Comments

Site Specific Part 2 Local Plan - Publication Plan Consultation (18/12/19 to 12/02/20)

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Consultation Point Policy GRC2 Land to the north of Loddington Road, Great Cransley (View)
Status Processed
Submission Type Web
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Representation

Please use a separate form for each representation.

Which part of the Publication Plan does your representation relate to?

Section 13, Great Cransley, Policy GRC2

Tests of Soundness

Do you consider the Local Plan is sound in terms of being:

- Justified . No
- Effective . No
- Positively prepared . No
- Consistent with National Policy . No

Legal and Procedural requirements

Do you consider the Local Plan has been prepared in line with legal procedural requirements? Yes

Duty to Cooperate

Do you consider the Local Plan to be compliant with the Duty to Cooperate? Yes

Reasons
Please give the reason(s) why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the statutory Duty to Cooperate.

Housing site RA/146 has been designated for Great Cransley yet there are three key issues that have not been adequately addressed:

1. Is there a need and justification for additional housing in Great Cransley?
2. Would site RA/146 provide a suitable location for new housing?
3. 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.”.

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 2nd principle above now repeats at GRC2 d), 4th principle above now repeats at GRC2 f) and 5th principle above now repeats at GRC h). It is clear that the 2nd and 4th principles above are not compatible with the 5th 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

Please explain what changes or actions are needed to make the Local Plan legally compliant.

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.

Attendance at the examinations hearings

If you are seeking to change the Plan, would you like to attend the examination hearings?  No

Notifications

Do you wish to be notified?  . When the Plan is submitted for independent examination?
. When the Inspector's Report is published?
. When the document is adopted?