Dear Ms Worthington,

Kettering Site Specific Part 2 Local Plan – Areas of Work following the Hearing Sessions

1. Further to your letter dated 6th November 2020 regarding the areas of work to be provided following the hearing sessions, this work has now been completed and is detailed in this letter and attached documents.

2. This letter details the work which has been undertaken and is accompanied by an Interim Table of Main Modifications at Appendix 1 which provides a consolidated version of modifications contained in previous schedules, those discussed at the hearing sessions and in the post hearing session list of areas of work set out in our letter, document reference EXAM16, and your letter document reference EXAM17.

3. Below I have detailed how the areas of work for each hearing session have been addressed and provide detail on the areas where it was requested that the Council give further consideration to specific policies or sections of the document.

Matter 1:

4. Modifications are provided in the Interim Table of Main Modifications.

Matter 2:

5. Modifications are provided in the Interim Table of Main Modifications. Paragraph 3 of EXAM17 requested the Council give further consideration to the approach to re-development and previously developed land in the countryside and to the relationship between Policies RS3 and RS4.
6. The Council has considered the approach to re-development and previously developed land in the countryside, including the re-development of non-historic buildings.

7. Policy 11 of the JCS details the sorts of development that are permissible in the rural areas. This allows for:
   - Rural diversification and the appropriate re-use of rural buildings in accordance with Policy 25
   - Renewable energy developments in accordance with Policy 26
   - Other forms of development will be resisted unless there are special circumstances as set out in Policy 13 or national policy.

8. The use of previously developed land is addressed by Policy 6 of the JCS. This seeks to maximise the delivery of development through the reuse of suitable previously developed land and buildings within the urban areas.

9. Policy 25 provides support for proposals which offer sustainable opportunities to develop and diversity the rural economy and Policy 13 sets out the exceptional circumstances in which residential development may be permitted in the open countryside. These policies would apply to previously developed land.

10. There are not significant areas of previously developed land located in the open countryside in Kettering Borough. Therefore, the approach set out in the JCS is adequate to deal with previously developed land in the open countryside.

11. It is considered that no further change is required in the SSP2 to the approach to redevelopment and previously developed land because the sorts of development that are permissible in the rural areas are defined and constrained by Policy 11 of the JCS.

12. Taking into account the approach to development in the open countryside set out in the JCS, Policies RS3 and RS4 have been considered in more detail. Given the exceptions set out in Policy 13 and Policy 25 it is not considered necessary to differentiate between Category 3 settlements and the Open Countryside, particularly given the difficulty in defining where Policy RS3 would apply and where Policy RS4 would apply without a defined settlement boundary. It is considered that the approach set out in Policy RS4, which links to JCS Policies 13, 25 and 26 and national policy is adequate and should be applied to development in Category 3 settlements. An amendment has been proposed to address this in the Interim Table of Main Modifications.

Matter 3
13. No additional areas of work.

Matter 4

14. Modifications are provided in the Interim Table of Main Modifications.

Matter 5

15. Modifications are provided in the Interim Table of Main Modifications.

Matter 6

16. Modifications are provided in the Interim Table of Main Modifications. A note to update on progress made and commencement of BLA6 is attached at Appendix 2.

Matter 7

17. Modifications are provided in the Interim Table of Main Modifications.

Matter 8

18. Modifications are provided in the Interim Table of Main Modifications.

19. Consideration has been given to whether paragraph 4.16 should be removed. It is considered that this paragraph needs to remain, it is proposed that this paragraph is extended to explain the local issues and the journey of the policy to provide justification for the policy provision. A proposed modification is shown in the Interim Table of Main Modifications.

20. Paragraph 4 of EXAM17 requested that the Council consider what Policy HOU5 intends to deal with and to clarify what the policy adds over and above JCS Policy 13.

21. Policy HOU5 seeks to deal with single plot affordable self-build housing, Policy 13 of the JCS enables local housing needs to be met on schemes adjacent to village boundaries, this could include self-build or custom build schemes. However, Policy HOU5 seeks to particularly encourage individual self-build exceptions schemes to enable local people to build their own affordable home. An amendment is proposed to the supporting text in the Interim Table of Main Modifications to provide clarification on the purpose of the policy and to provide the justification for its inclusion.

22. The list of areas of work set out in EXAM16 included the deletion of the first bullet point of HOU5, however having considered this further, and in light of the amendments to the supporting text discussed above it is considered this bullet
point is important to the policy as this is one of the key requirements of a self-build property.

**Matter 9**

23. Modifications are provided in the Interim Table of Main Modifications.

**Matter 10**

24. Modifications are provided in the Interim Table of Main Modifications.

25. Paragraph 5 of EXAM17 requested that the role of the SUE’s District and Local Centres is considered in the plan and that the approach to the sequential and impact tests in light of Policy 12 is considered.

26. Proposed modifications are included in the Interim Table of Main Modifications to clarify the role of the Local and District Centres. Modifications are also proposed to the supporting text for Policies TCE5 and TCE6 to clarify the approach to the sequential and impact tests in light of Policy 12. This was discussed with officers from the North Northants Joint Planning and Delivery Unit and it is considered that the exception set out in Policy 12 of the JCS just applies to Local Centres.

**Matter 11**

27. Modifications are provided in the Interim Table of Main Modifications. Paragraph 7 of EXAM17 requested that the criteria for this policy be re-assessed to ensure it is clear how a planning application should be judged. Modifications are proposed in the Interim Table of Main Modifications to address this.

28. The work undertaken in relation to Policy HWC2 resulted in the need to review the purpose of the final paragraph of the Policy to ensure it added local detail to Policy 7 of the JCS.

29. Policy HWC3 has been comprehensively reviewed as requested in paragraph 7 of EXAM17 and modifications are provided in the Interim Table of Modifications. The definition of major development is set out within the glossary.

**Matter 12**

30. Modifications relating to Local Flood Risk Management (NEH1), Green Infrastructure (Policy NEH2), Historically and Visually Important Local Green Spaces (NEH3), and Open Spaces (NEH4) are all provided in the Interim Table of Main Modifications.
31. A note to respond to your request for more evidence to respond to the points you raised in your letter dated 6th November 2020, and exhibited at EXAM 17, and expressed at the Matter 12 hearing session is also provided for your deliberation at Appendix 3.

Matter 13

32. Modifications are provided in the Interim Table of Main Modifications. Paragraph 8 of EXAM 17 requested that the purpose and overlap of policies RS1-5 is reviewed and that the tiers of policy, including JCS Policy 8 and the general, village specific and site specific development principles, be reviewed to ensure that the purpose of policies is clear and to ensure applicants are aware of which policies would apply. It was also requested that the inclusion of criterion h of Policy RS5 be justified.

33. Policies RS1 to RS5 have been reviewed and additional supporting text has been added to explain the purpose of the policies and to set out how these should be applied. Policy RS5, the village specific development principles and the site allocation policies have been reviewed and duplicate or overlapping criteria have been removed.

34. A modification has been proposed in the Interim Table of Main Modifications to delete criterion h of Policy RS4, on balance it is considered that criteria i encourages consideration to be given to non-residential uses first and enables the provision of employment to be considered, this is considered to be adequate without the requirement in criteria h.

35. EXAM16 set out that consideration should be given to whether Policy RS5 should be before RS1-4. Additional wording has been proposed in the Interim Table of Main Modifications to explain the approach to these policies, Policies 1-4 categorise the villages, Policy RS5 then sets out general development principles, this then leads into the more detailed village and site specific development principles in the following sections. Therefore, it is not considered that RS5 should be before RS1-4.

Matter 14

36. Modifications are provided in the Interim Table of Main Modifications.

If you have any questions in relation to the contents of this letter or attachments or require any further information, please let me know.

Yours sincerely

J Baish
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