# Comments

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

<table>
<thead>
<tr>
<th>Comment ID</th>
<th>66</th>
</tr>
</thead>
<tbody>
<tr>
<td>Response Date</td>
<td>11/02/20 15:04</td>
</tr>
<tr>
<td>Consultation Point</td>
<td>Policy GED2 Geddington Sawmill, Grafton Road, Geddington (View)</td>
</tr>
<tr>
<td>Status</td>
<td>Processed</td>
</tr>
<tr>
<td>Submission Type</td>
<td>Email</td>
</tr>
<tr>
<td>Version</td>
<td>0.5</td>
</tr>
</tbody>
</table>

## Representation

Please use a separate form for each representation.

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

Policy GED2 Geddington Sawmill, Grafton Road, Geddington (RA/107)

## Tests of Soundness

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

<table>
<thead>
<tr>
<th>Justified</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Effective</td>
<td>No</td>
</tr>
<tr>
<td>Positively prepared</td>
<td>Yes</td>
</tr>
<tr>
<td>Consistent with National Policy</td>
<td>No</td>
</tr>
</tbody>
</table>

## 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.

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.

3.31 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.

4.4 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

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

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.

3.34 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.

3.35 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.

3.36 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.

3.37 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).

Attendance at the examinations hearings

If you are seeking to change the Plan, would you like to attend the examination hearings?

If Yes, please outline the reason(s) why, below.

It is considered that we, Marrons Planning, on behalf of our client should be invited to participate at the oral part of the examination. We believe we should be given the right to be heard as our representations seek changes to the plan. We feel that we should be part of discussions guided by the Inspector so that issues are probed thoroughly and the evidence is tested, in particular matters relating to the Rural Area of the Borough and to the following policies: RS1 (Category A Villages) RS2 (Category B Villages) GED1 (Geddington Development Principles) GED2 (Geddington Sawmill)
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?