Matter 2 – Spatial Strategy

Matter Statement by Kettering Borough Council

September 2020
<table>
<thead>
<tr>
<th>Contents</th>
<th>Page No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Introduction</td>
<td>1</td>
</tr>
<tr>
<td>Spatial Strategy</td>
<td>1</td>
</tr>
<tr>
<td>Matter 2 – Question 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?</td>
<td>1</td>
</tr>
<tr>
<td>Matter 2 – Question 2: What context does the JCS provide in terms of the distribution of development in Kettering borough? Is the proposed distribution of development in Kettering as the Growth Town and Burton Latimer, Desborough and Rothwell as Market Towns in accordance with the JCS and sustainable development principles?</td>
<td>2</td>
</tr>
<tr>
<td>Matter 2 – Question 3: Does the Plan include sufficient flexibility and contingencies to take account of any changes in circumstances, including any review of the JCS?</td>
<td>3</td>
</tr>
<tr>
<td>Site Selection</td>
<td>3</td>
</tr>
<tr>
<td>Matter 2 – Question 4: Was the methodology used to assess and select the proposed site allocations appropriate? Were reasonable alternatives considered and tested? Are the reasons for selecting the preferred sites and rejecting others clear?</td>
<td>3</td>
</tr>
<tr>
<td>Settlement Categories and Boundaries</td>
<td>4</td>
</tr>
<tr>
<td>Matter 2 – Question 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?</td>
<td>4</td>
</tr>
<tr>
<td>Matter 2 – Question 6: Is the principle of using settlement boundaries to direct and control the location of new development sound? How does it work in relation to rural exception sites?</td>
<td>5</td>
</tr>
<tr>
<td>Matter 2 – Question 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</td>
<td>5</td>
</tr>
<tr>
<td>Matter 2 – Question</td>
<td>Description</td>
</tr>
<tr>
<td>--------------------</td>
<td>-------------</td>
</tr>
<tr>
<td>8</td>
<td>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?</td>
</tr>
<tr>
<td>9</td>
<td>Does Policy LOC1 provide a clear indication of how a decision maker should react to a development proposal? Would the boundaries be better referred to in RS1 and RS2 and would this be sufficient? Does paragraph 3.8 repeat the Policy?</td>
</tr>
<tr>
<td>10</td>
<td>Is the wording of Policies RS1, RS2 and RS3 sufficiently clear for the purposes of decision making? Does it repeat the provisions of the JCS, national policy and other policies in the Plan? To be considered under these policies would a proposal need to be by definition within the settlement boundary? What is the definition of ‘infill development’? Do the policies need to refer to compliance with other policies? What are the Part 1 and Part 2 Local Plans referred to in the final criteria of each policy and does this go without saying?</td>
</tr>
<tr>
<td>11</td>
<td>Is it clear what the difference in approach will be to the three categories in terms of decision making? In practical terms how do the requirements of Policy RS1 differ from those of Policies RS2 or RS3 for example?</td>
</tr>
<tr>
<td>12</td>
<td>How do the requirements of Policy RS3 for Category 3 villages differ from those of RS4 for development in the open countryside? If Category C villages are considered to be in the open countryside (as indicated at paragraph 13.16) should RS4 apply there? Is RS3 stricter than RS4? Should RS3 allow the replacement of an existing dwelling in the same way that RS4 does? Should the wording in relation to RS3 criterion b and RS4 criterion c be consistent?</td>
</tr>
<tr>
<td>13</td>
<td>Is the approach in Policy RS4 to development in the open countryside justified and in line with the Framework and the JCS? Does it relate to all development or just residential development?</td>
</tr>
<tr>
<td>14</td>
<td>Does the policy reflect the circumstances set out at paragraph 79 of the Framework relating to isolated</td>
</tr>
<tr>
<td>Question</td>
<td>Page</td>
</tr>
<tr>
<td>------------------------------------------------------------------------</td>
<td>------</td>
</tr>
<tr>
<td>Matter 2 – Question 15: Is the wording of Policy RS4 sufficiently clear for the purposes of decision making? Does it repeat the requirements of other policies in the JCS and the Plan? Are the provisions of the Policy repeated in the supporting text?</td>
<td>11</td>
</tr>
<tr>
<td>Matter 2 – Question 16: What are small scale private equestrian facilities referred to in the final paragraph? Why are these justified as an exception? Are there other exceptions?</td>
<td>11</td>
</tr>
</tbody>
</table>

**Conclusion**

11

**Appendices**

**Appendix 1: List of Reference Documents**

13
1. Introduction

1.1. This statement sets out the Council’s response to Matter 2: Spatial Strategy (Location of Development, Spatial Strategy, Scale of Development, Site Selection and Settlement Boundaries - Policies LOC1, RS1, RS2, RS3 and RS4), questions 1 - 16, in respect of the following issues:

- 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?

1.2. The statement also addresses any representations which the Council considers are of particular significance or concern, where this is the case the relevant respondent number and comment id are provided.

1.3. All documents referred to in this statement are listed in Appendix 1, submission document numbers are provided throughout where applicable.

Spatial Strategy

2. Matter 2 – Question 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 JCS sets out the Spatial Strategy and the scale of development required in Kettering Borough.

2.2. Policy 11 of the JCS sets out the spatial strategy, Kettering is identified as a Growth Town which is the focus for infrastructure development and higher order facilities to support major employment, housing, retail and leisure development. Burton Latimer, Desborough and Rothwell are identified as Market Towns which provide a strong service role for their local communities and surrounding rural area with growth in homes and jobs to support regeneration and local services, at a scale appropriate to the character and infrastructure of the towns.

2.3. Sustainable Urban Extensions (SUE’s) provide strategic locations for housing and employment development, these are shown on the Key Diagram in the JCS. In Kettering Borough there are three SUE’s, East Kettering, Desborough North and Rothwell North. The JCS also allocates Strategic Employment sites, in Kettering Borough there are two strategic employment allocations, Land at Kettering North (Policy 36) and Land at Kettering South (Policy 37).

2.4. In the rural area development is limited to that required to support a prosperous rural economy or to meet locally arising need which cannot be met more sustainably at a nearby larger settlement.

2.5. The housing requirements for Kettering Borough are set in Policy 28 of the JCS, Kettering Borough is required to provide 10,400 dwellings in the period
2011 to 2031, an annual average of 520 dwellings per year. The Housing Land Supply Background Paper (HOU1) sets out the scale of development proposed in the SSP2 alongside existing commitments and completions, table 7 of HOU1 details that with existing completions, commitments and the SSP2 allocations a supply of 12,976 dwellings has been identified. Paragraph 1.7 of HOU1 sets out the JCS housing requirements, paragraphs 1.9 to 1.11 explain the approach which has been taken in the plan to provide an additional 10% flexibility allowance above the JCS requirement. The JCS housing requirements are minimum requirements and the Council considers that the scale of housing development proposed in the SSP2, which provides a flexible approach to ensure delivery of the minimum requirements, is consistent with the scale of development required in the JCS.

2.6. Employment requirements are set out in Policy 23 of the JCS, the net job creation target for Kettering is 8,100 for the period 2011 to 2031. The Employment Allocations Background Paper (EMP1) assessed progress towards achieving the job creation targets, paragraphs 9.3 to 9.7 consider two options for the allocation of employment sites in the SSP2 and provide a justification for the approach taken. The Council considers that the scale of employment development proposed in the SSP2, which identifies additional small scale sites to provide greater choice and flexibility and provides the opportunity to meet some of the need for general industrial units, is consistent with the scale of development required in the JCS.

2.7. The requirements for town centres are set out in Policy 12 of the JCS. Policy 12 identifies a requirement for a minimum increase of 12,500 sq m net comparison shopping floorspace in Kettering Town Centre. As set out in the Council’s response to question 24 of the Inspector’s Initial Questions, EXAM 2, this requirement will be met through a review of the Kettering Town Centre Area Action Plan.

2.8. Policy 12 also supports the provision of a medium-sized foodstore to serve the Desborough/ Rothwell area, Policy TCE2 has been included in the SSP2 to provide criteria against which a proposal for this type of facility would be considered.

2.9. Section 5 of the Sustainability Appraisal, SA1, discusses the housing and employment growth and distribution, this discussed reasonable and unreasonable alternatives and sets out why the preferred approach has been selected.

2.10. It is considered that the scale of development proposed in the SSP2 is consistent with the JCS requirements.

3. Matter 2 – Question 2: What context does the JCS provide in terms of the distribution of development in Kettering borough? Is the proposed distribution of development in Kettering as the Growth Town and Burton Latimer, Desborough and Rothwell as Market Towns in accordance with the JCS and sustainable development principles?
3.1. The JCS sets out the Spatial Strategy for development, as discussed under the response to Question 1. In addition to this Policy 29 distributes the overall housing requirement to settlements within the Borough, the distribution is set out in table 5 of the JCS.

3.2. The Housing Land Supply Background Paper (HOU1) demonstrates how the development proposed within the SSP2 is in accordance with the JCS. This document sets out the existing completions and commitments in each settlements and provides a justifications for the number of housing allocations identified in each settlement in relation to the JCS requirements, this is set out in section 2 of HOU1, paragraphs 2.15 to 2.23 discuss the number of dwellings allocated in each settlement in relation to the JCS requirement.

3.3. There are only 3 employment allocations identified in the plan, one as part of a mixed-use scheme at Kettering, one at Desborough and one at Geddington. The scale of these proposed allocations in consistent with the spatial strategy set out in the JCS.

3.4. The scale of development proposed in the SSP2 is in accordance with the JCS and sustainable development principles, the distribution of development set out in the JCS accords with sustainable development principles, this was considered through the Examination of the JCS.

4. Matter 2 – Question 3: Does the Plan include sufficient flexibility and contingencies to take account of any changes in circumstances, including any review of the JCS?

4.1. The SSP2 includes sufficient flexibility and contingencies to take into account changing circumstances. This is discussed in paragraphs 1.9 to 1.12 of HOU1. The Council has added a 10% flexibility allowance to the housing requirements in the urban areas, this will ensure that if some sites are slower than anticipated in coming forward there will be sufficient sites to ensure that the housing requirements are delivered. In addition to this windfall in the urban area will also make an additional contribution to meeting housing requirements.

4.2. The review of the JCS will take place once the North Northants Unitary Authority has formed on 1st April 2021. The SSP2, along with existing commitments, strategic allocations, the Town Centre AAP and Neighbourhood Plans, provide sufficient sites to ensure a supply of housing and employment land will be maintained if circumstances change.

Site Selection

5. Matter 2 – Question 4: Was the methodology used to assess and select the proposed site allocations appropriate? Were reasonable alternatives considered and tested? Are the reasons for selecting the preferred sites and rejecting others clear?
5.1. Section 7 of SA1 sets out the approach which has been taken to identifying and assessing reasonable alternatives for housing allocations. This provides a summary of the work which had been undertaken in identifying and assessing options for housing sites and is supported by further detail which is set out in the Housing Allocations Background Papers (2012 (HOU9), 2018 (HOU6) and 2019 (HOU5)) and the Housing Allocations - Assessment of Additional Sites and Update (2013) (HOU8). In addition to these documents in the rural area the Rural Masterplanning Report (2012) (RA3) provided a summary of the housing site assessments for each village.

5.2. The methodology used to assess and select the housing site options is considered to be appropriate, the methodology ensured that all reasonable site options were identified and assessed. The detailed assessment of sites, which linked site assessment criteria to the Sustainability Appraisal objectives ensured that all sites were tested in a consistent manner and the reasons for selecting the preferred sites and rejecting others is clearly set out in HOU9, HOU6, HOU5 and HOU8.

5.3. Section 8 of SA1 sets out the approach which has been taken to identifying and assessing reasonable alternatives for employment allocations. This provides a summary of the work which has been undertaken in identifying and assessing options for employment sites and is supported by further details set out in the Employment Allocations Background Paper (2012) (EMP3) and Employment Allocations Background Paper (2019) (EMP1).

5.4. The methodology used to assess and select employment options is considered to be appropriate, the methodology ensured that all reasonable site options were identified and assessed, the detailed sites assessments were similar to those undertaken but amended to reflect the difference requirements for employment sites. The details assessment ensured that all sites were tested in a consistent manner and the reasons for selecting the preferred sites and rejecting others is clearly set out in EMP1 and EMP3.

Settlement Categories and Boundaries

6. Matter 2 – Question 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?

6.1. The methodology for categorising villages is set out in the Categorisation of Villages: Background Paper (2019) (RA1), the approach to determining the categories set out in RA1 is considered to be robust. RA1 provides a justification for the categorisation of villages and demonstrates that the approach taken is consistent with the JCS which allows the identification of villages that have a sensitive character or conservation interest, in which new development will be strictly managed and settlements of a dispersed form which may be designated as open countryside, outside the formal settlement hierarchy.
7. Matter 2 – Question 6: Is the principle of using settlement boundaries to direct and control the location of new development sound? How does it work in relation to rural exception sites?

7.1. The principle of using settlement boundaries to direct and control the location of new development is considered to be sound. The supporting text to JCS Policy 11, paragraph 5.18, states that ‘in order to clarify the application of the criteria 2b and 2c of Policy 11, Part 2 Local Plans and/or Neighbourhood Plans may define village boundaries or more detailed village boundary criteria, taking account of the character of the village. Village boundaries can provide a tool to plan positively for growth and to prevent ad-hoc encroachment into open countryside, particularly for villages located close to larger settlements where coalescence is a concern…’. Pursuant to the indication in the JCS, settlement boundaries are included in the adopted Part 2 Wellingborough Local Plan and proposed in the submitted Part 2 Corby Local Plan.

7.2. At the Issues stage of plan preparation (PKB7), the issue of whether to use settlement boundary or criteria-based policy was considered. CON1 provides a summary of the main issues raised through the Issues Paper consultation, the summary in this section of the report highlights that respondents preferred the use of settlement boundaries rather than a criteria-based policy for controlling development in the open countryside. The Settlement Boundary Background Paper (2012) (ENV3), section 2, considered whether settlement boundaries or a criteria-based policy should be used and identified the use of settlement boundaries as the preferred approach. The Interim Sustainability Appraisal Report (2012) (SA3), which accompanied the Site Specific Proposals LDD – Options Paper (PKB6), also concluded that identifying settlement boundaries was the most sustainable option.

7.3. The identification of settlement boundaries to direct and control the location of development is consistent with the JCS and provides certainty over which areas will be treated as open countryside. This approach is considered to be sound.

7.4. A representation was received from Gladman Land (Respondent number 70, comment Id 175) which considers that the approach proposed provides no flexibility and it too restrictive. The Council considers that sufficient flexibility has been provided in the plan, further detail on this is provided in the Council’s Matter 4 statement and in paragraph 9.3 below.

7.5. The approach to rural exception sites is set out in Policy 13 of the JCS. As an exception, this policy allows for development adjoining established settlements but outside the defined boundary, provided the proposal satisfies the criteria set out in the policy.

8. Matter 2 – Question 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?

8.1. The justification for providing settlement boundaries is set out in the Settlement Boundary Background Papers (2012 [ENV3] and 2018 [ENV2]). Settlement boundaries are considered provide certainty over which areas will be treated as open countryside. The SA1 considered the effects of Policy LOC1 in paragraphs 11.2.1 to 11.2.4, 11.3.1 to 11.3.4, 11.4.1 to 11.4.3 and 11.5.1 to 11.5.2 which set out the positive effects of providing settlement boundaries against the SA Framework.

8.2. The approach to defining settlement boundaries is set out in the Settlement Boundaries Background Papers (2012 [ENV3] and 2018 [ENV2] and in the Settlement Boundaries Background Paper (Update October 2019) [ENV1]. The issue of how to define the settlement boundaries was first considered through the Issues Paper Consultation (PKB7), through this consultation four draft principles were presented, set out in Appendix 1 of this document, and a question was asked whether consultees agreed with these criteria. Section 3 of ENV3 sets out the responses to this consultation were taken into account and provides an updated set of principles.

8.3. The four principles defined are considered to be appropriate, they provide a clear approach to considering whether an area should be included within or excluded from the settlement boundary and ensure a consistent approach is taken to defining settlement boundaries.

8.4. Category C villages do not have settlement boundaries because these settlements are of a dispersed form or small in scale where it would be difficult or inappropriate to define a boundary.

9. Matter 2 – Question 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?

9.1. The Settlement Boundary Background Papers (2012 [ENV3] and 2018 [ENV2]) and the Settlement Boundaries Background Paper (Update October 2019) [ENV1] provide the detailed assessment undertaken in the preparation of the settlement boundaries, these documents provide the justification for the settlement boundaries which have been drawn. The specific boundaries are considered to be fully justified.

9.2. The settlement boundaries are considered to be adequately drawn in all instances with the exception of one area in Stoke Albany which is identified in EXAM2D – Appendix 4, EXAM2D includes an updated policies map which proposes to remove an area on the southern edge of the boundary which was previously included because it was part of the housing allocation identified in Policy STA2. The reason for this proposed change was that this area was no longer needed as part of the housing allocation, it was proposed that the area of the housing allocation was also amended to reflect this. The reasons for this
9.3. The settlement boundaries include sites which are allocated through the SSP2, JCS and the Town Centre Area Action Plan, sites with planning permission are also included, however the settlement boundaries are not expected to accommodate all development, Policy 13 of the JCS and the NPPF allow for development outside settlement boundaries in specific circumstances and Policy 11 of the JCS allows Neighbourhood Plans to identify sites adjoining settlement boundaries to meet locally identified needs and rural housing requirements, this approach is considered to be sufficiently flexible to ensure that the needs identified in the JCS can be adequately accommodated for the plan period.

9.4. Several representations have been received seeking changes to the settlement boundaries. These include respondent Id 18 (comment Id 32) which relates to development along Windy Ridge, respondent Id 32 (comment Id 54) which relates to Warkton Lodge Farm, respondent Id 113 (comment Id 243) which relates to The Manor House Grafton Underwood, respondent Id 79 (comment number 201) which relates to The Woodyard, Rothwell Road, Harrington, respondent Id 85 (comment number 209) which relates to Home Farm, Pytchley, respondent Id 83 (comment number 206) which relates to The Lane, Weston by Welland, respondent Id 40 (comment number 67) which related to GED3, respondent Id 124 (comment number 115) which relates to farm buildings north of RA/128, Braybrooke and respondent Id 59 (comment number 154) which relates to land north of the existing Weetabix Site.

9.5. The Council’s response to these representations is set out in the ‘Regulation 20 Representations with Council’s response’. The Council considered that the settlement boundaries have been defined using a robust set of criteria and the approach taken is justified and based on evidence as set out in the Settlement Boundary Background Papers ENV1, ENV2 and ENV3. The Council does not consider that the areas identified by respondents meet the criteria for inclusion within the settlement boundaries.

9.6. The boundaries provide certainty as to whether an area is considered to be open countryside or part of a settlement. As set out in the response to question 3, sufficient flexibility has been included in the plan to ensure that contingencies are in place should changes occur, ensuring that JCS requirements can be achieved if circumstances change.

10. Matter 2 – Question 9: Does Policy LOC1 provide a clear indication of how a decision maker should react to a development proposal? Would the boundaries be better referred to in RS1 and RS2 and would this be sufficient? Does paragraph 3.8 repeat the Policy?
10.1. Policy LOC1 is considered to provide a clear indication to the decision maker when read alongside policies RS1 and RS2 and Policy RS4.

10.2. However, the Council would be happy to consider a main modification to policies RS1 and RS2 to refer to the settlement boundaries if the Inspector considers this is required.

10.3. The Council has considered whether a modification to these policies alone would be sufficient and has concluded that, if the settlement boundaries are referred to in RS1 and RS2, they would also need to be referred to in Policy RS4 as this policies sets out criteria for development in the open countryside and the settlement boundaries are used to determine whether an area is considered to be located within the open countryside.

10.4. The first sentence of paragraph 3.8 does repeat the policy to an extent and the Council would support a modification to amend this wording to explain how the settlement boundaries have been defined. The Council will update the Schedule of Proposed Changes to the Publication Plan and will add this to the Examination webpage before the hearing sessions commence.

11. Matter 2 – Question 10: Is the wording of Policies RS1, RS2 and RS3 sufficiently clear for the purposes of decision making? Does it repeat the provisions of the JCS, national policy and other policies in the Plan? To be considered under these policies would a proposal need to be by definition within the settlement boundary? What is the definition of ‘infill development’? Do the policies need to refer to compliance with other policies? What are the Part 1 and Part 2 Local Plans referred to in the final criteria of each policy and does this go without saying?

11.1. The wording of Policies RS1, RS2 and RS3 is considered to be sufficiently clear for the purposes of decision making. These policies set out how a proposal for development in each of the categories of villages will be considered.

11.2. These policies further refine the spatial strategy set out in the JCS in relation to the categorisation of villages. The justification for this approach is set out in the Categorisation of villages: Background Paper (RA1). These policies provide further detail in relation to each of these villages and the policies in the JCS rather than repeating policies contained in this document.

11.3. Policies RS1 and RS2 set out how proposals for development within the settlement boundaries and proposals for development adjoining the settlement boundaries will be considered.

11.4. Small scale infill development is defined in paragraph 5.17 of the JCS as the development of vacant and under-developed land within the main built up areas of the village on land which is bounded by existing built curtilages on at
lease two sites, such as the filling in of a small gap in an otherwise substantial frontage’

11.5. The policies refer to other policies to clearly set out how proposals within these villages should be considered and to avoid repeating the content of existing policies.

11.6. The Part 1 and Part 2 plans referred to are the JCS and the SSP2, the Council would be happy to support a modification to clarify this. The Council will update the Schedule of Proposed Changes to the Publication Plan and will add this to the Examination webpage before the hearing sessions commence.

12. Matter 2 – Question 11: Is it clear what the difference in approach will be to the three categories in terms of decision making? In practical terms how do the requirements of Policy RS1 differ from those of Policies RS2 or RS3 for example?

12.1. The approach set out in the policies allows different levels of growth dependent upon the categorisation of the village. The policies allow for a greater level of development on sites within the boundaries of category A villages than is allowed in Category B villages and the level of growth allowed in Category C villages is reduced further. This categorisation reflects the sustainability of the settlements and also their sensitivity to development.

12.2. Policy RS1, Category A villages, allows infill development within the settlement boundary, in accordance with Policy 11 of the JCS, the definition of infill is provided in paragraph 11.4 above, housing allocations have also been identified in some of these villages. RS2 is different in that the level of infill allowed in Category B villages is limited to proposals for 1 or 2 dwellings, this is to reflect the sensitive character and conservation interests of these villages. Within Category C villages development is limited to the re-use, conversion or redevelopment of existing rural buildings, this reflects the scattered nature and limited size of these settlements and the limited facilities available.

13. Matter 2 – Question 12: How do the requirements of Policy RS3 for Category 3 villages differ from those of RS4 for development in the open countryside? If Category C villages are considered to be in the open countryside (as indicated at paragraph 13.16) should RS4 apply there? Is RS3 stricter than RS4? Should RS3 allow the replacement of an existing dwelling in the same way that RS4 does? Should the wording in relation to RS3 criterion b and RS4 criterion c be consistent?

13.1. Category C settlements consist of small settlements of a scattered nature, they do not have settlement boundaries and are considered in policy terms as open countryside however policy RS3 distinguishes these settlements from the open countryside to reflect the difference between development in these locations and development in the wider open countryside. Policy RS3 does not provide the same level of restriction in terms of the re-use of existing rural buildings as RS4 does and Policy RS3 allows for
the redevelopment of rural buildings rather than just the re-use of these buildings.

13.2. The replacement of an existing dwelling would be considered acceptable within the Category 3 villages and the Council would support a modification to Policy RS3 to clarify this. The Council will update the Schedule of Proposed Changes to the Publication Plan and will add this to the Examination webpage before the hearing sessions commence.

13.3. Criterion b of RS3 and criterion c of RS4 differ because Policy RS3 provides less restriction than RS4, as proposals which would fall under RS3 are located within an area of scattered development a more flexible approach can be applied to re-use of buildings within these locations.

Development in the Countryside

14. Matter 2 – Question 13: Is the approach in Policy RS4 to development in the open countryside justified and in line with the Framework and the JCS? Does it relate to all development or just residential development?

14.1. Policy RS4 is in line with the JCS which seeks to resist development in the open countryside. The policy addressed types of development which would be considered acceptable in the open countryside which are not specifically addressed by policies in the JCS. Paragraph 79 of the NPPF allows for the development of isolated homes in the countryside where the development would re-use redundant or disused buildings and enhance the immediate setting, criterion c of the policy provides further local policy in relation to these types of proposals.

14.2. Parts b and c of the policy apply to residential development, Policy 25 of the JCS addresses rural economic development and diversifications so the policy does not duplicate the policy contained in the JCS. Part d of the policy applies to small scale private equestrian facilities.

15. Matter 2 – Question 14: Does the policy reflect the circumstances set out at paragraph 79 of the Framework relating to isolated homes? Do the requirements of criterion c exceed those circumstances? Are the requirements in relation to replacement dwellings at criterion b appropriate outside the Green Belt?

15.1. The parts of the policy which relate to residential development are considered to reflect the circumstances set out at paragraph 79 of the NPPF. Criterion c of the policy provides further local policy in relation to paragraph 79 c). Paragraph 79 does not make reference to replacement dwellings, however the principle of development on these sites is established by the presence of the existing dwelling and therefore the key considerations relate to the suitability of the proposal.
15.2. It is considered that the requirements in relation to replacement dwellings at criterion b are appropriate outside the Green Belt. Kettering Borough does not contain any area of Green Belt. However, the countryside is an attractive mix of landscapes as described in paragraph 2.6 of the SSP2 and it is important that the intrinsic character and beauty of the countryside is recognised as set out in NPPF paragraph 170 b).

15.3. New development in the locations where criterion b applies would be resisted and it is considered appropriate that replacement dwellings in these locations do not result in a development that would have a detrimental impact on the openness and character of the open countryside.

16. Matter 2 – Question 15: Is the wording of Policy RS4 sufficiently clear for the purposes of decision making? Does it repeat the requirements of other policies in the JCS and the Plan? Are the provisions of the Policy repeated in the supporting text?

16.1. The wording of Policy RS4 is considered to be sufficiently clear decisions making purposes. The policy provides additional local policy for proposals within the open countryside and does not address areas already covers by the JCS. The policy provides references to the JCS policies to provide a clear link between the policies.

16.2. The supporting text provides a justification for the policy and sets out how the policy should be applied.

17. Matter 2 – Question 16: What are small scale private equestrian facilities referred to in the final paragraph? Why are these justified as an exception? Are there other exceptions?

17.1. Equestrian facilities are a use which would be expected to be found in the rural area, Policy 25 of the JCS provides policy to be applied to commercial equestrian proposals, however there are currently no policies which address the provision of small scale private equestrian facilities. Criterion d. of Policy RS4 has therefore been included to address this.

18. Conclusion

18.1. The Council considers that the submitted Kettering Borough Site Specific Part 2 Local Plan is sound in relation to the Issues and Questions set out in Matter 2. This is founded on the assessment provided in this statement which sets out the approach to the scale and distribution of development and the site selection process. The statement draws on a series of background papers which form part of the evidence base for the SSP2.

18.2. The statement demonstrates that the approach to scale and distribution of development in the SSP2 conforms with the spatial strategy and scale of development required by the JCS. It sets out the methodology for assessing
sites and demonstrates that the approach taken is appropriate and justified and that reasonable alternatives have been considered and tested.

18.3. The statement sets out the approach taken to defining settlement boundaries and provides a justification for the approach taken and the settlement boundaries defined.

18.4. The statement justified the approach taken to categorising villages and explain the justification for, and difference between, the categories. It also provides a justification for the approach taken to development in the open countryside.

18.5. The statement demonstrates that overall the approach to the scale and distribution of development is appropriate and will ensure the JCS requirements are achieved.

18.6. Therefore, to conclude, the Council considers the SSP2 (PKB1) to be positively prepared and justified, effective and consistent with national policy in relation the scale and distribution of development proposed and the site selection process.
Appendix 1: List of Reference Documents

PKB1 – SSP2 Publication Plan
PKB 6 - Site Specific Proposals Local Development Document – Options Paper
PKB7 – Site Specific Proposals Local Development Document - Issues Paper
EXAM2 – KBC Response to Initial Questions
EXAM2D – Appendix 4 – Schedule of Proposed Changes to the Publication Plan
HOU1 – Housing Land Supply: Background Paper
HOU5 – Housing Allocations Background Paper - Update
HOU6 – Housing Allocations: Background Paper
HOU8 – Housing Allocations - Assessment of Additional Sites and Update consultation
HOU9 – Housing Allocations: Background Paper (2012)
SA1 – Sustainability Appraisal
SA3 – Interim Sustainability Appraisal Report February 2012
RA1 – Categorisation of villages: Background Paper
RA3 – Rural Masterplanning Report
CON1 – Regulation 22 Consultation Statement
ENV1 – Settlement Boundaries Background Paper (Update October 2019)
ENV2 – Settlement Boundaries: Background Paper (update April 2018)
ENV3 – Settlement Boundaries: Background Paper
EMP1 – Employment Allocations Background Paper
EMP3 – Employment Allocations Background Paper