Comments

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

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Representation

Please use a separate form for each representation.

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

Figure 18.22 - Pytchley Proposals Map

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.

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 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.

Proposed Actions/Changes

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

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- 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.

Attendance at the examinations 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 support the inquiry process if requested by Inspector

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?