Comments

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

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Consultation Point Policy PYT2 Two fields on the outskirts of Pytchley (View)
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Representation
Please use a separate form for each representation.

Which part of the Publication Plan does your representation relate to?
Policy PYT2

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

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.

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 enclosured. Reflect the hierarchy of streets in the historic core, with narrow informal streets which create a pedestrian friendly environment. Contribute towards the following identified improvements to the village. Improvements to the recreation ground. The creation of a safe pedestrian/cycle route to Kettering.
d. Contribute towards the following identified improvements to the village

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

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

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.

Attendance at the examination hearings

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

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

To offer an alternative site in the face of a contested inadequacy in rural housing provision.

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?