WRITTEN STATEMENT IN RESPECT OF THE KETTERING SITE SPECIFIC PART 2 LOCAL PLAN EXAMINATION

MATTER 2 – SPATIAL STRATEGY

On Behalf of The Boughton Estate
1. **INTRODUCTION**

1.1 This Written Statement is made on behalf of our client, The Boughton Estate (the Estate), in respect of the forthcoming examination (EIP) of the Kettering Site Specific Part 2 Local Plan.

2. **MATTER 2 – SPATIAL STRATEGY**

(Location of Development, Spatial Strategy, Scale of Development, Site Selection and Settlement Boundaries - Policies LOC1, RS1, RS2, RS3 and RS4)

**Issue:** Is the Plan positively prepared and justified, effective and consistent with national policy and the JCS in relation to the scale and distribution of development proposed and the site selection process?

**Questions**

**Spatial Strategy**

1. What context does the JCS provide in terms of the scale of development required in Kettering borough? What are the specific requirements for housing, employment and town centres? Is the scale of development in the Plan consistent with this?

2.1 The scale of development in the Plan is consistent with the JCS, albeit there is a need for a 10% flexibility allowance to be added to the provision of new housing in the Rural Areas.

3. Does the Plan include sufficient flexibility and contingencies to take account of any changes in circumstances, including any review of the JCS?

2.2 Paragraph 4.4 of the SSP2 allocates enough sites to provide for 10% flexibility above the JCS requirement in Kettering, Burton Latimer, Desborough and Rothwell. However, this approach has not been taken
2.3 The same approach should be taken across the Borough as a whole and in our view SSP2 will not adequately guard against under delivery in the rural areas unless a 10% flexibility allowance is also allowed for. The likely housing supply from Neighbourhood Plans over allocating, rural exceptions sites, and self-build plots (taken from paragraph 4.7 of the Plan as the reason for not applying an allowance) is likely to be very limited and would form part of the windfall allowance which has already been taken into account in the supply figures. This is not therefore an effective contingency measure in the event allocated rural sites or rural windfalls do not deliver.

Settlement Categories and Boundaries

5. Is the categorisation of the villages into Categories A, B and C (Policies RS1, RS2 and RS3) justified and consistent with the JCS? Is the methodology used to determine the categories robust?

2.4 The hierarchy and its methodology is considered robust.

7. What is the justification for the settlement boundaries referred to in Policy LOC1? What is the approach to defining boundaries and how has this evolved? Are the four defining principles used to define the extent of the areas within the settlement boundaries appropriate? What is the justification for not defining settlement boundaries in Category C Villages?

2.5 Policy HOU1 ‘Windfall and Infill Development: Principles of Delivery’ provides general support for infill development within settlement boundaries. However, the settlement boundaries are drawn tightly around rural settlements (excluding large gardens) and this will limit the amount of appropriate sites to accommodate the relied upon 108 windfall dwellings.

8. Are the specific boundaries/confines for the settlements justified and
adequately drawn in all instances? Do the boundaries as drawn provide flexibility to respond to change?

2.6 The settlement boundary for Geddington (and therefore allocation boundary GED3 Geddington South East) does not follow any defensible features. In our view the arbitrary line should be repositioned commensurate with the rear garden boundaries at Steele Way to the north east of the allocation, and to run south to the existing south east corner of the allocation (see Appendix A to representations submitted at the Regulation 19 stage).

2.7 This very slightly larger site would provide for a built form and development character which is in-keeping with the current urban fabric and maintain the relationship between the built village and the surrounding countryside.