

29 November 2017
CAPL373201/A3/LV



Development Services
Kettering Borough Council
Municipal Offices
Bowling Green Road
Kettering
NN15 7QX

Lydia Voyias BA (Hons) MPlan, MRTPI

E:
DL: +44 (0) 1223 347 269
F: +44 (0) 1223 347 000

Unex House
132-134 Hills Road
Cambridge CB2 8PA
T: +44 (0) 1223 347 000
F: +44 (0) 1223 347 111
savills.com

By email: planningpolicy@kettering.gov.uk

Dear Sir/ Madam,

**Response to Broughton Neighbourhood Plan and Neighbourhood Development Plan 2016 to 2031
On behalf of Taylor Wimpey**

I write on behalf of Taylor Wimpey UK to provide representations in response to the Draft Broughton Neighbourhood Plan (Regulation 16 stage) and the Neighbourhood Development Order (Regulation 23).

Consultation Statement and Neighbourhood Plan Pages 8 to 10

Representations were made in January 2017 on behalf of Taylor Wimpey in response to the 'Broughton Neighbourhood Plan Pre-Submission Consultation' to seek to promote 'Land West of Darlow Close and Cransley Hill, Broughton' and 'Land south of Northampton Road, Broughton' for residential allocation.

It is noted that the current consultation is supported by the 'Broughton Neighbourhood Plan: Shaping Our Future Together 2016 through to 2031 – Consultation Statement (Part 5, Section 15 Neighbourhood Planning (General Regulations 2012)'. The 'Consultation Statement' refers to the statutory consultee responses within the main report whilst the non-statutory comments are contained at separate Annex 1 'Pre-Consultation Survey Responses'. I draw to your attention that a number of objections were raised in response to the draft Neighbourhood Plan during previous consultation periods.

Current Representations

These current representations are made in response to the following chapters of the Broughton Neighbourhood Plan:

- Foreword (pages 3 and 4)
- Procedure and Policy (pages 6 and 7)
- Development in Broughton (Chapter 4)
- Village Boundary Policy 1
- Broughton Sustainable Solution Statement (Chapter 2)
- High Street, Broughton (Chapter 7)

Foreword – Pages 3 and 4

The Foreword of the Neighbourhood Plan highlights that the scope for the Neighbourhood Plan applies "*not only to housing developments, but to the development of community facilities, green spaces and design codes, and to lots of other issues that are vital to people growing up and living in a community*" (page 4). Support is given to this statement. The two sites promoted for residential allocation by Taylor Wimpey (as discussed below in detail) both site offer opportunities for wider benefits to the community.



Procedure and Policy – Pages 6 and 7

It is stated at page 6 of the Draft Neighbourhood Plan that “*The Neighbourhood Plan complies with European legislation, National Policy and conforms with existing strategic regional planning policies.*” This is a matter for the Neighbourhood Plan Examiner to make judgement as part of the Examination process.

As a point of clarity, regional policies do not exist. The ‘regional spatial strategies’ were revoked in 2010. The North Northamptonshire Joint Core Strategy (2011-2031) forms Part 1 of the Local Plan for Corby, East Northamptonshire, Kettering, and Wellingborough and identifies the overarching spatial strategy for the area.

It is noted that Kettering Borough is still in the early stages of preparing its Local Plan Part 2 with initial Issues Consultation and subsequent Options Consultation taking place in 2009 and 2012. It is clear that this Neighbourhood Plan has been prepared in advance of the Kettering Borough Council Local Plan Part 2 and therefore needs to be robustly justified by its own supporting evidence.

Furthermore, there is a need to ensure the Draft Neighbourhood Plan is consistent, where relevant, with saved policies of the Kettering Local Plan (1995).

The following representations are in response to specific sections of the Draft Neighbourhood Plan. We have highlighted inconsistencies in the Draft Neighbourhood Plan with the strategic policies of the Development Plan and also identified shortcomings in the pursuit of sustainable development.

Development in Broughton – Chapter 4

Draft Development Policy 4 (page 50) allocates sites to meet the ‘*identified housing need in Broughton Parish for the period until 2031... identifying a surplus to the identified need, this surplus is responding to the specific small scale dwelling required for entry level and later life downsizing need required in Broughton.*’

Table B lists the proposed allocations (pages 43 and 44). The proposed allocations comprise of: 81 dwellings are at sites which benefit from planning permission or at sites where development has been completed. The following additional sites have been identified for allocation:

- Carter Avenue – 6 x 2 bed dwellings
- Church Street – 7 X 2 bed dwellings
- Windfall proposals – 5 dwellings

Objection is raised against this policy for the following reasons.

a) Options for Growth

Page 7 of the Draft Neighbourhood Plan states “(nb: the Joint Core Strategy has established the overarching regional housing need for Broughton within its total regional housing need for the period 2011 to 2031 and Kettering Borough Council have established the housing need for Broughton within the total regional housing requirement for this period.”

It is correct that the North Northamptonshire Joint Core Strategy identifies the needs for 10,400 new homes within Kettering Borough 2011-2031. Table 5 of the Joint Core Strategy identifies the housing requirement for 480 new homes to be delivered in the rural area of Kettering Borough over the period 2011 to 2031.

The Pre-Submission Draft Neighbourhood Plan suggested the housing need for Broughton was 87 dwellings over the plan period. It is noted that Kettering Borough Council's consultation response to this suggested figure states that “*The rural housing figure in the Joint Core Strategy covers the whole rural area and the work undertaken in distributing the figure is still on-going through work on the Site Specific Part 2 Local Plan. The work provided to the Parish Council on housing numbers for Broughton was based on work done in the preparation of the Joint Core Strategy and looked at natural growth, then taking into account capacity of villages to accommodate additional development on sites identified in the SHLAA. It is not a definitive figure for the plan*

period and does not include an allowance for windfall development which would be in addition to any allocations made."

In addition Kettering Borough Council has previously sought comments from the public about the possible spatial strategy for the rural area. Paragraph 9.3 of the 'Kettering Borough Council Site Specific Proposals LDD Housing Allocation Assessment of Additional Sites and Update (2013)' consultation document states that *"...of the two alternatives identified the dispersed option emerged as the preferred approach for delivering growth. Nevertheless, there were some objections to the three sites identified"*. It is considered that there remain unresolved objections to the emerging spatial strategy for the rural area and at Broughton, as such limited weight should be given to it.

The 'Strategic Environmental Assessment Report' supporting the Neighbourhood Plan has not assessed alternative growth options for Broughton and therefore the potential benefits of larger site allocations. The supporting evidence base is therefore considered to be flawed.

b) Housing Needs Survey

It is considered that the Parish Council, in preparing its own Neighbourhood Plan should produce its own evidence to justify the level of growth to be planned for. It is stated at page 10 of the Draft Neighbourhood Plan that *"Although not as a direct result of this Neighbourhood Plan process but as a consequence of our Parish Plan: a Housing Needs Survey was carried out by (KBC) in September 2013 to determine the level of housing need in the village..."*

The Broughton Housing Needs Survey (2013) is available on Kettering Borough Council's website. Housing Needs Surveys provide a snapshot in time of the housing market and rely on the interpretation of those completing the survey, this limitation is acknowledged at page 20 of the Broughton Housing Needs Survey.

The Broughton Housing Needs Survey (2013) does not include a copy of the survey which is unfortunate however, one of the 'Key Findings' reported was that *'67 households indicated they needed to move in the next five years'* (page 1). Whilst page 16 states that *"...the above mix is simply indicative of the survey findings but could be used to inform future development along with other sources of information available at that time. It is clear that opportunities for attractive down-sizing households would be a useful consideration to take on board on new developments in both the social and market sectors. Opportunities for some small scale low cost sale options for first time buyers or other forms of intermediate tenure should also be explored."*

In this case, this evidence base document reflects the housing need position for Broughton at April and May 2013 and is now over 4 years old. It does not therefore represent the current need within Broughton. Objection is raised to the use of this dated survey as the evidence base for the Neighbourhood Plan. As a consequence the Neighbourhood Plan falls short of one the Core Planning Principles of the National Planning Policy Framework for *"...Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth"* (paragraph 17) and Planning Practice Guidance Paragraph: 040 Reference ID: 41-040-20160211.

c) Approach to Settlement Capacity

Pages 30 and 31 of the Draft Broughton Neighbourhood Plan reproduce Kettering Borough Council's assessment of Broughton's capacity to accommodate additional development. Again we reiterated that Kettering Borough Council does not consider this 87 dwelling figure to a 'definitive figure' for the assessment of housing need (Consultation Statement, Annex 1 'Pre-Consultation Survey Responses' page 81).

The Borough Council's proportionate approach to growth initially suggested a figure of 128 new dwellings for Broughton. A number of local issues were then taken into consideration which reduced the housing need to 87 new dwellings. One such local consideration is 'school at capacity' (page 30). It is stated that *"Figure should be reduced to prevent need for commuting from the village to other schools"*. This statement may not be an up to date representation of the current school capacity as it is noted within the supporting Neighbourhood Plan



Consultation Statement that Northamptonshire County Council Schools Service have not commented on the Draft Broughton Neighbourhood Plan.

In addition, the 'Site Specific Proposals LDD Site Assessment Sheet – Land West of Darlow Close' makes reference to "NCC Education report that Broughton Primary School would require expansion to accommodate further development (Planning Policy Report November 2016)". However, the minutes for the Kettering Borough Planning Policy Meeting of November 2016 state that the matter of school capacity was raised by a Councillor rather than Northamptonshire County Council themselves. Objection is raised in response to this approach to the identification of the suggested 'housing need' figure as it is not considered to be based on up to date and robust evidence.

d) Proposed Allocations

The majority of sites identified for allocation already benefit from planning permission or are sites where development has been completed.

It is questioned what is the Council's approach to classifying the sites in the comments section in respect of 'identified housing need'.

Policy 30 of the North Northamptonshire Joint Core Strategy establishes a requirement for 40% affordable housing to be delivered on schemes of 11 or more dwellings. Objection is raised to the proposed allocations as they would not result in a mix of affordable and market dwellings and is therefore considered a shortcoming in the pursuit of sustainable development.

Market housing would be directed to the Church Street allocation site and other windfall sites due to their scale. Furthermore, the proposed Neighbourhood Development Order identifies the current BT Exchange at Church Street for the delivery of smaller sized properties of one or two bedrooms suitable for a range of occupiers to respond to "locally identified open market housing need" (page 3).

In addition, the following statement is provided on page 55 of the Draft Neighbourhood Plan "At the start of this plan, it is not possible to legally designate that these properties remain open market properties in perpetuity to prevent them falling to housing association or buy to let ownership, but this aspect will be kept in review as part of the monitoring exercise conducted every 5 years. Should legislation change, and it is still possible to do so, this status will be enabled in order to maintain these properties as the open market asset to the village that they are intended to be". This is not considered to be an example of positive planning and does not reflect a commitment to the delivery of the social dimension of sustainable development as outlined by the National Planning Policy Framework.

The wording of Table B in relation to the Carter Avenue site is considered to be ambiguous. The site is identified as 'strategic suitable option for affordable small scale local housing authority opportunity'. If this site is to be allocated for affordable housing use then this should be specified and justified by relevant evidence.

Suggested Allocation: Land west of Darlow Close, Broughton

This site has been submitted to Kettering Borough Council as part of the Call for Sites Update 2016 as a possible location for residential allocation. In addition the site was promoted for allocation in response to the pre-submission Draft Neighbourhood Plan consultation.

This site is considered to be a suitable location for development, which is both available and achievable. Concept sketches of the site have been shared with the Parish Council and Kettering Borough Council which illustrate the opportunity to incorporate key benefits for Broughton which include:

- Improvement of the existing vehicular and pedestrian access to Broughton Primary School via Cransley Hill;
- A new parent 'drop off and pick up parking area' within the site;



- A Children's play space adjacent to the school and central public open space;
- An area of additional staff/ overflow parking;
- Approximately 50 dwellings of a range of house sizes and tenures, including affordable housing.

The Development Site Evaluation Report has assessed the development of this site. The site has been scored relatively positively for a greenfield site receiving 11 double tick scores, 4 single tick scores, 8 neutral scores, 4 negative scores, and one double negative score.

The double negative score was received for drainage infrastructure requirements. It is considered that this is an excessive scoring and this should be reduced to a single negative score.

It is requested that this site is allocated within the Neighbourhood Plan.

Suggested Allocation: Land South of Northampton Road, Broughton

This site has been also been submitted to Kettering Borough Council as part of the Call for Sites Update 2016 as a possible location for residential allocation. In addition the site was promoted for allocation in response to the pre-submission Draft Neighbourhood Plan consultation.

This site is considered to be a suitable location for development, which is both available and achievable. It offers the opportunity to incorporate benefits for Broughton which include:

- Approximately 50 dwellings of a range of house sizes and tenures, including affordable housing; and
- The provision of public open space and new local area of play.

The Development Site Evaluation Report has assessed the development of this site. The site has been scored relatively positively for a greenfield site receiving 13 double tick scores, 1 single tick scores, 9 neutral scores, 4 negative scores, and one double negative score.

The double negative score was received for drainage infrastructure requirements. It is considered that this is an excessive scoring and this should be reduced to a single negative score.

It is requested that this site is allocated within the Neighbourhood Plan.

Village Boundary Designation – Pages 12 to 15

Page 13 of the Draft Neighbourhood Plan states that "*The adopted Broughton village boundary has not been revised since the 1995 Kettering Local Plan*", as such it is considered that an assessment should be made of the settlement boundaries to ensure that they are robust.

The current consultation is accompanied by a document entitled 'Settlement Boundary Defining Principles' – albeit it is not clear who produced such a document. This document identifies the following:

- Principle 1 – Tightly defined boundary around the built up framework of the settlement, where possible following defined features.
- Principle 2 – The boundary should reflect committed development, buildings on the edge of settlements, curtilages which are contained and visually separated from the open countryside and new allocations.
- Principle 3 – Excludes large gardens, playing fields, open space designations, allocations for affordable housing, existing development which is physically or visually detached from the settlement.

These principles should apply in order to protect areas of valued landscape and sites of biodiversity value.

Objection is raised to the proposed settlement boundary (page 12). Land West of Darlow Close, Broughton and Land South of Northampton Road, Broughton scored positively in respect of landscape and biodiversity impact

in the supporting Development Site Evaluation Report and therefore residential development is unlikely to have significant detrimental impact.

Sustainability Solution for Broughton – Chapter 2

The National Planning Policy Framework explains that *“pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people’s quality of life...”*(paragraph 9). Chapter 2 of the Neighbourhood Plan ‘Sustainability Solution for Broughton’ primarily focuses upon the delivery of housing.

Specific support is given to the fourth point of the Broughton Sustainable Solution Statement which states *“To deliver an increased supply of housing required to enable the opportunity for the young, single, and senior members of the community to remain in Broughton”* .

Some support is given to draft sustainability solution as it seeks to readdress the housing mix to *“...achieve a full spectrum of type of dwellings...”* (page 21). However when taking into consideration the size and expected capacity of the draft site allocations, listed at Table B on page 43, it is considered unlikely that a meaningful supply of affordable housing would be delivered in Broughton in the period 2017 to 2031. For this reason it is considered that the proposed sustainability solution is not seeking to meet the social dimension of sustainable development.

‘Sustainability Policy 2’ as stated on page 22 only makes reference to *“building of the type and level of housing based on Broughton Parish locally assessed need enabling a Broughton specific response to the established gap in the housing stock”*. An objection is raised against this policy.

As previously stated, it is considered the supporting Housing Needs Survey is not an up to date reflection of housing need in Broughton. In addition it is considered that it would more beneficial to pursue a ‘sustainability solution’ which seeks to deliver a wide range of house sizes and types to respond to both local needs and aspirations. This could be achieved through the allocation of larger sites which would enable the delivery of both market and affordable housing. It is considered that this revised solution can be implemented in a sustainable way to accord with the Neighbourhood Plan ‘core strategy’ to maintain the village status and rural identity of Broughton.

Taylor Wimpey suggests that the following sites should be allocated for residential development:

- Land West of Darlow Close and Cransley Hill; and
- Land South of Northampton Road.

An objection is also raised to the sustainability credentials of Broughton referenced on page 19 of the Neighbourhood Plan and the statement that *“reliance on the car is now essential for our primary connectivity for work, education and leisure and is becoming increasingly so”*. There are regular bus links available to the services and facilities at Kettering. It is our opinion that the village is relatively sustainable as it benefits from the following facilities and can support additional residential development:

- Broughton Primary School
- Local retail including Central England Co-Operative Store, Hairdressers, and take away restaurants
- Local employment
- A Village Hall
- Two Churches
- A Public House
- Public Open Space, recreation facilities and allotments.
- Bus links

In order to further develop Broughton’s sustainability, it is considered that the Neighbourhood Plan should seek wider opportunities for positive improvements in Broughton which can be delivered alongside new residential



development. Taylor Wimpey has two sites under their control within Broughton which offer the potential to deliver market housing, affordable housing, and open space. The benefits associated with each site are set out above at the suggested allocation section. It is acknowledged that the Neighbourhood Plan aspires to maintain the character of the village and it is considered that these sites could be sensitively developed to achieve this strategy.

High Street Broughton – Chapter 7

One of the key objectives of the National Planning Policy Framework is to support a prosperous rural economy. The objectives listed on page 72 seek to respond to the issues raised within the Neighbourhood Plan however there is no mention of a strategy to promote non-vehicular trips to the High Street, the most sustainable option.

Objection is raised in response to High Street Policy 8 which states that *“The creation of additional road or driveway access will not be permitted in the High Street”; and “Back land or tandem development of more than 3 dwellings in the High Street will not be permitted access through existing driveways or road access”* as this policy is unnecessarily restrictive and is not considered to adhere to North Northamptonshire Joint Core Strategy Policy 8 which seeks to not stifle innovation.

As discussed earlier in this letter, Taylor Wimpey is promoting land to the West of Cransley Hill and Darlow Close for residential development. Illustrative plans have been shared with the Parish Council which show the opportunity to widen the existing access road to Broughton Primary School and provide an area of parking intended to be used for school 'drop off and pick up'. It is considered that this proposal would reduce parking pressures along Cransley Hill during the morning and afternoon. Consequentially this has the potential to alleviate parking pressures at the High Street.

Kettering Borough Council has established its own 'Local Requirements for Planning Applications' in 2015. This states that Transport Statements will be required for applications seeking approval for 10 to 14 dwellings, and Transport Assessment will be required for application seeking approval for 15 or more dwellings. Paragraph 32 of the National Planning Policy Framework states that *“development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe”*.

Conclusion

For the above stated reasons, it is considered that the Broughton Neighbourhood Plan fails to meet the basic conditions of paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004.

If you have any queries regarding the content of these representations please do not hesitate to contact me. It is requested that I am kept up to date with the progress of the Neighbourhood Plan.

Yours sincerely

A rectangular area of the document is redacted with a light green background, obscuring the signature of Lydia Voyias.

Lydia Voyias BA (Hons) MPlan, MRTPI
Associate