part of the wider built-up framework of the village of Grafton Underwood, it is considered to be outside of a larger built-up area. The status of the site as previously developed land lends substantial weight to the argument that the site should be included within the defined settlement boundary. Moreover, the site is evidently part of the Grafton Underwood built up area and site which forms part of the urban fabric of the village. The site is integral to the built-up area, and merits inclusion within the village Settlement Boundary. Inclusion of the subject land within the village settlement boundary represents a logical 'rounding off' of both the physical boundary of Grafton Underwood and the built form of the village without resulting in harm to the openness of the countryside or the amenity of neighbouring properties. The inclusion of the subject land within the settlement boundary will accord with the presumption in favour of sustainable development and related policies, as set out in the National Planning Policy Framework (NPPF) and relevant local planning policies within the North Northamptonshire Joint Core Strategy (NNJCS) and emerging Site-Specific Part 2 (SSP2) Local Plan. Moreover, the subject land must be included within the Grafton Underwood settlement boundary to ensure consistency with the parcel of garden land that is proposed to be included. Exclusion of the garden land will ensure that the emerging Local Plan is not justified, effective or positively prepared.</p>
<p>Proposed Actions/Changes</p>
<p>It is considered that the following changes are necessary to ensure that the Local Plan is legally compliant and sound: Kettering Borough Council is required to ensure its Site-Specific Part 2 (SSP2) Local Plan is positively prepared, justified, effective and consistent with national planning policy. To meet the requirement criteria set out in national planning policy the Policies Map is required to be amended to include the residual residential curtilage land at The Manor House, Brigstock Road, Grafton Underwood (the subject land, shaded red on the attached Plan) within the Grafton Underwood settlement boundary. Please refer to the attached Appendix A, which illustrates the subject land and the proposed amended Settlement Boundary in respect of Grafton Underwood.</p>
<p>Officer Response</p>
<p>The settlement boundaries have been drawn in accordance with a robust set of criteria. The Settlement Boundaries Background Papers (February 2012, April 2018 and October 2019) provide the evidence base and justification for the settlement boundaries shown on the policies maps.</p>
<p>Officer Recommended Change(s)</p>
<p>No changes recommended.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
244	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
I am concerned with the suggestion that Policy 10 of the Local Plan should be amended. Thorpe and Cransley Reservoirs need to be protected places. They are important for the environment, for wildlife and for leisure pursuits. Migrating birds use the reservoirs each year. They are also part of the footpath network. Policy 10 has stood the test of time and I see no reason for it to be amended.									
Proposed Actions/Changes									
None.									
Officer Response									
Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
245	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
I am writing to express my concern at the possible dilution/removal of Policy 10. It is difficult enough for wildlife with developments being built in rural areas, but to allow this around areas where water is available for their survival and habitat is incomprehensible. It will deter them from going there with people and lots of activity. We should be preserving our countryside, especially around reservoirs, not soften the Planning rules to enable our countryside to disappear in years to come. What are we doing to our countryside? Please consider keeping Policy 10 as is. Let's keep our wildlife visiting us and enjoying their presence.									
Proposed Actions/Changes									
None.									
Officer Response									
Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
246	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
<p>I write to say that I think that the Cransley and Thorpe Malsor reservoirs should remain protected as they were under Policy10 of the 1995 Local Plan. The two reservoirs provide a wildlife resource for both indigenous birds and migrating wildfowl. The reservoirs provide beauty spots close enough to Kettering to be enjoyed by local people who are interest in wildlife or just prefer to enjoy some peace and quiet in a rural setting. We are being encouraged not to use vehicles with all their emissions needlessly and it is quite a long journey to access other wildfowl area s. The Policy 10 has worked well in the past and I request that it is kept for the two reservoirs for the future so that there are still some places kept for nature after all the very extensive house building has taken place. The NEH2 does not allow for any long term preservation of natural spaces for both humans and nature's own.</p>									
Proposed Actions/Changes									
None.									
Officer Response									
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
247	Local Resident	8	Natural Environment and Heritage						
Reasons/Details of representation									
I am writing to say that I think Cransley and Thorpe Malsor reservoirs should remain protected as they are under Policy 10 of the 1995 Local Plan. They are a valuable wildlife resource for indigenous birds and migrating birds. The reservoirs provide valuable open beauty spots which can be enjoyed by many who appreciate the space and varied bird species. Policy 10 had worked well in the past and I ask that it is kept for the two reservoirs in the future.									
Proposed Actions/Changes									
None.									
Officer Response									
Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.									
Officer Recommended Change(s)									
None.									

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
248	Wilbarston Parish Council	13	Wilbarston						

Reasons/Details of representation

13.172 Wilbarston Conservation Area Appraisal was adopted in June 1983. In addition to this, the Wilbarston Village Design Statement was adopted in 2010. This needs to be amended to read the Parish Plan not Village Design Statement. The attached map needs to be amended to include the three highlighted open spaces; playing field, Carlton Road allotments and village green.

Proposed Actions/Changes

None.

Officer Response

See below.

Officer Recommended Change(s)

A Main Modification is proposed to add the recreation ground to the policies map, the other two spaces are too small to be include in the open space audit but would be considered on individual merits should an application come forward. Refer to the Main Modifications Schedule, MM51

An Additional Modification is proposed to amend to reference for Village Design Statement to Parish Plan. Refer to the Additional Modifications Schedule, AM41

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
249	Cransley Parish Council	8	Natural Environment and Heritage						

Reasons/Details of representation

<p>Councillors of Great Cransley Parish Council all emphatically agreed that Policy 10 should be retained. It would be detrimental to the whole area, the wildlife, including small mammals and birds, the water quality and the well used public footpaths bordered by wild flowers if it did not have the protection of Policy 10 to secure its future. Cransley Reservoir is enjoyed by the public for its views from the surrounding area and from the footpath over the dam. The sailing boats from the active sailing club give extra interest and enjoyment to the peace and quiet of this local area of countryside which must never be allowed to be commercialised.</p>
<p>Proposed Actions/Changes</p>
<p>None.</p>
<p>Officer Response</p>
<p>Saved Local Plan Policy 10 seeks to set out those circumstances where development of these areas is considered acceptable, it is an exceptions policy. Cransley and Thorpe Malsor reservoirs are both located outside of any existing or proposed settlements boundaries and are therefore considered as being in open countryside. As a result, these areas are afforded a level of protection through existing policy in the North Northamptonshire Joint Core Strategy (JCS). The relevant JCS policies are referenced in Policy RS4 of the emerging SSP2 Publication Plan. The purpose of this policy is to set criteria that have to be met for development in the open countryside to be considered acceptable. Policy RS4 of the Publication Plan provides additional criteria to that set out in the JCS, in relation to replacement dwellings and the re-use of redundant or disused buildings as well as private equestrian facilities. Cransley and Thorpe Malsor reservoirs are sufficiently protected due to their location in the open countryside. Therefore although, there is no specific policy in relation to both the Cransley and Thorpe Malsor reservoirs proposed in the Publication Plan, the level of protection afforded to these two reservoirs will not diminish as a result.</p>
<p>Officer Recommended Change(s)</p>
<p>None.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
250	North Northamptonshire Joint Planning Unit	General Comments	Site Specific Part 2 Local Plan- Publication Plan						

Reasons/Details of representation

Relationship with the JCS The JPDU considers that the Site Specific Part 2 Plan (SSP2) appropriately understands its relationship with the JCS - Part 1 of the Local Plan. This is clearly explained in the purpose and content section (paras 1.1-1.4). The SSP2 addresses non-strategic issues and does not duplicate policies within the JCS. The JPDU considers that the Plan provides appropriate local distinctiveness to the strategic policies of the JCS. Para 3.4 of the SSP2 further acknowledges the non-strategic role of the Plan, setting out that: 'The Joint Core Strategy allocates strategic housing and employment sites (Strategic sites are 500+ dwellings for housing sites and 5+ hectares for employment sites), the SSP2 allocates additional smaller scale sites to meet housing and employment requirements'. Policy DES6 allocates Land adjacent to Magnetic Park, Desborough (referenced as site D1) an 8.1ha site for B2/B8 uses, which is above the defined strategic site threshold of 5ha that is referenced in the Plan. It is noted that the Sustainability Appraisal at para 11.3.95 sets out that the sites primary function is to 'support additional employment opportunities locally' and 'enables existing residents and those from the new developments to access jobs locally thus reducing the need for long distance commuting'. For transparency and clarity, the Council should explain in the supporting text to Policy DES6 why an employment site in excess of 5ha is being allocated in the SSP2. The 5ha threshold was used in the JCS to focus the strategic plan on large sites that are critical to realising the spatial strategy. It also avoided burdening the JCS with smaller non-strategic allocations and saves Part 2 Local Plans from having to consider strategic sites. The JPDU considers that the key questions in relation to proposed Policy DES6 are whether it is consistent with the strategic policies of the JCS, and whether the scale and wider impacts of the site are of a strategic scale that can only be considered properly at a North Northamptonshire level. On the first question, the JPDU considers that the identification of employment land at the Market Town of Desborough is consistent with the spatial strategy set out in the JCS, which seeks to diversify and expand the employment base of the town. On the second question, the JPDU notes that the site boundary appears to be logical on-plan and that the impacts of developing the site have been assessed through the Sustainability Appraisal. We consider that the scale of the site, although greater than 5ha, is unlikely to result in significant impacts beyond Kettering Borough. For these reasons, and given the benefits identified in the Sustainability Appraisal, the JPDU is satisfied that the proposed allocation of Land adjacent to Magnetic Park is appropriate within the SSP2. The SSP2 makes reference in Table 4.1 to the housing requirements set out by Table 5 of the JCS, with the overall target for the Borough being at least 10,400 new dwellings by 2031 consistent with the requirements in Policy 28 of the JCS (Housing Requirements). Para 4.4 explains that the SSP2 allocates sites to meet the remaining housing requirement in each settlement. In addition to the minimum housing requirements, the SSP2 allocates enough sites to provide a 10% flexibility allowance above the JCS housing requirements in Kettering, Burton Latimer, Desborough and Rothwell. In addition to allocations, a windfall allowance has also been included as part of the supply. Table 4.3 provides a summary of existing completions, commitments and SSP2 allocations and sets out the provision for an additional 2,576 homes in addition to the JCS requirement. Table 4.3 demonstrates that in all settlements the allocations included in the SSP2 will meet and exceed the housing requirements identified in the JCS. It is considered that this approach provides a robust contingency to support housing delivery and is consistent with the provisions of Policy 29 of the JCS (Distribution of New Homes). This is taken forward by site specific allocations within the Borough (as detailed in Chapters 9-13) in addition to the SUEs of Kettering East (Hanwood Park, also known as a Garden Community), Rothwell North and Desborough North as well as other sources of

housing supply. The site-specific policies identify specific site requirements, including for infrastructure. Conclusion The JPDU welcomes the progress made by the council with the SSP2. It is considered that the Plan is in conformity with the JCS and identifies the relevant local issues where additional guidance is required. It clearly recognises the existing policy framework within the JCS and the importance of not duplicating this. The JPDU will continue to support Kettering Borough Council in taking the SSP2 forward to submission and beyond this to the Examination.
Proposed Actions/Changes
None.
Officer Response
See below.
Officer Recommended Change(s)
A Main Modification has been proposed to address issues relating to the size of DES6. Refer to the Main Modification Schedule, MM30

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
251	North Northamptonshire Joint Planning Unit – Health and Planning	2	Vision						

Reasons/Details of representation
Para 2.13 - SSP2 Vision I welcome the references to health and wellbeing in the vision for Kettering Borough. The wording, revised from earlier versions, reflect the broader ways in which planning and new development can contribute to health and wellbeing as well as reflecting the requirements of National Planning Policy to address health and wellbeing, and the significant health and wellbeing challenges faced in Kettering and the wider county.
Proposed Actions/Changes
None.
Officer Response

Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
252	North Northamptonshire Joint Planning Unit – Health and Planning	Policy HWC1	Health and Well-being						

Reasons/Details of representation

Policy HWC1 = Health and Wellbeing I welcome the inclusion of a specific policy on health and wellbeing. However the content of the actual policy wording is quite narrow, not entirely reflecting the health and wellbeing content included in the vision statement. I request the inclusion of additional wording as identified in italics below: Health and Well-being The Council will seek to improve health and well-being in the Borough. The Council will work with its partners to: -Identify appropriate sites for new health infrastructure based on a health service delivery plan; -Protect existing facilities and support the provision of new or improved health facilities; -Prioritise interventions and resources to those areas of the borough where health inequalities are greatest; and -Support the integration of community facilities and services, i.e. health, education, cultural and leisure in multi-purpose buildings. -Create environments that support and encourage healthy and active lives. Health Impact Assessment: In order to ensure that the health and wellbeing policy is implemented I would request that a policy requirement for Health Impact Assessments be included in the SPP2, which would apply to major developments. This would act as a mechanism to encourage and assist applicants to effectively address health and wellbeing in their development proposals and thus deliver policy HCW1. It would also help the local planning authority to determine whether the proposals / application meet the requirements of Policy HWC1. A local Health Impact Assessment tool has been created and could be used for this purpose - <http://www.nnjpdu.org.uk/publications/northamptonshire-rapid-hia-for-planning-tool/>

Proposed Actions/Changes

None.

Officer Response

See below.
Officer Recommended Change(s)
A Main Modification is proposed to add the additional criteria to HWC1 to create environments that support and encourage healthy and active lives. Refer to the Main Modification Schedule, MM4

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
253	North Northamptonshire Joint Planning Unit – Health and Planning	Table 15.1							

Reasons/Details of representation
Monitoring and review (Table 15.1): A single indicator is identified for the purpose of monitoring delivery of Policy HWC1 and the objective of improving health and wellbeing in the Borough. This indicator is ‘Additional floorspace for health infrastructure.’ This is a very narrow view of health and wellbeing and is a poor measure of ‘improving health and wellbeing in the Borough’. Consideration should be given to better ways of monitoring delivery of this objective.
Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with	Legal Req	Duty to Co-operate
----	------------	----------------	------	-----------	-----------	---------------------	-----------------	-----------	--------------------

							national policy		
254	North Northamptonshire Joint Planning Unit – Health and Planning	Policy HWC3	Sport, Recreation and Physical Activity						
Reasons/Details of representation									
Policy HWC3 - Sport, Leisure and Physical activity: We welcome the references to formal sports and leisure provision. However it is important to recognise that creating everyday environments that encourage informal physical activity is important - as well as formal sports and leisure facilities. To this end I welcome the inclusion of the Sport England Active Design principles as guidance that will be used to judge proposals.									
Proposed Actions/Changes									
None.									
Officer Response									
Noted.									
Officer Recommended Change(s)									
None.									

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
255	North Northamptonshire Joint Planning Unit – Health and Planning	Policy NEH2	Green Infrastructure						

Reasons/Details of representation
We support the requirements for good quality green infrastructure and open spaces, recognising the various health and wellbeing benefits it provides.
Proposed Actions/Changes
None.
Officer Response
Noted
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
256	North Northamptonshire Joint Planning Unit – Health and Planning	7	Health and Well-being and Community Facilities						

Reasons/Details of representation
We fully support the policy aspirations to improve connectivity and specifically the need to improve infrastructure for active travel.
Proposed Actions/Changes
None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

Item 6 Appendix 1

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
257	Rothwell Town Council	General Comments	Site Specific Part 2 Local Plan- Publication Plan						

Reasons/Details of representation

Rothwell Town Council (RTC) are of the opinion that commencing the consultation just before the Christmas period and the lack of publicity in promoting the consultation by Kettering Borough Council did not actively encourage community engagement. Furthermore, Kettering Borough Council passed a motion on the 24th July formally declaring a Climate Emergency in Kettering Borough and committed to a target of making the area covered by the Borough Council carbon neutral by 2030. RTC is of the opinion that there are no clear indications that this motion has been fully incorporated within SSP2.

Proposed Actions/Changes

None.

Officer Response

The consultation ran for eight weeks rather than six to allow for the Christmas period. Significant effort was made to engage with the community, this included a consultation event held in Rothwell.

Officer Recommended Change(s)

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
258	Rothwell Town Council	Policy ROT1	Rothwell Town Centre Development Principles						

Reasons/Details of representation

Item 6 Appendix 1

<p>Whilst RTC acknowledges that the redevelopment of the library area has been taken out of the SSP2, RTC are of the opinion that specific reference to the Community Library Hub, recognising the importance of this building and the boundary of the current lease agreement with NCC must be included within SSP2. Furthermore, if at a later stage the Fire Station should relocate, any potential use of this site including the current parking area for housing development should be removed and utilised for a car park in view of the lack of parking in the Town, thereby reducing on-street parking in this area. RTC welcome the provisional of additional car parking in the Town which would increase the footfall to the current businesses. RTC fully support any further traffic calming improvements to the Town and whilst RTC are fully supportive of environmental improvements, a percentage of on street parking cannot be avoided and can be seen to act as preventative.</p>
<p>Proposed Actions/Changes</p>
<p>None.</p>
<p>Officer Response</p>
<p>Noted. Policy HWC1 seeks to protect community facilities, it is not necessary to have a specific policy for Rothwell library. The Fire Station site is no longer included as an area of opportunity in the plan, an proposals for the site would need to comply with policies in the development plan</p>
<p>Officer Recommended Change(s)</p>
<p>None.</p>

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
259	Rothwell Town Council	Policy ROT2	Opportunity Environmental Improvement Sites in Rothwell						

<p>Reasons/Details of representation</p>
<p>12:11 - RTC fully support improvements to pedestrian and cycle links. 12:12 - It is essential that further investigations take place with the increase in traffic resulting from the Rothwell North Development and the impact on junction 3 of the A14 and the A6/Rothwell link road junction. In addition, the impact on Harrington Road/Fox Street/Kettering Road by traffic attempting to gain access to junction 4 of the A14 when junction 3 is congested at peak times when exiting off the A6 must also be investigated.</p>
<p>Proposed Actions/Changes</p>

None.
Officer Response
Noted.
Officer Recommended Change(s)
None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
260	Rothwell Town Council	Policy ROT3	Land to the West of Rothwell						

Reasons/Details of representation

12.16 - RTC strongly recommend that this should be removed and reiterate that this area should be utilised for green infrastructure. Any additional housing (proposed 300 houses) should be deleted from SSP2 and should only be included within the plan at a later date when the impact of the current Rothwell North Development has been completed and improvements to the current infrastructure have taken place. (H) land to West: RTC strongly support that the strategic link road must be built before considering the build of a further 300 houses. RTC are of the opinion that with the current developments taking place significant improvements to the current bus provision are a crucial requirement to the Town and its residents. RTC are of the opinion that improvements are made to the access to Montsaye School directly via a new entrance directly onto the new link road through the Rothwell North Development area. With the development of the area, including a new primary school this will relieve the congestion on Greening Road.

Proposed Actions/Changes

None.

Officer Response

An additional housing allocation is needed to meet housing requirements identified in the North Northamptonshire Joint Core Strategy. The Housing Land Supply Background Paper (October 2019) provides the justification for the number of allocations proposed in each of the settlements.

Officer Recommended Change(s)

None.

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
261	Rothwell Town Council	18	Appendix 3 - Policies Maps						

Reasons/Details of representation

RTC fully support and reinforce that this land ('A' marked in red on the attached plan) should be designated as recreational, woodland and an extension for allotment use. This will substantially improve this area environmentally. Any further amendment to designate this area to industrial or employment would increase traffic on the roads and is against the Town Council's policy for reducing traffic, especially HGV traffic.

Proposed Actions/Changes

None.

Officer Response

The area of land shown on the plan as 'A' is not designated in the plan, the green shown is the ordnance survey base mapping.

Officer Recommended Change(s)

No changes recommended

ID	Respondent	Policy/Chapter	Name	Justified	Effective	Positively Prepared	Consistent with national policy	Legal Req	Duty to Co-operate
262	Central England Co-Op Ltd	11	Housing Site Policies	No	No	No	No	Yes	Yes

Reasons/Details of representation

On behalf of our clients, Central England Co-op, and further to representations made in 2016, I write to promote the above site for inclusion in the emerging Site Specific Part 2 Local Plan (SSP2) for Kettering Borough. A plan identifying the proposed allocation and the Council's standard representation form are attached to this letter. The land forms 55 Hectares of well-enclosed fields to the South-West of the town between the existing urban area and the A6 and is in the ownership of Central England Co-op Limited. It is our view that the land is well located for new housing development. This view that has previously been established in evidence; the 2013 JPU Urban Structures Study identified Eastern expansion of the town (including this site) as the best opportunity for extending and 'repairing' the network of routes and spaces to improve and enhance the structure of the town. Development of this site would have a very pleasant outlook, good access to existing open spaces excellent pedestrian and cycle connectivity to the town centre, existing schools and other facilities. When developed, the site would fit well with the existing urban structure and expand existing communities off Federation and Pioneer Avenues. The existing street pattern can readily be extended to accommodate new development. The site has very few technical constraints and we are not aware of any issues that would prevent residential development being brought forward quickly. There are no legal or title issues affecting the ownership. Having been promoting the site for some years, our client is able to mobilise quickly and have already undertaken a range of technical assessments of the site. We would be pleased to share these assessments with you to aid your consideration of the site. The site is located entirely within Flood Zone 1 and is not at risk of flooding. The site generally slopes Northwards towards the shallow valley floor and would drain naturally in that direction. There is a fall across the site of 5m from 120AOD to 115AOD at the Northern boundary. A SuDS scheme could easily be designed into a development scheme to provide a sustainable drainage solution. There are no known utilities or foul drainage issues affecting the site and the proximity to the existing urban area ensures all major utilities are close at hand to serve new development. There are no known heritage issues that would inhibit development of the site. The site has been assessed as Grade 3 Agricultural Land and is not classed as best or most versatile. Phase 1 Extended Habitat Surveys have indicated that the impacts of any development can be mitigated, indeed the overall biodiversity of the site can be enhanced through development incorporating a comprehensive new landscape framework. As drafted, the emerging SSP2 identifies a housing requirement for Desborough of 1,360 dwellings to be delivered within the plan period up to 2031. Our clients consider the approach to delivery of housing at Desborough to be unsound for two principal reasons. Firstly, emerging SSP2 is too rigidly applying the housing targets set out in the adopted Joint Core Strategy (JCS). The JCS was adopted in 2016 and takes no account of the Government's standardised methodology for determining objectively assessed housing need. SSP2 therefore seeks to provide insufficient housing in Kettering Borough as a whole. Secondly, SSP2 sets out that, of the 1,360 dwellings needed at Desborough, only 373 have been completed in the eight years of plan period to date. The emerging plan relies extremely heavily on the 700 committed dwellings proposed at the allocated Desborough North urban extension which is running significantly late on projected delivery timescales. We contend that Desborough North does not meet the definition of deliverable as set out in Government guidance and that, should development come forward at all, the limited access options provided for will prevent development at the rate envisaged in the emerging plan. It is apparent from the emerging SSP2 as drafted that the Borough Council recognise the vulnerability of delivery at Desborough. In order to meet the shortfall of housing provision at the town the Council has sensibly identified two additional residential allocations totalling 439 dwellings through proposed policies DES4 and DES5. Our clients support the

principle of additional allocations at Desborough for the reasons set out above, however we strongly object to the proposed allocations DES4 and DES5 as the wrong sites have been chosen in order to effectively enable delivery. It is the view of our client that Manor Farm, Desborough offers significant sustainability benefits when compared to the proposed allocations in emerging SSP2.

Proposed Actions/Changes

Based on an assumed average density of 30 dwellings per hectare, the site is capable of accommodating at least 1,200 dwellings. It is our view that this site should be allocated now to address soundness deficiencies in the emerging SSP2 for the reasons set out below.

Officer Response

In Desborough both housing allocations included in the SSP2 have planning permission. The Housing Land Supply Background Paper provides detail of the supply of sites in Desborough. This demonstrates that the supply in Desborough is significantly in excess of the JCS requirement plus 10% flexibility allowance. Therefore there is not a need for additional sites in Desborough to be identified in the SSP2. The site propose is of a strategic scale and significantly exceeds the 500 dwellings threshold of a strategic site.

Officer Recommended Change(s)

No changes recommended.