Matter 7 – Housing Allocations in Rural Areas

Matter Statement by Kettering Borough Council

September 2020
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1. Introduction

1.1. This statement sets out the Council’s response to Matter 7: Housing Allocations in Rural Areas, questions 1 - 12, in respect of the following issues:

Whether the following housing allocations are soundly based:

- BRA2 – Top Orchard, Braybrooke
- CRA2 - South of New Stone House, Duck End, Cranford
- CRA3 – Land east of the corner of Duck End and Thrapston Road, Cranford
- GED2 – Geddington Sawmill, Grafton Road, Geddington
- GED3 – Geddington South East, Geddington
- GED4 – Old Nursery Site, Grafton Road, Geddington
- GRC2 – Land to the north of Loddington Road, Great Cransley
- MAW2 – Land west of Mawsley
- PYT2 – Two fields on the outskirts of Pytchley, Isham Road
- STA2 – Land to the south of Harborough Road, Stoke Albany
- WES2 – Home Farm, Weston by Welland

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.

2. BRA1 – Top Orchard, Griffin Road, Braybrooke

Question 1 - Are the housing allocations appropriate and justified in light of the potential constraints, infrastructure requirements and adverse impacts?

2.1. This site has been subject to a site assessment using a consistent methodology throughout the preparation of the SSP2. This methodology was first set out in the Housing Allocations Background Paper (2012) (HOU9). This process sought to ensure the sites identified as allocations in PKB1 would be the most suitable and appropriate to meet the residual housing requirement as set out in Table 4.3 of PKB1 and HOU1. Whilst simultaneously identifying potential constraints, infrastructure requirements and any requirements for the mitigation of any adverse impacts. The Council’s response to Matter 2: Spatial Strategy, question 4, provides more detail on the methodology for assessing housing allocations, and provides a justification for the approach taken to allocating sites.

2.2. Appendix 3 of the Housing Allocations Background Paper – 2018 (HOU6) provides a summary assessment sheet for this site. The information included in the summary sheet is sourced from more detailed assessments undertaken by the Council. A summary of all the scores for this site can be found within Appendix 2 of HOU6.
2.3. Constraints identified for this site include a large Beech tree which is protected by TPO, poor access to services and facilities, impact on the conservation area and historic buildings and a limit on the number of dwellings which could be provided from a private drive. Development principles for the site set out in Policy BRA2 address these constraints and ensure that the allocation is appropriate and justified.

**Question 2** - Are there any significant factors that indicate that any sites/parts of sites should not have been allocated?

2.4. The constraints identified for this site in relation to the large Beech tree and adjacent listed building mean that not all of the site is suitable for built development. As a result, criteria have been included in BRA2 (a., d. and e.) to ensure that the tree is protected, to include an area of open space to the north of the site to protect the setting of the Old Rectory Grade 2 Listed Building and the Conservation Area and to locate built development in the southern part of the site. However, it is considered appropriate to include these areas within the area of the allocation to ensure a comprehensive development.

**Question 3** - Are the sites viable and deliverable? Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery?

2.5. The viability of sites has been considered through the Whole Plan Viability Assessment (VIA1). The Council’s response to Matter 3: Infrastructure and Viability provides further detail on the viability assessment undertaken. The results of the viability testing in paragraph ES 15 of VIA1 sets out that the analysis showed that greenfield development is viable across all housing scenarios tested. Appendix 2 of VIA1 assessed the impact on viability of Policy BRA2 as low.

2.6. Through the site assessment process, the site promoter indicated that this site is available immediately and is deliverable within two years.

2.7. The site has been promoted for development and is available now, it has been assessed as a suitable location for development and is achievable, the scale of development proposed is small scale and it is realistic that, once the site is allocated for development, housing will be delivered on the site within five years. There are no constraints that would prevent development or adversely affect viability and delivery.

**Question 4** - How were the site capacities determined? What assumptions have been made? Are these justified?

2.8. The capacity of the site was put forward by the site promoter and takes into account the constraints identified, including the need to protect the Beech Tree and the Listed Building/Conservation Area. Given the constraints on the site the capacity is considered to be justified.
Question 5 - What is the current planning status of the site?

2.9. The site does not have planning permission.

Question 6 - What benefits would the proposed development bring?

2.10. The proposed development will deliver housing to meet the rural housing requirements and provides an incremental level of growth to meet local needs.

Question 7: What are the potential adverse impacts of developing the site and how might they be mitigated?

2.11. Constraints identified included potential to impact on the adjacent listed building and conservation area; and potential impact on the TPO tree. Development principles have been included in Policy BRA2 to address these issues, therefore there would be no adverse impacts associated with the development of this site.

2.12. A representation was received (representor id 31, comment Id 53) which raised concerns in relation to access to the site and the impact of previous planning permissions on this. The Council response to this comment is set out in the ‘Regulation 20 Representations with Council’s response’. The housing allocation shown on the policies map and the planning application boundary referenced do overlap, however the site promoter has confirmed that sufficient land has been retained in the ownership of the site promoter to provide access to the site.

Question 8 - Would the Modifications proposed by the Council address any shortcomings?

2.13. Only one MM (77) has been proposed for Policy BRA2. This is not to address any shortcomings but to add a reference in the policy text to the policies map, to provide clarity on the geographic location of the site.

Question 9 - What is the expected timescale and rate of development and is it realistic?

2.14. The site is available now and the site promoter has indicated the site could be developed within two years. The site schedule contained in HOU1 sets out the following housing trajectory for this site:

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2.15. It is anticipated that once the site is allocated it could come forward more quickly than set out in the housing trajectory.
Question 10 - Is the boundary of the site appropriate? Is there any justification for amending the boundary?

2.16. The boundary for the site relates to a discrete parcel of land, it is not considered there is any justification for amending the boundary.

Question 11 - Are the detailed policy requirements for each site, effective, justified and consistent with national policy? Are they needed when some of the sites already have planning permission?

2.17. The policy requirements for the site are considered to be effective, justified and consistent with planning policy. The supporting text to Policy BRA2, paragraphs 13.37 to 13.41, and the site assessment contained in HOU6 identified the constraints identified in relation to this site and provide a justification for the criteria contained in the policy.

2.18. This site does not have planning permission.

3. CRA2 – South of New Stone House, Duck End, Cranford

Question 1 - Are the housing allocations appropriate and justified in light of the potential constraints, infrastructure requirements and adverse impacts?

3.1. This site has been subject to a site assessment using a consistent methodology throughout the preparation of the SSP2. This methodology was first set out in the Housing Allocations Background Paper (2012). This process sought to ensure the sites that identified as allocations in PKB1 would be most suitable and appropriate to meet the residual housing requirement as set out in Table 4.3 of PKB1 and HOU1. Whilst simultaneously identifying potential constraints, infrastructure requirements and any requirements for the mitigation of any adverse impacts.

3.2. Appendix 3 of the Housing Allocations Background Paper – 2018 (HOU6) provides a summary assessment sheet for this site. The information included in these is sourced from more detailed assessments undertaken by the Council. A summary of all the scores for this site can be found within Appendix 2 of HOU6.

3.3. The site assessment for this site identified a number of constraints following consultation with statutory consultees and the assessment of other criteria which were assessed solely by the Council. The first constraint identified was in relation to the site’s location, given it is located on the edge of the village, outside the proposed settlement boundary in PKB1. However, at this stage despite scoring poorly in terms of accessibility, the Council considered this site to be within close enough proximity to the centre of Cranford village to be considered accessible.
3.4. Further to this, given the site’s location within the conservation area and proximity to listed buildings such as the Church of St. John and Cranford Hall, criteria a) to c) has been included within Policy CRA2 to address this.

Question 2 - Are there any significant factors that indicate that any sites/parts of sites should not have been allocated?

3.5. Through the site assessment process, Anglian Water indicated that this site was within close proximity (approximately 200m) of the Cranford Water Recycling Centre (WRC) to the east. Therefore, concerns were raised as to the potential impact odour could have on the potential occupiers of the properties on site CRA2. As a result, Anglian Water undertook a review of the potential impact of the WRC on the site and determined that the risk of impact was ‘minimal’ and that an assessment to determine this impact through Policy CRA2 was not required, enabling the site to progress as an allocation.

3.6. Further to this, through an assessment of the site in the SFRA (ENV14), it became apparent that the risk of surface water flooding was ‘high’ for this site, as set out in paragraph 6.7 of this document. As a result, the SFRA (ENV14) indicated that a Level 2 assessment would be required to assess the risk of surface water flooding (paragraph 6.12). This is also set out in the table on page 52 of ENV14.

3.7. The Council decided at this stage to commission this work to be done, given that this site was a ‘rural exception site’ to deliver affordable housing to meet an identified local need. This work resulted in a site specific report (ENV13) for this site. This report found that ‘although surface water flood risk is high in the southern part of the site and in its vicinity, there are visible mitigation measures that can make the site safe, without increasing flood risk elsewhere’ (paragraph 4.1.1). Therefore, because the flood risk issue was found to be ‘localised’ and there are feasible mitigation measures, the site ‘cannot be rejected in the Local Plan from a flood risk perspective’ (paragraph 4.2.1). As a result, criteria d) – g) have been included within Policy CRA2 to ensure that this issue is mitigated against at planning application stage.

Question 3 - Are the sites viable and deliverable? Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery?

3.8. Through the assessment of policies in PKB1, VIA1 found that Policy CRA2 had ‘High’ impact on viability as shown in Appendix 2 of VIA1. This is because this site seeks to be allocated as a rural exception site, in accordance with Policy 13 of the JCS, a higher level of affordable dwellings is proposed to meet the locally identified need in the Cranford Housing Needs Survey (2016). Through this policy, all dwellings are expected to be affordable, unless an element of market housing is required to make the site viable (criterion d). As a result, this has been considered separately in VIA1.
3.9. The findings of the testing for this typology indicate that a greenfield development of this type is viable up to 70% affordable housing, although at this level no s.106 contributions can be provided. In order to accommodate these, the percentage of affordable housing would have to be reduced. This is set out in paragraph 5.58 of VIA1.

3.10. This site has been included within Appendix 1 (SSP2 Housing Site Schedule) Housing Land Supply Background Paper – 2019 (HOU1). The justification for its inclusion is set out in the schedule. In accordance with the NPPF and PPG, this site is considered ‘deliverable’, given that it is considered a suitable location for development and also benefits from having a willing landowner who is prepared to release the site for development. As set out above, the timescale of anticipated delivery shown in the aforementioned Site Schedule (HOU1) have been informed by site promoters.

3.11. The justification for the entry for this this site within Appendix 1 HOU1, states that ‘Further information required on flood risk, subject to this the site has been assessed as a suitable location for development for the proposed use. Site could be viably developed at the point of time envisaged’.

3.12. In addition, through consultation on the Publication Plan (PKB1) a comment was received to support the allocation of site CRA2 (comment ID 21). However, a comment which supported the allocation of rural exception sites was received (comment ID 193) but disputed the allocation of this site and the other site (CRA3) in Cranford. However, as seen in the response to this comment in CON2, the Council is confident the site assessment process has determined that these sites are suitable for housing.

Question 4 - How were the site capacities determined? What assumptions have been made? Are these justified?

3.13. Through the site assessment process densities of both 15dph (3 dwellings) and 30dph (5 dwellings) were considered, although initially the lower density was considered to be more appropriate given the location and setting of the site.

3.14. This was echoed through comments from NCC Highways at this stage, who indicated that 5 dwellings would be too many on this site and that a lower number would be more suitable.

3.15. However, through discussions with the site promoter, it became evident that because of the nature of the site, as a rural exception allocation, to make the site viable a higher number of dwellings (5-6) was required. As a result, this was discussed with NCC Highways who in principle agreed with this higher figure.

Question 5 - What is the current planning status of the site?

3.16. There is currently no active planning permission on this site.

Question 6 - What benefits would the proposed development bring?
3.17. Given that the site is a rural exception site allocation, the primary benefit is the provision of affordable housing to meet the identified need which has been determined by the Cranford Housing Needs Survey (2016). Also given the current use of the site, an agricultural paddock, development of the site has the potential to improve the aesthetic value of the area, adjacent to existing residential development, in accordance with criterion b) of Policy CRA2.

**Question 7: What are the potential adverse impacts of developing the site and how might they be mitigated?**

3.18. In response to Question 2, the Council identified an issue with surface water flooding on the site and through ENV13, mitigation measures were identified. To ensure that there are no adverse impacts associated with developing the site, sufficient mitigation in accordance with ENV13 must be considered when the site is developed.

**Question 8 - Would the Modifications proposed by the Council address any shortcomings?**

3.19. Only one MM (78) has been proposed for Policy CRA2. This is not to address any shortcomings but to add a reference in the policy text to the policies map, to provide clarity on the geographic location of the site.

**Question 9 - What is the expected timescale and rate of development and is it realistic?**

3.20. The table below indicates the estimated timescales for delivery as set out in the Housing Site Schedule from HOU1. This is based on the most up to date information from the site promoter and is therefore considered realistic. This site is expected to deliver housing in the middle of the remaining plan period.

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**Question 10 - Is the boundary of the site appropriate? Is there any justification for amending the boundary?**

3.21. The site was initially put forward by Cranford Parish Council to seek the provision of affordable housing in the village, with the current boundary. Through the site assessment process and further discussions with the site promoter, there has been no scope to change the site boundary.
Question 11 - Are the detailed policy requirements for each site, effective, justified and consistent with national policy? Are they needed when some of the sites already have planning permission?

3.21. The policy requirements for the site have been collated following the findings of the site assessment, where the various criteria have been assessed through consultation with statutory consultees as well as based on solely the Council’s informed judgement.

3.22. The assessments required by criteria d) to g) have all been based on advice from the relevant statutory consultees in relation to surface water drainage and flood risk through the site assessment process and the SFRA (ENV14). The other criteria are considered important in this policy to ensure that development of the site reflects and is sympathetic to its local context as well simultaneously seeking to achieve a high quality development which benefits the local community, especially given the site is within the conservation area, specifically criterion a).

3.23. The Council consider the policy requirements included within Policy CRA2 to be effective, justified and consistent policy.

4. **CRA3 – Land east of the corner of Duck End and Thrapston Road, Cranford**

Question 1 - Are the housing allocations appropriate and justified in light of the potential constraints, infrastructure requirements and adverse impacts?

4.1. This site has been subject to a site assessment using a consistent methodology throughout the preparation of the SSP2. This methodology was first set out in the Housing Allocations Background Paper (2012). This process sought to ensure the sites that identified as allocations in PKB1 would be most suitable and appropriate to meet the residual housing requirement as set out in Table 4.3 of PKB1 and HOU1. Whilst simultaneously identifying potential constraints, infrastructure requirements and any requirements for the mitigation of any adverse impacts.

4.2. Appendix 3 of the Housing Allocations Background Paper – 2018 (HOU6) provides a summary assessment sheet for this site. The information included in these is sourced from more detailed assessments undertaken by the Council. A summary of all the scores for this site can be found within Appendix 2 of HOU6.

4.3. The site assessment for this site identified a number of constraints following consultation with statutory consultees and the assessment of other criteria which were assessed solely by the Council. The first constraint identified was in relation to the sites location, given it is located on the edge of the village, outside the proposed settlement boundary in PKB1. However, at this stage despite scoring poorly in terms of accessibility, the Council considered this site
to be within close enough proximity to the centre of Cranford village to be considered accessible.

4.4. Further to this, given the site’s close proximity to a haulage yard to the west, criterion b) has been included to ensure that a suitable and effective buffer is provided to mitigate visual and noise impacts on the site.

Question 2 - Are there any significant factors that indicate that any sites/parts of sites should not have been allocated?

4.5. Through the site assessment process, Anglian Water indicated that this site was within close proximity (approximately 200m) to Cranford Water Recycling Centre (WRC) to the east. Therefore, concerns were raised as to the potential impact odour could have on the potential occupiers of the properties on site CRA3. As a result, Anglian Water undertook a review of the potential impact of the WRC on the site and determined that the risk of impact was ‘minimal’ and that an assessment to determine this impact through Policy CRA3 was not required, enabling the site to progress as an allocation.

Question 3 - Are the sites viable and deliverable? Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery?

4.6. Through the assessment of policies in PKB1, VIA1 found that Policy CRA3 had ‘High’ impact on viability as shown in Appendix 2 of VIA1. This is because this site seeks to be allocated as a rural exception site, in accordance with Policy 13 of the JCS, a higher level of affordable dwellings is proposed to meet the locally identified need in the Cranford Housing Needs Survey (2016). Through this policy, all dwellings are expected to be affordable, unless an element of market housing is required to make the site viable (criterion d). As a result, this has been considered separately in VIA1.

4.7. The findings of the testing for this typology indicate that a greenfield development of this type is viable up to 70% affordable housing, although at this level no s.106 contributions can be provided. In order to accommodate these, the percentage of affordable housing would have to be reduced. This is set out in paragraph 5.58 of VIA1.

4.8. This site has been included within Appendix 1 (SSP2 Housing Site Schedule) Housing Land Supply Background Paper – 2019 (HOU1). The justification for its inclusion is set out in the schedule. In accordance with the NPPF and PPG, this site is considered ‘deliverable’, given that it is considered a suitable location for development and also benefits from having a willing landowner who is prepared to release the site for development. As set out above, the timescale of anticipated delivery shown in the aforementioned Site Schedule (HOU1) has been informed site promoters.

4.9. The justification for the entry for this site within Appendix 1 HOU1, states that ‘The site is an emerging allocation in the SSP2 so has been assessed as a
suitable location for the type of development proposed. Site could be viably developed at the point of time envisaged. Information provided by the site promoter has been used to inform the site schedule.’

4.10. In addition, through consultation on the Publication Plan (PKB1) comments were received to support the allocation of site CRA3 (comment ID 22 and 25). However, a comment which supported the allocation of rural exception sites was received (comment ID 193) but disputed the allocation of this site and the other site (CRA2) in Cranford. However, as seen in the response to this comment in CON2, the Council is confident the site assessment process has determined that these sites are suitable for housing.

Question 4 - How were the site capacities determined? What assumptions have been made? Are these justified?

4.11. Through the site assessment process, densities of both 15dph (9 dwellings) and 30dph (18 dwellings) were considered, although initially the lower density was considered to be more appropriate given the location and setting of the site. Another consideration was the adjacent use, a haulage yard, and to facilitate the provision of a suitable buffer the Council considered that the figure of 9 dwellings was considered appropriate for the site. Hence the yield of 8-10 dwellings required by Policy CRA3.

Question 5 - What is the current planning status of the site?

4.12. There is currently no active planning permission on this site.

Question 6 - What benefits would the proposed development bring?

4.13. Given that the site is a rural exception site allocation, the primary benefit is the provision of affordable housing to meet the identified need which has been determined by the Cranford Housing Needs Survey (2016). Also given the current use of the site, an agricultural paddock, development of the site has the potential to improve the aesthetic value of the area, by creating a gateway to the village, in accordance with criterion c) of Policy CRA3.

Question 7 - What are the potential adverse impacts of developing the site and how might they be mitigated?

4.14. The Council consider that there are no potential adverse impacts associated with the development of this site.

Question 8 - Would the Modifications proposed by the Council address any shortcomings?

4.15. MM79 does not seek to address any shortcomings but to add a reference in the policy text to the policies map, to provide clarity on the geographic location of the site. The other MM (34) addresses comments by a representation made by the Environment Agency (comment 242) whereby criterion e) is proposed to be
amended to provide consistency with related policy requirement in other site allocations in the Plan.

**Question 9 - What is the expected timescale and rate of development and is it realistic?**

The table below indicates the estimated timescales for delivery as set out in the Housing Site Schedule from [HOU1](#). This is based on the most up to date information from the site promoter and is therefore considered realistic. This site is expected to deliver housing in the middle of the remaining plan period.

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**Question 10 - Is the boundary of the site appropriate? Is there any justification for amending the boundary?**

4.17 The site was initially put forward by Cranford Parish Council to seek the provision of affordable housing in the village, with the current boundary. Through the site assessment process and further discussions with the site promoter, there has been no scope to change the site boundary.

**Question 11 - Are the detailed policy requirements for each site, effective, justified and consistent with national policy? Are they needed when some of the sites already have planning permission?**

4.18 The policy requirements for the site have been collated following the findings of the site assessment, where the various criteria have been assessed through consultation with statutory consultees as well as based on solely the Council’s informed judgement.

4.19 The assessment required by criterion h) has been based on advice from the relevant statutory consultees in relation to surface water drainage through the site assessment process. The other criteria are considered important in this policy to ensure that development of the site reflects and is sympathetic to its local context as well simultaneously seeking to achieve a high quality development which benefits the local community, including criteria c) and g). Another criterion which seeks to benefit the local community is criterion a), which seeks to provide improvements to accessibility between the site and the centre of the village.
4.20. The Council consider the policy requirements included within Policy CRA3 to be effective, justified and consistent policy.

5. GED2 Geddington Sawmill, Grafton Road, Geddington

Question 1 - Are the housing allocations appropriate and justified in light of the potential constraints, infrastructure requirements and adverse impacts?

5.1. This site has been subject to a site assessment using a consistent methodology throughout the preparation of the SSP2. This methodology was first set out in the Housing Allocations Background Paper (2012). This process sought to ensure the sites that were identified as allocations in PKB1 would be most suitable and appropriate to meet the residual housing requirement as set out in Table 4.3 of PKB1 and HOU1. Whilst simultaneously identifying potential constraints, infrastructure requirements and any requirements for the mitigation of any adverse impacts.

5.2. Appendix 3 of the Housing Allocations Background Paper – 2018 (HOU6) provides a summary assessment sheet for this site. The information included in these is sourced from more detailed assessments undertaken by the Council. A summary of all the scores for this site can be found within Appendix 2 of HOU6.

5.3. The most significant constraint identified through the site assessment was the impact of the existing sawmill business on the site and how this will be managed. To enable development of the site, the existing business needs to reduce in size and mitigation measures are required to be put in place as identified by criterion c) of Policy CRA3 following advice from the Council’s Environment Health team. In addition, a ‘water asset belonging to Anglian Water was identified within the site boundary, as a result criterion d) has been included.

Question 2 - Are there any significant factors that indicate that any sites/parts of sites should not have been allocated?

5.4. The Council is confident that there are no significant factors identified through the site assessment process that would indicate that this site or any part of the site should not have been allocated.

Question 3 - Are the sites viable and deliverable? Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery?

5.5. The Viability Assessment of the SSP2 (VIA1) sought to assess the viability of the site. However, the approach taken for the assessment, as guided by PPG, was not to individually assess each site but to identify typologies based on ‘location, whether brownfield or greenfield, size of site and current and proposed use or type development’ as set in paragraph 5.5 as referenced on
page 21 of VIA1 and in response to question 4 of Matter 3 (Infrastructure and Viability). As a result, Aspinall Verdi, identified 15 different typologies, across the three value zones, and split by their brownfield/greenfield status and site yield.

5.6. Through the assessment of policies in PKB1, VIA1 found that Policy GED2 had ‘Low’ impact on viability as shown in Appendix 2 of VIA1. This is reflected in the results of the testing of the typologies identified for residential development, which found that most of the typologies can provide their affordable housing target, set out in paragraph 9.18 of VIA1. The testing showed that brownfield development in the higher value area is unviable in paragraph 9.12. Although, because smaller brownfield developments only make up a limited proportion this is unlikely to be an issue, as stated in paragraph 9.13 of VIA1.

5.7. This site has been included within Appendix 1 (SSP2 Housing Site Schedule) Housing Land Supply Background Paper – 2019 (HOU1). The justification for its inclusion is set out in the schedule. In accordance with the NPPF and PPG, this site is considered ‘deliverable’, given that it is considered a suitable location for development and also benefits from having a willing landowner who is prepared to release the site for development. As set out above, the timescale of anticipated delivery shown in the aforementioned Site Schedule (HOU1) have been informed site promoters.

5.8. The justification for the entry for this this site within Appendix 1 HOU1, states that ‘The site is an emerging allocation in the SSP2 so has been assessed as a suitable location for development. Site could be viably developed at the point of time envisaged. Information provided by the site promoter has been used to inform the site schedule’. Full support by the site promoter has also been provided through comment ID 66 from consultation on PKB1.

Question 4 - How were the site capacities determined? What assumptions have been made? Are these justified?

5.9. The capacity of the site was originally 10 dwellings when the site was first consideration a housing allocation. Through consultation with the site promoter, this capacity was confirmed by the site promoter in July 2016.

Question 5 - What is the current planning status of the site?

5.10. There is currently no active planning permission on this site.

Question 6 - What benefits would the proposed development bring?

5.11. The provision of a housing development that responds to local vernacular, the use of stone boundary walls and enhances the setting of nearby heritage assets will provide a benefit to the village. It will also provide housing for the village, whilst also contributing to the rural housing requirement. Development of this site can also contribute in progressing improvements in the village as set out in criterion g) of Policy GED1.
5.12. A development of this scale could also require developer contributions, through a s.106 agreement which has the potential to provide both on-site and off-site contributions.

Question 7 - What are the potential adverse impacts of developing the site and how might they be mitigated?

5.13. The Council considers that there are no potential adverse impacts associated with the development of this site.

Question 8 - Would the Modifications proposed by the Council address any shortcomings?

5.14. Only one MM (80) has been proposed for Policy GED2. This is not to address any shortcomings but to add a reference in the policy text to the policies map, to provide clarity on the geographic location of the site.

Question 9 - What is the expected timescale and rate of development and is it realistic?

5.15. The table below indicates the estimated timescales for delivery as set out in the Housing Site Schedule from HOU1. This is based on the most up to date information from the site promoter and is therefore considered realistic. This site is expected to deliver housing in the middle of the remaining plan period.

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Question 10 - Is the boundary of the site appropriate? Is there any justification for amending the boundary?

5.16. The site boundary is the original boundary when the site was first considered as a housing allocation. There has been no scope to amend the boundary.

Question 11 - Are the detailed policy requirements for each site, effective, justified and consistent with national policy? Are they needed when some of the sites already have planning permission?

5.17. The policy requirements for the site have been collated following the findings of the site assessment, where the various criteria have been assessed through consultation with statutory consultees as well as based on solely the Council’s informed judgement.
5.18. The assessment required by criteria h) and i) have been based on advice from the relevant statutory consultees in relation to surface water drainage and flooding through the site assessment process. The other criteria are considered important in this policy to ensure that development of the site reflects and is sympathetic to its local context as well simultaneously seeking to achieve a high quality development which benefits the local community, including criteria a), b) and e) and f).

5.19. The Council consider the policy requirements included within Policy GED2 to be effective, justified and consistent policy.

6. GED3 – Geddington South East, Geddington

Question 1 - Are the housing allocations appropriate and justified in light of the potential constraints, infrastructure requirements and adverse impacts?

6.1. This site has been subject to a site assessment using a consistent methodology throughout the preparation of the SSP2. This methodology was first set out in the Housing Allocations Background Paper (2012). This process sought to ensure that the sites identified as allocations in PKB1 would be most suitable and appropriate to meet the residual housing requirement as set out in Table 4.3 of PKB1 and HOU1. Whilst simultaneously identifying potential constraints, infrastructure requirements and any requirements for the mitigation of any adverse impacts.

6.2. Appendix 3 of the Housing Allocations Background Paper – 2018 (HOU6) provides a summary assessment sheet for this site. The information included in these is sourced from more detailed assessments undertaken by the Council. A summary of all the scores for this site can be found within Appendix 2 of HOU6.

6.3. The first constraint identified through the site assessment of the site is in relation to impact on heritage, more specifically Boughton House, however this has sought to be mitigated against through criterion i) of Policy GED3. In addition, Anglian Water identified that there was limited foul sewerage network capacity, however this has been mitigated for the requirement for SuDS by criterion m).

6.4. Another significant constraint identified the need for a single shared access which was considered by NCC Highways as the only acceptable option, this is required through criterion h) of Policy GED3. A representation was also received (comment ID 59) with regards the capacity of the highway and access, stating that the yield was too high, however the Council is confident that this has been subsequently assessed and 11 dwellings was considered suitable.

Question 2 - Are there any significant factors that indicate that any sites/parts of sites should not have been allocated?
6.5. Through the site assessment process, Anglian Water indicated that this site was within close proximity to Geddington Water Recycling Centre (WRC). Therefore, concerns were raised as to the potential impact odour could have on the potential occupiers of the properties on site GED3. As a result, the site promoter undertook a review of the potential impact of the WRC on the site and determined that the risk of impact was limited therefore enabling the site to progress as an allocation. This was agreed Planning Policy Committee on 4th October 2017, where it was reported that Anglian Water raised no objection to the findings on this study. However, a criterion (j) has been included in Policy GED3 in any case.

Question 3 - Are the sites viable and deliverable? Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery?

6.6. The Viability Assessment of the SSP2 (VIA1) sought to assess the viability of the site. However, the approach taken for the assessment, as guided by PPG, was not to individually assess each site but to identify typologies based on ‘location, whether brownfield or greenfield, size of site and current and proposed use or type development’ as set in paragraph 5.5, as referenced on page 21 of VIA1 and in response to question 4 of Matter 3 (Infrastructure and Viability). As a result, Aspinall Verdi, identified 15 different typologies, across the three value zones, and split by their brownfield/greenfield status and site yield.

6.7. Through the assessment of policies in PKB1, VIA1 found that Policy GED3 had ‘Low’ impact on viability as shown in Appendix 2 of VIA1. The testing showed that greenfield development in the higher value area is viable in paragraph 9.8. Where the 40% requirement for affordable housing can be alongside other policy requirements, such as those required by the JCS, including water offset costs and accessible housing standards. A surplus for this type of development is also available.

6.8. This site has been included within Appendix 1 (SSP2 Housing Site Schedule) Housing Land Supply Background Paper – 2019 (HOU1). The justification for its inclusion is set out in the schedule. In accordance with the NPPF and PPG, this site is considered ‘deliverable’, given that it is considered a suitable location for development and also benefits from having a willing landowner who is prepared to release the site for development. As set out above, the timescale of anticipated delivery shown in the aforementioned Site Schedule (HOU1) has been informed by site promoters.

6.9. The justification for the entry for this this site within Appendix 1 HOU1, states that’ The site has been assessed as a suitable location for development. Site could be viably developed at the point of time envisaged’. Support has been provided for this allocation by comment ID 66.

Question 4 - How were the site capacities determined? What assumptions have been made? Are these justified?
6.10. The capacity for the site has been determined by the site promoter. This Council consider this to be a suitable yield for this site.

**Question 5 - What is the current planning status of the site?**

6.11. There is currently no active planning permission on this site.

**Question 6 - What benefits would the proposed development bring?**

6.12. The provision of a housing development that responds to local vernacular, the inclusion of a comprehensive landscape scheme, enhancing existing features including the hedgerow, and maintaining the open rural character and frontages that are set back, allow the site to be an attractive gateway into the village. Development of this site can also contribute in progressing improvements in the village as set out in criterion g) of Policy GED1.

6.13. A development of this scale could also require developer contributions, through a s.106 agreement which has the potential to provide both on-site and off-site contributions.

**Question 7 - What are the potential adverse impacts of developing the site and how might they be mitigated?**

6.14. The Council consider that there are no potential adverse impacts associated with the development of this site.

**Question 8 - Would the Modifications proposed by the Council address any shortcomings?**

6.15. Only one MM (81) has been proposed for Policy GED3. This is not to address any shortcomings but to add a reference in the policy text to the policies map, to provide clarity on the geographic location of the site.

**Question 9 - What is the expected timescale and rate of development and is it realistic?**

6.16. The table below indicates the estimated timescales for delivery as set out in the Housing Site Schedule from HOU1. This is based on the most up to date information from the site promoter and is therefore considered realistic. This site is expected to deliver housing in the middle of the remaining plan period.
Question 10 - Is the boundary of the site appropriate? Is there any justification for amending the boundary?

6.17. The initial boundary of the site covered a larger area, to the east and the north, however through discussions with the site promoter, the boundary was reduced to include the current site as a frontage development along Kettering Road, to the south of the village.

Question 11 - Are the detailed policy requirements for each site, effective, justified and consistent with national policy? Are they needed when some of the sites already have planning permission?

6.18. The policy requirements for the site have been collated following the findings of the site assessment, where the various criteria have been assessed through consultation with statutory consultees as well as based on solely the Council’s informed judgement.

6.19. The assessment required by criteria j), m) and n) have been based on advice from the relevant statutory consultees in relation to surface water drainage and flooding through the site assessment process. The other criteria are considered important in this policy to ensure that development of the site reflects and is sympathetic to its local context as well simultaneously seeking to achieve a high quality development which benefits the local community, including criteria a), b) and c) and f). Criterion k) has been included to mitigate the noise created by the existing sawmill use on the site.

6.20. The Council consider the policy requirements included within Policy GED3 to be effective, justified and consistent policy.

7. GED4 Old Nursery Site, Grafton Road, Geddington

Question 1 - Are the housing allocations appropriate and justified in light of the potential constraints, infrastructure requirements and adverse impacts?

7.1. This site has been subject to a site assessment using a consistent methodology throughout the preparation of the SSP2. This methodology was first set out in the Housing Allocations Background Paper (2012). This process sought to ensure that the sites identified as allocations in PKB1 would be most suitable and appropriate to meet the residual housing requirement as set out in Table 4.3 of PKB1 and HOU1. Whilst simultaneously identifying potential
constraints, infrastructure requirements and any requirements for the mitigation of any adverse impacts.

7.2. Appendix 3 of the Housing Allocations Background Paper – 2018 (HOU6) provides a summary assessment sheet this site. The information included in these is sourced from more detailed assessments undertaken by the Council. A summary of all the scores for this site can be found within Appendix 2 of HOU6.

7.3. The first constraint identified through the site assessment of the site is the TPO on the site, which includes a tree belt along the sites eastern and southern boundary. Criterion c) has been included to protect this feature and incorporate it into a landscaping scheme for the site.

7.4. Another significant constraint identified the need for the development of the site to respond to the historic core within the village as well as protect existing heritage assets in Geddington. This has been reflected though the inclusion of criteria b) and h) respectively.

Question 2 - Are there any significant factors that indicate that any sites/parts of sites should not have been allocated?

7.5. The Council is confident that there are no significant factors, identified through the site assessment process that would indicate that this site or any part of the site should not have been allocated.

Question 3 - Are the sites viable and deliverable? Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery?

7.6. The Viability Assessment of the SSP2 (VIA1) sought to assess the viability of the site. However, the approach taken for the assessment, as guided by PPG, was not to individually assess each site but to identify typologies based on “location, whether brownfield or greenfield, size of site and current and proposed use or type development” as set in paragraph 5.5, as referenced on page 21 of VIA1 and in response to question 4 of Matter 3 (Infrastructure and Viability). As a result, Aspinall Verdi, identified 15 different typologies, across the three value zones, and split by their brownfield/greenfield status and site yield.

7.7. Through the assessment of policies in PKB1, VIA1 found that Policy GED4 had ‘Low’ impact on viability as shown in Appendix 2 of VIA1. The testing showed that brownfield development in the higher value area is unviable in paragraph 9.12. Although, because smaller brownfield developments only make up a limited proportion this is unlikely to be an issue, as stated in paragraph 9.13 of VIA1.

7.8. This site has been included within Appendix 1 (SSP2 Housing Site Schedule) Housing Land Supply Background Paper – 2019 (HOU1). The justification for
its inclusion is set out in the schedule. In accordance with the NPPF and PPG, this site is considered ‘deliverable’, given that it is considered a suitable location for development and also benefits from having a willing landowner who is prepared to release the site for development. As set out above, the timescale of anticipated delivery shown in the aforementioned Site Schedule (HOU1) has been informed by site promoters.

7.9. The justification for the entry for this site within Appendix 1 HOU1, states that ‘The site is an emerging allocation in the SSP2 so has been assessed as a suitable location for development. Site could be viably developed at the point of time envisaged. Information provided by the site promoter has been used to inform the site schedule’.

Question 4 - How were the site capacities determined? What assumptions have been made? Are these justified?

7.9. The capacity for the site is based on 30dph and is the yield that has been proposed by the site promoter as the estimate for market housing on the site.

Question 5 - What is the current planning status of the site?

7.10. There is currently no active planning permission on this site.

Question 6 - What benefits would the proposed development bring?

7.11. The provision of a housing development that responds to local vernacular, the inclusion of a comprehensive landscape scheme, enhancing existing features and heritage assets with the potential to provide footpath links to the centre of the village is likely to provide a significant benefit to the village. A representation (comment ID 2) was received through consultation on PKB1, specifically in relation to the footpath, which stated that this should provide access to the youth club. The Council in response, were satisfied that this was sufficiently addressed through Policy GED4.

7.12. A development of this scale could also require developer contributions, through a s.106 agreement which has the potential to provide both on-site and off-site contributions. Development of this site can also contribute in progressing improvements in the village as set out in criterion g) of Policy GED1.

Question 7 - What are the potential adverse impacts of developing the site and how might they be mitigated?

7.13. The Council consider that there are no potential adverse impacts associated with the development of this site.

Question 8 - Would the Modifications proposed by the Council address any shortcomings?
7.14. Only one MM (82) has been proposed for Policy GED4. This is not to address any shortcomings but to add a reference in the policy text to the policies map, to provide clarity on the geographic location of the site.

Question 9 - What is the expected timescale and rate of development and is it realistic?

7.15. The table below indicates the estimated timescales for delivery as set out in the Housing Site Schedule from HOU1. This is based on the most up to date information from the site promoter and is therefore considered realistic. This site is expected to deliver housing in the middle of the remaining plan period.

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Question 10 - Is the boundary of the site appropriate? Is there any justification for amending the boundary?

7.16. The site boundary remains the same as that was originally proposed by the site promoter. There has been no scope to amend this original boundary, given that it is considered to be appropriate.

Question 11 - Are the detailed policy requirements for each site, effective, justified and consistent with national policy? Are they needed when some of the sites already have planning permission?

7.17. The policy requirements for the site have been collated following the findings of the site assessment, where the various criteria have been assessed through consultation with statutory consultees as well as based on solely the Council’s informed judgement.

7.18. The assessment required by criteria e) to g) have been based on advice from the relevant statutory consultees in relation to surface water drainage and flooding through the site assessment process. The other criteria are considered important in this policy to ensure that development of the site reflects and is sympathetic to its local context as well simultaneously seeking to achieve a high quality development which benefits the local community, including criteria b), d) and h). Criterion a) has been included to ensure that a single access point is used to access the site, to reflect comments received from NCC Highways.

7.19. Support for this policy has been received through consultation on the Publication Plan (PKB1), via representation 47. In addition, support was also provided for specific criteria, h) and l), by Historic England (comment ID 110).
7.20. The Council consider the policy requirements included within Policy GED4 to be effective, justified and consistent policy.

8. GRC2 - Land to the north of Loddington Road, Great Cransley

Question 1 - Are the housing allocations appropriate and justified in light of the potential constraints, infrastructure requirements and adverse impacts?

8.1. This site has been subject to a site assessment using a consistent methodology throughout the preparation of the SSP2. This methodology was first set out in the Housing Allocations Background Paper (2012). This process sought to ensure that the sites identified as allocations in PKB1 would be most suitable and appropriate to meet the residual housing requirement as set out in Table 4.3 of PKB1 and HOU1. Whilst simultaneously identifying potential constraints, infrastructure requirements and any requirements for the mitigation of any adverse impacts.

8.2. Appendix 3 of the Housing Allocations Background Paper – 2018 (HOU6) provides a summary assessment sheet for this site. The information included in these is sourced from more detailed assessments undertaken by the Council. A summary of all the scores for this site can be found within Appendix 2 of HOU6.

8.3. The first constraint identified through the site assessment of the site is accessibility and distance to facilities and employment. However, this is not considered to be significant given that it is close enough to Kettering to be considered accessible. Therefore, this would not preclude allocation or subsequent development of the site.

8.4. Another constraint identified the need for further assessment of potential archaeological features on the site. Consultation with NCC Archaeology indicated that this is unlikely to preclude development of the site, but an assessment was required to identify any mitigation prior to development, hence the inclusion of criterion g) of Policy GRC2.

Question 2 - Are there any significant factors that indicate that any sites/parts of sites should not have been allocated?

8.5. The Council is confident that there are no significant factors, identified through the site assessment process that would indicate that this site or any part of the site should not have been allocated.

Question 3 - Are the sites viable and deliverable? Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery?

8.6. The Viability Assessment of the SSP2 (VIA1) sought to assess the viability of the site. However, the approach taken for the assessment, as guided by PPG,
was not to individually assess each site but to identify typologies based on ‘location, whether brownfield or greenfield, size of site and current and proposed use or type development’ as set in paragraph 7 of VIA1 and in response to question 4 of Matter 3 (Infrastructure and Viability). As a result, Aspinall Verdi, identified 15 different typologies, across the three value zones, and split by their brownfield/greenfield status and site yield.

8.7. Through the assessment of policies in PKB1, VIA1 found that Policy GRC2 had ‘Low’ impact on viability as shown in Appendix 2 of VIA1. The testing showed that greenfield development in the higher value area is viable in paragraph 9.8. Where the 40% requirement for affordable housing can be alongside other policy requirements, such as those required by the JCS, including water offset costs and accessible housing standards. A surplus for this type of development is also available.

8.8. This site has been included within Appendix 1 (SSP2 Housing Site Schedule) Housing Land Supply Background Paper – 2019 (HOU1). The justification for its inclusion is set out in the schedule. In accordance with the NPPF and PPG, this site is considered ‘deliverable’, given that it is considered a suitable location for development and also benefits from having a willing landowner who is prepared to release the site for development. As set out above, the timescale of anticipated delivery shown in the aforementioned Site Schedule (HOU1) have been informed site promoters.

8.9. The justification for the entry for this this site within Appendix 1 HOU1, states that ‘The site is an emerging allocation in the SSP2 so has been assessed as a suitable location for development. Site could be viably developed at the point of time envisaged. Information provided by the site promoter has been used to inform the site schedule’.

Question 4 - How were the site capacities determined? What assumptions have been made? Are these justified?

8.10. Densities of both 15dph (6 dwellings) and 30dph (13 dwellings) were considered in the early stages of the site assessment process. However, through consultation with the site promoter, it was evident that there was a desire to deliver a site for between 10 and 15 dwellings. Although higher than the 15dph density that is considered suitable for rural settlements, this capacity was considered acceptable.

Question 5 - What is the current planning status of the site?

8.11. A planning application for the site was received for 9 dwellings in April 2020. This application was subsequently withdrawn on 4th June 2020.

Question 6 - What benefits would the proposed development bring?
8.12. Development of the site will provide additional housing in the village. Depending on the yield that comes forward there is potential for the site to deliver affordable housing on the site, in accordance with Policy 30 of the JCS. Therefore 40% of the dwellings, could deliver 4-6 affordable dwellings. Development of this site can also contribute in progressing improvements in the village as set out in criterion c) of Policy GRC1.

Question 7 - What are the potential adverse impacts of developing the site and how might they be mitigated?

8.13. The Council consider that there are no potential adverse impacts associated with the development of this site.

Question 8 - Would the Modifications proposed by the Council address any shortcomings?

8.14. Only one MM (84) has been proposed for Policy GRC2. This is not to address any shortcomings but to add a reference in the policy text to the policies map, to provide clarity on the geographic location of the site.

Question 9 - What is the expected timescale and rate of development and is it realistic?

8.15. The table below indicates the estimated timescales for delivery as set out in the Housing Site Schedule from HOU1. This is based on the most up to date information from the site promoter and is therefore considered realistic. This site is expected to deliver housing in the middle of the remaining plan period.

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Question 10 - Is the boundary of the site appropriate? Is there any justification for amending the boundary?

8.16. The site boundary remains the same as that originally proposed by the site promoter. There has been no scope to amend this original boundary, given that it is considered to be appropriate.

Question 11 - Are the detailed policy requirements for each site, effective, justified and consistent with national policy? Are they needed when some of the sites already have planning permission?

8.17. The policy requirements for the site have been collated following the findings of the site assessment, where the various criteria have been assessed through
consultation with statutory consultees as well as based on solely the Council’s informed judgement.

8.18. The assessment required by criteria g) and i) have been based on advice from the relevant statutory consultees in relation archaeology and surface water drainage. The other criteria are considered important in this policy to ensure that development of the site reflects and is sympathetic to its local context as well simultaneously seeking to achieve a high quality development which benefits the local community, including criteria a), b), c) and f). Criterion a) has been included to ensure that on-site turning is provided for properties which front onto Loddington Road, to reflect comments received from NCC Highways.

8.19. A representation (comment ID 41) for this site was received when the Publication Plan (PKB1) was consulted on. Concerns were raised in relation to the need for and suitability of the site. In response the Council reiterated the thorough site assessment process that the site had been subject to and therefore considered to be suitable to accommodate housing in the rural area.

8.20. The Council considers the policy requirements included within Policy GRC2 to be effective, justified and consistent policy.

9. **MAW2 Land to the west of Mawsley**

   Question 1 - Are the housing allocations appropriate and justified in light of the potential constraints, infrastructure requirements and adverse impacts?

9.1. This site has been subject to a site assessment using a consistent methodology throughout the preparation of the SSP2. This methodology was first set out in the Housing Allocations Background Paper (2012) (HOU9). This process sought to ensure that the sites identified as allocations in PKB1 would be the most suitable and appropriate to meet the residual housing requirement as set out in Table 4.3 of PKB1 and HOU1. Whilst simultaneously identifying potential constraints, infrastructure requirements and any requirements for the mitigation of any adverse impacts. The Council’s response to Matter 2: Spatial Strategy, question 4, provides more detail on the methodology for assessing housing allocations, and provides a justification for the approach taken to allocating sites.

9.2. Appendix 3 of the Housing Allocations Background Paper – 2018 (HOU6) provides a summary assessment sheet for this site. The information included in the summary sheet is sourced from more detailed assessments undertaken by the Council. A summary of all the scores for this site can be found within Appendix 2 of HOU6.

9.3. Constraints identified for this site through the site assessment process included risk from ground water flooding, a requirement to provide a loop road with a maximum number of dwellings of 50 and constraints in relation to the water and waste capacity. Criteria have been added to the policy to ensure that the issues identified are adequately addressed.
9.4. The Strategic Flood Risk Assessment (ENV14) assessed this site as ‘site deliverable in flood risk management terms, providing the site-specific considerations as incorporated into the policy of the site’. The requirements for a site specific assessment of surface water and ground water flooding set out in Table 8 of ENV14 have been included in Policy MAW2 to address this.

9.5. Through the site assessment process discussions took place with NCC Highways in relation to access to the site and the capacity of Cransley Rise. NNC advised that a loop road serving a maximum of 50 dwellings would be acceptable without the need to widen Cransley Rise, this requirement has been included within Policy MAW2.

9.6. A number of representations were received objecting to the allocation of this site (representor id 7, comment no 12), (representor id 16, comment no 30) (representor id 22, comment no 37), (representor id 14, comment no 26), (representor id 38, comment no 60), (representor id 46, comment no 77), (representor id 50, comment no 130), (representor id 51, comment no 135), (representor id 24, comment no 42). The Council has responded to these comments in the ‘Regulation 20 Representations with Council’s response’. The Council considers that the issues raised in these representations have been considered in detail through the site assessment work, the detail of this is included in the Housing Allocations Background Papers (2012, 2013, 2018 and 2019). Where appropriate, criteria have been included in Policy MAW2 to ensure issues identified through the assessment process are adequately addressed.

9.7. A response was also received from Natural England (representor id 49, comment no 129) which requested an amendment to the wording of Policy MAW2 and a commitment to be included in the policy to provide a CEMP. The Council has responded to this comment in the ‘Regulation 20 Representations with Council’s response’. The Council considers the wording of the policy is sufficient to ensure that mitigation is informed by the assessment required by Policy MAW2 criteria I.

9.8. A representation was received (respondent id 111, comment no 238) which related to the assessment of this site when compared with an alternative site. The Council has responded to this comment in the ‘Regulation 20 Representations with Council’s response’. The Council considers that it has carried out a robust, evidence based assessment of sites, this assessment process is documented in the Housing Allocations Background Papers (2012 (HOU9), 2018 (HOU6) and 2019 (HOU5) and the Housing Allocations and Assessment of Additional Sites and Update (2013) (HOU8). The issues raised in this representation have been considered through the assessment process.

Question 2 - Are there any significant factors that indicate that any sites/parts of sites should not have been allocated?

9.9. Constraints identified through the assessment process for the site have been addressed through the requirements of Policy MAW2, it is not considered that there are any significant factors which indicate that the sites or parts of the site should not be allocated.
Question 3 - Are the sites viable and deliverable? Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery?

9.10. The viability of sites has been considered through the Whole Plan Viability Assessment (VIA1). The Council’s response to Matter 3: Infrastructure and Viability provides further detail on the viability assessment undertaken. The results of the viability testing in paragraph ES 15 of VIA1 sets out that the analysis showed that greenfield development is viable across all housing scenarios tested. Appendix 2 of VIA1 assessed the impact on viability of Policy MAW2 as low.

9.11. Through the site assessment process, the site promoter indicated that the site is available immediately, that the site is deliverable within the first five years and that there are no abnormal site development costs that could affect the delivery, timing or viability of developing this site.

9.12. The site has been promoted for development and is available now, it has been assessed as a suitable location for development and is achievable, given the scale of development proposed it is realistic that, once the site is allocated for development, housing will be delivered within the timescales set out in the housing trajectory. There are no constraints that would prevent development or adversely affect viability and delivery.

Question 4 - How were the site capacities determined? What assumptions have been made? Are these justified?

9.13. The capacity of the site has evolved through the site assessment process. The site promoter originally indicated that 75 dwellings could be accommodated, however through discussions with NCC highways in relation to the capacity of Cransley Rise and the need to provide a loop road within the site the capacity was reduced to a maximum of 50 dwellings, this was agreed with the site promoter. It is considered that the capacity identified in Policy MAW2 is justified.

Question 5 - What is the current planning status of the site?

9.14. The site does not have planning permission.

Question 6 - What benefits would the proposed development bring?

9.15. The proposed development will deliver housing to contribute towards meeting the rural housing requirements. It will also contribute towards the provision of affordable housing in the rural area in accordance with Policy 30 of the JCS. The proposal also provides the opportunity to join two stubs of cycle way creating a link along the western edge of the village.

Question 7: What are the potential adverse impacts of developing the site and how might they be mitigated?
9.16. The constraints identified for this site are set out in the response to question 1, these include risk from surface water and ground water flooding, limits on development capacity relating to access and water and waste capacity. The criteria set out in the policy address issues raised through the site assessment process and ensure that impacts are suitably mitigated, therefore there would be no adverse impacts associated with the development of this site.

Question 8 - Would the Modifications proposed by the Council address any shortcomings?

9.17. The modifications proposed to this policy include minor corrections to clarify the site area and correct grammatical errors. In addition to this MM (85) has been proposed for Policy MAW2. This is not to address any shortcomings but to add a reference in the policy text to the policies map, to provide clarity on the geographic location of the site.

Question 9 - What is the expected timescale and rate of development and is it realistic?

9.18. The site is available now and the site promoter has indicated the site could be developed within years 1-5. The site schedule contained in HOU1 sets out the following housing trajectory for this site. This site is expected to deliver housing in the middle of the remaining plan period.

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9.19. It is considered that the rate of delivery set out is realistic given the scale of the site and the time needed to progress the site through the planning application process.

Question 10 - Is the boundary of the site appropriate? Is there any justification for amending the boundary?

9.20. The boundary for the site is appropriate, the boundary allows for the connection of the two cycle stubs to the north and south of the site and Policy MAW2 restricts the areas of built development to prevent development extending beyond the existing built form to the north east and south west of the site.

Question 11 - Are the detailed policy requirements for each site, effective, justified and consistent with national policy? Are they needed when some of the sites already have planning permission?

9.21. The policy requirements for the site are considered to be effective, justified and consistent with planning policy. The supporting text to Policy MAW2, paragraphs
13.106 to 13.110, and the site assessment contained in HOU6 set out the constraints identified in relation to this site and provide a justification for the criteria contained in the policy.

9.22. This site does not have planning permission.

10. **PYT2 Two fields on the outskirts of Pytchley, Isham Road**

*Question 1 - Are the housing allocations appropriate and justified in light of the potential constraints, infrastructure requirements and adverse impacts?*

12.1. This site has been subject to a site assessment using a consistent methodology throughout the preparation of the SSP2. This methodology was first set out in the *Housing Allocations Background Paper (2012)*. This process sought to ensure that the sites identified as allocations in PKB1 would be most suitable and appropriate to meet the residual housing requirement as set out in Table 4.3 of PKB1 and HOU1. Whilst simultaneously identifying potential constraints, infrastructure requirements and any requirements for the mitigation of any adverse impacts.

12.2. Appendix 3 of the Housing Allocations Background Paper – 2018 (HOU6) provides a summary assessment sheet for this site. The information included in these is sourced from more detailed assessments undertaken by the Council. A summary of all the scores for this site can be found within Appendix 2 of HOU6.

12.3. The first constraint identified through the site assessment of the site is accessibility and distance to facilities and employment. However, this is not considered to be significant given that it is considered to be in close enough proximity to Kettering to be considered accessible. Therefore, this would not preclude allocation or subsequent development of the site.

12.5. Another constraint identified the need for further assessment of potential archaeological features on the site. Consultation with NCC Archaeology indicated that this is unlikely to preclude development of the site, but an assessment was required to identify any mitigation prior to development, hence the inclusion of criterion g) of Policy PYT2.

*Question 2 - Are there any significant factors that indicate that any sites/parts of sites should not have been allocated?*

10.6. The Council is confident that there are no significant factors, identified through the site assessment process that would indicate that this site or any part of the site should not have been allocated.
Question 3 - Are the sites viable and deliverable? Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery?

10.7. The Viability Assessment of the SSP2 (VIA1) sought to assess the viability of the site. However, the approach taken for the assessment, as guided by PPG, was not to individually assess each site but to identify typologies based on ‘location, whether brownfield or greenfield, size of site and current and proposed use or type development’ as set in paragraph 5.5, as referenced on page 21 of VIA1 and in response to question 4 of Matter 3 (Infrastructure and Viability). As a result, Aspinall Verdi, identified 15 different typologies, across the three value zones, and split by their brownfield/greenfield status and site yield.

10.8. Through the assessment of policies in PKB1, VIA1 found that Policy PYT2 had ‘Low’ impact on viability as shown in Appendix 2 of VIA1. The testing showed that greenfield development in the higher value area is viable in paragraph 9.8. Where the 40% requirement for affordable housing can be alongside other policy requirements, such as those required by the JCS, including water offset costs and accessible housing standards. A surplus for this type of development is also available.

10.9. This site has been included within Appendix 1 (SSP2 Housing Site Schedule) Housing Land Supply Background Paper – 2019 (HOU1). The justification for its inclusion is set out in the schedule. In accordance with the NPPF and PPG, this site is considered ‘deliverable’, given that it is considered a suitable location for development and also benefits from having a willing landowner who is prepared to release the site for development. As set out above, the timescale of anticipated delivery shown in the aforementioned Site Schedule (HOU1) have been informed by site promoters.

10.10. The justification for the entry for this site within Appendix 1 HOU1, states that ‘The site is an emerging allocation in the SSP2 so has been assessed as a suitable location for development. Site could be viably developed at the point of time envisaged. Information provided by the site promoter has been used to inform the site schedule’.

Question 4 - How were the site capacities determined? What assumptions have been made? Are these justified?

10.11. Densities of both 15dph (8 dwellings) and 30dph (15 dwellings) were considered in the early stages of the site assessment process. However, through discussions with the site promoter, the Council considered that the lower density scheme for 8 dwellings was the most appropriate for the site.

Question 5 - What is the current planning status of the site?

10.12. There is currently no active planning permission on this site.
Question 6 - What benefits would the proposed development bring?

10.13. The provision of a housing development that responds to local vernacular and which reflects the linear pattern of development of the village as well as providing additional housing for the village, will provide significant benefits. Development of this site can also contribute in progressing improvements in the village as set out in criterion e) of Policy PYT1.

10.14. A representation (comment ID 171) was received through consultation on PKB1, which objected to the allocation of this site on the basis that it is not consistent with Policy PYT1 and the scale of development does not allow the facilitation of the proposed improvements in the village. The Council consider that the site assessment process sufficiently considered the suitability and proposed yield of the site and is confident that the approach to allocating this site in the village is sufficiently robust and thorough based on robust evidence.

Question 7 - What are the potential adverse impacts of developing the site and how might they be mitigated?

10.15. The Council considers that there are no potential adverse impacts associated with the development of this site.

Question 8 - Would the Modifications proposed by the Council address any shortcomings?

10.16. Only one MM (86) has been proposed for Policy PYT2. This is not to address any shortcomings but to add a reference in the policy text to the policies map, to provide clarity on the geographic location of the site.

Question 9 - What is the expected timescale and rate of development and is it realistic?

10.17. The table below indicates the estimated timescales for delivery as set out in the Housing Site Schedule from HOU1. This is based on the most up to date information from the site promoter and is therefore considered realistic. This site is expected to deliver housing in the middle of the remaining plan period.

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Question 10 - Is the boundary of the site appropriate? Is there any justification for amending the boundary?

10.18. The site boundary remains the same as that which was originally proposed by the site promoter. There has been no scope to amend this original boundary, given that it is considered to be appropriate.
Question 11 - Are the detailed policy requirements for each site, effective, justified and consistent with national policy? Are they needed when some of the sites already have planning permission?

10.19. The policy requirements for the site have been collated following the findings of the site assessment, where the various criteria have been assessed through consultation with statutory consultees as well as based on solely the Council’s informed judgement.

10.20. The assessment required by criterion e) has been based on advice from the relevant statutory consultees in relation to surface water drainage. The other criteria are considered important in this policy to ensure that development of the site reflects and is sympathetic to its local context as well simultaneously seeking to achieve a high quality development which benefits the local community. Criterion a) has been included to ensure that on-site turning is provided for properties which front onto Isham Road, to reflect comments received from NCC Highways.

10.21. The Council considers the policy requirements included within Policy PYT2 to be effective, justified and consistent policy.

11. **STA2 Land to the south of Harborough Road, Stoke Albany**

Question 1 - Are the housing allocations appropriate and justified in light of the potential constraints, infrastructure requirements and adverse impacts?

11.1. This site has been subject to a site assessment using a consistent methodology throughout the preparation of the SSP2. This methodology was first set out in the [Housing Allocations Background Paper (2012)](#). This process sought to ensure the sites that identified as allocations in PKB1 would be most suitable and appropriate to meet the residual housing requirement as set out in Table 4.3 of [PKB1] and [HOU1]. Whilst simultaneously identifying potential constraints, infrastructure requirements and any requirements for the mitigation of any adverse impacts.

11.2. Appendix 3 of the Housing Allocations Background Paper – 2018 ([HOU6](#)) provides a summary assessment sheet for this site. The information included in these is sourced from more detailed assessments undertaken by the Council. A summary of all the scores for this site can be found within Appendix 2 of [HOU6](#).

11.3. The first constraints identified through the site assessment of the site was the loss of the hedgerow on Harborough Road and the impact on the adjacent conservation area. Therefore criteria a) and j) have been included to address these issues. The other constraint identified through the site assessment process was access. Previous comments from NCC Highways indicated that this a major constraint which would prevent the progression of the site through the SSP2. However, through the most recent consultation with NCC Highways
through the site assessment process, mitigation measures where identified to overcome this constraint, hence the inclusion of criterion b), in Policy STA2.

**Question 2 - Are there any significant factors that indicate that any sites/parts of sites should not have been allocated?**

11.4. The land is a triangular shaped area of grassed paddock, with frontage onto Harborough Road. The full area was originally allocated and consulted upon through the Plan. Through the Publication Plan consultation, a response was received seeking to reduce the area of the allocation. A planning application was submitted in June 2020, seeking permission for 16 dwellings on part of the site. The land excluded was a small area of paddock in the south-west corner. This land was initially identified for allotments but was subsequently removed after the applicant’s pre-application consultation had indicated a need for this use could not be found. To address the potential resultant anomaly with the village boundary, the Council suggested a MM49 to remove that part of the site and ensure consistency.

11.5. Through the assessment of the application, the Council’s Design Panel has expressed concern over the exclusion of the paddock from the development, stating that this area is not of a size which would allow it to be used for grazing, and has no natural surveillance from the development, potentially encouraging anti-social behaviour. The same concerns over the lack of natural surveillance was identified for the area of open space forming a part of the application.

11.6. The applicant is seeking to find a solution, which will include the paddock land within the site, increasing the site yield, open space provision, and overcoming the concerns expressed with regards design. The Council is willing to explore with the developer how this can be achieved, by reverting to the initial site boundary and increasing the yield. The Council is confident that there are no significant factors, identified through the site assessment process that would indicate that this site is not suitable for allocation, and propose to update the Inspector at the hearings on the progress being made with an indicative layout plan for the full site area.

**Question 3 - Are the sites viable and deliverable? Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery?**

11.7. The Viability Assessment of the SSP2 (VIA1) sought to assess the viability of the site. However, the approach taken for the assessment, as guided by PPG, was not to individually assess each site but to identify typologies based on ‘location, whether brownfield or greenfield, size of site and current and proposed use or type development’ as set in paragraph 4.37, as referenced on page 21 of VIA1 and in response to question 4 of Matter 3 (Infrastructure and Viability). As a result, Aspinall Verdi, identified 15 different typologies, across the three value zones, and split by their brownfield/greenfield status and site yield.
11.8 Through the assessment of policies in PKB1, VIA1 found that Policy STA2 had ‘Low’ impact on viability as shown in Appendix 2 of VIA1. The testing showed that greenfield development in the higher value area is viable in paragraph 9.8. Where the 40% requirement for affordable housing can be alongside other policy requirements, such as those required by the JCS, including water offset costs and accessible housing standards. A surplus for this type of development is also available.

11.9 This site has been included within Appendix 1 (SSP2 Housing Site Schedule) Housing Land Supply Background Paper – 2019 (HOU1). The justification for its inclusion is set out in the schedule. In accordance with the NPPF and PPG, this site is considered ‘deliverable’, given that it is considered a suitable location for development and also benefits from having a willing landowner who is prepared to release the site for development. As set out above, the timescale of anticipated delivery shown in the aforementioned Site Schedule (HOU1) has been informed by site promoters.

11.10 The justification for the entry for this site within Appendix 1 HOU1, states that ‘The site is an emerging allocation in the SSP2 so has been assessed as a suitable location for the type of development proposed. Site could be viably developed at the point of time envisaged. Information provided by the site promoter has been used to inform the site schedule’.

Question 4 - How were the site capacities determined? What assumptions have been made? Are these justified?

11.9. Densities of both 15dph (23 dwellings) and 30dph (45 dwellings) were considered in the early stages of the site assessment process. However, through discussions with the site promoter, a frontage development of approximately 16 dwellings was suggested. The Council considered this to be appropriate and the site assessment of the site was subsequently based on this figure.

Question 5 - What is the current planning status of the site?

11.10. An application for planning permission for this site for 16 dwellings was received in June 2020. The Council is in discussions with the applicant to resolve design issues associated with the scheme. This may lead to the withdrawal of the existing application, and resubmission for a larger site, and an increase in yield. A further update will be made available at the Examination Hearings.

Question 6 - What benefits would the proposed development bring?

11.11. The provision of a housing development that responds to local vernacular and which reflects the linear pattern of development of the village on Harborough Road as well as providing additional housing for the village, will provide significant benefits, including a proportion of affordable housing in accordance with Policy 30 of the JCS and criterion l) of Policy STA2. The site also has the
opportunity to provide a significant area of open space along the southern boundary of the site adjacent to the A427. This has the potential to benefit the village as a whole, rather than the occupants of the site, solely. Development of this site can also contribute in progressing improvements in the village as set out in criteria a) and g) of Policy STA1.

11.12. A development of this scale could also require developer contributions, through a s.106 agreement which has the potential to provide both on-site and off-site contributions.

**Question 7 - What are the potential adverse impacts of developing the site and how might they be mitigated?**

11.13. The Council considers that there are no potential adverse impacts associated with the development of this site.

**Question 8 - Would the Modifications proposed by the Council address any shortcomings?**

11.14. MM87 does not address any shortcomings but adds a reference in the policy text to the policies map, to provide clarity on the geographic location of the site. MM41 seeks to respond to representations made by the site promoter ([comment ID 228](#)) during consultation on the Publication Plan ([PKB1](#)) regarding the content of the criteria in Policy STA2. The specific criterion which the Council has sought to amend in light on these comments are criteria c) and g), in relation to traffic assessments and allotments, respectively. Sufficient justification through the representations for these changes have been provided.

11.15. In addition, an area within the original site allocation boundary was identified as surplus, given that it would not contribute to the provision of residential development on the site, as required by Policy STA2. Therefore, as requested by the site promoter the site allocation boundary and the settlement boundary have been amended as shown in Table 3 of [EXAM2D](#). This is discussed further in response to Question 10, for this site, below. As set out in response to question 2, an issue has arisen through the planning application process with respect to the scheme design. The Council propose to delete MM49 from it’s submission to the Inspector, and following discussions with the applicants propose the removal of the suggested MM49 which reverts to the initial site boundary, and increase the site yield with an additional Main Modification. 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.

11.16. The remaining MM (42) addresses comments by a representation made by the Environment Agency ([comment 242](#)) whereby criterion e) is proposed to be amended to provide consistency with related policy requirement in other site allocations in the Plan.
Question 9 - What is the expected timescale and rate of development and is it realistic?

11.17. The table below indicates the estimated timescales for delivery as set out in the Housing Site Schedule from HOU1. This is based on the most up to date information from the site promoter and is therefore considered realistic. This site is expected to deliver housing in the middle of the remaining plan period. Although it is recognised that if the current planning application is approved that the delivery of the site may be sooner than initially anticipated, below.

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Question 10 - Is the boundary of the site appropriate? Is there any justification for amending the boundary?

11.18. As detailed in response to question 2 above, a Main Modification is to be proposed which clarifies the site area and increases its yield. The justification for this came about through considerations made in assessing the site through planning application number KET/2020/0385.

Question 11 - Are the detailed policy requirements for each site, effective, justified and consistent with national policy? Are they needed when some of the sites already have planning permission?

11.19. The policy requirements for the site have been collated following the findings of the site assessment, where the various criteria have been assessed through consultation with statutory consultees as well as based on solely the Council’s informed judgement.

11.20. The assessment required by criteria h) and i) have been based on advice from the relevant statutory consultees in relation to surface water drainage and flood risk. The other criteria are considered important in this policy to ensure that development of the site reflects and is sympathetic to its local context as well simultaneously seeking to achieve a high quality development which benefits the local community, such as criteria a), e), g) and k). Criterion b) has been included to ensure the levels of traffic on Harborough Road aren’t at a level which would make access from the site unsafe. Also, criterion d) and f) have been included to identify the impact of contamination and noise, respectively.

11.21. The Council considers the policy requirements included within Policy STA2 to be effective, justified and consistent policy.

12. **WES2 Home Farm, Weston by Welland**
Question 1 - Are the housing allocations appropriate and justified in light of the potential constraints, infrastructure requirements and adverse impacts?

12.1. This site has been subject to a site assessment using a consistent methodology throughout the preparation of the SSP2. This methodology was first set out in the Housing Allocations Background Paper (2012). This process sought to ensure that the sites identified as allocations in PKB1 would be most suitable and appropriate to meet the residual housing requirement as set out in Table 4.3 of PKB1 and HOU1. Whilst simultaneously identifying potential constraints, infrastructure requirements and any requirements for the mitigation of any adverse impacts.

12.2. Appendix 3 of the Housing Allocations Background Paper – 2018 (HOU6) provides a summary assessment sheet for this site. The information included in these is sourced from more detailed assessments undertaken by the Council. A summary of all the scores for this site can be found within Appendix 2 of HOU6.

12.3. The first constraint identified through the site assessment of the site was the impact on the conservation area and listed buildings within the village. Therefore, criterion a) has been included to address this issue.

12.4. Another constraint identified through the site assessment of the site is accessibility and distance to facilities and employment, however it is not considered this would preclude allocation or subsequent development of the site.

Question 2 - Are there any significant factors that indicate that any sites/parts of sites should not have been allocated?

12.5. The Council is confident that there are no significant factors, identified through the site assessment process that would indicate that this site or any part of the site should not have been allocated.

Question 3 - Are the sites viable and deliverable? Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery?

12.6. The Viability Assessment of the SSP2 (VIA1) sought to assess the viability of the site. However, the approach taken for the assessment, as guided by PPG, was not to individually assess each site but to identify typologies based on “location, whether brownfield or greenfield, size of site and current and proposed use or type development” as set in paragraph 5.5, as referenced on page 21 of VIA1 and in response to question 4 of Matter 3 (Infrastructure and Viability). As a result, Aspinall Verdi, identified 15 different typologies, across the three value zones, and split by their brownfield/greenfield status and site yield.
Through the assessment of policies in PKB1, VIA1 found that Policy WES2 had ‘Low’ impact on viability as shown in Appendix 2 of VIA1. The testing showed that greenfield development in the higher value area is viable in paragraph 9.8. Where the 40% requirement for affordable housing can be alongside other policy requirements, such as those required by the JCS, including water offset costs and accessible housing standards. A surplus for this type of development is also available.

This site has been included within Appendix 1 (SSP2 Housing Site Schedule) Housing Land Supply Background Paper – 2019 (HOU1). The justification for its inclusion is set out in the schedule. In accordance with the NPPF and PPG, this site is considered ‘deliverable’, given that it is considered a suitable location for development and also benefits from having a willing landowner who is prepared to release the site for development, demonstrated through the existing planning permission on the site. As set out above, the timescale of anticipated delivery shown in the aforementioned Site Schedule (HOU1) has been informed by site promoters.

The justification for the entry for this site within Appendix 1 HOU1, states that ‘Emerging allocation with pending planning application KET/2018/0767, Full Application scheduled to be determined August 2019. Clear evidence that site is available and deliverable within five years’.

Question 4 - How were the site capacities determined? What assumptions have been made? Are these justified?

Densities of both 15dph (11 dwellings) and 30dph (22 dwellings) were considered in the early stages of the site assessment process. However, through discussions with the site promoter, the Council considered that a lower density scheme for 10 dwellings was the most appropriate for the site.

Question 5 - What is the current planning status of the site?

Planning permission for 10 dwellings on this site was granted on 19th December 2019.

Question 6 - What benefits would the proposed development bring?

The provision of a housing development that responds to local vernacular and which reflects the pattern of development in the village as well as providing additional housing for the village, will provide significant benefits, including a proportion of affordable housing in accordance with Policy 30 of the JCS and criterion e) of Policy WES2. Development of this site can also contribute in progressing improvements in the village as set out in criteria l) of Policy WES1 as well as improving the aesthetics of the site benefiting the village given that the site is currently a used agricultural holding.
12.13. A development of this scale could also require developer contributions, through a s.106 agreement which has the potential to provide both on-site and off-site contributions.

Question 7 - What are the potential adverse impacts of developing the site and how might they be mitigated?

12.14. The Council consider that there are no potential adverse impacts associated with the development of this site.

Question 8 - Would the Modifications proposed by the Council address any shortcomings?

12.15. Only one MM (88) has been proposed for Policy WES2. This is not to address any shortcomings but to add a reference in the policy text to the policies map, to provide clarity on the geographic location of the site.

Question 9 - What is the expected timescale and rate of development and is it realistic?

12.16. The table below indicates the estimated timescales for delivery as set out in the Housing Site Schedule from HOU1. This is based on the most up to date information from the site promoter and is therefore considered realistic. This site is expected to deliver housing in the shorter term given it benefits from planning permission.

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Question 10 - Is the boundary of the site appropriate? Is there any justification for amending the boundary?

12.17. The site boundary remains the same as that which was originally proposed by the site promoter. There has been no scope to amend this original boundary, given that it is considered to be appropriate.

Question 11 - Are the detailed policy requirements for each site, effective, justified and consistent with national policy? Are they needed when some of the sites already have planning permission?

12.18. The policy requirements for the site have been collated following the findings of the site assessment, where the various criteria have been assessed through consultation with statutory consultees as well as based on solely the Council’s informed judgement.
12.19. The assessment required by criteria d), f) and h) have been based on advice from the relevant statutory consultees in relation to surface water drainage and flood risk. The other criteria are considered important in this policy to ensure that development of the site reflects and is sympathetic to its local context as well simultaneously seeking to achieve a high quality development which benefits the local community, such as criteria a), b), and c). Criterion a) is supported by Historic England (comment ID 117).

12.20. The Council considers the policy requirements included within Policy WES2 to be effective, justified and consistent policy.

MAW2 Land west of Mawsley (50)

13. Question 12: Is the housing proposal justified and appropriate in light of the potential constraints including flood risk and highway safety? Does the wording of criterion I address the concerns of Natural England in relation to the nearby SSSI?

13.1. The housing proposal is justified in light of the constraints relating to flood risk and highway safety. The site assessment process has involved a robust assessment of sites, as set out in the Council’s response to Matter 2, Question 4, which has taken into account constraints identified on sites when selecting the most appropriate site allocations.

13.2. The Strategic Flood Risk Assessment (ENV14) assessed this site as ‘site deliverable in flood risk management terms, providing the site-specific considerations as incorporated into the policy of the site’. The requirements for a site specific assessment of surface water and ground water flooding set out in Table 8 of ENV14 have been included in Policy MAW2 to address this.

13.3. Table 8 of ENV14 identifies that the site is in flood zone 1 but there is a high risk of surface water flooding due to a significant flow path across centre of the site plus other areas at low risk of ponding and in terms of ground water the south-eastern half of the site is at high risk and remainder of site at very low risk from spring flow. Table 8 of ENV14 sets out the flood risk assessments required to be undertaken, these are required through Policy MAW2, paragraph 13.109 of the SSP2 provides detail of the requirements in relation to the assessment.

13.4. NCC Highways have been consulted throughout the site assessment process and the requirements of Policy MAW2 to provide a loop road with a maximum capacity of 50 dwellings to ensure that the allocation is acceptable in terms of providing safe access. A transport assessment is also required through Criteria k of the policy.

13.5. The response received from Natural England (representor id 49, comment no 129) requested an amendment to the wording of Policy MAW2 and a commitment to be included in the policy to provide a CEMP. The Council has
responded to this comment in the 'Regulation 20: Representations with Council’s response'. The Council considers the wording of the policy is sufficient to ensure that mitigation is informed by the assessment required by Policy MAW2 criteria I.

14. Conclusion

14.1. The suitability of these sites has been assessed using a consistent, robust methodology and therefore these sites are deemed suitable for meeting the housing requirement set out in Policy 30 of the JCS.

14.2. The site assessment process has identified a number of constraints, although through consultation with statutory consultees. These constraints are not considered significant and where necessary mitigation has been provided through criteria in the policies which allocated these sites for housing. These sites are considered both viable and deliverable as shown in VIA1 and HOU1. The delivery of these sites also has the potential to deliver significant benefits to rural settlements.

14.3. The housing allocations identified in the Rural Areas are considered to be soundly based.
Appendix 1 – List of reference documents

EXAM2D - Schedule of Proposed Changes to the Publication Plan
PKB1 – SSP2 Publication Plan
HOU1 – Housing Land Supply: Background Paper
HOU5 - Housing Allocations Background Paper - Update
HOU6 – Housing Allocations: Background Paper
Housing Allocations Background Paper 2012
HOU8 - Housing Allocations - Assessment of Additional Sites and Update consultation
HOU9 - Housing Allocations: Background Paper
VIA1 – Site Specific Part 2 Local Plan Viability Study
ENV13 - Level 2 Flood Risk Assessment for Duck End Cranford
ENV14 – Kettering Strategic Flood Risk Assessment Level
Cranford Housing Needs Survey (2016)
CON2 - Regulation 20 Consultation Representations and Council's response