

Comments

Site Specific Part 2 Local Plan - Main Modifications Consultation (19/03/21 to 30/04/21)

Comment ID	42
Response Date	28/04/21 11:29
Status	Processed
Submission Type	Web
Version	0.1

Please use a separate form for each representation.

Which Main Modification, change to the Policies Map or section of the Sustainability Appraisal Report Addendum or Habitat Regulations Assessment Addendum does your comment relate to?

MM92 Representation 1

Please use a separate form for each representation.

Representation

The target for Policy GRC2 at table 15.1, page 169 is changed from: "*By 2031 deliver 15 dwellings at Land to the north of Loddington Road*" to "*By 2028 deliver 15 dwellings*". Although this simple deletion of the site may appear at first glance to be benign, it carries the risk of being interpreted as a change from an aspirational site yield to a housing target for the settlement.

Additionally, whereas at SSP2 Section 13, Policy GRC2 states; "*The site will provide between 10 and 15 dwellings*", at Table 15.1 the target has been changed to; "*By 2028 deliver 15 dwellings*". It is suggested that to be consistent with Policy GRC2, Table 15.1 should be changed to "*By 2028 deliver between 10 and 15 dwellings*".

However, this increased housing target raises a number of points:

Is there now a target of 15 dwellings for Great Cransley?

If site RA/146 under delivers on this number as is expected, will this provide an opening for opportunistic 'Market' housing development to make up the shortfall at another site or sites? Noting of course that sites of less than 11 dwellings require no affordable housing to be delivered. Whereas site RA/146 was initially justified by KBC to meet a need for affordable housing and this affordable housing justification repeats through most of the SSP2 timeline, the housing target for this site is now for 'Market' housing, with no justification as to why.

The Neighbourhood Plan Steering Group Housing Needs Assessment has since confirmed the need for affordable housing and that there is no need for additional 'Market' housing. This Housing Needs Assessment was submitted prior to the Examination in Public. KBC (now NNC) have failed to acknowledge this Housing Needs Assessment when producing their Major Modifications.

The Great Cransley Neighbourhood Plan steering group are currently assessing sites for the 4 to 6 affordable two-bedroom houses already shown as being needed. The preliminary site assessments have shown there are only a small number of sites with potential to achieve this level of development without developing potentially large sites remote from the core of the village. All of these smaller sites have constraints of varying degrees and site RA/146 is one of these smaller sites with identified constraints. Initial site assessment indicates that site RA/146 may be suitable for up to six semi-detached affordable houses after vehicle access, parking and road safety measures are addressed.

If the SSP2 allocates site RA/146 as indicated by KBC (NNC) and it would almost certainly be for market housing, then one or two more of our potential small sites would be required for the remainder. With land for market housing attracting a higher premium than land for affordable housing, this would create a major obstacle to securing a willing landowner for affordable housing. The end result being a major disincentive to proceed any further with the neighbourhood plan.

The insistence by KBC (NNC) to continue to designate site RA/146 for up to 15 houses after the Examination in Public during October 2020 has triggered further research into the background on this matter. Further to my SSP2 Representation No. 41 dated 7 Feb 2020 and my Additional Representation dated 31 Aug 2020, the following has come to light.

Please refer to the Planning Policy Meeting dated Wednesday 19 April 2017

https://www.kettering.gov.uk/meetings/meeting/1541/planning_policy_committee

Appendix 1 - Rural Area Housing Options Sect 6 (page 11) discusses the Great Cransley site. Whereas the Housing Allocation Assessment of additional sites and update, dated October 2013 identified the potential yield of site RA/146 as 6 to 8 dwellings, this seems to have been increased sometime later to 10 to 15 dwellings. The Officers presenting to the committee at this meeting are named.

The Planning Policy Committee meeting of 23 November 2016 is referred to, see:

file:///C:/Users/rnjic/Downloads/Minutes%20(1).pdf

The section on Great Cransley at page 10 quotes; *“For site RA/146, two options had been proposed, for 10-15 dwellings, the lower yield scheme being linear along Loddington Road, with the 15 dwelling scheme being a higher density scheme. However, at this stage it was considered that linear development of the site for the 10 dwellings proposal was more appropriate as it would match more closely with previous indicators of the potential yield for this site. Further discussions would be required with the site promoters in terms of the amount of affordable housing in the light of the change to national planning policy.”*

At this time, November 2016, it seems a 10-dwelling scheme was preferred, it having been increased from the original 6 to 8 dwelling scheme. Returning to the 19 April 2017 meeting, Appendix 1 para 6.3 states; *“As previously reported, two options for the site have been proposed, the first is for 10 and the second is for 15 dwellings. The former scheme for 10 dwellings, which is proposed to be linear development of Loddington Road and a continuation of existing residential development could be preferable. However, given the existing threshold for affordable housing in the JCS of 40% of dwellings in the rural area, this would apply to the site if it were to come forward for 11 or more dwellings. Great Cransley has also been identified as a settlement where there is a need for this type of housing.”*

This would seem to be a weak argument for a higher housing density since any reasonable planning application for a development for less than the 11 dwellings threshold for Market housing on this small site would almost certainly be approved by the Planning Committee or if not, would be approved by a Planning Inspector on Appeal, especially if it could be shown that a higher housing density was unfeasible. Additionally, it is difficult to imagine that any experienced Planning Officer could believe that developers would present a scheme for 11 houses to include 40% affordable houses when a 10-house scheme or less would not be required to deliver any affordable houses.

Appendix 1 para 6.4 states; “*Therefore, it is recommended that the site is allocated for up to 15 dwellings, given that there are no major constraints identified on this site and it would assist with the delivery of affordable housing to benefit the community. This can be specified in the draft allocation policy/ development principles for the site.*”

One can only surmise that increasing the site yield was all about achieving housing targets with affordable housing delivery simply a smokescreen. There is no evidence that a site visit or proper site assessment has ever been made.

Para 6.4 states specifically that; “*given there are no major constraints identified on this site....*” without providing any evidence of a site survey to demonstrate that doubling the site yield is feasible. My evidence previously submitted clearly demonstrates that such a high density is totally unfeasible. This includes the withdrawn planning application for 9 dwellings KET/2020/0278 and consultation responses that demonstrate even 9 dwellings is unfeasible given the site constraints. These constraints include:

- The need for off road vehicle turning space and parking for residents and visitors.
- Road safety measures as the site is located on a blind corner
- Provision of a footpath on that side of Loddington Road
- The loss of medieval ridge and furrow
- The loss of protected hedgerow
- The site elevation being 2m above Loddington Road as the road runs in a cutting past the site
- It would be impossible to comply with SSP2 Policies GRC1 and GRC2 with such a high housing density.

The minutes of the Planning Policy Meeting of the 19 April 2017 show that the committee approved the resolution based on the planning officer recommendation, but noting that; “*No significant issues were identified.*”

By claiming there are no major constraints to site RA/146 when clearly there are, would indicate that the Planning Committee Councillors were misled by the Planning Officers. Having made this error during 2017 it was apparent to me during questioning by the Inspector during the October 2020 Examination in Public, that the Planning Officers were not going to concede to any error and continue to defend a housing density that is both totally unfeasible for this site and is double what should normally be realised in a rural setting. For comparison, the Neighbourhood Plan site assessment indicates that six semi-detached affordable houses would be the appropriate yield for site RA/146.

For comparison purposes the Kettering district Category A village housing allocations have been tabulated at Table 1 using data available in the SSP2 and is shown below:

The following is apparent from Table 1:

Two sites, RA146 for Great Cransley and RA/170 (affordable housing) for Cranford stand out as having a significantly higher DPH (34.9 and 35.0 respectively) than the other sites. These sites vary from 5.6 to 19.2 DPH.

Only 8 out of 16 Cat A villages are allocated housing yet some villages without any housing allocations are significantly larger than Great Cransley and by all measures should be considered as more sustainable settlements in having more local facilities, e.g., Loddington, Rushton, Wilbarston. Great Cransley by comparison has no shops, no school, no pub or restaurant and no bus service so should rate low regarding sustainability.

Table 1 - Category A Village Housing Allocations

Category A Village	Population @ 2011 Census*	Housing Target	Site Allocated	Area Ha*	No. Houses	Density DPH
Ashley	224	None				
Braybrooke	378	3	RA/128	0.54	3	5.6
Broughton ***	2,208	N Plan				
Cranford (St Andrew + St John)	422	16 **	RA/170	0.17	6 **	35.0
			RA/173	0.59	10 **	16.9
Geddington	1,503	31	RA/107	0.92	10	10.9
			RA/109	1.35	11	8.1
			RA/110	0.8	10	12.5
Great Cransley	305	15	RA/146	0.43	15	34.9
Harrington	146	None				
Loddington	520	None				
Mawsley	2,320	50	RA/174	2.6	50	19.2
Pytchley	489	8	RA/177	0.5	8	16.0
Rushton	461	None				
Stoke Albany	390	18	RA/221	1.5	18	12.0
Sutton Bassett	88 (2001 Census)	None				
Thorpe Malsor	145	None				
Weston by Welland	246	10	RA/136	0.72	10	13.9
Wilbarston	753	None				
*Source: NCC mapping website						
** Affordable Housing						
*** Made Neighbourhood Plan						

Do you wish to be notified?

When the Inspector's Report is published?