

## Section 1 – Introduction and General Comments

### Summary of Comments

#### **Objections**

Strongly disagree (21)

#### **Issues raised/ comments:**

##### **General locations**

- Sites should be located in the middle of nowhere/ away from residential areas/ not in existing built up areas (9)
- Sites should be located by the A14 away from towns or villages (1)
- Concern over concentration of sites in the west of the Borough (1)
- Existing sites should be extended (2)

##### **Alternative locations**

- Council car park should be used instead (1)
- Use the site off Northampton Road instead (1)
- Potential sites: shooting club adjacent to the leisure village, disused land off Wood Lane or on A6003 behind the Harvester. Spare land near BP garages adjacent to the A509 junction with the A14, disused railway just opposite the Woodford turning off the A509 junction.

##### **Need**

- Northamptonshire already has a lot of sites compared to other nearby counties (1)
- Use existing sites which are half empty (1)
- Sites should not be provided (5)

##### **Assessment criteria**

- Study doesn't consider impact on adjacent settlements and therefore sustainability and social impact can't be objectively assessed. (1)
- The SA criteria are heavily weighted towards sites in close proximity to services and facilities and do not take account of 'DCLG Designing Gypsy and Traveller Sites Good Practice Guide or Planning Policy for Traveller sites. The criteria do not take account of cultural differences and do not promote peaceful and integrated co-existence between the site and the local community. (1)
- Weighting system should have been used to rank the sites (1)
- Accessibility – no explanation of how distances were set and why access to these facilities is important (1)
- Public transport – no rating or weighting as to whether a site is on a route or some distance from it (1)
- Criteria are not consistent with NPPF as do not give significant weight to sustainable development. In order to achieve sustainable development brownfield sites that are well connected to existing settlements should be considered first. (1)

**Services and facilities**

- Need to make sure there are schools/ will put pressure on schools (2)

**Archaeology**

- Has an archaeological survey been carried out (1)

**General concerns**

- Property prices will fall (4)
- Why force travellers off land they own and go to the expense of building new sites (1)
- Are quoted local plans still valid? (1)
- Money should be spent on something more important like a speed camera on Northampton Road/ High Street. (1)
- All sites should be considered for housing as there is a housing shortage and housing is sustainable. Only temporary pitches should be provided (1)
- Definition of a 'pitch' unclear (1)
- Integration needs to be given a lot of thought (1)

Desborough Town Council agrees that the current Pastures site, additional 7 pitches (KET/2013/0263) adequately meet the needs for the area. The Town Council and members of the public believe there are enough Gypsy and traveller pitches in the north of the Borough. Further sites should be placed elsewhere.

***Supporting Comments***

Agree (5)

Comments:

- Support for the document but concern that a criteria policy has not been used to select the sites. (1)
- Unclear whether sites will be for sale, for social provision or for private renting or if any are for transit provision. (1)
- Unclear whether the Gypsy and Traveller community have been consulted. (1)
- Planning Policy for Traveller Sites makes it clear that Traveller sites should be strictly limited in the open countryside. It also requires that careful consideration is given to the scale, location and design of traveller sites to ensure all sites are appropriate. We hope KBC pursue their policy of smaller sites across the borough to allow families to live amicably with their neighbours. Current situation of segregation and large isolated sites exacerbates issues. The preferred option is to find sites that are suitable, planned, maintained, managed and budgeted. This is preferable to the current situation where inappropriate sites are bought and occupied and the appeal process is lengthy. (1)
- There is a duty to cooperate to ensure partnership working on strategic planning matters. Hopefully KBC are consulting with neighbours. KBC should be sensitive to communities and make sure none are singly too large and that consideration is given to the cumulative effect. North of the Borough is at capacity. Consideration should be given to making provision

in East Kettering.(1)

Braybrooke Parish Council: Hope that this robust action is the beginning of a fair and firm process that will ensure fair provision and help address the issue of concentration of sites around Braybrooke. We suggest consideration is given to sites within or around the Kettering East SUE. This would reduce impact on existing communities. KBC must set out and enforce conditions when permitting sites.

### **General Comments**

- Should be addressed at county level and adjacent counties not just a KBC issue (1)

English Heritage – Comments are provided on specific sites but these have been through desk based analysis and focus on sites with the potential for greatest historic environment impacts. Most assessments have focused on scheduled monuments and historic parks and gardens. Wider landscape/townscape impacts are also important and should be considered, along with cumulative impact of sites.

Stagecoach Midland does not have any objections to the proposals contained in the gypsy and traveller accommodation options paper.

### **Officer Comments**

#### **General locations**

The Designing Gypsy and Traveller Sites Good Practice Guide (CLG, 2008) sets out the Governments advice on designing good Gypsy and Traveller sites. This document states that where possible, sites should be developed near to housing for the settled community as part of main stream residential developments. The document highlights the need for sites to be close to schools and healthcare facilities and to promote integration and co-existence with the settled community. The document also supports the identification of small sites which are known to work well for single extended families.

Extending existing sites was included as an option for consultation in the Site Specific Proposals LDD Options Paper consultation (March 2012), however the preferred option agreed at Planning Policy Committee on the 11<sup>th</sup> July 2012 was a combination of dispersing provision and using sustainability appraisal criteria.

#### **Alternative locations**

Alternative sites suggested have been considered separately.

#### **Need**

The GTAA assessed need for pitches in the Borough. This document took into account the existing pitches in the Borough. The sites which are allocated would meet need in addition to existing provision. The Council has a duty

under section 225 of the Housing Act 2004 to assess Gypsy and Traveller accommodation needs and to prepare a strategy for meeting these needs. National Planning Policy for Traveller Sites requires local authorities to maintain a supply of deliverable sites to meet identified need.

### **Assessment criteria**

Assessment criteria consider the impact on adjacent settlement in terms of material planning considerations such as impact on highway network.

The SA criteria do take into account proximity to services and facilities which is consistent with the *DCLC Designing Gypsy and Traveller Sites Good Practice Guide* which states that where possible, sites should be developed near to housing for the settled community as part of main stream residential developments. The document highlights the need for sites to be close to schools and healthcare facilities and to promote integration and co-existence with the settled community.

A weighting system was used in terms of the number of ticks and crosses, however in some instances there can be one or two over riding constraints which can mean the site is unsuitable even when it scores well against the other criteria.

Accessibility – Distances used to assess access to facilities are the Institute of Highways and Transport acceptable walking distances. The facilities selected are those which residents need to meet basic needs such as access to a primary school and access to a shop.

Public transport – The assessment measures distance to a route to a main urban centre to recognise that while there may not be a bus stop a new bus stop is easier to provide than creating a new bus route.

Consistency with the NPPF – The criteria give weight to access to services and facilities and higher order settlements and seek to promote development in sustainable locations. A brownfield site close to existing settlements would be preferable but this needs to be balanced with the full range of sustainability considerations and site constraints.

### **Services and facilities**

NCC education has been consulted and had no comments to make on the sites.

### **Archaeology**

NCC archaeology has been consulted and comments have been taken into account in the assessment of sites. Further archaeological assessment may be required as part of a planning application.

### **General concerns**

- Property prices are not a material planning consideration.
- Sites are required to be provided in appropriate locations in accordance

with planning policy.

- Local plans quoted in the consultation are valid.
- Local authorities have a statutory duty to prepare development plans and this work is part of that duty. The money can not therefore be spent on alternative projects.
- Sites could be considered for housing/ affordable housing; however there is equal need to provide suitable sites to meet gypsy and traveller accommodation need. Provision is required for permanent pitches not just temporary pitches.
- A pitch provides accommodation for 1 family. This typically includes a static caravan and 1 or 2 touring caravans.
- It is noted that integration needs to be carefully considered.

Desborough Town Councils comments relating to existing sites and the need for future sites to be located elsewhere are noted. The site search focused on identifying sites across the Borough.

### **Supporting comments**

Criteria set out in the Gypsy and Traveller Accommodation Background Paper have been used to assess the sites. A criteria based policy will be included in the Joint Core Strategy review.

Tenure of sites has not been determined at this stage but it is anticipated that there will be a mixture of sites for private sale and local authority run sites.

The Gypsy and Traveller Community have been consulted. Officers visited sites in the Borough to inform of the consultation and to explain the process.

KBC are aiming to identify a mix of sites in terms of size and to spread these across the Borough.

Braybrooke Parish Councils comments are noted. Consideration will be given to the potential for identifying sites as part of large housing developments.

### **General comments**

The issue of need for provision has been at North Northamptonshire level. The GTAA was prepared for Corby, Kettering, Wellingborough and East Northamptonshire.

English Heritage comments in relation to need to consider wider landscape/ townscape impacts are noted. This assessment is included in the site assessment work.

## Section two – Question 1

### Summary of Comments

#### **Objections**

Total number of objections (36)

#### **Issues raised/ comments**

- Council should adopt a criteria based approach to identify broad locations. Should be based on current criteria but revised and more relevant and focussed criteria. We are of the opinion that sites are identified to meet the need up until 2022 and then the GTAA would be reviewed to assess the quantitative need. If the council opted to identify a land supply to meet the accommodation needs up until 2031 then the figures used would be estimates rather than an identified up to date needs assessment. (1)
- Option 2 should be followed to ensure sufficient sites are provided in a timely fashion. (1)
- Sites need to be built away from housing areas, has to be fixed number of slots, no expansions and in areas away from residential homes. (1)
- Have sites been identified for much wanted social housing in this area? (1)
- Need explanation of what is a pitch? Not enough school spaces or rental housing (1).
- Too short term and does not recognise real need. (1)
- Future development at East Kettering should include affordable housing; small proportion should be allocated as Gypsy and Traveller development. (1)
- Council need to have in place an action plan to address the proliferation of sites with temporary permission. (1)
- Lesser number of sites would cause fewer issues for people. (1)
- I do not agree that even broad locations should be considered for 2022 to 2031. It is not sensible to make planning assumptions for more than 10 years ahead. (2)
- Priorities change constantly, directed by external, legal, political and environmental factors. (2)
- LA should not be expected to provide substandard permanent housing. Provision of transit sites is reasonable. (1)
- Impossible to forecast. (2)
- Need to sort out existing permitted and / or unauthorised settlements before looking at longer term. (14)
- If proposed sites in residential areas proceed then may have lots of potential sites available as a result of people leaving. (1)
- Estimates made now for 2031 will be meaningless. (1)
- Unrealistic commit funds as far ahead as 2031. (2)
- Broad assessment criteria adopted is fundamentally flawed, and its application in assessing sites appears to be entirely subjective. Underlying agenda in predetermining the outcome. (1)
- Option 1 can only be used at present as future growth has not been estimated in conjunction with proposed infrastructure available. (1)

- Not a statutory requirement and the assessed need over this period is currently unclear, a criteria based policy would be the most appropriate mechanism for identifying future sites. (1)
  - Need to review assessment criteria. It should properly be based on relevant land-use objectives; there is no weighting system to the selected criteria so every criteria has equal weight
  - accessibility topic is flawed e.g. no explanation of how the various set distances to shops and schools (nor any differentiation to whether it is a primary or secondary school for instance) were arrived at, or any consideration of the relative merits of the different routes taken from each potential site to such facility.
  - There is no ranking/weighting system applied to whether a potential site is on a public transport route, or is some distance from it.
  - contrary to the clear advice contained in both the (NPPF) and the Government's Planning Policy for Traveller Sites, which sets out any criteria based policy should give significant weight to achieving sustainable development. The 3 dimensions of which are set out at Paragraph 7 of the NPPF's and are economic, social and environmental. Brownfield sites that are well connected to existing settlements, in terms of general accessibility to shops, schools, other services and transport connections, are considered first. Once all such sites have been fully assessed, should the Council consider looking at alternative sites beyond existing settlements. The Council have not done this. Plainly unsustainable sites, such as Site BROD08 (Highcroft Farm, Broughton) are being promoted, which cannot properly be considered to be sustainable by the proper definition.

### ***Supporting Comments***

Total number of supporting comments 23

### **Issues raised/ comments:**

- Regular reviews of the estimated need are necessary. Facilities should be of an acceptable standard.(1)
- Should meet minimum statutory obligations under section 225 of Housing Act 2004. 15 sites should be identified now with remaining 12 being considered closer to 2022 taking into account any illegal sites which may have been established. (1)
- Need for a criteria based policy to inform site selection and any windfall sites. For years 6-10 specific developable sites or broad locations for such sites should be identified. Is 15 pitches sufficient to meet demand to 2022? appears need has changed re Greenfield site. Consider there should be a 20% increase in site provision. Not clear if these are small family pitches, social provision, owner occupation, private rent or for large families. Important that there is choice of location type, tenure and size of sites. Need needs to be monitored. (1)
- More realistic, many factors change and need to be considered (2).
- Ten year plan is more than adequate, more than KBC currently has in

place for traditional housing supply. (1)

- Need to be in a position where the Inspectorate will not overrule every KBC decision on appeal simply because it has failed to fulfil its statutory duty. Should take care not to provide sufficient sites that attract more travellers, and demand goes up and more sites need to be found. (1)
- Specific sites should be agreed for period 2022. Disagree for period 2022 – 2031. (1)
- If sites are kept free for Gypsy and Traveller accommodation then the infrastructure around the can be planned more effectively. Beneficial if or when other developments are built near or adjacent to these sites as more facilities will no doubt be provided in a larger development plan. (9)
- Specific sites must be sustainable, preferably from brown sites, though it is recognised that some green sites will have to be selected. Fair distribution throughout Borough. Whole County should take a share. Small communities established within settled community. Large housing development should include sites. Concerns over commercial activity. (1)
- Believe due to changes planned in the mix of housing and services that potential sites may be created before 2022 which cannot currently be considered. (1)
- Need to maintain and keep under review a policy for broad spatial distribution. Should avoid over concentration in any one area. Maximum opportunity for integration into community, allowing traveller's balanced access to community services. (1)
- Inappropriate sites causing disruption and damaging community relations in a few areas of concentration. Planning for future is essential. (1)
- Selection needs to be specific in order to ensure clear provision, undisputed appropriate areas to meet the need of accommodation. Danger that in making the selection more loose/broader then the sites will risk being disputed when to comes to commissioning them. If specific and earmarked in advance then can be planned to take into account traveller and settled communities more effectively. (1)
- Urgent need for the first period to 2022. Fear 15 pitch requirement will prove an under statement bearing in mind the temporary permissions ending soon, which should not be made permanent. (1)

### **General Comments**

#### **Issues raised/ comments:**

- Specific sites should be identified and a policy adopted to make provision for several pitches on any new major development. This policy in itself could identify the required number of pitches. (1)
- No option should include site allocation within suburban areas due to different cultural natures. Rural sites should be provided. (1)
- Not requirement of PPTS for 2022 – 2031 and it may be advisable to consider phasing. Danger of land banking. Consider broad locations would suffice for 2022-2031. Need to now what the policy criteria are. (1)
- Broad locations should be identified for 2022-2031. (1)
- Should meet minimum statutory obligations under section 225 the Housing Act 2004. criteria based approach is sensible methodology, should focus in ease of integration into the local population; large primary



and secondary schools, close to main bus routes, shops and doctors surgery's. Should look at lowest infrastructure costs. (1)

- Criteria based policy is needed to deal with future applications.(1)

#### Response Received from Broughton Parish Council

- 0 pitches are required until 2017 through the delivery of 2 pitches at Broughton, 7 at the Pastures and 1 at Stoke Albany Road, Desborough. 10 further pitches are already approved for the period beyond 2017 however due to "lack of clarity", these pitches are not taken into account. Surely this situation should be resolved as a priority rather than completely being discounted.
- 5 pitches have temporary planning permission at Springfields and Black Paddock, Braybrook and Woodcroft, Stoke Albany. Planning permission is due to expire this year however provision is being made in the consultation to discount these 5 pitches and to add 5 to the total to be found afresh. Why would this be the required course of action rather than renewing the existing temporary planning permission? No reason is given for this.
- Since the preparation of the GTAA, there are a further 10 pitches with temporary planning permission which alone covers the pitch requirements up to 2022 which is the stated need for the GTAA.

It is being asked whether provision should cover beyond the required period from 2022 until 2031. The total provision for the full period up to 2031 is 37 pitches – if account is taken of the pitches as described above then 12 unidentified pitches remain for the period 2021 to 2031.

We recommend that for the period 2022-2031 a criteria based policy should be used to identify appropriate sites to the benefit of all – Gypsies and Travellers and other residents in equal measure and without discrimination to either as all needs are required to be under consideration and not one side at the expense or discrimination of the other.

#### Name of Site

#### Section two – Question 2

#### Summary of Comments

#### **Objections**

Total number of objections (28)

#### **Issues raised/ comments:**

- Local Authority should not be required to provide residential pitches. Gypsies should join the housing list. (2)
- Requirement should not be projected forward to 2031 because it is possible the number of sites required by that date will be found during the investigation for sites up to 2022. (1)
- Council should adopt a criteria based approach to identify broad locations. Should be based on current criteria but revised and more relevant and focussed criteria. We are of the opinion that sites are identified to meet the

need up until 2022 and then the GTAA would be reviewed to assess the quantitative need. If the council opted to identify a land supply to meet the accommodation needs up until 2031 then the figures used would be estimates rather than an identified up to date needs assessment. (1)

- Should only look to identify land to meet requirements up until 2022. Too far in the future to be realistic or accurate. (10)
- Too many unknown factors to project requirements 18 years ahead. A number of illegal sites may have been established and should be factored into any new assessment to 2031. (1)
- No requirement in national guidance to identify suitable sites for 10 years and beyond. Better to update and refresh need on annual basis and review site provision accordingly. If plan this far ahead then other authorities will take advantage and off load their need to your area. Introduce a phasing policy, no control over who land is sold to or pitches rented to. Ensure neighbouring authorities are doing their fair share. (4)
- Ten year plan is more than adequate and would more be more than KBC currently has in place for traditional housing supply. (1)
- Current inadequate provision has resulted in money being wasted trying to justify the breaking of current requirements for provision and has scarred the area with large number of temporary unsightly and inappropriate sites. Council cannot breach requirements set down by Parliament. (1)
- Unrealistic to look ahead to 2031, even in broad terms. (4)
- Remove the cost of repeating this exercise in the longer term. (1)
- Long term plan is risky as fails to take into account changes in society, economy. (1)
- Policy for identifying needs and selecting sites seems to be purely based on numbers. What are the actual requirements of the community in terms of social and community integration? Pastures should be used as a model. (1)
- GTAA figures have proved quite unrealistic so far. Influx on Greenfields has shown there are no restrictions for travellers anywhere in the country coming to this area. Sites should be established quickly before temporary permissions end. (1)

### ***Supporting Comments***

Total number of supporting comments 22

### **Issues raised/ comments:**

- Offers security to settled community knowing that provision was planned and budgeted. New sites should be well planned and brought forward at a sensible pace then schools, surgeries and other services and the local settled community are going to be able to accommodate everyone with relative ease. (2)
- Option 1 is too short term and the matter will need to be looked at again in the not too distant future. Option 2 would be better as it removes uncertainty for all concerned. (1)
- Offers security to settled community knowing provision budgeted and planned for. Assessment reviewed regularly it can be adjusted according

to need. More cost effective as unauthorised developments will become a thing of the past, should they occur then stops notices and enforcement orders will be effective. Sites should be commissioned as soon as possible. 13 unauthorised pitches must be offered alternative sites within the next 18 months. (8)

- Sensible to look ahead so as not caught out as in recent years. (1)
- Existing illegal encampments will be moved away from inappropriate places. (1)
- Would put KBC in a position of strength. Will add clarity for the planning department. (1)
- Long term planning vital. Speculative development in the past decade has caused immense distress to settled community. Sites should be designed and placed to offer both communities the ability to mix and coexist together. (1)
- Sites should be planned for in advance and forced to follow the law, not be able to follow loopholes due to poor council administration. (1)
- Recent Planning Inspectorate decisions emphasises the necessity for alternative sites to be made available to meet the need. Imperative that the provision of sites is planned well in advance. Saves time effort and money. (1)
- Sensible as long as not too much is built on it. (1)
- Plan for future as spent a lot in last ten years defending the indefensible. (1)
- Good practice to identify specific sites, small sites and work with local parish/town to facilitate integration. Open process essential. Need to be proactive. Important to have a vision. (1)
- KBC should be proactive, demonstrate strong leadership. Wider community relying on and will benefit in the long run if KBC are rigorous in planning provision of sites. (1)
- Should be a minimum requirement. (1)

#### Response received from Broughton Parish Council

- A further consultation on selection of such criteria would be appropriate in the period leading up to the years 2022-2031 in order to be able to deliver the most satisfactory option – what could be a proposed criteria today may not carry as much weight or requirement in the future and other elements may come to the fore in the rapidly changing county landscape and other general lifestyle factors that will undoubtedly alter e.g. countywide access policies, ecological and technological advances.

#### **General Comments**

- Formula would only work if there were no backlog in provision of pitches. Shortfall should be updated regularly. Liaise with adjacent Boroughs to establish need.

#### **Officer Comments**

These questions sought to gain views on two options. Option 1 to identify sites to meet the need to 2022 and a criteria based policy to be used to

identify broad locations where sites may be considered to be appropriate in the remainder of the plan period. Option 2 was to identify specific sites to meet the identified need to 2022 and also to meet the estimated need to 2031.

Some responses related to the need to identify sites at all. Local authorities have a legal duty to carry out an assessment of the accommodation needs of gypsies and travellers and then prepare a strategy to meet those needs. Not identifying sites is not an option.

Some concern has been raised that the pitch requirement is an underestimate. This is based on the GTAA and sites which were temporary when the GTAA was prepared have been taken into account in the pitch requirement and have been assessed through the site assessment process. Pitches which have been granted since the GTAA have been included in the site assessment work and have been considered alongside sites identified. The GTAA is reviewed periodically and where necessary pitch requirements will be reviewed. The 10 pitches at Stoke Albany Road have not been included in the supply because it is not considered that there is a reasonable prospect of these pitches being delivered.

Planning Policy for Traveller Sites requires that local planning authorities identify and update annually a five year supply of sites against locally set targets. It also requires local authorities to identify of specific, developable sites or broad locations for growth for six to ten and where possible 11-15 years.

The views on which option should be progressed are mixed. The advantage of option 2 is that this would provide a supply of sites for the plan period which would ensure site are identified in appropriate locations and that a five year supply of sites can be maintained. The will assist in preventing unauthorised development in inappropriate locations. It is recognised that provision would have to be reviewed to ensure adequate provision is identified to meet any changes in need however this option would provide greater certainty. The difficulty with this approach is that the estimated need could change and this may require early review of the plan. While it has been highlighted by some respondents that external influences/ priorities could also change the plan would be monitored and if significant changes have taken place then the plan would need to be reviewed.

The progressing option 1 would provide less certainty over the location of sites in the future, however if the Council are unable to identify sufficient sites to meet the need to 2031 then this approach would enable the Council to demonstrate a five year supply and the use of criteria would accord with national planning policy.

### **Recommendation**

It is recommended that identifying sites to meet the need to 2031 would be the most appropriate option as this would enable a sufficient supply of sites to

be maintained and will provide greater certainty on the location of sites. However if the Council are unable to identify sufficient suitable sites then identifying sites to 2022 and using a criteria based policy to identify broad locations for sites would enable a five year supply of sites to be identified and would provide guidance on location of sites in the future.

### **Section 3 – General comments**

#### **Summary of Comments**

##### ***Objections***

Total objections (60)

##### **Issues raised/ comments:**

##### **General location**

- Braybrooke has a number of existing sites so the site at Braybrooke should not be considered (2)
- Sites should all be out of town/ not in residential areas/ in the open countryside (e.g. Market Harborough has two reasonable size sites at each end of the town) (28)
- Sites should not be concentrated in a single area, Broughton has a permanent Gypsy and Traveller site and should not be considered for expansion while places like Weston by Welland, Sutton Bassett, Ashley, Little Oakley, Grafton Underwood and Cranford have not been selected for encampments (1)
- Sites are concentrated to the north and west of the borough. None of the temporary permissions in this area should be made permanent. There are no sites to the east of Kettering and only 3 discounted sites to the north east of Kettering. Look again in this area to ensure a fairer dispersal of sites. (1)
- Existing sites should be extended, this would be more cost effective (4)
- Option 3 – unsuitable area (1)
- Against preferred sites (4)
- Sites should be small and distributed across the borough. (4)
- Alternative sites – Much better to provide suitable Gypsy and Traveller quality rural sites for Gypsy and Travellers to lead their normal lifestyle. (1)
- No sites should be put in Rothwell or Desborough, they are small communities with not many amenities (1)
- All proposed sites are inappropriate (1)

##### **Alternative locations**

- Sites should be included within large developments e.g. Kettering East, where they can be properly planned and set out (1)
- A disused airfield within easy distance of school and medical centre would be a good choice for travellers (1)

### **Size of sites**

- Pitches should be placed together e.g. at Cohen's Yard (2)
- Sites with 1 or 2 pitches are not viable. Travellers prefer to live in groups (1)
- Some sites are too big, should be a maximum of 2 pitches to allow integration with local community (1)

### **Alternative sites**

- Alternative sites – The two at Broughton and Braybrooke would work. Others too near too residential areas (1)
- Alternative sites do not meet the criteria so should not be progressed (1)
- Some of the alternative sites should be progressed as potential sites. Development should be focused around Kettering, Burton Latimer, Desborough and Rothwell in accordance with the CSS away from rural areas. North of the Borough is already saturated with sites. Piecemeal development of Gypsy and Traveller sites would not reflect this strategy. Sites should be in locations with a range of services and facilities to maximise opportunities for social inclusion. A transit site adjacent to the A14 would be helpful in the short term to reduce the need for roadside encampments (4)
- Some alternative sites could be progressed but Broughton can't support further residents (1)

### **Discounted sites**

- Why have sites in Geddington been discounted? (2)

### **Noise**

- Noise will be an issue (1)

### **Services and Facilities**

- Schools are at capacity (1)
- Consider schools, doctors, shops and other amenities first (1)

### **Assessment Criteria**

- There is no explanation in the background paper for the 2000m distance to a Primary School and shop. The paper included sites which are not within 2000m of a Primary School or shop (1)
- Why should sites be located within 2000m of a primary school and local shop, this entitlement is not given to everyone (2).
- It is not clear how impact on nationally or internationally important wildlife sites has been assessed (1)
- No justification regarding assessment criteria used (1)
- No scoring system used so no clear ranking of sites. A weighting methodology should be applied to criteria. (1)
- Background paper discounts sites in flood zone 3 but 3 sites (KET 016, BUR017 and KET022) have been included in the assessment (1)
- Whole site selection process is flawed (1)
- No mention of a distance marker in relation to Policy 1 of the CSS (1)
- Score for health is illogical as it jumps from neutral to maximum score (1)

- Assessment of schools does not specify whether it refers to primary or secondary schools (1)
- Rail and road impacts are combined under liveability , impacts are unlikely to be similar and appear to be confined to noise and odour (1)
- Landscape assessment groups visibility, quality of landscape and landscape features together, these should not be amalgamated. (1)
- No reason why sites with 50-75% pdl and 25-49% pdl should score the same. (1)
- No justification for not scoring minerals (1)
- Access to Highway Network only has two scores; there are a number of options which could be added. (1)
- Basic infrastructure – not clear what this includes (1)
- Health assessment does not include safety but this is referred to in the summaries. (1)
- Availability – considered ownership constraints and attractiveness to the market – these should be considered separately so should constraints in the sub category (1)
- Not clear whether the Council would use CPO powers as this would impact on availability (1)

#### **Need**

- Sufficient sites have been identified to meet the need to 2022 (including 10 pitches at KET/2009/0155). Least impact decision would be for the 5 temporary pitches included in the GTAA residential supply to be progressed as allocations (1)
- Rockingham Castle Estate acknowledge that the 7 pitches at The Pasture are progressing but does not feel that the 10 pitches referred to on pages 20/21 of the background paper would be viable for future consideration and would like confirmation that this site does not form part of any future proposal (1)

#### **General concerns**

- Converting temporary sites into permanent ones encourages illegal sites e.g. Springfields (1)
- Community should have been better informed of the proposals (2)
- All sites could be developed to meet housing requirements. Transit sites should be provided in locations not suitable for permanent development (2)
- If long term accommodation is needed in residential areas it should be in the form of a house (1)
- House prices will decrease (4)
- How will sites be paid for (1)
- Concern that sites will expand beyond the permitted size (2)

#### **Sites in Rothwell: Total comments (34)**

##### **Location**

- Too close to the town/ residential areas (3)
- Would the Gypsy and Traveller community welcome sites in towns?(1)
- Too close to existing properties (2)

- Sites should not be proposed south of the A14 as this will set a precedent for development (1)
- Sites should be away from the A14 and residential areas (2)
- Why are there no sites identified in Kettering, why have none of the KBC owned commercial sites been identified/ there are sites available south of Kettering (2)
- Sites are too close to the town and main roads, dangerous to have children living next to a trunk road. (1)
- Travellers prefer to be out of town (1)
- All sites in Rothwell and Orton area are unsuitable as too close to A14, on land liable to flooding, or on contaminated land (1)
- Criteria for positioning sites should be changed. Pick large land owners e.g. Buccleugh Estates (1)
- Support Rothwell Town Councils objections to ROT/010, and ROT011/013a/013b/037/039 (2)

#### Highways

- Effect on traffic (2)

#### Noise

- Impact on noise (1)
- Sites are too close to the A14 where noise and traffic would be a problem (2)

#### Visual impact/ character

- Sites are at entrances to the historic town / will make town less attractive to visit/ will impact on towns reputation (10)
- Sites are unsuitable because they are all on the approaches to or in this historic town (2)

#### Services and facilities

- Will put pressure on schools (3)
- Impact on health centre/ health centre/ hospital (2)
- Allotments allow people to get exercise and interaction and are good for mental well being (1)
- Will impact on existing amenities (1)
- Will put pressure on education (7)
- Town centre is already busy and dangerous for pedestrians (1)
- Pressure on medical centre (3)
- Infrastructure can't cope (3)

#### Number of sites/ need

- Alternative sites would result in a large population which is unviable for the size of Rothwell (1)
- Why has Rothwell got the most sites and pitches?/ number of sites disproportionate to size of town/ why are there so few sites in Kettering (16)
- Sites not needed around Rothwell (6)

#### General concerns

- House prices will decrease (5)
- Impact on businesses (2)
- Residents should have been informed earlier (1)
- Unoccupied rental properties should be used instead (1)



- Not clear how many people a pitch would hold (1)
- Land south of A14 should be reserved for road relief of A14 junction (1)
- Public perception of sites is a problem (1)
- Environmental impact on Squires Brooke (1)

#### Rothwell Town Council

- Disagrees with all preferred sites as these should not be located within or on the edge of existing residential areas.
- KET015, KET016 and land at Gypsy Lane opposite the crematorium in Rothwell Road should be identified as potential sites.

#### **Sites in Kettering (4)**

- Sites should be in the outskirts of town (which is still close to amenities) but not in residential areas (3)
- Should not be selected as is built up area (1)

#### **Sites in Broughton (18)**

##### General location

- There is already a substantial site when compared to the size of the village (3)
- Sites should be located in Kettering where there are more schools and facilities/ village has no infrastructure to support any kind of development/ school is full/ KGH can't cope (3)
- Sites should be considered for housing and if not considered suitable this should also apply to these proposals (1)
- Existing sites should be utilised first before further development takes place/ existing site is never full this should be used first/ existing site has recently been increased in size. (5)
- Sites should not be concentrated in one area. Broughton has a long-standing site and should not be considered for expansion/ no need for additional sites in the Broughton area/ preferred option agreed at Committee was to disperse sites. (10)
- Areas like Weston by Welland, Sutton Bassett, Little Oakley, Grafton Underwood and Cranford should be looked at before Broughton (2)

##### Highway impact

- Increase in traffic/ congestion/ roads already busy/ roads too narrow (4)

##### Impact on amenity/ adjacent residents

- Sites are unsuitable and effect of development on residents (3)
- There has been no assessment of the impact on sites of those who live nearby (1)
- Suitability has been assessed from the point of view of occupiers not existing residents (2)

##### Services and facilities

- There are no medical facilities (3)
- Water/ Sewage system can't cope (2)
- School is at capacity (1)
- No buses (1)

##### General comments

- House prices will decrease (3)

Broughton Parish Council – Individual pitches separate from any other site would not appear an ideal situation and would be highly isolatory for Gypsy and Travellers. Residents would be faced with a pitch completely out of context with the vicinity. Management of single pitches would not be cost effective.

Broughton Parish Council Alternative options: We believe that sites that already have existing temporary planning permissions should be progressed – for example BRA028 has existing temporary planning permission, is given as an Alternative Option in the Consultation Document and in the Background Assessment Paper is indicated as having “no constraints”.

### ***Supporting Comments***

Total number (18)

- Existing sites should be made bigger rather than creating new ones (1)
- All of the potential sites could be allocated but the larger ones, BUR017a, KET002 and BRO008 should be capped in size at 7 or preferably 5 pitches/ reduced in size. (9)
- Limits on number of caravans and commercial activity should be strictly enforced (2)
- It is important to provide a choice of sites and it is good that sites have been identified within urban areas. In many part of the country sites are found side by side with other residential uses (1)
- Sites should be spread evenly throughout the Borough. (2) At present there is a concentration in the Desborough – Harrington - Braybrooke area (1)
- If people don't want travellers sites traveller families should be given houses (2)
- More smaller sites are preferable to avoid concentrations (1)
- BRO006, KET023, and ROT039 are identified in the background paper as potential sites but in the consultation document they are alternative sites, if they have potential they should be considered as such (1)
- Some of the alternative sites should be progressed as potential sites. Development should be focused around Kettering, Burton Latimer, Desborough and Rothwell in accordance with the CSS away from rural areas. North of the Borough is already saturated with sites. Piecemeal development of Gypsy and Traveller sites would not reflect this strategy. Sites should be in locations with a range of services and facilities to maximise opportunities for social inclusion. A transit site adjacent to the A14 would be helpful in the short term to reduce the need for roadside encampments (6)
- Some alternative sites should be progressed as potential sites but these need to be small to enable co-existence between the settled and the traveller communities (1)
- Support alternative sites. Smaller sites are needed and should avoid open countryside between settlements to reduce motor travel to reach services and facilities (1)

- Sites should be considered on the same basis as housing for the settled community (1)
- Alternative sites outside residential areas or on the outskirts of town are the only satisfactory way of accommodating needs of the settled community and travellers. Kettering is the largest town so should have the largest number of pitches. (1)

Loddington Parish Council agree with the potential sites but do not think they are qualified to assess which should be allocated as they do not know or understand any of the issues with these sites.

Environment Agency: All potential sites could be allocated as Gypsy and Traveller sites as they are in flood zone 1. Flood Risk Assessments should be completed in accordance with the NPPF Technical Guidance.

NCC Archaeology – agree with all the potential options except ROT013 as they will not have a detrimental impact on known archaeological remains. Agree with all the alternative sites except ROT013 a,b,c and BRO007 as they will not have a detrimental impact on known archaeological remains.

Harrington Parish Council – All potential options would meet the criteria of sustainability and closeness to facilities. It is important that the settled community are prepared that one or two families are allocated to these areas so that they become integrated. Large sites such as Scott Road, Highcroft Farm and The old sewage works, Burton Latimer should be reduced in size to allow integration.

Harrington Parish Council – some alternatives could be progressed provided they meet the criteria but others are in dangerous area (see site summary sheets). Integration will be easier with smaller sites. Larger sites should be avoided. Integration with the settled community is important.

### **General Comments**

- If new sites are identified people should be consulted (1)
- No site for caravans to house families permanently is sustainable (1)
- KBC should provide purpose built out of town sites (1)
- Alternative sites for families living on the 3 pitches at Black Paddock and 10 pitches at Greenfields need to be addressed urgently (10)
- Those living in unauthorised locations (Greenfields) must not be allowed to develop any further (2)
- Sustainability Appraisal is a good starting point but only the communities listed in table 3.1 could make objective comments on the social impact and suitability of sites listed above (1)
- Why are there no sites in the Ashley, Welland Valley area? (1)
- Strongly disagree with sites that impinge on local residents but agree with the sites that have minimal impact on the community (1)
- Police must be consulted on suitability of sites (1)
- Broughton is becoming a major centre of traveller activity and the increase in size on the existing site at Northampton Road and the additional 15

pitches in walking distance from the village would be an unwelcome intrusion on village life and the very limited facilities it can offer (1)

- Only feasible alternatives are those not located in residential areas (2)

Desborough Town Council agree the current Pastures site and the additional 7 pitches meet the needs for this area. The Town Council members and members of the public believe there are enough sites in the north of the Borough. Further sites should be placed elsewhere.

Environment Agency – Most of the alternative sites could be progressed as potential sites as they are located in flood zone 1.

### **Officer Comments**

#### **General location**

Braybrooke was not included in the search area so the only sites in this area which were included in the assessment were those with temporary planning consent.

The Designing Gypsy and Traveller Sites Good Practice Guide (CLG, 2008) sets out the Governments advice on designing good Gypsy and Traveller sites. This document states that where possible, sites should be developed near to housing for the settled community as part of main stream residential developments. The document highlights the need for sites to be close to schools and healthcare facilities and to promote integration and co-existence with the settled community. The document also supports the identification of small sites which are known to work well for single extended families.

The site search sought to identify sites across the Borough in locations within 2000m of a school or shop. Weston by Welland, Sutton Bassett, Ashley, Little Oakley, Grafton Underwood and Cranford were not included in the site search as these settlements are not within 2000m of a shop and school. The process has sought to identify a mix of sites including small sites.

Extending existing sites was included as an option for consultation in the Site Specific Proposals LDD Options Paper consultation (March 2012), however the preferred option agreed at Planning Policy Committee on the 11<sup>th</sup> July 2012 was a combination of dispersing provision and using sustainability appraisal criteria.

Rothwell and Desborough are identified as small towns in the Core Spatial Strategy and are a secondary focus for growth; they have adequate levels of services and facilities.

#### **Alternative locations**

Alternative sites suggested have been considered separately.

#### **Size of sites**

A mix of comments were received in terms of focusing pitches on one site or having a larger number of small sites. The document will seek to identify a mix of site sizes.

**Alternative sites**

Alternative sites have been reviewed in light of comments made and these are reviewed on the summary sheets for the individual sites.

**Discounted sites**

The reasons for discounting sites at Geddington are set out in the 'Gypsy and Traveller Site Search and Assessment: Background Paper' (KBC, May 2013).

**Noise**

Where necessary noise assessments would be required as part of a planning application.

**Services and facilities**

Need for new schools and facilities is considered through plan making and contributions towards facilities are sought through s106 agreements.

**Assessment criteria**

The 2000m was based on the maximum distance shown in the Institute of Highways and Transport acceptable walking distances. Members of the Planning Policy Committee on the 11 July 2012 asked that areas just outside the 2000m search area were considered to reflect the comments made during the consultation stating that sustainability was not an important factor to the community.

The NPPF requires development to be sustainable. The 2000m distance to a shop and school was included to ensure sustainable access to these facilities.

Through the initial assessment of sites impact on internationally or nationally important wildlife site was considered in relation to the distance from the site and potential impact.

The assessment criteria have been developed using the Sustainability Appraisal criteria and national and local planning policies.

A weighting system was used in terms of the number of ticks and crosses, however in some instances there can be one or two over riding constraints which can mean the site is unsuitable even when it scores well against the other criteria.

KET016 and KET022 have been discounted; reviewing the flood risk maps KET016 is entirely in flood zone 3 and should have been discounted through the initial assessment. BUR017 was not discounted through the initial assessment as only a small portion of the site is in flood zone 2 and 3 and therefore a smaller portion of the site which is outside these flood zones was considered in detail.

Site selection process is closely linked with the Sustainability Appraisal criteria and based on robust assessment of the sites.

The assessment in relation to settlement hierarchy assessed whether sites

were within 1500m of the tiers of settlements.

Score for health ranges includes 3 scores ×, ~ and ✓✓ to recognise potential for mitigation in some instances.

Assessment of schools considered primary and secondary education.

The assessment under liveability deals with noise and odour rather than road and rail impact, impact on highways is considered under a separate criterion. The roads listed are examples, impact of noise from all roads was considered in the assessment, including A roads. At this stage an initial assessment has been completed but detailed noise assessment would be required through a planning application for sites which are progressed.

Landscape assessment considered visibility, quality of landscape and landscape features. While these are different it is considered appropriate to group these together.

PDL scores will be reviewed to reflect the need for different scores.

Minerals assessment was altered from score to comments to allow consideration to be given to the type of allocation or permission.

Access to the highway network is assessed using two criteria because satisfactory access can either be achieved or not. No additional criteria have been suggested and it is considered that the existing criteria are adequate.

Basic infrastructure – The first criteria refers to practical connection whereas the second refers to capacity of infrastructure. Reasonable distance is considered on a site by site basis to reflect individual circumstances.

Safety of children on ROT012 was an issue raised by the Police which was why it was added to the assessment of the site.

Availability –this considers ownership constraints and attractiveness to the market, while these are separate questions it is considered appropriate to consider them together. The same is the case for the sub-category.

Availability – The Council do not intend to use CPO powers.

### **Need**

The five temporary pitches have been assessed alongside other sites and where these have been assessed favourable in comparison to other sites they have been included as potential sites.

It is noted that Rockingham Estates do not wish the development of the 10 pitches under planning permission KET/2009/0155 to be progressed. These pitches have not been included in the number of pitches already identified because it is unlikely that this site would be developed.

### **General concerns**

The five temporary pitches have been assessed alongside other sites and where these have been assessed favourable in comparison to other sites that have been included as potential sites.

The Council has exceeded the consultation requirements set out in the Statement of Community Involvement and proposals were advertised in the local press, at sites and other community meeting places.

Sites could be considered for housing; however there is equal need to provide suitable sites to meet gypsy and traveller accommodation need. Provision is required for permanent pitches not just temporary pitches.

Supreme Court Judgement - Romany Gypsies and Irish Travellers are distinct ethnic groups who have throughout their long history faced hostility and rejection. To live in permanent housing is anathema to many, but it does not follow that they wish to travel frequently. A caravan may be positioned with such attendant facilities that it can no longer move. But it is nonetheless a home which is radically different from one built of bricks and mortar. The law requires society to accept and understand that difference.

Property prices are not a material planning consideration.

How sites are paid for will depend whether they are publicly or privately run.

Any unauthorised development outside the sites would need to be dealt with separately and this does not impact on the suitability of the sites for development.

### **Sites in Rothwell**

Location:

- The Designing Gypsy and Traveller Sites Good Practice Guide (CLG, 2008) sets out the Government's advice on designing good Gypsy and Traveller sites. This document states that where possible, sites should be developed near to housing for the settled community as part of main stream residential developments. The document highlights the need for sites to be close to schools and healthcare facilities and to promote integration and co-existence with the settled community. The document also supports the identification of small sites which are known to work well for single extended families.
- If the site south of the A14 was allocated this would not set a precedent for unallocated development which would still need to be considered against policies for the open countryside.
- Where sites are near the A14 appropriate noise mitigation would be required but it is not appropriate to discount sites just because they are close to the A14 if mitigation of the impacts is possible. Sites would need to be designed to ensure safety of children and to prevent access to the A14.
- Sites have been identified in Kettering, where available sites were considered in commercial areas. The land referred to south of Kettering has been promoted as a strategic employment site and is not available for

this use.

- Issues relating to individual sites have been considered on the relevant site summary sheets.
- Large landowners have been approached to identify additional sites – detail is provided in the list of alternative sites.

Highways.

- NCC Highways has been consulted in relation to highway impacts for each of the sites and these have been considered in the detailed assessment of sites.

Noise

- Noise assessments would be required as part of a planning application where necessary and appropriate mitigation required.

Visual impact/ character

- Visual impact of the sites has been considered in the individual site summary sheets. Visual impact can be minimised by good design and landscaping.

Services and facilities

- The small increase in population from these sites will be considered as part of the planned growth in the Borough. The Joint Core Strategy will be accompanied by an Infrastructure Delivery Plan which will identify improvements to services and facilities to accommodate the additional population.

Number of sites/need

- While there are a number of sites around Rothwell which have been considered the number of pitches which are needed is lower than the number of sites identified in the document and not all of the sites identified in the consultation document would be required to meet the need. The GTAA identifies a need for the Borough to be met in appropriate locations in accordance with national planning policy.

General concerns

- Property prices are not a material planning consideration.
- Residents should have been informed earlier – This is the first stage in the consultation process so this is the earliest opportunity for the residents to be informed.
- A pitch provides accommodation for 1 family. This typically includes a static caravan and 1 or 2 touring caravans.

Rothwell Town Council

- The Designing Gypsy and Traveller Sites Good Practice Guide (CLG, 2008) sets out the Governments advice on designing good Gypsy and Traveller sites. This document states that where possible, sites should be developed near to housing for the settled community as part of main stream residential developments. The document highlights the need for sites to be close to schools and healthcare facilities and to promote integration and co-existence with the settled community.
- KET015 has been discounted because it is not available. There are aspirations for housing on this site. KET 016 is located in flood zone three and access is not achievable. These are significant constraints which cannot be overcome. The land at Gypsy lane has been considered



separately.

### **Sites in Kettering**

- The Designing Gypsy and Traveller Sites Good Practice Guide (CLG, 2008) sets out the Government's advice on designing good Gypsy and Traveller sites. This document states that where possible, sites should be developed near to housing for the settled community as part of main stream residential developments. The document highlights the need for sites to be close to schools and healthcare facilities and to promote integration and co-existence with the settled community.

### **Sites in Broughton**

- There are a number of sites around Broughton which have been considered however the number of pitches which are needed is lower than the number of sites identified in the document and not all of the sites identified in the consultation document would be required to meet the need.
- Kettering was included in the search areas and sites within Kettering have been considered using the same assessment process as other settlements.
- Sites could be considered for housing; however there is equal need to provide suitable sites to meet gypsy and traveller accommodation need. Provision is required for permanent pitches not just temporary pitches.
- The GTAA assessed need for pitches in the Borough. This document took into account the existing pitches in the Borough, including the site at Broughton. The need which sites which are allocated would meet is in addition to existing provision.
- The site search sought to identify sites across the Borough to ensure a dispersed provision, Broughton currently has one site but the majority of sites are currently located in the west of the Borough in the Braybrooke/Desborough area.
- The site search sought to identify sites across the Borough in locations within 2000m of a school or shop. Weston by Welland, Sutton Bassett, Ashley, Little Oakley, Grafton Underwood and Cranford were not included in the site search as these settlements are not within 2000m of a shop and school.

#### **Highway impact**

- NCC Highways have been consulted in relation to impact on the highway. The only site around Broughton where an impact on the highway was identified as an issue was BRO009 and this site has been discounted.

#### **Impact on amenity/ adjacent residents**

- Sites will need to be designed to ensure no overlooking or impact on adjacent residents' amenity. Site assessment work considered compatibility with neighbouring uses.

#### **Services and facilities**

- It is noted that there are no medical facilities but these are available in Mawsley and Kettering which are within reasonable distance of Broughton.
- Need for new schools and facilities is considered through plan making and contributions towards facilities are sought through s106 agreements.

#### General comments

- Property prices are not a material planning consideration.

#### Broughton Parish Council

- The Designing Gypsy and Traveller Sites Good Practice Guide (CLG, 2008) sets out the Governments advice on designing good Gypsy and Traveller sites. This document states that where possible, sites should be developed near to housing for the settled community as part of main stream residential developments. The document highlights the need for sites to be close to schools and healthcare facilities and to promote integration and co-existence with the settled community. The document also supports the identification of small sites which are known to work well for single extended families.
- Support for BRA028 is noted.

#### Loddington Parish Council

- Noted

#### Supporting comments

- Extending existing sites was included as an option for consultation in the Site Specific Proposals LDD Options Paper consultation (March 2012), however the preferred option agreed at Planning Policy Committee on the 11<sup>th</sup> July 2012 was a combination of dispersing provision and using sustainability appraisal criteria.
- Comments regarding size are noted, the document will seek to identify a range of size sites, however the need to limit site size will need to be balanced along side management requirements and viability of development.
- Enforcement – comments noted.
- Comments relating to need to provide a choice of sites and for these to be spread across the Borough are noted.
- BRO006, KET023 and ROT039 were identified as alternative options because availability of these sites was uncertain.
- The assessment acknowledges the settlement hierarchy set out in the CSS and seeks to ensure sites are located in locations with access to services and facilities.
- The Designing Gypsy and Traveller Sites Good Practice Guide (CLG, 2008) sets out the Governments advice on designing good Gypsy and Traveller sites. This document states that where possible, sites should be developed near to housing for the settled community as part of main stream residential developments. The document highlights the need for sites to be close to schools and healthcare facilities and to promote integration and co-existence with the settled community.

#### Loddington Parish Council

- Comments noted.

#### Environment Agency

- Comments noted.

NCC Archaeology

- Comments noted.

Harrington Parish Council

- Comments noted. The document will seek to identify a range of size sites; however the need to limit site size will need to be balanced along side management requirements and viability of development.

**General comments**

- People will be consulted if new sites are identified.
- Supreme Court Judgement - Romany Gypsies and Irish Travellers are distinct ethnic groups who have throughout their long history faced hostility and rejection. To live in permanent housing is anathema to many, but it does not follow that they wish to travel frequently. A caravan may be positioned with such attendant facilities that it can no longer move. But it is nonetheless a home which is radically different from one built of bricks and mortar. The law requires society to accept and understand that difference.
- Comments relating to the need to identify sites are noted.
- The assessment criteria provide a robust basis for assessing sites.
- Sites have not been identified in Ashley or the Welland Valley as these are further then 2000m from a school or shop.
- The Police have been consulted and their comments fed into the assessment process.
- Comments relating to the number of pitches are noted
- Concerns have been raised that the size of the site in combination with the existing site would dominate the settled community. The existing site has 13 pitches. The addition of up to 10 could result in provision of up to 23 pitches. The site at The Pastures accommodates 15 pitches and The Laurels which is located approximately 75 m from The Pastures will accommodate 7 pitches and allow an additional pitch to be provided at Stoke Road. This also equates to 23 pitches. The population of Broughton is 2,208 (Census 2011). It is not considered that the addition of up to 10 pitches, even when considered alongside the existing site, would be of a scale that would dominate the settled community.

Desborough Town Council – Comments regarding need to disperse sites are noted.

Environment Agency – Noted.

**Name of Site:** Springfields, north west of Braybrooke (BRA027)

**Summary of Comments**

**Objections** - Total number of objections (13)

Issues raised/ comments

### **Sustainability Issues**

- The site should not be considered sustainable because it abuts an existing settlement and is subjective(2)
- Countryside location is not sustainable (1)

### **Scale/ Location of Development**

- Precautions will need to be taken to ensure it isn't allowed to get any bigger and strict conditions will be required and enforced – pitch numbers, access points, vehicle numbers, street lighting (11)
- Site needs to be considered in the context of extensive settlements that have been established around Braybrooke (4)
- Over concentration in Braybrooke. If made permanent the number of pitches in or adjacent to Braybrooke is 23 (10)

### **General Comments**

- The assumption the highway access is acceptable is subjective given lack of consideration for other road users given by existing incumbents(1)
- Public health issues with existing smells of raw sewerage (1)
- Curtailing the excessive use of lighting would make it a less alien feature in the landscape (8)
- No further vehicular access should be allowed (2)
- No commercial activity, business use or vehicle storage should be allowed (6)
- Site is already used for the parking of large numbers of commercial vehicles (3)
- Braybrooke school closing (1)

### **Supporting Comments**

Total number of supporters (7)

Issues raised/ comments

- Uncomfortable that it confirms the view that once temporary permission has been granted it inevitable becomes permanent, but it is worth it if it puts KBC back in a position to run a planning policy (1).
- Site should be reduced in size
- Site has already been considered favourable and has planning permission (1)
- Small scale site (1)
- No additional impact to retain the existing additional plot (1)
- The site is large enough to accommodate a 2<sup>nd</sup> pitch (1)
- The site is served by all essential services (1)
- There will be no public expense in terms of site provision (1)
- Site is deliverable and available (1)
- Travellers do not want to live with the settled community (2)

Loddington Parish Council

- Agree. We agree with the potential sites identified but we do not think

that we are qualified to assess which should be allocated as Gypsy and Traveller sites as we may not know or understand any issues with these sites. The communities near the sites would need to answer this question.

#### Braybrooke Parish Council – Response 1

- Springfields. We broadly support the conversion of the site with permanent planning permission with the following reservations:-
  1. The site remains a two pitch without any possibility of further planning
  2. The site is a residential site from which no business activities take place
  3. There is no further storage of vehicles for other Traveller and Gypsy families
  4. The lights on the side of the entrance gates be re-sited
  5. There remains only one entrance to the site
  6. There is a limit of 2 family vehicles per pitch

#### Braybrooke Parish Council – Response 2

- Springfield 2 pitches per site – this will produce more pitches than we currently have within Braybrooke. Although it is only 1 pitch it would increase the number of permanent pitches in or adjacent to Braybrooke to 23. This does not include the additional 30 or so pitches at Justin Park which also abuts the Parish and the 13 temporary pitches currently within the Parish. If the temporary site at Springfields were to be given permanent permission then we would ask that strict conditions are applied to the site and they are rigorously enforced. Existing conditions pertaining to the site should be enforced. We would ask that the amount of vehicles on site at any time reflects the number estimated in planning applications submitted by the family living there. We appreciate that one or two vehicles might be used for work and a further car needed for domestic use, therefore a limit imposed of 2 vehicles per pitch does not seem unreasonable. Curtailing the excessive use of light would make it less of an alien feature in the landscape. No further entrances should be allowed nor any commercial activity, business use or vehicle storage.

#### Environment Agency

- All potential sites should be allocated as Gypsy and Traveller sites as they are located in flood Zone 1 Proposed developments greater than 1 hectare located in Flood Zone 1 NPPF Paragraph 103 requires applicants for planning permission to submit a Flood Risk Assessment when development is greater than one hectare located in Flood Zone 1 defined by Technical Guidance to the NPPF as having a low probability of flooding. The proposed scale of development may present risks of flooding on-site and/ or off site if surface water run-off is not effectively managed. Guidance on the requirements of the FRA can be found at [www.environment-agency.gov.uk/static/documents/Utility/FRAGuidanceNote1\\_v3.1.pdf](http://www.environment-agency.gov.uk/static/documents/Utility/FRAGuidanceNote1_v3.1.pdf) Proposed developments less than 1

hectare located in Flood Zone 1. These development sites are less than 1 hectare located in Flood Zone 1, (low probability of river and sea flooding as defined in the NPPF. The main flood risk to consider is usually the management of surface water run-off. Drainage from the new development must not increase flood risk either on-site or elsewhere. Government policy strongly encourages a SuDS approach to achieve these objectives. Guidance on how to address specific local surface water flood risk issues may also be available through the Strategic Flood Risk assessment or Surface Water Management Plan produced.

County Archaeological Advisor

- I agree with all the allocations within Option 3 Potential sites. The sites, apart from the Rothwell site, will not have any detrimental impact on any known archaeological remains.

**No opinion (3)**

Issues raised/ comments

- Stringent conditions required restricting vehicles, external lighting and only one vehicular entrance and need to be enforced (3)
- Reference made to high number of existing and temporary pitches in the parish (3)

**Officer Comments**

**Sustainability Issues**

The site is located in the open countryside, being located approximately 1.6 km to the edge of Braybrooke Village and 1.2km to the edge of Market Harborough town. National and local policy both direct development of Gypsy and Traveller sites to be located within sustainable locations, with the CLG 'Designing Gypsy and Traveller Sites Good Practice Guide ' 2008 recommending that sites are developed within or close to the settled community to improve integration and co existence. The site does not provide for this as there are only two dwellings located near to the site.

In terms of sustainability, the site does not score as favourably as sites which are located within or immediately adjacent to towns and villages, although the site scores well compared to other sites identified through the process in respect of access to facilities due to its good pedestrian links with Market Harborough, there being a footway at the side of the road. Braybrooke Road/ Harborough Road is a bus route but the nearest bus stops are some distance from the site entrance. The bus route would allow access to nearby towns by public transport.

Whilst development in the open countryside cannot be the most sustainable solution, the following factors would support allocation of this site:

The site is an expansion of an existing site, involving the retention of a temporary site, so would not appear significant in the landscape;

The site is within walking distance of Braybrooke and Market Harborough, to which there is continuous footway provision;

The site does not result in a visual overconcentration of sites in the locality.

### **Scale/Location of Development**

A second permanent pitch can be readily accommodated on this site, making a total of 2 pitches. It is important to note that as the site has had temporary permission for a second pitch, the number of pitches would not be expanded as a result of this proposal.

Concerns have been raised about the concentration of sites around Braybrooke as a whole. No other sites can be seen from the appeal site or along the road from Braybrooke to Market Harborough. Whilst there are a number of sites around the area they are visually separated and the addition of one pitch at this site would not result in an overconcentration of sites in the area that would be out of keeping with or dominate the local settled community. This is the stance adopted by planning inspectors when determining appeals.

### **General Comments**

A number of comments have been received concerning suggested planning conditions should the site be approved. These matters, relating to lighting, vehicular access, vehicle numbers, commercial activity may be matters that can be controlled by planning condition, while other matters may amount to development that would need to be looked at separately. As the proposed site allocation is for one traveller pitch, this is the issue that needs to be determined as part of this process and not those other issues which are not directly related to site allocation.

### **Recommendation**

That the site be allocated for the provision of one additional pitch.  
Site has now been granted planning permission KET/2013/0376

**Name of Site:** Black Paddock, Braybrooke (BRA028)

### **Summary of Comments**

#### ***Objections***

Total number of objections (20)

#### **Issues raised/ comments:**

#### **Location/ Sustainability Issues**

- Previous planning history – KBC and Planning Inspectorate have stated the site is inappropriate and unsustainable (2)
- Cumulative impact on neighbouring communities (2)
- Site is unsuitable and should not be made permanent (3)
- There is already a significant number of pitches in the local area (6)
- With other sites on Park Lane this would provide for a massive site contrary to advice(3)

- Site is not close to supporting services (1)
- Site is not within 2km of a health centre – assessment incorrect(2)
- Site does not have access to public transport - assessment incorrect(2)
- No evidence to show the current occupants use public transport (1)
- No footpaths and fast running roads (2)
- To make the site permanent would place a strain on relations between the two communities contrary to Government policy (1)

#### **Scale of Development**

- Site could expand further if approved (1)
- Black Paddock should not accommodate further pitches as this will negatively impact current occupants (1)

#### **Flooding/ Drainage**

- Local roads regularly flood (2)

#### **General Comments**

- One side of the site has been empty for a number of years (1)
- it would send the wrong message to give this permanent consent (1)

#### **Supporting Comments**

Total number of supporters (2)

- The site should be a green site as constraints can be overcome (2)
- Travellers do not walk to facilities (2)
- Increasing the number of residents will have commercial benefits and companies supplying services will have more customers (2)
- If required a footpath could be provided (1)

#### **General Comments**

##### Braybrooke Parish Council

We do not support the site as a possible site and would request that it is closed down as soon as the temporary permission period ends and that no further periods are granted. We do so for the following reasons:-

- The site is yet another one in our overcrowded parish and there are more suitable sites which could be developed.
- Together with the other sites in Park Lane this gives one massive site which is against advice.
- The last Planning Inspectorate report stated it to be unsustainable and granted a temporary consent until a permanent site could be found.
- The site is not close to supporting services (school, shops and healthcare to name but a few).
- There would be a strong possibility of further site development with or without planning approval should this site be approved

#### **Officer Comments**



## **Location/ Sustainability Issues**

### Sustainability of site and access to facilities

The site is located in the open countryside, being located approximately 1.2 km to the edge of Braybrooke Village. National and local policy both direct development of Gypsy and Traveller sites to be within sustainable locations. The CLG 'Designing Gypsy and Traveller Sites Good Practice Guide ' 2008 recommends that sites are developed within or close to the settled community to improve integration and co existence. The site does not provide for this as there is only one dwelling located nearby to the site.

Reference has been made to assessment work being incorrect in terms of distance to the health centre and access to public transport. Comments have stated that there is no health centre within 2 km. The assessment work does not state that there is a health centre within 2 km; instead it states that the closest health centre is Desborough medical centre which is located within 5km of the site. With regards to public transport, comments have been received that site does not have access to public transport. In the assessment criteria it is identified that the site is located 320 metres from bus route 18. The assessment work is not incorrect as bus route 18 runs along Desborough Road and the site is located within 320 metres of Desbrough Road (the criteria states 200 m to 400 m of a route to a main urban centre). The nearest bus stop to the site is approximately 1300 metres close to the junction of School Lane and Desborough Road in Braybrooke. There is also the potential for a bus stop to be created closer to the site if there was a commercial demand for the service.

In terms of sustainability, the site does not score as favourably as those sites identified which are located within or immediately adjacent to towns and villages. The site scores moderately well compared to other sites identified through the process in respect of access to facilities, but performs poorly in respect of pedestrian and cycle links and it is considered that the site will result in a reliance on the private car. This is the case with many of the sites which are located within the open countryside. The sustainability of the site was considered by the Planning Inspectorate under the planning appeal in respect of KET/2010/0566 to vary a previous planning permission from temporary to permanent permission. The inspector considered that the main issue was the effect the decision would have on achieving a sustainable pattern to the location of sites for Gypsies and Travellers. The inspector concluded that residents of the site would be almost entirely reliant on the private car for access to services and facilities and it cannot be regarded as closely linked to an existing settlement.

Significant concerns have been raised about the over concentration of sites both around Braybrooke as a whole and the number close to the junction with Park Lane and Desborough Road in particular. On this cross roads there are four existing Gypsy and Traveller sites with permanent planning permission, each of which are private sites, which are run separately from each other and separated by boundary treatment. The site known as Animal Corner has permission for 7 pitches, Braybrooke Stables has permission for 3 pitches, 3 Park Lane has permission for 3 pitches and Brookside has permission for 2

pitches. Excluding Black Paddock, there are 15 pitches in total.

Concern has been raised that granting permanent permission for 7 – 10 pitches would provide for a massive site contrary to national advice. CLG's 'Designing Gypsy and Traveller Sites Guide' 2008 states that sites should ideally consist of not more than 15 pitches. However as already indicated, the existing four sites, whilst adjoining each other, are separate sites. It is considered that the potential development of a permanent site at Black Paddocks, which is located approximately 200 metres away from these existing sites and north of the railway viaduct will not result in the development of one site greater than 15 pitches. This separation is further emphasised with the existing sites located at the crossroads not being visible from the Black Paddock site. A similar approach has been taken elsewhere in the borough with the development of the new Laurels site close to the existing Pastures site.

One of the objectives set for identifying potential sites was to avoid the over concentration of sites in Braybrooke and for this reason the search area excluded the Braybrooke and Desborough area. The Black Paddock site has been included within the assessment as it is an existing site. Whilst the development of 10 pitches on this site could be considered an over concentration of Gypsy and Traveller pitches in the Braybrooke locality as a whole, the retention of the 3 existing pitches on the site is considered to be of a scale that does not dominate the area. The site could be extended to provide one further pitch to the rear of the site without again causing domination of the area.

In the previous appeal decision on KET/2010/0566 (an application to remove a temporary condition) the Planning Inspector did conclude that the site would be reliant on the private car. The Inspector does however acknowledge that in their experience it is very rare to find new Gypsy sites within or abutting urban areas. The reason for the Inspector dismissing the appeal was that the Site Specific process would ensure the necessary number of Gypsy and Traveller sites were provided in the most sustainable locations. At the time of his decision the assessment work for the Site Specific had not been undertaken, the Inspector concluded that a permanent permission was not justified at that time. The Inspector did not dismiss the site as a future potential site.

### **Scale of Development**

As noted above, whilst the site has potential to be divided up into 7 – 10 pitches, for the reasons noted above, the development of a lesser number of pitches on the site would be a more preferable option. Currently the site has permission for 3 pitches with currently the south eastern quarter of the site not forming part of a pitch. If the site were to progress forward, it would be logical extension to provide one further pitch in this corner to the mirror the arrangement to the north of the pitch with a tandem layout.

Concerns have been expressed that the site could extend further if it were approved. It is important to note that since the site has had temporary

permission for 3 pitches, the number of pitches has not increased and the site has not expanded. If the site were to be progressed, the provision of appropriate boundary treatment, both internally and externally, would reduce the likelihood of sites expanding.

The development of the site for a potential 4 pitch site would provide for spacious plots which would ensure that privacy and general residential amenity of future occupiers would not be compromised.

### **Flooding**

Concern has been expressed about the local roads flooding. There is no evidence to suggest the current site for three pitches has contributed to this flooding. Flooding was not raised as an issue under the recent determination of KET/2013/0517 which provided for a further 2 year temporary permission.

### **General Comments**

One comment has been received the one of the pitches on the existing site is vacant and has been for a number of years. Monitoring records indicate that in 2012 and 2013 the pitch in the south western corner of the site appeared to be vacant. However a recent site visit in January 2014 was undertaken which confirmed that all 3 pitches were occupied.

### **Recommendation**

One of the objectives of identifying sites through this exercise is to identify sites in the most sustainable locations to accord with national and local policy. The site is not the most sustainable site identified through the process when compared to other sites within or immediately adjacent to town and village boundaries. However, many of these sites that did compare more favourably in respect of sustainability are now no longer available. In all other respects it compares favourably to other sites. For these reasons it is recommended that the site is progressed, but for the reduced number of pitches of 4.

**Name of Site:** Wellingborough Road Broughton (BRO006)

### **Summary of Comments**

#### ***Objections***

Total number of objections (32)

#### **Issues raised/ comments:**

##### **Principle**

- Land owner does not want site included (1)
- Site too near to residential area (7)
- Existing sites should be expanded (1)
- Site should be developed for conventional housing. (2)
- Traveller accommodation should be outside of village (3)
- A single pitch site would be contrary to integration – a large site (4-5 pitches) would provide a better social balance for occupiers (3)

- Inappropriate location (unspecified) (3)
- Effect on property values and house sales (10)
- Village has a site already – should not have more (9)

### **Highways**

- Difficulty of access for large / towing / emergency vehicles (1)
- Increased traffic (3)
- Large vehicles would damage roads and increase risks of accidents (2)
- Busy, fast and dangerous road (6)

### **Amenity**

- Village services (School, etc) are strained (7)
- Effect on visual amenity (4)
- Effect of having second site at entry point to village

### **Constraints**

- Proximity to public path (2)

### **Suggestions of other search areas**

Ashley, Cranford, Cransley, Geddington, Grafton Underwood, Little Oakley, Loddington, Mawsley, Pipewell, Pytchley, Sutton Bassett, Weekley, Weston By Welland

### **Broughton Parish Council**

- Generally, individual pitches that are separate from any other site would not appear to be an ideal situation for either Gypsies and Travellers or neighbouring Residents in the locality as these would be highly isolatory for the Gypsies and Travellers themselves. Residents equally would be faced with a pitch that would be completely out of context with any surrounding vicinity and if not permanently occupied, would quickly become derelict
- As indicated above, this would be an individual pitch completely out of context with the surrounding properties. Wellingborough Road is completely characteristic and to include a plot for caravan usage would be totally out of keeping with the surrounding properties.
- Any further increase in the locality to Broughton of the Gypsy and Traveller community would seriously compromise an existing fragile co-habitation.

### ***Supporting Comments (9)***

None

### ***General Comments***

Environment Agency

Sites in Flood zone 1 could be allocated. Sites in excess of 1ha need FRA with application. Surface water run off needs managing

## **Officer Comments**

### **Principle/ Sustainability**

The site is a small parcel within the village boundary, adjacent to housing, where planning permission has been granted for residential development. The Designing Gypsy and Traveller Sites Good Practice Guide (CLG, 2008) sets out the Government's advice on designing good Gypsy and Traveller sites. This document states that where possible, sites should be developed near to housing for the settled community as part of main stream residential developments. The document highlights the need for sites to be close to schools and healthcare facilities and to promote integration and co-existence with the settled community.

Chapter 3 of Designing Gypsy and Traveller Sites – A Good Practice Guide suggests some criteria for the location of permanent sites. This site would meet the vast majority of the identified criteria, including; providing easy access to local services, the transport and road network, and to social contact with other residents; it not being in a location that would be hazardous to health; and it being a site equally suited to housing. A number of commenters' hold views opposed to those of the Good Practice Guide.

Consultation had been undertaken in February 2012 as to how site allocation should proceed. The preferred options were to limit the expansion of existing sites and identify sustainable locations across the Borough. Effect on property values and house sales is not a planning consideration.

### **Highways**

Concerns have been expressed about access for large vehicles, the effect of large vehicles on the road and an increase in traffic. The site would accommodate one pitch, which would be a less intensive use than the two dwellings already permitted. NCC Highways have confirmed that the road network has sufficient capacity and that adequate access can be achieved. The site is within the 30mph speed limit zone.

### **Amenity**

Some concerns have been raised about village amenities. With regard to this site, it should be borne in mind that permission has been granted for 2 houses and the replacement of these with one traveller pitch is unlikely to have a significantly different effect. NCC Education has raised no issues with the proposal.

In terms of visual amenity, the details of design, boundary treatments and landscaping could all be dealt with at a later date. The street scene comprises a mix of styles of 2 storey houses, in pairs and terraces. These are punctuated by gaps between properties, where car parking, outbuildings and other developments of a single storey scale are located.

### **Constraints**

A public path runs alongside the south west boundary of the site and concerns have been raised in regard to its proximity. It should be noted that this is outside of the boundary to the site. Boundary treatments or

landscaping would be required along this boundary, for the sake of amenity and the privacy of prospective occupants. As such there is no obvious conflict between the provision of a pitch on the land and the nearby footpath network.

### **Alternative locations**

The search areas have been restricted to those locations where the land is publicly owned, or where brown field land was on the market for sale. In addition, in order to provide some semblance of sustainability, the search areas were restricted to within 2km of a school and shop. Areas where these criteria could not be met were excluded from the search areas.

### **Recommendation**

Owner has indicated that site is not available. Do not progress further.

**Name of Site:** Woodcroft, Stoke Albany Road, Desborough (DES031)

### **Summary of Comments**

#### ***Objections***

Total number of objections (3)

#### **Issues raised/ comments:**

#### **Scale of Development**

- Site is only for 1 pitch and this has the potential to be abused (1)
- Already a large number of pitches in the area (1)

#### ***Supporting Comments***

Total number of supporters (10)

Issues raised/ comments

- Travellers do not want to live with the settled community (2)

Wilbarston Parish Council

- Agree. Our response refers to DES031, but on the understanding that this will have links to the existing nearby site at the Pastures, as we understand that stand alone single pitches are not desirable.

Loddington Parish Council

- Agree. We agree with the potential sites identified but we do not think that we are qualified to assess which should be allocated as Gypsy and Traveller sites as we may not know or understand any issues with these sites. The communities near the sites would need to answer this question.

Braybrooke Parish Council

- Agree the site should be allocated to Gypsy and Traveller accommodation

#### Environment Agency

- All potential sites should be allocated as Gypsy and Traveller sites as they are located in flood Zone 1 Proposed developments greater than 1 hectare located in Flood Zone 1 NPPF Paragraph 103 requires applicants for planning permission to submit a Flood Risk Assessment when development is greater than one hectare located in Flood Zone 1 defined by Technical Guidance to the NPPF as having a low probability of flooding. The proposed scale of development may present risks of flooding on-site and/ or off site if surface water run-off is not effectively managed. Guidance on the requirements of the FRA can be found at [www.environment-agency.gov.uk/static/documents/Utility/FRAGuidanceNote1\\_v3.1.pdf](http://www.environment-agency.gov.uk/static/documents/Utility/FRAGuidanceNote1_v3.1.pdf) Proposed developments less than 1 hectare located in Flood Zone 1. These development sites are less than 1 hectare located in Flood Zone 1, (low probability of river and sea flooding as defined in the NPPF. The main flood risk to consider is usually the management of surface water run-off. Drainage from the new development must not increase flood risk either on-site or elsewhere. Government policy strongly encourages a SuDS approach to achieve these objectives. Guidance on how to address specific local surface water flood risk issues may also be available through the Strategic Flood Risk assessment or Surface Water Management Plan produced.

#### County Archaeological Advisor

- I agree with all the allocations within Option 3 Potential sites. The sites, apart from the Rothwell site, will not have any detrimental impact on any known archaeological remains.

#### **Officer Comments**

##### **Scale of Development**

Concern has been expressed that the site is only for one pitch and has the potential to be abused. The site is already secure on its boundaries with an existing 1.8 metre high timber fence on the north west, south west and south eastern boundaries of the site. There is existing built development in place on all three of these boundaries (Woodcroft a dwelling to the north east, Woodside a dwelling with associated cattery business to the south west and a commercial unit to the south east on the site), thus there is no potential for the site to encroach. If this site is progressed, restrictive conditions can be attached to any grant of planning permission to limit the number of caravans on the site and to prevent any business use. The site is currently occupied in association with an existing temporary planning permission (KET/2013/0679) and no complaints have been received since the site has been occupied.

A comment has been received from Loddington Parish Council that stand alone pitches are not desirable. CLG 'Designing Gypsy and Traveller Sites

Good Practice Guide' 2008 states that there is no one ideal size of site or number of pitches. Whilst this document suggest that from experience 15 pitches should be a maximum, no minimum figures are given. It is considered within the Borough, there is an equal need for smaller sites of only one pitch as there are for sites of up to 15 pitches. There are other examples within the Borough of single pitches which are operated and integrate well with the settled community.

One comment has been received that there is already a large number of Gypsy/ Traveller pitches within the Borough. Currently there are 15 pitches at the Pastures, a local authority run site, which is located approximately 780 m away by road. Construction work is currently undertaken for a further 7 pitches at 'The Laurels' which will also be a local authority run site. The Laurels is located approximately 670 metres from this site. Work has also commenced on one single pitch on the corner of Stoke Albany Road and this is located approximately 135 metres from the site.

Whilst permission has been granted for a further 10 pitches to the south of The Laurels Site, there is no funding for this site and it is considered highly unlikely that this permission will be implemented.

The Woodcroft site will be a private site run separately from the other nearby local authority managed sites. This site is located sufficiently far away from the other sites within the area and does not adjoin them and is not visible from them. Woodcroft is well screened and it is not considered that the continued residence of this one pitch would add to such a level of over concentration that it should not be progressed. The site is surrounded by either dwellings or commercial units, this reducing any impression of over concentration of Gypsy / Traveller sites within this locality.

**Recommendation**

The site is progressed.

**Name of Site:** Abattoir Site Broughton (BRO007)

**Summary of Comments**

**Objections**

Total number of objections (36)

**Issues raised/ comments:**

**Principle**

- Site too near to residential area (2)
- Traveller accommodation should be outside of village (1)
- Unsustainable location (2)
- Inappropriate location (unspecified) (3)
- Effect on property values and house sales (7)
- Village has a site already – should not have more (8)



- Possibility of contamination from Anthrax, Foot and Mouth Disease and asbestos (5)

### **Highways**

- Difficulty of access for large / towing / emergency vehicles (1)
- Access alignment and visibility (6)
- Seasonal visibility of access – fog pocket (2)
- Lack of footway/ cost of provision (4)
- Size, alignment and use of road (4)
- Increased traffic (4)
- Busy, fast and dangerous road (2)

### **Amenity**

- Village services (School, etc) are strained (6)
- Effect on visual amenity (2)
- Effect of having second site at entry point to village (2)

### **Suggestions of other search areas**

Ashley, Cranford, Grafton Underwood, Little Oakley, Sutton Bassett, Weston By Welland

### **Broughton Parish Council**

- On the paper evaluation the site scores lower than other sites which have been discounted and yet it still appears as a potential site for consideration.
- Wellingborough Road is a very fast country road serving very many cars as demonstrated in a survey by Northamptonshire Police on speed and number of vehicles using the road in 2009 and again in 2011. These surveys demonstrate an increasing number of vehicles and sadly continued high speeds on arriving in the village. We can advise that the situation has certainly not improved since then and at times of delays on the A43/A14/A509 this route becomes extremely busy with traffic trying to find a way through.
- The exit from the field for this potential site would emerge at one of the most dangerous points beyond a bend and blind uphill/downhill on either side – visibility at this point is concealed and in winter is prone to particularly difficult driving conditions. There have been many accidents over the years including a fatality.
- The site was formerly used as an abattoir and residents with local knowledge and experience of the site have made us aware at our local consultation meeting that anthrax was regularly used with carcasses being buried in the ground (including cases of foot and mouth).
- The site is in a dip and would be completely exposed to being viewed from the road, local footpath network through the fields and Broughton properties.
- There is no pavement or safe footpath along Wellingborough Road for access to either Broughton or Pytchley.
- Any increase in the already large numbers of vehicles using the Pytchley Crossroads would seriously aggravate an acknowledged

accident blackspot which has frequently been discussed with Highways and reported at Parish Council meetings for maintenance to improve visibility.

**Supporting Comments (4)**

there is obviously an entrance track to the site which could be upgraded. It is only a short distance along the road to Broughton or via footpaths to Broughton, a footway could be provided. Sewage not a problem with septic tanks. Part of this site included joint core strategic employment site so access should not be such an issue, and site is for sale.

A far better planning prospect in its potential to deliver on all counts and meets all the criteria without the impacts on amenity and wildlife that site BRO008 would have.

**General Comments**

Environment Agency

Sites in Flood zone 1 could be allocated. Sites in excess of 1ha need FRA with application. Surface water run off needs managing

County Archaeology

Development will have a negative impact on the historic environment however this impact can be mitigated by the imposition of an appropriate archaeological condition.

English Heritage

Site potentially lies within the setting of the Grade II\* listed Church of St Andrew in Broughton to the north. It depends on topography and landscaping, but this should be assessed before the next consultation stage should this site be taken forward for allocation. If necessary, appropriate wording should be included in the final document to ensure that possible setting issues arising from this allocation are addressed at the application stage.

**Officer Comments**

**Principle/ Sustainability**

The site is a linear parcel of land situated in open countryside to the south east of Broughton. There are high voltage, overhead electricity lines on pylons the length of the site. The site is some 500m from the village boundary, along an unlit country road with no footways, which is subject to national speed limits.

The Designing Gypsy and Traveller Sites Good Practice Guide (CLG, 2008) sets out the Governments advice on designing sites. It indicates that where possible, sites should be developed near to housing for the settled community as part of main stream residential developments. The document highlights the need for sites to be close to schools and healthcare facilities and to promote integration and co-existence with the settled community. This site would be reasonably close to most local services, and the transport and road network.

The site sits under high voltage power lines and there have been reports that

the site has been used for the burial of animals with anthrax and foot and mouth disease. As such and without further site investigation, it could be assumed that the location might be hazardous to health, which would be contrary to the GPG.

Consultation had been undertaken in February 2012 as to how site allocation should proceed. The preferred options were to limit the expansion of existing sites and identify sustainable locations across the Borough. Effect on property values and house sales is not a planning consideration.

### **Highways**

Concerns have been expressed about access for large vehicles, the access alignment and visibility, and an increase in traffic. The site could accommodate a number of pitches, which would be likely to increase the use of the access. The absence of a footway and the national speed limit on the approach to Broughton would make walking or cycling unattractive to site occupiers.

NCC Highways have confirmed that the access is unacceptable as insufficient visibility is available in either north or south direction, with that to the south being particularly poor at 82 metres where the requirement is 215 metres. These splays cannot be brought up to standard, due to the alignment of the road network and to the speed limit pertaining to it (60mph), and so no adequate access arrangement could be engineered. It therefore objects to the allocation of the site.

### **Amenity**

Some concerns have been raised about the effect of such a development on village amenities. It is considered that a site for 5 pitches would be unlikely to cause a significant strain on village amenities. NCC Education has raised no issues with the proposal.

In terms of visual amenity, the details of design, boundary treatments and landscaping could all be dealt with at a later date. The site is a linear plot which is set perpendicular to the road and therefore need not be overly prominent in the street scene or landscape.

### **Alternative locations**

The search areas have been restricted to those locations where the land is publicly owned, or where brown field land was on the market for sale. In addition, in order to provide some semblance of sustainability, the search areas were restricted to within 2km of a school and shop. Areas where these criteria could not be met were excluded from the search areas.

### **Recommendation**

In view of the insurmountable constraints on the provision of a suitable access, the site be excluded from further consideration.

**Name of Site:** Highcroft Farm, Broughton

**Summary of Comments**

**Objections**

Total number of objections (84)

**Issues raised:**

**General location and sustainability**

- No bus stops nearer than Broughton (should be a red cross in scoring)/ not on a bus route/ bus does not pass the site/ creation of bus stops would be dangerous on this route (should score ~ or X) Bus route would need to be created. (38)
- There are already sites in Broughton/ nearby site is underused/ sites in Northamptonshire underused/ too close to existing site/ would equate to 20% of Broughton population/ existing sites have recently expanded. (29)
- Broughton already has an established site/ has been earmarked for 3 additional pitches at the existing site/ has a site which is not fully utilised/ (7)
- There are no accessible footpaths along Broughton Road and no footpath on Northampton Road, people will be forced to drive undermining the sustainability of the site. Score should be amended and site removed from potential site list/ should have scores XX/ should score the same as BRO009/ no safe crossing on Pytchley Road. (16)
- Site is more than 2000m from a school/, shops/ healthcare so should not have been included. (5)
- Site is significantly detached from Broughton and detached from services and facilities which undermines the principles of CSS policies 9, 10 13 and 17, inclusion of the site would be contrary to CSS policies. (1)
- The existing site is under utilised and it is argued that the cumulative impact of the sites cannot be ascertained while the existing site is under capacity (2)
- Putting sites on the outside of the town does not promote community cohesion in accordance with GPG (1)
- Site should be considered for housing and if not considered suitable this should also apply to this proposal (3)
- Development would be unsustainable and concern it has only been included because it is remote so unlikely to generate high level of objections. Would not be considered suitable for residential development/ development in the countryside should be limited (2)
- Development would not promote integration and co-existence between the site and the local community because it is a significant distance from the local community (3)
- Only fully on-site business operations would be sustainable in this location (2)
- Location is unsuitable (2)
- Sites should be located in areas where there are no existing sites (1)
- Criteria are flawed and do not promote sustainable development contrary

to NPPF (1)

- Greenfield site with no close connections to shops, schools , services or public transport (1)
- Para 23 of Planning Policy for Travellers states 'local planning authorities should limit new traveller site development in the open countryside away from existing settlements. This site is well away from existing settlements. (1)

#### **Alternative locations**

- Sites on A14/A6 junction after Rothwell and proposed truck stop would be more suitable (1)
- Would be better to add single pitches to existing sites (1)
- Why are there no sites in Mawsley? (1)
- All potential sites should be scrapped in favour of a site at the Waterside Enterprise Zone in Northampton. (1)
- There are better alternatives nearer to Kettering, where there are better facilities and work opportunities. (1)
- There must be brownfield sites which could be used instead (1)
- Some of the alternative sites would meet the NPPF criteria and would be more suitable than BRO008 (1)

#### **Highways**

- Road safety – A43 is dangerous already and this would make the situation worse/ access onto A43 would be dangerous/ congestion would increase/ would require costly road improvements/ increase traffic going through Pytchley/ traffic impact assessment would be required/ busy junction with poor visibility/ significant number of movements from 60 families/ rural roads already busy/ increase of traffic in the village. (60)
- Development would prejudice A43 road widening/ was compulsory purchased for road widening/ would families need compensating in the future if the scheme went ahead/ should be kept for road widening. (20)
- ROT012 has been discounted due to safety of young children, this site would have similar issues with the A43. (1)
- Traffic in Broughton is already a problem – Northampton Road needs a pedestrian crossing and speed camera or speed bumps/ will increase traffic in Broughton. (2)

#### **Scale of development**

- 15 pitches is too many – (Police recommend a maximum of 3 pitches to avoid concentration)/ concern over cost of maintaining/ managing a large site/. (33)
- Would result in 60 extra families / 120 residents needing access to schools and healthcare/ size of site should score X (7)
- An additional site on top of the existing would mean development is not commensurate to the size and scale of Broughton as required by '*Planning for Traveller Sites*'. Combination of this site and others in Broughton alongside existing would dominate the settled community (4)

#### **Impact on facilities and provision of basic infrastructure**

- Health facilities are at capacity (2)
- Local schools are full (should be orange or red/ X)/ where will children go to school. (47)
- Village children now have to travel outside the borough for secondary education (1)
- Nearest secondary schools are Kettering and Moulton (1)
- Village does not have the infrastructure to support such a large site. (3)
- Site should be located where infrastructure is already available (1)
- Water and sewage supplies are not adequate/ available/ there is an issue with water pressure/ would be costly to provide (drainage score should be red/ XX) (Basic infrastructure score should be XX. (44)
- Provision of facilities will be costly/ there are no facilities/ would be expensive to develop the site. (6)
- Electricity supply not adequate. (1)
- Insufficient infrastructure/ cost of infrastructure (3)
- There is no doctors surgery in Broughton (3)
- Accessibility – site is remote from facilities and should have scored X (1)

#### **Noise**

- Noise and pollution from A43/ should score XX (9)

#### **Ecology**

- Wildlife – this is the last remaining unimproved part of the old Broughton common, a wide variety of species are present on the site (rare plants, rare/ endangered animals) (should be red score/ XX)/ an ecological assessment is needed/ has an Environmental Impact Assessment been completed? (21)
- There are rare orchids that grow in the area (1)
- Health – will result in loss of open space should be graded X (1)
- Adverse impact on adjoining wildlife margins and SSSI and should be graded X (1)

#### **Landscape/ visual impact/ heritage impact**

- Landscape – while the site is shielded by the leylandi hedge within the site are substantial trees and bushes which if opened up would alter the character, site has high sensitivity to development so should be graded XX (1)
- Site is visible from a number of key countryside views and visual impact assessment is required to ensure there would not be a significant impact. Cost of screening would impact on viability/ site would be alien in this landscape (2).
- Would ruin countryside around Broughton (2)
- Cultural heritage – should score XX as land is last vestige of old Broughton common grazing (2)
- Compatible Development – hard to see how a traveller site would be compatible with the rural environment (1)

#### **Flooding and drainage**

- Ground is not flat and does not have good drainage (1)

- Drainage will be an issue due to clay (1)

### **General comments**

- House prices will fall/ houses will be difficult to sell. (5)
- Existing occupiers would have to be evicted/ should not be evicted/ there are plenty of areas of land which do not have occupiers which could be used. (31)
- Occupiers of the site were not informed prior to the consultation (1)
- The site does not comply with certain safety aspects listed in the 'Designing Gypsy and Traveller Sites Good Practice Guide'. (2)
- There are no street lights (2)
- Would be expensive to develop the site. (6)
- NCC have advised KBC that the site is not available, availability of site needs confirmation as the two councils seem to conflict on this. (2)
- Existing buildings would need to be demolished (1)
- Availability – as the land was compulsory purchased under the principles of the Crichel Down rules it should be offered back to the former owners or their successors therefore should be graded XX. (6)
- Due to environmental constraints and in light of Crichel Down rules site should score Yes for constraints that may prejudice development (1)
- Options paper should meet the recommendations set out in '*Planning Policy for Traveller Sites*' – through out the papers there appears to be no indication that community engagement has taken place. Too often sites are left empty because they don't meet traveller needs. GTAA does not comply with the new levels of community engagements in the 2012 guidance. Site assessment methodology does not appear to have specifically addressed the identified needs of travelling communities that have derived from effective consultation. Methodology has been designed for residential allocations not traveller allocations. (2)
- Agree with the comments made by Pytchley Parish Council (1)
- Risk of site expanding (1)
- Requirement to 2017 has almost been met so site is not needed (1)

### **Broughton Parish Council:**

Site is inappropriate as potential sites for following reasons:

- Land was compulsory purchased for A43 widening, the lawful entitlement to purchase the land originally was cited as being for the dual carriageway of the A43 and on the basis of this, it is not deemed that the land is therefore available to be proposed for a Gypsy and Travellers Site.
- Highcroft Farm has been incorrectly assessed on the paper evaluation process as there is no main sewerage, drainage and only a very limited water supply.
- Highcroft Farm is situated at extremely close proximity to the A43 which is classed as a Red Route and is acknowledged as a road at capacity. Other identified sites scoring much more highly than Highcroft Farm (e.g. ROT012) have been dismissed from consideration because of their proximity to major routes and potential danger for children.
- Access at this point for Highcroft Farm is particularly dangerous as the A43 is very busy. It is very difficult to turn right on the A43 and increasing

the traffic flow towards Pytchley crossroads is not welcomed as this is a notorious blackspot for accidents. Access to Pytchley Road from the A43 heading south is eased by a wide jaw access allowing vehicles to enter the junction at a certain speed.

- Highcroft Farm is in fact the very last remaining portion of the original Broughton Common. This piece of ground has never been cultivated and is an important element in the Broughton History and Heritage and is today an unadulterated piece of ground providing valuable habitat for a wide ranging flora and fauna. We would suggest that it should have a professional ecological survey. Maps are attached showing the original Broughton Common.
- The Highcroft Farm site is large and indicated that it would deliver 15 plots with the potential for up to 60 caravans and would be in addition to the existing Gypsy and Travellers site at Broughton. In fact, this potential site would stand at just one field away from the existing site and there is grave concern expressed of further incursion into the countryside from one site or the other creating a very real potential for a huge site to develop.
- The impact of a further site in such close proximity to the existing site would give the impression of a very large scale area being occupied by Gypsies and Travellers in what is open countryside and would become a dominant feature for the village of Broughton and its immediate vicinity.
- The enforcement of any unlawful incursion/extension or planning contravention is evidentially most unlikely to be pursued with the existing Enforcement Order ENFO/2011/00027 dated 17th October 2011 still to be executed as ordered.
- The potential density ratio of a further 15 plot site in addition to the existing site in relation to Broughton village and its Parish would be an unsustainable development for the area.
- Broughton village provides no healthcare – nearest location is equidistant either in Kettering or Mawsley.
- Other potential sites comply with the NPPF, this site does not. (1)

**Adjacent Parish Councils (Walgrave Parish Council, Hannington, Divisional County Councillor (Molton Division), Old Parish Council)  
Object:**

- Scoring for this site is flawed
- Land was compulsory purchased by NCC for widening of A43 and question need to be raised about purpose and original owner rights.
- If a portion of site is to be kept for A43 site would not longer be viable to accommodate 15 pitches.
- NCC has indicated that local schools are at capacity and couldn't cope with a possible influx of 30 children. It is key that Gypsy and Traveller children's education needs are fully met without having to travel great distances.
- Walgrave primary school is at capacity as are other nearby village schools
- No specific bus route that passes the site to schools and shops and no potential for a bus stop due to safety reasons.
- Investment un public transport needed and this may detract from existing inadequate service



- Footpath along A43 would need to be used by children attending school and is unlit and not fit for purpose.
- Proposed access of the A43 is a red route and accident blackspot. Potential for 120 additional vehicle movements would have serious impact on local roads and A43.
- Pitches would suffer from poor air quality due to the proximity to the A43.
- Noise would be a further health hazard.
- There are no medical facilities or shops in the proximity or other essential utility services including electricity, mains water or sewage disposal.
- Site is a wildlife sanctuary established on old Broughton common. It is also a wildlife corridor. Development would impact on rare plants and animals.
- No Environmental Impact Assessment has been carried out and given the diverse species present is essential.
- BRO007 is a better planning prospect and meets the criteria without impacting on wildlife.

**Pytchley Parish Council Object to BRO008:**

- Access to public transport is over 1 mile away so should get a X.
- Land has had a farm house for 100 years and should remain as this.
- Resident should not be evicted for other families to live there, tenant should remain until such a time as the land is needed for the A43 widening.
- Land has been rough pasture for over 100 years and will be teaming with flora and fauna. Ecological assessment required.
- Extensive drainage would be required which would be expensive. There is no mains sewage to the site.
- Access and ongoing roads not suitable for increased traffic. A43 very busy and Pytchley has an ongoing traffic problem. Significant highway improvements would be needed.
- Land was part of a CPO for the A43 widening and land should remain available for this scheme.
- Broughton and Pytchley Primary schools are at capacity and have no plans to increase in size.
- Local doctors, dentists and hospitals are at near or full capacity.
- Parish Council are disappointed that the tenants were not informed prior to the consultation.

***Supporting Comments***

- Given that Gypsies prefer to live in smaller settlements it might be sensible to reduce the pitch number of the Old Sewage Works, Burton Latimer, Scott Road Garages and Highcroft Farm, Broughton (1)
- Agree the site should be allocated but should be reduced in size (2)
- Agree with the site (3)

**Harrington Parish Council** – site should be reduced in size to make it more manageable for integration. 15 pitches is too large.

## **Officer Comments**

### **General location and sustainability**

The assessment in relation to public transport measured the distance of the site to a route to a main urban centre. The site is adjacent to service 304 and the Shire Community Transport service and therefore the assessment of the site is correct. The assessment criteria did not assess frequency of the service and it is noted that the services which currently pass the site offer a limited bus service and that there is currently no bus stop near to the site. There is potential for a bus stop to be created closer to the site if there was a commercial demand for the service. Any provision of new bus stops/ services would need to ensure current services are not adversely affected.

The need for new sites and the under use of the existing site in Broughton has been assessed in the GTAA. This document took into account the existing pitches in the Borough, including the site at Broughton. The need that sites which are allocated would meet is in addition to existing provision. While there may be pitches on the Broughton site which are under used these are privately owned sites and the Council has no control over their occupation.

The site connects to the footpath/ cycle route along the A43 which leads to Kettering. This path connects to Northampton Road which leads into Broughton but does not currently have a pavement. There are other routes in to Broughton from the A43 footpath which are along footpaths but these are considerably further from the site than Northampton Road. To access the school via the alternative footpaths is likely to be approximately 3km. The assessment of the site is correct in that there are footpaths available into Broughton, however it is recognised that the distance and level of traffic on the A43 may impact on whether people choose to walk into Broughton from the site.

The site is located on the boundary of the 2000m distance to a shop and school search area. Members of the Planning Policy Committee on the 11 July 2012 asked that areas just outside the 2000m search area were considered to reflect the comments made during the consultation stating that sustainability was not an important factor to the community.

The site is detached from Broughton and concerns have been raised in relation to the sustainability of the site, possibility for integration and undermining principles of CSS policies. While the site is detached from Broughton it is located on a major transport route with good links to Kettering. As discussed above there is also a footpath which links the site with Broughton. The site is close enough to allow residents to access facilities in the village and to allow integration. Policies 9, 10, 13 and 17 of the CSS seek to strictly control development in the open countryside and policy 17 seeks to ensure Gypsy and Traveller sites are closely linked to an existing settlement with an adequate range of services and facilities. Broughton has a school, shops, pub, village hall and recreation ground. While a site located within or adjacent to an existing town or village would be preferable in terms of sustainability this site is located close enough to the village to allow access to

services and facilities. Use of services and facilities within the village will help promote social cohesion.

The site would not be considered suitable for housing development because it is detached from the existing settlement however sites which would be considered suitable for housing are sold at a price which reflects this and therefore value of land may make these sites unviable or unavailable for traveller development.

The criteria for assessing the sites are based on the Sustainability Appraisal criteria and provide a robust basis for assessing sites.

While paragraph 23 of Planning Policy for Traveller Sites states that 'local planning authorities should limit new traveller site development in the open countryside away from existing settlements' it goes on to say 'or outside areas allocated in the development plan'. The PPTS does not rule out traveller sites in the open countryside, although it does seek to limit their development away from existing settlements.

### **Alternative locations**

Alternative sites suggested have been considered separately.

Extending existing sites was included as an option for consultation in the Site Specific Proposals LDD Options Paper consultation (March 2012), however the preferred option agreed at Planning Policy Committee on the 11<sup>th</sup> July 2012 was a combination of dispersing provision and using sustainability appraisal criteria.

Mawsley was included in the search area however no sites were identified which were suitable for progression beyond the initial sieve.

### **Highways**

NCC highways were consulted during the assessment of sites and did not raise concerns with gaining safe access to the site or with capacity of the highway network. The only comment they made was that access could only be provided from Pytchley Road.

Concerns were raised about the impact of development of the site on the A43 widening scheme. Discussions have taken place with NCC and part of the site would need to be retained for the A43 widening, development of the remaining part of the site would therefore not impact on the widening of the A43.

Concern has been raised for the safety of young children close to the A43, however provided the site is designed to ensure safety this issue can be overcome.

### **Scale of development**

The site was proposed for up to 15 pitches. Some respondents have based their comments on the assumption that this could generate up to 60 families, however this is not the case. A pitch would accommodate 1 family; therefore the site would accommodate a maximum of 15 families. Given the size of the

site and the area that is required for A43 widening it is considered that the site could accommodate up to 10 pitches.

Concerns have been raised that the size of the site in combination with the existing site would dominate the settled community. The existing site has 13 pitches. The addition of up to 10 could result in provision of up to 23 pitches. The site at The Pastures accommodates 15 pitches and The Laurels which is located approximately 75 m from The Pastures will accommodate 7 pitches and allow an additional pitch to be provided at Stoke Road. This also equates to 23 pitches. The population of Broughton is 2,208 (Census 2011). It is not considered that the addition of up to 10 pitches, even when considered alongside the existing site, would be of a scale that would dominate the settled community. The sites are visually separated and visually would not result in an overconcentration of sites in the area that would be out of keeping with or dominate the local settled community.

The Governments Good Practice Guide '*Designing Gypsy and Traveller Sites*' suggests that a maximum of 15 pitches is conducive to providing a comfortable and easy to manage environment. This site would not exceed 10 pitches and is therefore in accordance with this guidance. While the police preference is for smaller sites this needs be considered alongside the viability of managing a large number of small sites if they are in local authority ownership.

#### **Impact on facilities and provision of basic infrastructure**

NCC Education were consulted and did not raise concerns in relation to this site. The number of additional children is likely to be relatively small in comparison with the population of Broughton.

Anglian Water were consulted. They highlighted that significant off-site sewage works would be required to connect to foul water, however there are alternative methods of disposing of sewage such as treatment plans which could provide an alternative. Disposal of sewage is a constraint which can be overcome through technical solutions.

Access to and capacity of services and facilities has been raised as an issue. There are basic facilities available in Broughton and the site has good access to Kettering. Doctor's surgeries are located in Mawsley and Kettering which are within reasonable travelling distance of the site.

Adequate water and electricity supplies would need to be provided to the site and this may require upgrading of existing supplies or alternative solutions. These would need to be investigated if the site is progressed.

#### **Noise**

Concerns were raised in relation to noise and pollution from the A43. There is adequate space within the site to provide mitigation for noise and pollution. There is also an existing dwelling on the site which is close to the A43, it is not anticipated that the pitches would be any closer to the A43 than this property.

### **Ecology**

Concerns have been raised in relation to the impact on ecology. Respondents have highlighted that the site has not been ploughed for many years and comments identify numerous flora and fauna and protected species located in the site. A walkover ecological survey was submitted following the consultation which identified a number of species and potential habitats.

The Wildlife Trust requires that any further proposals for the site are fully informed and underpinned by appropriate ecological assessment. The Wildlife Trust recommends that either an Extended Phase 1 Habitat Survey exercise be undertaken or a full Phase 2 Survey exercise.

The score for open space is correct as this refers to public open spaces such as recreation grounds. This site is not a public open space.

### **Landscape/ visual impact/ heritage impact**

The site is well screened by existing vegetation and leylandii. If the site is developed additional landscaping could be required to minimise visual impact. It is not considered that development would have an unacceptable visual impact.

### **Flooding and drainage**

The site is located in flood zone 1. Comments from the Environment Agency highlight the need for a flood risk assessment if the site is greater than 1ha. As some of the land is required for road improvements, it is likely that the developable area will be less than 1 ha.

Adequate drainage would need to be provided as part of the scheme.

### **General comments**

Concern has been raised that the proposed development would affect property prices. This is not a land use planning consideration and therefore does not affect the suitability of the site in planning terms.

Concern has also been raised over the security of tenure of existing occupants. Although the site has tenants it is owned by NCC and occupants would need to be given notice when the A43 widening scheme commences. If the site was progressed occupants would need to be served notice in line with contractual agreements.

Concern has been raised safety standards for traveller sites. If the site is progressed the detailed design of the site would need to take these standards into account.

Concerns relating to street lighting can be overcome at planning application stage.

Concern has been raised over the cost of developing the site, this has not been assessed in detail at this stage but it is not considered that any of the costs would be of a scale to make development unviable.

A number of respondents highlighted the Crichel down rules. This is a legal issue rather than a planning issue and does not affect the assessment of the site in planning terms.

NCC have confirmed that part of the site is available for development.

Concern has been raised over the loss/ demolition of existing buildings which have been on the site for many years. It is likely that either as part of the A43 widening or development for the proposed use the existing buildings would need to be demolished. The buildings are not designated heritage assets.

Consultation with the traveller community – the traveller community were consulted during the issues paper and options paper consultations and will be involved in further progression of the project.

Concern was raised over the risk of expansion or joining of the site with the existing site. Any unauthorised development outside the site would need to be dealt with as a separate issue and this does not impact on the suitability of the site itself for development.

Concern has been raised in relation to the need for an Environmental Impact Assessment. The need for an Environmental Impact Assessments is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. Environmental Impact Assessments only apply to those projects which are likely to have significant effects on the environment. If this site or any other sites identified are progressed, the Local Planning Authority will need to determine if the project requires an Environmental Assessment and a Screening Opinion will determine if it falls within the remit of the Regulations. If this is the case, a planning application would need to include an Environmental Statement. This Statement will be taken into account by the Local Planning Authority, together with any other information which is relevant to the decision.

The requirement to 2017 has almost been met, however the Site Specific Proposals LDD will allocated sites beyond this period and therefore additional sites are needed. The NPTS requires authorities to demonstrate a rolling 5 year supply of sites.

**Recommendation**

Ecological survey of the site is required to determine whether the site should be progressed.

**Name of Site:** Former Sewage Works Burton Latimer (BUR017a)

**Summary of Comments**

## **Objections**

Total number of objections (300) plus 2000 signature petition

### **Issues raised/ comments:**

#### **Principle**

- Site too near to residential area (37)
- Site should not be located next to allotments (6)
- Existing sites should be expanded (3)
- Site should be developed for conventional sustainable housing. (1)
- Traveller accommodation should be out of towns (13)
- Inner town/village sites should be abandoned as traveller and settled communities are incompatible (14)
- A stand alone site would be contrary to integration (5)
- Inappropriate location (unspecified) (28)
- Incompatibility with existing or surrounding land usage (24)
- Costs incurred in preparing/maintaining site (12)
- Proximity of site to Irthlingborough and Wellingborough sites (1)
- Contaminated land (80)
- Effect on property values and house sales (86)
- Effect on local business and town investment (7)

#### **Highways**

- Difficulty of access for large / towing / emergency vehicles (62)
- Increased traffic (37)
- Poor access from Finedon Road (22)
- Land take and cost of road and service laying (46)
- Access through residential estate is inappropriate (44)

#### **Amenity**

- Traffic and noise will have a negative effect on the local community (47)
- Overlooking settled houses and site being overlooked (21)
- Town services (GP's, Schools) are strained (58)
- Loss of / effect on allotments (34)
- Security of allotments due to shared access (7)
- Effect on visual amenity (34)

#### **Constraints**

- Ecologically rich (Great crest, newts, bats, kingfishers, meadow) (72)
- Ancient? Hedgerow (17)
- Flood plain / Risk of flood (74)
- Springs on site, Boggy and Marsh land (46)
- Potential contamination of water course (30)
- Topography – Open and sloping site (24)
- Proximity to public path (11)
- Archaeology – Iron Age site (1)
- No objection subject to reduction in pitch numbers (4)

#### **Suggestions of other sites**

Cohen's Yard  
Windmill Cottages  
Isham end of Station Road – (out of Borough?)  
Cranford Road, by Think Environmental

Burton Latimer Town Council

- 'Boggy' ground, subject to flooding - contrary to National Planning Policy Framework Para. 10
- Poor drainage
- Security issues
- Containment of site
- Does not integrate with surroundings - would significantly detract from the landscape and important features unlikely to be retained and mitigation is not possible
- Does not comply with Para. 2 subsection (e) pp 7 in the Options Paper - 'Planning Policy for Traveller sites should protect local amenity and environment'
- Surrounding area of site may be dangerous
- The potential access via Jacques Road is unsafe due to the likely heavy volume of traffic for a quiet residential road
- Above situation further compromised by the close proximity of two cul-de-sacs, Addis Close and Ashby Close
- Ecological quality of the site is such that it is unsafe due to marshy ground and unprotected sink hole
- The site was cleared of the sewage station but the underground infrastructure is still in situ
- Access to the potential site is for farmer and allotment holders only
- The need to preserve the interests of the allotment holders
- The site is unstable and contaminated and containment could not be viably mitigated
- A number of criteria indicate that there is an ancient hedgerow (traced back to 1803) - ecological feature that is included in the BAP Priority Habitat (PPS 9).
- There is evidence that the G&T's preference for location in the Borough does not include BL
- Closeness of the site to Westley Close is overbearing on current residents and any future development and would adversely affect their quality of life
- Well documented spring adjacent to the existing hedgerow could cause further problems with flooding
- General concern regarding the capacity of the brook to take additional run-off
- Health Centre - no scope at present to take new patients
- Primary Schools - no scope at present to take new pupils above existing planned growth
- Existence of Great Crested Newts - photographic evidence (PPS 9)

**Supporting Comments (9)**

Agree that site would be suitable, although pitch capacity should be reduced



(9).

### **General Comments**

Environment Agency

Sites in Flood zone 1 could be allocated. Sites in excess of 1ha need FRA with application. Surface water run off needs managing

Potential site BUR017a reduced site area should now be considered with the above advice

Nature Improvement Area Officer:

Site is within the Nene Valley Nature Improvement Area, designated by Defra in 2012. Provided that an ecological survey reveals the quality of the grassland to be poor then suitable for development. Ecological enhancement (boundary hedging) expected

### **Officer Comments**

- Site too near to residential area; Traveller accommodation should be out of towns; Inner town/village sites should be abandoned as traveller and settled communities are incompatible; Inappropriate location (unspecified); Access through residential estate is inappropriate

The Good Practice Guide(GPG) on Designing Gypsy and Traveller Sites (CLG, 2008) sets out Government advice on design of sites. It states that where possible, sites should be developed near to housing for the settled community as part of main stream residential developments. The document highlights the need for sites to be close to schools and healthcare facilities and to promote integration and co-existence with the settled community. It is considered that this site would be sufficiently close to the town amenities and housing to meet these aims.

- Site should be developed for conventional sustainable housing

The GTAA (2011) evidences a need for site development in the Borough. This consultation is specifically about locating G&T sites, where provision needs to be made to meet the identified need. The GPG indicates a preference for sites that could be identified for conventional housing. The sustainability of mobile homes is not a matter for discussion – there is an identified need which needs to be met.

- A stand alone site would be contrary to integration

The site is sufficiently closely integrated to existing developments and the amenities of the town for this to not be a barrier to development of the site. Any/all site selection would involve some compromises.

- Site should not be located next to allotments; Incompatibility with existing or surrounding land usage

A residential use is compatible with the surrounding housing and allotment uses.

- Existing sites should be expanded

When considering the Options Report, Councillors endorsed the majority view that a spread of site locations across the Borough be sought. This could not be achieved solely by expansion of existing sites.

- Costs incurred in preparing/maintaining site; Contaminated land; Site is

unstable and contaminated and containment could not be viably mitigated. Costs have not been investigated and so the cost of the site is not yet known. Development of any site will involve costs, including decontamination due to the underlying geology of the Borough. Underlying geology of the Borough suggests that any site selected would need to be assessed and potentially remediated (as is the case with development of sites for conventional housing). The viability of the site will be looked into at a later stage.

- Proximity of site to Irthlingborough and Wellingborough sites

These sites, which are not known to have vacant and available pitches, are approx. 5 miles by road from this location. The GTAA, which covers the whole of North Northamptonshire, will have taken the provision at these sites into account in determining the further requirement for the Borough.

- Effect on property values and house sales

This is not a land use planning consideration.

- Effect on local business and town investment

The GPG advises that easy access to local services, and to social contact with other residents in the community, should help deal with the myths and stereotypes which can cause community tension and instead encourage a greater sense of community with shared interests.

- Land take and cost of road and service laying; Difficulty of access for large / towing / emergency vehicles

NCC Highways raise no objection to a single lane access, provided that a passing place is provided close to the junction with the public highway. The private driveway track would be in the region of 200m long. Views of emergency services still to be obtained.

- Increased traffic

Residential development of any kind would result in an increase in traffic. NCC Highways raise no objection to the likely change in volume or type of traffic likely to arise from this proposal. Proximity to town amenities and public transport may result in a modal shift from the private motor vehicle for some journeys.

- Poor access from Finedon Road

The site is not accessed from Finedon Road and no such access is proposed.

- Amenity: Traffic and Noise

The small scale of the site and the number of pitches it could yield would be unlikely to generate any significant traffic or noise issues. Any on-site noise generation would be mitigated by the distance of the site, at least 60m, from the closest dwelling.

- Overlooking

The site boundary is at least 60m from the closest dwelling and there is a row of trees on the boundary of those houses. The accommodation, by its nature, would be single storey. For these reasons, overlooking is unlikely to be an issue.

- Town Services (Schools/GPs) are strained

Conventional housing developments place the same level of strain on such services. The normal practice is to seek contributions to improve such provision and thereby mitigate the effect of the development. These would be sought for developments of 10+ dwellings. As this site would accommodate less than 10 pitches, there would be no requirement for such a contribution in

this instance.

- Effect on allotments

NCC Highways has confirmed that there would be no requirement for significant improvement to the width or alignment of the access track. Any necessary realignment of gates and fences would be likely to be minor matters of detail which could be resolved.

- Visual Amenity

Any form of development, in any location, is likely to impact on the appearance of an area. Caravan and mobile home development, by its very design, is likely to appear different to conventional bricks and mortar development. However, this does not mean that such development has to adversely affect visual amenity. Site design and landscaping can be so arranged as to present an attractive setting and provide a welcoming place for people to live.

- Ecological matters

Further advice sought from the Wildlife Trust who consider that GCNs and bats may utilise the site and that there may be interesting plant species. As such the site would require appropriate ecological surveys to establish this. Mitigation and / or compensation measures required will be dependant on findings. Most findings can be mitigated.

- Flood risk and flood plain/ Springs and Marsh Land; Ecological quality of the site is such that it is unsafe due to marshy ground and unprotected sink hole

The site boundary for BUR017b has been drawn so as to exclude land within flood zones 2 or 3 and the former sewage tanks. Further survey work would be required as to the source of ground water emanating from the site and whether this could be abated.

- Potential contamination of water course

Provision for foul drainage from the site would be required. This could be by connection to the foul sewerage system or by installation of a package plant. In either case the development should not result in contamination of the water course. Likewise, parking areas would need to be drained into the foul system, and any heating oil would need to be held in bunded tanks. There would be no increase in the volume of surface water, although the rate of run off could be abated through the use of drainage systems.

- Topography

A study would need to be undertaken as to how the site could be developed to maximise the opportunity for its development and to mitigate its effect within the landscape.

- Proximity to public path

A public footpath runs south of the site. At its nearest point it is 85m away from the site. There is no reason why development of this site should cause demonstrable harm to the amenity of users of this path.

- Archaeology

Reference has been made to an Iron Age site in this location, although no such matter was revealed at the initial consultation with NCC Archaeology. Further investigation will be required.

- Containment of site; Surrounding area of site may be dangerous

Any unauthorised development outside the site would need to be dealt with

separately and this does not impact on the suitability of the site itself for development.

- Access to the potential site is for farmer and allotment holders only  
The land is registered title. Any restrictions as to access would be revealed through research of deeds held by Land Registry.

- A number of criteria indicate that there is an ancient hedgerow (traced back to 1803) - ecological feature that is included in the BAP Priority Habitat. The Highway Authority has confirmed that it would not require significant alteration to the access lane.

- There is evidence that the G&T's preference for location in the Borough does not include BL.

No evidence of this has been put forward to support this and therefore it cannot carry any weight as a comment.

### **Recommendation**

It is recommended that this site is not progressed due to significant cost of mitigating flood and contamination, provision of satisfactory access and services relative to the small size of the site.

**Name of Site:** London Road, Kettering (KET023)

### **Summary of Comments**

Issues raised/ comments

#### ***Objections***

Total number of objections (172)

#### **General Location**

- Location of a Gypsy site in residential/ commercial area is unacceptable (61)
- Location near to schools in inappropriate (7)
- Proximity to hospital (1)
- close to a care home (18)
- close to child care facilities (2)
- site is located too close to local churches (1)
- Site will not meet the needs of travellers and travellers will not want to live here (4)
- Site would be better used for housing/ affordable housing (15)
- Detrimental to the town centre/ inappropriate location close to the town centre (4)
- Negative impact on local businesses (3)
- Site could impact on the attraction of Wicksteed Park (1)
- Site would have an impact on local pubs (1)
- Site is isolated from the travelling community (3)

#### **Scale of Development**

- Site is too small (4)
- With large family units, small pitches may become overcrowded (5)
- Size of site is smaller than favoured by Travellers and unlikely to be used (5)
- Site is too small to accommodate associated business use (3)
- The site could extend – Travellers tend to congregate (2)
- Number of pitches will be overbearing to the local area (3)

### **Highways**

- Increased traffic and congestion (37)
- Access is too close to the junction with Broadway (1)
- School children will have to walk past the site (2)
- Site needs a separate entry and exit and a turning circle and site is not big enough to accommodate these (5)
- Access is onto a very busy main road (40)
- Access is narrow and substandard (21)
- Increased parking requirements (13)
- Concerns over access for emergency vehicles and refuse vehicles (10)

### **Amenity**

- Noise and disturbance (23)
- High odour / pollution (2)
- Too close to dwellings (24)
- Concerns over rubbish collection (3)
- Loss of privacy (20)
- Light pollution (6)
- Concerns over business use being run from the site (3)
- Loss of outlook (5)
- Site will not protect local amenity or the environment – contrary to NPPF (1)
- Emotional distress (3)

### **Trees and Wildlife**

- Garden is large with trees and ponds and would effect biodiversity (6)
- Heron has been regularly spotted in the garden (1)
- Site supports protected species; bats; hedgehogs; bird species of conservation concern; house sparrow; song thrush and starling (1)
- Two trees on the site are subject to TPO's (Cedar and Wellingtonia) which reinforces the importance of maintaining the site in its current integrity (2)
- Loss of mature trees – visual amenity (8)
- Trees help sound protection from London Road (1)
- Access to the site will result in damage to the trees (2)

### **Character/ Historic Environment**

- Area should be within a conservation area (2)
- The house is subject to a conservation area for listed buildings (1)
- Site should be developed with buildings of a similar architectural

- character to their surroundings (5)
- Loss of old wall for access (1)
- Loss of the existing house (16)
- Development will undermine the Article 4 Direction (1)
- The existing house is of historical interest to Kettering and this will be harmed(24)
- Loss of existing boundary wall to London Road (1)
- Implications for archaeology (1)
- Loss of Victorian garden (1)
- Caravans/ Development/ Materials will be out of keeping with the character of the area (25)
- Concerns over the future use of the existing house (1)
- Green site (1)
- Access to the site will result in damage to the house (2)
- Site would require high walls or fences resulting in isolation to the travellers and contrary to national planning policy on Travellers sites (2)

#### **Impact on Facilities and Infrastructure**

- Local schools are full and at capacity (27)
- Hospitals / health care facilities are running above capacity (6)
- Police services will be placed under greater pressure (4)
- Concerns over the use of masts to supply electricity (1)
- The cost and effort of developing the site would be excessive (18)
- Site does not have infrastructure to support the development (2)

#### **Availability**

- Question if the site is available (1)
- Site already has planning permission for residential development (1)

#### **Flooding/ Drainage**

- Local sewers don't have capacity (1)
- Previous flooding from the sewer on London Road and this would create a further burden on the sewer system (1)

#### **General Comments**

- Increase in house insurance (1)
- Loss of property value and saleability (47)
- Cultural differences between Gypsies and settled community create challenges for integration (16)
- Overcrowding of sites has led to serious social tensions (3)
- Assessment work is heavily weighted towards proximity to local amenities and does not address the other needs of Gypsies (3)
- Concerns over schooling experience for Travelling children - prejudice(3)
- Site does to comply with DCLG Designing Gypsy and Traveller Sites Good Practice Guide May 2008 or policy B of Planning Policy for Travellers Sites March 2012 DCLG (2)
- Not in accordance with policy 13 of the NNCSS (2)

- Implications for the human rights of existing residents (2)
- There are plenty of areas of waste ground out of town (1)
- Site will not reduce tensions between settled and traveller community nor promote a peaceful and integrated co-existence contrary to NPPF (1)
- Existing problems with litter and this will increase (1)
- There will be resentment/ tension between the 2 communities (5)
- Animals on the site (1)
- Development will be contrary to article 1 Human Rights Act, First Protocol, Protection of Property (1)

### ***Supporting Comments***

Total number of supporters (1)

### **Issues raised/ comments**

None

### **Officer Comments**

#### **General Location**

A large number of people have raised concerns that a residential area is unsuitable for the location of a Gypsy and Traveller site. The Designing Gypsy and Traveller Sites Good Practice Guide (CLG, 2008) sets out the Government's advice on designing good Gypsy and Traveller sites. This document states that where possible, sites should be developed near to housing for the settled community to aid integration with the settled community. This document also sets out that sites should not be identified for Gypsy and Traveller accommodation in locations that are inappropriate for ordinary residential dwellings. The site is considered to be an appropriate location for ordinary residential dwellings, given its location within the town boundary of Kettering as defined by saved policy 35 of the Local Plan.

Concerns have also been raised that the site is located too close to the town centre, local businesses, local schools, Kettering General Hospital, care homes, child care facilities and local churches. The 'Designing Gypsy and Traveller Sites Good Practice Guide highlights the need and importance of sites being located close to schools and local facilities and services to promote integration and co-existence with the settled community.

It has been suggested that the site would be better used for housing/ affordable housing. Whilst the site could be identified for housing/ affordable housing, and there is a need for this, there is an equal need to provide suitable sites to meet Gypsy and Traveller accommodation needs and there is no reason to discount sites simply for this reason.

It has also been questioned if the site is a location where Gypsy and Travellers would wish to live and that it is isolated from the Travelling community. Reference again needs to be made to CLG's 'Designing Gypsy and Traveller Sites' which emphasises the importance of sites being located

near to the settled community and facilities.

### **Scale of Development**

Concern has been raised that the site is too small to accommodate 2 Gypsy/ Traveller pitches. In the sustainability assessments undertaken with the options paper, a suitable site area was defined at 650 square metres. This is considered a sufficient size to easily accommodate space for a mobile homes, a towing caravan, a utility building and space for parking, all of which are considered necessary elements to include within a Gypsy/ Traveller pitch. The site has an area of 1348 square metres, and is therefore of a sufficient size to accommodate 2 pitches.

Concern has been raised about the site being too small with Travellers tending to prefer larger sites and the site would not be used. The provision of 2 pitches on the site adheres to the guidance set out in CLG's 'Designing Gypsy and Traveller Sites Good Practice Guide' 2008 which states that there is no one ideal size of site, however experience suggests that a maximum of 15 pitches is conducive to providing a comfortable environment, however smaller sites can also be successful. There are examples of smaller 2 pitch sites within the Borough, for example, Springfields, near Braybrooke.

There are concerns that the site could easily expand and become overcrowded. Any future design of the site would provide sufficient space within each pitch for one family (one mobile home and one tourer) and this would be clearly delineated from adjacent pitches. Conditions could be attached to any future planning application restricting the numbers of caravans on the site to ensure that pitches do not become overcrowded. Careful treatment of the boundaries of the site would ensure that no unauthorised expansion of pitches would occur.

Concern has been raised that the number of pitches proposed would be overbearing to the local area. The site has been potentially identified for 2 pitches. There are no other Gypsy / Traveller pitches within the St Michaels and Wicksteed Ward. The St Michaels and Wicksteed Ward as of March 2013 had an estimated population of 7,604. It is not considered that the addition of two Gypsy/ Traveller households will be overbearing to the area.

Concerns have been raised that the allocated site areas are too small to accommodate any business use. The site area of 650 square metres is too small to accommodate any business use. The potential sites identified through this process are for residential occupancy only.

### **Highways**

Concern has been raised about the proposed vehicular access and the implications this will have for highway safety. One concern is that the access is substandard due to it being too narrow. The location plan included within the Options Paper shows the vehicular access having a width of 6 metres (albeit that alterations would need to be made to the alignment of the access to ensure that the protected Wellingtonia tree is protected). Northamptonshire County Highways have been consulted on the scheme and have advised that



a satisfactory vehicular access can be gained to the site. Northamptonshire County Highways have advised that there is no need for a separate entry and exit, provided that the layout of any potential sites provides for turning to ensure vehicles entering London Road do so in forward gear. It is considered that there is sufficient space within this site to accommodate the required turning area and this can be provided for in any future layout. Whilst the scheme will result in an additional vehicular access onto London Road which is classified, subject to provision of the required turning area, NCC Highways have raised no objection. One concern has been raised regarding the proximity of the access to Broadway. Broadway is located in excess of 50 metres away and this separation distance is in line with Highways Standard Advice which requires a minimum separation distance of 25 metres from Broadway.

Concerns have been expressed about highways safety implications for school children walking past the site. There are existing footpaths on the east and western sides of London Road both with a minimum width of 2 metres. This existing footpath will not be compromised by the development of 2 Gypsy and Traveller pitches. Subject to the provision of a safe access, which can be achieved from London Road, suitable pedestrian visibility splays can be provided.

Northamptonshire County Council Highways have raised no objections to the capacity of nearby local roads. Local roads are of a sufficient width to accommodate extra traffic, with London Road having a width of 8 metres.

### **Amenity**

Concern has been expressed that the use of the site for Gypsy and Traveller accommodation will result in an unacceptable impact on the living conditions of local residents, contrary to the requirements of the NPPF.

One of the main areas of concerns raised relates to noise and disturbance associated with the occupancy of the site, particularly if businesses are to be run from the site. The potential sites identified through this process are for residential occupancy and not for a mixed commercial/ residential occupancy. The site is unlikely to generate a greater level of noise than any other group of dwellings within the settled community. Notwithstanding this, as with any scheme for residential development, careful attention will need to be given to the layout of the site, particularly with regards to boundary treatment and pitch layout. The site is of a sufficient size to allow for careful consideration of these issues.

A number of concerns have been raised in respect of proximity to dwellings and the loss of privacy and outlook to existing dwellings which adjoin the site. The site is bounded by residential dwellings. To ensure privacy of occupiers of existing dwellings is maintained, careful consideration will need to be given to the layout and appropriate boundary treatment and landscaping if the site is progressed.

Lighting would need to be provided on the site and consideration would need

to be given at design stage if the site were progressed to the type, location and level of lighting proposed to ensure no adverse amenity issues result.

Some concerns has been raised regarding pollution and implications for health. If progressed, the site would be allocated for residential purposes only, thus, no greater health implications would result to existing occupiers of nearby dwellings than if the site were developed for housing for the settled community.

With respect to refuse collection, the Councils refuse department will collect rubbish and recycling as is the case with the settled community.

### **Trees and Wildlife**

Concern has been expressed about the impact the use would have on trees and wildlife within the site.

There are two trees with a TPO within the site. Adjacent to the northern boundary is T1 which is a Cedar and adjacent to the southern boundary is a Wellingtonia T2. The Options Paper indicates that a vehicular access could be served to the site adjacent to the southern boundary. It is considered that there a scope for a vehicular access in this location which would not compromise the health or amenity value of either T1 or T2

Within the site there is tree and hedge planting on the boundary and a number on trees internally. With careful consideration to the layout and design of the site, there is scope for these existing trees and hedges to retain. The layout of any future site would be influenced by a topographical survey and tree survey.

Concerns have been raised regarding the impact that would result to wildlife with nearby neighbours having witnessed herons, bats, hedgehogs and birds. As part of the original consultation on these sites, the Wildlife Trust were consulted and advised that an ecological survey would be required to determine the extent of wildlife, however this could be satisfactorily mitigated against. These matters would form part of any future planning application.

### **Character / Historic Environment**

The potential allocation of this site allows for the retention of the existing dwelling which is protected by an Article 4 Direction. The location identified for the access is the same as has been granted on previous planning permissions for the site, thus, there will be no greater loss of existing boundary treatment on London Road than previously approved.

Significant concerns have been raised about the impact the use of the site for Gypsy and Traveller accommodation would have on the Article 4 protected house, in respect of the adverse impact on its character and setting, its historical interest, loss of the Victorian garden, caravans and associated paraphernalia being out of keeping.

116 London Road is subject to an Article 4 Direction. The house was built in

1886 by the architects Blackwell, Storry and Scott, an important architects practice. The architects were highly influential in bringing classic villa style development to the town producing some important buildings including the vicarage to St Andrews Church and Nat West Bank on the High Street.

The house was built for Dr John Winter Dryland who was a social reformer within Kettering. The property is indicative of Kettering's suburban expansion during the 19<sup>th</sup> century following the growth of the shoe and textile industries in the town. The house is a large detached suburban villa which fronts London Road, one of the main arterial routes in and out of the town centre. The construction of large villas on these routes (including Rockingham Road and Headlands) were illustrative of Kettering's wealth during this period with the middle classes building their properties where they would be admired by all on their way into town. The Article 4 was made as it was considered that the loss of 116 London Road would be unacceptable given the historical significance of the property and the commanding presence it has on the character of the area. The Article 4 was approved 05.05.2009 and covers alterations, new windows and doors, porches, painting of exterior, installation of antennas, front boundary treatment and demolition.

The identified Gypsy and Traveller site will take up most of the large garden associated with 116 London Road and the site boundary would abut part of the existing structures in place at 116 London Road. This proximity will result in a close relationship between the two uses. Given this proximity and juxtaposition immediately to the rear of the dwelling in place at 116 London Road, it is considered that the development of the site would compromise the character and setting of number 116 London Road, to the detriment of the historically important building.

In respect of archaeology, Northamptonshire County Council Archaeology were consulted on the assessment work which informed the Options Paper and advised that site is unlikely to impact on archaeology on the site.

#### **Impact on Facilities and Infrastructure**

Northamptonshire County Council Education were consulted on the proposed sites and raised no objections. The number of additional children generated is likely to be relatively small in comparison with the overall population of the St Michaels and Wicksteed Ward.

Concern has been expressed about the capacity of local doctors/ facilities to cope with the increased demand for services. The site is located within a reasonable distance of a number of doctor's surgeries within Kettering. Given the small number of residents which would be generated by the use if the site for Gypsy and Traveller accommodation, the use raises no strategic implications. The capacity of the local doctors for a similar number of houses for the settled community would not prevent the development from going ahead.

The Police have been consulted previously on the proposed sites and raised no issues in respect of their capacity.

The site is located within the built up area and located well in relation to existing utility provision, including electricity.

### **Availability and Develop ability**

There is some question as to whether the site is available for the use as Gypsy and Traveller Accommodation.

There is a complex planning history to the site, the most relevant decisions are noted below.

KET/2008/0226 Demolition of existing house; erection of 2 no. three storey houses, 2 no. two storey semi-detached houses; 3 no. two storey detached houses, Refused

KET/2009/0728 Conversion of 116 London Road to 4 no. flats including two storey side and rear extension, plus parking and storage facilities. This permission allowed for one of the two trees to be removed to provide for the vehicular access. This application had no further implications.

KET/2010/0695 – 3 no. dwellings approved and development commenced. Vehicular access proposed to the south of 116 London Road. With 3 dwellings set behind.

The conditions for planning permissions KET/2009/0728 and KET/2010/0695 have recently been discharged and this gives a clear indication that it is the intention of the applicant to develop the site for housing rather than as a Gypsy and Traveller Site. The site is therefore now considered not to be available for the use as Gypsy and Traveller accommodation.

Deliverability /viability of the site is also questionable given that the site has permission for three dwellings, thus raising land values and making it unaffordable for the building of a Gypsy/ Traveller site.

### **Flooding/ Drainage**

Flood risk is unlikely to be an issue with site development as the site is located entirely within flood zone 1. Comments from the Environment Agency highlight that there is no need for a flood risk assessment as the site has an area of less than 1 hectare. Surface water run off from the site would need to be given careful consideration at site layout and design stage if the site were to be progressed.

### **General Comments**

Integration and friction between the Gypsy/ Traveller community and the settled community. Integration of Gypsy and Travellers within the settled community is essential. CLG 'Designing Gypsy and Traveller Sites Good Practice Guide' 2008 emphasises the importance of sites being located within the settled community to help reduce tensions and help tackle myths and stereo types and encourage a greater sense of community with shared interests. The site meets these requirements given its location in an

established residential area with easy access to local facilities. Careful consideration at design stage to the layout, taking into account the principles set out in the Good Practice Guide will help to encourage integration.

The Good Practice Guide also states that the national shortage of sites has led to unauthorised encampments and developments which has at times created tensions between the Gypsy and Travellers and the settled community. The allocation of sites for Gypsy and Traveller accommodation will reduce the extent of unauthorised encampments and development which will help to reduce tensions.

Loss of property values, saleability and increased in insurance costs are not relevant planning considerations.

A concern is raised about the assessment work undertaken for the sites which is included within the Options paper consultation being heavily weighed towards proximity to local services and does not address the needs of Gypsies and Travellers. The assessment criteria used reflects the advice contained within CLG's 'Gypsy and Traveller Sites Good Practice Guide' and CLG's 'Planning Policy for Travellers Sites'. The Good Practice Guide emphasises the importance of sites being sustainable, and located close by to local facilities and the local community. This is further reinforced in 'Planning Policy for traveller Sites' which emphasises that Gypsy and Traveller Sites need to be sustainable, economically, socially and environmentally.

Human Rights of the existing occupiers of nearby dwellings has been raised. No specific detail of how the use of the site for Gypsy accommodation will infringe the human rights of existing households has been provided. If specific detail is provided this matter can be considered further.

Concerns have been raised about animals on the site. The site is not large enough to include paddocks for horses etc, thus the keeping of animals will be restricted to domestic pets as with the settled community.

Regarding litter, refuse will be collected as per the settled community by the local authority.

**Recommendation**

The site should not be progressed. It is being progressed for alternative uses, would be costly to develop and will have an adverse impact on the character of the dwelling in place at 116 London Road which is protected by an Article 4 Direction.

**Name of Site:** Scott Road, Kettering (KET002)

**Summary of Comments**

**Objections**

Total number objections (408)

## **Issues raised/ comments:**

### **General Location**

- Land should be used for housing (19)
- Land should be used for car parking for school sports facilities / residents (3)
- Site could be used for the benefit of the community (2)
- Site should be used as a children's play area / park (3)
- Site could be useful for school expanding (1)
- Residential area is unsuitable for Gypsy sites (120)
- Location close to school children and elderly is inappropriate (106)
- Location next to playing field inappropriate (6)
- Inappropriate location close to local schools (93)
- Unsuitable for traveller needs and will not be used (12)
- Located too close to residential dwellings (33)
- Site is too close to businesses (1)
- Sites should not be put in town centres (2)
- Travellers do not want to live with the settled community (5)
- Travellers don't want small pitches in built up areas (1).
- Insufficient play areas in the area – mainly elderly people live in the area (1)
- Loss of allotments (1)
- Located too close to the allotments (5)
- There is no precedent for the development (1)
- Site does not comply with DCLG Designing Gypsy and Traveller Sites Good Practice Guide May 2008 or policy B of Planning Policy for Travellers Sites March 2012 DCLG (4)

### **Highways**

- Vehicular access is narrow, on a corner, and limited and unsuitable as well as nearby local roads(52)
- Site is too close to school and nursery entrance resulting in highway safety implications for school children (14)
- Site should have 2 accesses (1)
- Concerns over access for emergency vehicles (1)
- Increased traffic and highway safety implications/ pedestrian safety (283)
- Insufficient turning space within site for caravans and emergency vehicles (3)
- Development would add 240 movements per day of commercial vehicles/ use of vehicles over 3500kg (2)
- Conflict with vehicles accessing the Gypsy pitches and the allotments (12)
- Existing parking problems and there will be increased parking requirements (240)
- Sites need to be located close to main roads (1)
- Increased footfall (1)
- Associated commercial uses will result in increased traffic and

commercial vehicles which local roads are not suitable for (1)

### **Amenity**

- Noise and disturbance (278)
- pollution and implications for health (7)
- Loss of privacy to properties that adjoin the site and Gypsies (47)
- Lighting (1)
- Concerns over animals and where they will be kept / noise(10)
- Disruption during construction of the site (1)
- Contrary to NPPF and CSS as will have an unacceptable impact on the living conditions of neighbouring properties (1)
- Concern over hazardous fires – flammable gas bottles on site (1)
- Adjoining dwellings have very small gardens (1)
- Businesses may be run from the site (4)

### **Character**

- Existing green site (1)
- Out of keeping with the character of the area – caravans, no visual similarities with materials, layout or design contrary to NPPF (268)
- Planning policy obliges councils not to turn sites into fortresses with high fencing, however this could be necessary to create boundaries with existing dwellings (1)

### **General Comments**

- Loss of property values and saleability (85)
- House / car insurance prices will increase (2)
- Sharing a vehicular access with the allotments will have security implications for the allotments because it is harder to ensure that only legitimate allotment holders are able to get in (2)
- Negative impact on the local community (7)
- Negative impact on the perception of the area (1)
- Negative implications for the town centre (2)
- Cultural differences between Gypsies and settled community create challenges for integration (4)
- Travellers could be a target of crime and victimisation (1)
- Friction between the 2 communities (3)
- Implications for health and stress of existing residents (5)
- Assessment work is heavily weighted towards proximity to local amenities and does not address the other needs of Gypsies (3)
- Local businesses in the area will suffer (10)
- Local residents will move away from the area (1)
- Impact on the allotments – traffic, noise, litter and existing security problems, access (48)
- Query boundary treatment with the allotments (security) (1)
- Concerned over the responsibilities for keeping the site clean and tidy and management (3)
- The public footpath through the site would not be used and cause safety concerns (17)

- Implications for human rights of existing residents (3)
- Site has direct access to the woods behind Cleveland Avenue which has problems with nuisance vehicles (1)
- Development would contravene the E.U, Environmental Impact Assessment Directive 1995 (1)

A number of general concerns have been raised which relate to the perception of the Gypsy and Traveller community. These comments have not been summarised individually as they are perceptions rather than fact.

#### **Impact on Facilities and Infrastructure**

- Impact it would have on local schools (12)
- Local school are already over subscribed (26)
- Local doctors are at capacity (6)
- No sanitary facilities (1)
- Concern about capacity of police (2)
- Site has no utilities, water/ sewage – will there be plumbing (3)
- Query how site construction will be funded (1)
- Sites will be expensive to develop (3)
- Development would put a strain on local public services (1)
- Concerns over cost of provision of utilities and services (2)

#### **Scale of Development**

- With large family units, small pitches may become overcrowded (12)
- Overcrowding of sites has led to serious social tensions (3)
- Travellers travel in groups and site will become overcrowded (4)
- Over development of the site (18)
- A smaller site 2 – 3 pitches would be supported (1)
- Site is too small as communities tend to locate in much larger groups (1)
- Pitches are too small for the keeping of animals (2)
- 6 – 7 pitches could generate 28 residents, however site could accommodate 30 pitches resulting in more than 120 residents (1)
- Local area is already densely populated (3)
- Larger sites are required which have the potential to expand (1)
- Site is too small too accommodate associated business activities (2)
- Site could expand illegally on adjoining / nearby land (16)

#### **Flood Risk/ Drainage**

- Culvert runs along the edge / within the site and in the past has been blocked and access has been required from the gardens of properties on Kipling Road to rectify this. Question if culvert needs to be removed or diverted(3)

#### **English Heritage**

- This would have minimal impact on the setting of Boughton House Registered Park and Garden due to size, location and proximity of



existing built development, including the school.

### **Supporting Comments**

Total number of supporters (10)

#### **Issues raised/ comments**

- Site should be reduced in size (9)

Loddington Parish Council

- Agree. We agree with the potential sites identified but we do not think that we are qualified to assess which should be allocated as Gypsy and Traveller sites as we may not know or understand any issues with these sites. The communities near the sites would need to answer this question.

Braybrooke Parish Council

- Agree the site should be allocated to Gypsy and Traveller accommodation. Those sites, including Scott Road, with larger pitch provision should be reduced in size.

Environment Agency

- All potential sites should be allocated as Gypsy and Traveller sites as they are located in flood Zone 1 Proposed developments greater than 1 hectare located in Flood Zone 1 NPPF Paragraph 103 requires applicants for planning permission to submit a Flood Risk Assessment when development is greater than one hectare located in Flood Zone 1 defined by Technical Guidance to the NPPF as having a low probability of flooding. The proposed scale of development may present risks of flooding on-site and/ or off site if surface water run-off is not effectively managed. Guidance on the requirements of the FRA can be found at [www.environment-agency.gov.uk/static/documents/Utility/FRAGuidanceNote1\\_v3.1.pdf](http://www.environment-agency.gov.uk/static/documents/Utility/FRAGuidanceNote1_v3.1.pdf) Proposed developments less than 1 hectare located in Flood Zone 1. These development sites are less than 1 hectare located in Flood Zone 1, (low probability of river and sea flooding as defined in the NPPF. The main flood risk to consider is usually the management of surface water run-off. Drainage from the new development must not increase flood risk either on-site or elsewhere. Government policy strongly encourages a SuDS approach to achieve these objectives. Guidance on how to address specific local surface water flood risk issues may also be available through the Strategic Flood Risk assessment or Surface Water Management Plan produced.

County Archaeological Advisor

- I agree with all the allocations within Option 3 Potential sites. The sites, apart from the Rothwell site, will not have any detrimental impact on any known archaeological remains.

### **Officer Comments**

### **General Location and Sustainability**

A large number of people have raised concern that a residential area is unsuitable for the location of a Gypsy and Traveller site. The Designing Gypsy and Traveller Sites Good Practice Guide (CLG, 2008) sets out the Government's advice on designing good Gypsy and Traveller sites. This document states that where possible, sites should be developed near to housing for the settled community as part of main stream residential developments.

Various alternative uses have been suggested as being more appropriate for the site. Whilst the site could be identified for housing/ affordable housing, there is an equal need to provide suitable sites to meet Gypsy and Traveller accommodation and there is no reason to discount sites simply for this reason. It has also been suggested that the site could be used for a community use or as a children's play area, however this area is already served well by existing recreational facilities, with the identified site being located approximately 265 metres from the Recreation Ground at North park Road and Weekly Glebe Playing Fields. Other suggested alternative uses for the area is a car park for use by local residents and the school or could be used for an expansion of the school. The site is not within the ownership of the school and notwithstanding this, there is a greater need in the borough to provide Gypsy and Traveller sites.

Concern has been expressed about the site being located too close to playing fields; local schools, local nursery; dwellings; local businesses and the allotments. The location of Gypsy and Traveller sites within established residential areas is supported by CLG's 'Designing Gypsy and Traveller Sites Good Practice Guide' 2008 which states that where possible, sites should be developed near to housing occupied by the settled community to aid integration with the settled community. This document also states that sites should not be identified for Gypsy and Traveller sites in locations that are inappropriate for ordinary residential dwellings. This site is considered to be an appropriate location for ordinary residential dwelling, given its location within the town boundary of Kettering as defined by saved policy 35 of the Local Plan.

Concern has been expressed about the loss of the allotments. The use of this site for the accommodation of Gypsy and Travellers will not impact on the allotments. The allotments are located in excess of 220 metres and the site whilst adjacent to the access road to the allotments, does not encroach on this existing vehicular access.

It has also been questioned if the site is a location where Gypsy and Travellers would wish to live. The reasons specified are unsuitable for Gypsy needs and will not be used, and travellers don't want small pitches in built up areas. Reference again needs to be made to CLG's Designing Gypsy and Traveller Sites' which emphasises the importance of sites being located near to the settled communities and facilities. With respect to the size of the pitches, in all the sustainability assessments undertaken within the options

paper, a suitable site area was defined at 650 square metres. This is considered a sufficient size to easily accommodate space for a mobile home, a towing caravan, a utility building and space for parking all of which are considered necessary elements to include within a Gypsy/ Traveller pitch.

### **Scale of Development**

Concern has been raised that the site whilst only providing for 6 – 7 pitches could easily expand and become overcrowded. Any future design of the site would provide sufficient space within each pitch for one family (one mobile home and one tourer) and this would be clearly delineated from adjacent pitches. Conditions could be attached to any future planning application restricting the number of caravans on the site to ensure that pitches do not become overcrowded. Careful treatment of the boundaries of the site would ensure that no unauthorised expansion of pitches would occur.

Concerns have been expressed about the size of the site. There is concerns that the site is too small and would not be used as Gypsies and Travellers travel in large groups and conversely that the site should be smaller. The provision of 6 – 7 pitches on a site adheres to the guidance set out in CLG's 'Designing Gypsy and Traveller Sites Good Practice Guide' 2008 which states that there is no one ideal size of site, however experience suggests that a maximum of 15 pitches is conducive to providing a comfortable environment, however smaller sites can also be successful. There are examples of smaller 6 – 7 pitch public and private sites within the Borough, including the new KBC site at the Laurels which is currently being constructed and will accommodate 7 pitches.

Some concern has been expressed that the local area is already densely populated and no further development is required. The site is an unused piece of land, within the town boundary of Kettering which is a focus of growth, and as such is considered in principle to be suitable for development in some form whether it be housing for the settled community or for Gypsy and Traveller accommodation.

### **Highways**

Significant concern has been expressed regarding the safety of providing a vehicular access into the site, given the sites location on a corner of a narrow road.

Northamptonshire County Council were consulted as part of the Sustainability Assessment including within the Options Paper and advised that a satisfactory access can be gained to the site from Scott Road. Provided the access road into the site is of a sufficient width, which can be designed into any future scheme, there is no requirement for two accesses to the site to be provided. Northamptonshire County Highways have advised that the sites may not be suitable for commercial vehicle activity, given the residential nature of the site. This does not compromise the future delivery of this site as it has been assessed, as with all other sites identified, purely for residential purposes. Northamptonshire County Council Highways have raised no objections to the capacity of nearby local roads, subject to no commercial

activity being undertaken from the site. Local roads are of a sufficient width to accommodate extra traffic, with most roads, including Scott Road having a width of 6 metres

Concerns have been expressed about the potential conflict with the existing vehicular access to the allotments which is located immediately to the east of the site. Careful consideration will need to be given to the exact location of any access onto Scott Road; however the site is considered to have a sufficiently wide frontage (approximate width of 20 metres) to allow for some flexibility in access location on Scott Road. Northamptonshire County Council Highways have not raised this as a constraint of the site.

CLG's 'Designing Gypsy and Traveller Sites Good Practice Guide' 2008 states that access roads and site design should be capable of providing sufficient space for the manoeuvrability of average sized trailers up to 15 metres in length. The site is of a sufficient size to enable these requirements to be included within any future design / layout of the site. Careful consideration to the design of the site will also ensure that there is suitable access for emergency vehicles.

Significant concerns have been raised about the current parking problems in the area. Scott Road is characterised by a mix of dwellings, some with parking provision within their curtilage and others reliant on on street car parking. Notwithstanding any existing car parking problems within the area, the pitches identified each have the potential to have a site area of 650 square metres, which is considered sufficient to provide for the space for a mobile home, a tourer, an amenity building and ample space for car parking depending upon the needs of future residents. Careful design of any future site will ensure that there will be no pressure for residents to park on Scott Road or other adjoining streets.

Scott Road and all the roads within the area all benefit from wide footpaths, with Scott Road having a footpath with a width of 2 metres on both sides. These footpaths have capacity to accommodate the additional pedestrian movements generated by 6 – 7 pitches.

One comments received is that Gypsy and Traveller accommodation should be located close to main roads. Similar advice is given in CLG's 'Designing Gypsy and Traveller Sites Good Practice Guide 2008' which states that sites need to have easy access to major roads or public transport services to access facilities, employment and schools. The site is considered to be located close to main roads, being only approximately 1020 metres from Stamford Road which is an A road (A4300) and approximately 6800 metres from a trunk road (A14). The site is also served well by public transport being located within 160 metres of an hourly or better bus service to Kettering Town Centre and Tesco's and scoring very highly in the Sustainability Appraisal contained within the Options Paper.

#### **Amenity**

Concern has been expressed that the use of the site for Gypsy and Traveller

Accommodation will result in an unacceptable impact on the living conditions of local residents, contrary to the requirements of the North Northamptonshire Core Spatial Strategy and the North Northamptonshire Core Spatial Strategy, policy 13 (l) of which requires that developments do not have unacceptable impact in respect of noise, vibration, smell, light or other pollution, loss of light or overlooking.

One of the main areas of concern raised relates to noise and disturbance associated with the occupancy of the site and more specific concerns have been raised about noise from construction and noise from animals. The potential sites identified through this process, are for residential occupancy and not for a mixed commercial/ residential occupancy. Careful attention to the layout of any site to ensure that the site is designed for residential occupancy only. With respect to noise from animals, the site is not of a sufficient size to accommodate paddocks or grazing land, so any animals on the site will be domestic and no different to any animals that the settled community would keep. Noise and disturbance of a site for Gypsy and Travellers will be less than would be associated with the construction of a group of new dwellings for the settled community.

The site is unlikely to generate any greater levels of noise than any other group of dwellings within the settled community. Notwithstanding this, as with any scheme for residential development, careful attention will need to be given to the layout of the site, particularly with regards to boundary treatment, pitch layout and siting of the vehicular access into the site. The site is of a sufficient size to allow for careful consideration of these issues.

A number of concerns have been raised in respect of loss of privacy to existing dwellings which adjoin the site. The site is bounded by residential dwellings to the south, south west and south east by dwellings on Scott Road and to the west by a row of properties along Kipling Road. Dwellings to the west in particular have small rear gardens, with depths of between 6 to 8 metres being common. To ensure the privacy of occupiers of existing dwellings is maintained, careful consideration will need to be given to site layout and appropriate boundary treatment and landscaping if the site is progressed.

Lighting would need to be provided on the site, and consideration would need to be given at design stage if the site were progressed to the type, location and level of lighting proposed to ensure no adverse amenity issues result.

Some concern has been raised regarding pollution and implications for health. If progressed, the site would be allocated for residential purposes only, thus, no greater health implications would result to existing occupiers of nearby dwellings than if the site were developed for housing for the settled community.

Concern has been raised about the potential for hazardous fires. If the site is progressed, careful consideration will need to be considered at design and layout stage and fire risk assessments undertaken to ensure the risk of fire is

minimised. Any future design of the site would need adhere to the Model Standards for Park Homes which influence siting of mobile homes as well as the provision of water standpipes, hydrants, fire extinguishers etc.

### **Character**

Significant concerns have been raised about the use of the site for Gypsy and Traveller accommodation would be out of keeping with the character of the area as caravans and the design and layout of the site would have no visual similarities to the existing character of the area. The site is in a visible location along Scott Road, however careful consideration to the design, layout and provision of landscaping would ensure that no unacceptable visual impact would result.

Reference is raised in the consultations that the site is a green site. The site is previously developed land, which has in the past been used as a garage site and cannot be considered to be a Greenfield site.

### **Impact on Facilities and Infrastructure**

NCC Education were consulted on the proposed sites and they did not raise concerns in relation to this site. The number of additional children generated is likely to be relatively small in comparison with the overall population of the All Saints Ward.

With respect to water supply and sewage, Anglian Water have raised no objections to the potential site allocation. The site is located near to existing water and sewerage infrastructure as well as other utility provision including electricity etc.

Concern has been expressed about the capacity of local doctors/ facilities to cope with the increased demand for services. The site is located within a reasonable distance of a number of doctor's surgeries within Kettering. Given the small number of residents which would be generated by the use of the site for Gypsy and Traveller accommodation, the use raises no strategic implications. The capacity of local doctor for a similar number of houses for the settled community would not prevent the development from going ahead.

The Police have been consulted previously on the proposed sites and raised no issues in respect of their capacity. The comments they did make is that the site access road being made separate to the access to the allotments as well as referring to CLG advice in 'Designing Gypsy and Traveller Sites Good practice Guide' 2008.

### **Flood Risk/ Drainage**

A question has been raised as to whether an existing culvert which runs along the edge of the site will be removed or diverted. If the site is progressed, this matter would need to be looked into in more detail in the detailed design of the site. Flood risk is unlikely to be an issue with site development as the site is wholly contained within flood zone 1. Comments from the Environment Agency highlight that there is no need for a flood risk assessment as the site has an area of less than 1 hectare.

**Ecology**

The Wildlife Trust were consulted on the site prior to the consultation on the Options Paper. They advised that an Ecological Survey would be required to assess if the development of the site would impact on its ecological quality. This survey will determine if there is a need for ecological mitigation/compensation. If the site is progressed and allocated, this Ecological Survey would need to be included with the submission of any future planning application.

**General Comments**

Integration and friction between the Gypsy/ Traveller community and the settled community has been raised along with associated issues such as perception of the area. Integration of Gypsy and Travellers with the settled community is essential. CLG 'Designing Gypsy and Traveller Sites Good Practice Guide 2008 emphasises the importance for integration of sites being located within the settled. Integration will instead encourage a greater sense of community with shared interests. This site meets these requirements given its location within an established residential area with easy access to local facilities. Careful consideration at design stage to the layout, taking into account the principles set out in the Good Practice Guide will help to encourage integration.

The Good Practice Guide also states that the national shortage of site has led to unauthorised encampments and developments which has at times created tensions between the Gypsy and Travellers and the settled community. The allocation of sites for Gypsy and Traveller accommodation will reduce the extent of unauthorised encampments which will help to reduce tensions.

Loss of property values, saleability and increased insurance costs are not relevant planning consideration.

Concerns have been raised about the impact on the allotments and the public footpath to the east of the site, particularly if an access is shared. The site would not share an access with either the allotments or the existing public footpath, thus there will be no change to existing security arrangements to the allotments. Layout and boundary treatment will need to be given careful consideration at design stage if the site is progressed to provide for a fully integrated scheme.

A concern is raised about the assessment work undertaken for the sites which is included within the Options Paper consultation is heavily weighed towards proximity to local services and does not address the needs of Gypsies and Travellers. The assessment criteria used reflect the advice contained within CLG's 'Gypsy and Traveller Sites Good Practice Guide' and CLG's 'Planning Policy for Traveller Sites'. The Good Practice Guide emphasises the importance of sites being sustainable, and located close by to local facilities and the local community. This is further reinforced in 'Planning Policy for Traveller Sites which emphasises that Gypsy and Traveller Sites need to be sustainable, economically, socially and environmentally.

Concerns over the future responsibility for keeping the site clean and tidy and associated management are also raised. Any sites that will be allocated through this consultation process could be operated as either local authority run sites or private sites. Notwithstanding this, experience has shown that occupiers of approved sites within the borough maintain their sites in a clean and tidy condition as do the settled community.

A concern has been raised that the use of the site for Gypsy and Traveller accommodation would contravene the E.U. Environmental Impact Assessment Directive 1995. The need for an Environmental Impact Assessment is governed by the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. Environmental Impact Assessments only apply to those projects which are likely to have significant effects on the environment. If this site or any other sites identified are progressed a Screening Opinion will determine if the development falls within the remit of the Regulations. If this is the case, a planning application would need to include an Environmental Statement. This Statement will be taken into account by the Local Planning Authority, together with any other information which is relevant to the decision.

Human Rights of the existing occupiers of nearby dwellings has been raised. No specific detail of how the use of the site for Gypsy accommodation will infringe the human rights of the existing households. If specific detail is provided this matter can be considered further.

**Recommendation**

Progress site.

**Name of Site:** Crown Street, Kettering (KET025)

**Summary of Comments**

***Objections***

Total number of objections (102)

**Issues raised/ comments:**

**General Location**

- Residential / commercial areas are unsuitable for Gypsy sites (42)
- Location close to schools is inappropriate (3)
- Inappropriate location next to a church (2)
- Site should be used for housing (6)
- Site is located too close to the town centre (6)
- Too close to housing (7)
- Travellers do not want to live with the settled community/ built up area



and will not be used(8)

### **Scale of Development**

- With large family units, small pitches may become overcrowded (9)
- Site could extend/ expand and be over populated(2)
- Overcrowding of sites has led to serious social tensions (3)
- St Andrews church car park could be used as an overflow site (2)
- Overdevelopment of Crown Street which is already a densely populated residential area (10)
- Brambleside is already over crowded (1)
- Site is too small and will be cramped(2)
- Travellers do not want small pitches as they prefer to live in groups (11)

### **Highways**

- Increased parking requirements in an area with existing parking problems(41)
- Access is restricted and roads narrow and one way system (9)
- Concerns over access for emergency services (1)
- Issues over access and parking for the church rooms (1)
- Local roads unsuitable for larger vehicles – one way and narrow and can't cope with extra traffic and large vehicles (10)
- Increased traffic and congestion (44)
- Existing problems with speeding cars (1)
- Impact on local footpaths (1)

### **Infrastructure**

- Schools are already full and at capacity (14)
- Local health facilities are at capacity (4)
- Adverse impact on the schools (4)
- Concerns over capacity of police (3)
- Excessive costs (1)
- Pressure on local public services (1)

### **Amenity**

- Noise and disturbance (39)
- Existing problems in area of noise, disturbance , drinking and littering (4)
- Loss of privacy for existing residents and Travellers (31)
- Increase in pollution (3)
- Disruption during construction (2)
- Concern about businesses being operated (4)
- Noise and disturbance experienced by the Travellers will be unacceptable (2)
- Contrary to the NPPF and CSS as the development would harm the living conditions of adjacent dwellings (1)

### **Character**

- Not in keeping with character – design, layout and materials (39)
- Green site (1)

### **General Comments**

- Loss of house value and saleability (28)
- Increase house/ car insurance (1)
- Negative impact on the community (5)
- Negative impact on local businesses (3)
- Negative impact on the perception of the area/ town (1)
- Cultural differences between Gypsies and settled community create challenges for integration (9)
- Concerned that Travellers could be targeted (2)
- Assessment work is heavily weighted towards proximity to local amenities and does not address the other needs of Gypsies (3)
- Site does not comply with DCLG Designing Gypsy and Traveller Sites Good Practice Guide May 2008 or policy B of Planning Policy for Travellers Sites March 2012 DCLG (1)
- Concerns over animals (2)
- Concerns over management of the sites – 1 pitch sites cannot be managed effectively (1)

A number of general concerns have been raised which relate to the perception for the Gypsy and Traveller community. These comments have not been summarised individually as they are perceptions rather than fact.

### **English Heritage**

- The site could affect the setting of the Grade II listed Church of St Andrew. The potential impacts should be carefully assessed before this site is taken forward for allocation. If necessary appropriate wording in the final document should be included to ensure that the possible setting issues arising from the allocation are addressed at the application stage.

### **Supporting Comments**

Total number of supporters (9)

### **Issues raised/ comments:**

No specific reasons given.

### **Loddington Parish Council**

- Agree. We agree with the potential sites identified but we do not think that we are qualified to assess which should be allocated as Gypsy and Traveller sites as we may not know or understand any issues with these sites. The communities near the sites would need to answer this question.

### **Braybrooke Parish Council**

- Agree the site should be allocated to Gypsy and Traveller

accommodation

#### Environment Agency

- All potential sites should be allocated as Gypsy and Traveller sites as they are located in flood Zone 1 Proposed developments greater than 1 hectare located in Flood Zone 1 NPPF Paragraph 103 requires applicants for planning permission to submit a Flood Risk Assessment when development is greater than one hectare located in Flood Zone 1 defined by Technical Guidance to the NPPF as having a low probability of flooding. The proposed scale of development may present risks of flooding on-site and/ or off site if surface water run-off is not effectively managed. Guidance on the requirements of the FRA can be found at [www.environment-agency.gov.uk/static/documents/Utility/FRAGuidanceNote1\\_v3.1.pdf](http://www.environment-agency.gov.uk/static/documents/Utility/FRAGuidanceNote1_v3.1.pdf) Proposed developments less than 1 hectare located in Flood Zone 1. These development sites are less than 1 hectare located in Flood Zone 1, (low probability of river and sea flooding as defined in the NPPF. The main flood risk to consider is usually the management of surface water run-off. Drainage from the new development must not increase flood risk either on-site or elsewhere. Government policy strongly encourages a SuDS approach to achieve these objectives. Guidance on how to address specific local surface water flood risk issues may also be available through the Strategic Flood Risk assessment or Surface Water Management Plan produced.

#### County Archaeological Advisor

- I agree with all the allocations within Option 3 Potential sites. The sites, apart from the Rothwell site, will not have any detrimental impact on any known archaeological remains.

#### **Officer Comments**

##### **General Location and Sustainability**

A large number of people have raised concern that a residential area is unsuitable for the location of a Gypsy and Traveller site. The site is located within a mixed commercial/ residential area. The 'Designing Gypsy and Traveller Sites Good Practice Guide (CLG, 2008) sets out the Governments advice designing good Gypsy and Traveller sites. This document states that where possible, sites should be developed near to housing for the settled community as part of main stream residential development.

Concern has also been expressed the site is located too close to the town centre, the church, schools and local businesses. The town centre is located within 150m (walking distance of the site), commercial units are located adjacent to the site, the curtilage to St Andrews Parish Church is located immediately to the south of the site and the closest primary schools (St Andrews and Park Schools) are within 700 metres of the site. The location of Gypsy and Traveller sites within established residential areas is supported by CLG's 'Designing Gypsy and Traveller Sites Good Practice Guide 2008' which states that where possible, sites should be developed near to housing

occupied in the settled community to aid integration with the settled community. This document also states that sites should not be identified for Gypsy and Traveller sites in locations that are inappropriate for ordinary residential dwellings. The site is considered to be an appropriate location for ordinary residential development given its location within the town boundary as defined by saved policy 35 of the Local Plan. The site is also considered to be very sustainable, given its proximity to the town centre and local facilities and services, the importance of which are emphasised in the CLG Guidance in terms of integration and social contact with the settled community.

Suggestions have been made that housing would be a more suitable use for this site. Whilst there is a need for further houses within the borough, including affordable housing, there is an equal need to provide suitable sites to meet Gypsy and Traveller accommodation need and there is no reason to discount sites simply for this reason.

It has also been questioned if the site is a location where Gypsy and Traveller would wish to live. The reasons specified are that Gypsy and Travellers do not want to live on small pitches with the settled community, within the built up area. Reference again needs to be made to CLG's 'Designing Gypsy and Traveller Sites' which emphasises the importance of sites being located near to the settled community and facilities. With respect to the size of the pitches, in all the sustainability assessments undertaken in association with the options paper, a suitable site area was defined at 650 square metres. This site only has an area of 430 square metres, however as it is for just one pitch, with an easily achieved access off Crown Street, it was considered the site could accommodate one pitch. With careful design the site and could accommodate a mobile home, a towing caravan, a utility building and space for parking all of which are considered necessary elements to include within a Gypsy pitch. Whilst consideration will need to be given to the layout of the site, the size of the site is not considered in itself a reason not to progress the site.

### **Scale of Development**

Concern has been expressed that there is no need or demand for single pitch sites with Gypsy/ travellers preferring to live in larger groups. There is an equal need for smaller sites of only one pitch as there are for larger sites of up to 15 pitches. There are other examples within the Borough of single pitches which are occupied and integrate well within the settled community.

Concern has been expressed that the site could easily expand and become overcrowded. Any future design of the site would provide for sufficient space for one family (one mobile home and one tourer). Conditions could be attached to any future planning application restricting the number of caravans on the site to ensure the pitch does not become overcrowded. Careful treatment to the boundaries of the site will ensure that no unauthorised expansion of pitches would occur. Such measures will ensure that pitch provision is limited to one.

Some concern has been expressed that the local area is already densely

populated and there is no room for further development. The site is considered to be of a sufficient size to accommodate the development and which careful design and restrictions on any future planning submissions, will not result in a dense development. The site is relatively large compared to other single terraced dwellings within Crown Street which have a typical area of 100 square metres.

### **Highways**

Significant concern has been expressed regarding the safety of providing a vehicular access into the site, given the sites location on a narrow, one way street.

Northamptonshire County Council Highways were consulted as part of the Sustainability Assessment included within the Options Paper. In this consultation they advised that suitable access arrangements can be provided for the site.

In terms of the capacity of the local roads, Northamptonshire County Council Highways have advised that the local roads have sufficient capacity to cope with the extra traffic generated by one Gypsy/ Traveller pitch.

One comment received is the impact the scheme will have on local footpaths. Crown Street and the surrounding roads within the area benefit from pavements. Crown Street has a pavement on both the eastern and western side with a width of between 2 and 3 metres. These footpaths have capacity to accommodate the additional pedestrian movements generated by one pitch.

One comment received is that Gypsy and Traveller accommodation should be located close to main roads. Similar advice is given in CLG's 'Designing Gypsy and Traveller Sites Good Practice Guide 2008' which states that sites need to have easy access to major roads or public transport services to access facilities, employment and schools. The site is considered to be located close to main roads, being located within 170 metres of Rockingham Road which is a Classified A road. The site is also served well by public transport being located within 200 metres of bus interchange within Kettering town centre.

### **Infrastructure**

Northamptonshire County Council Education were consulted on the proposed sites and raised no concerns in respect of capacity. The number of additional children generated is likely to be relatively small in comparison with the overall population of the All Saints Ward.

Concern has been expressed about the capacity of local doctors/ facilities to cope with the increased demand for services. The site is located within a reasonable distance of a number of doctors surgeries within Kettering. Given the small number of residents which would be generated by the use of the site for one Gypsy and Traveller pitch, the use raises no strategic implications. The capacity of a local doctors surgery for a single house for the settled

community would not prevent the development from going ahead.

The Police have been consulted previously on the proposed sites and raised no issues in respect of capacity. Comments were made by the police in respect of fire regulations and boundaries and these are discussed in more detail below.

An issue has been raised about the excessive costs of developing the site. In terms of infrastructure, the costs of providing drainage, electricity etc will not be unreasonable given the sites location within the existing built up area, which has existing access to such utilities. The main issue with cost will be the purchase of the site, which given the sites location within the town boundary, may make the site financially unviable.

### **Amenity**

Concern has been expressed that the use of the site for Gypsy and Traveller Accommodation will result in an unacceptable impact on the living conditions of local residents, contrary to the requirements of the North Northamptonshire Core Spatial Strategy, policy 13 (l) of which requires that developments do not have unacceptable impact in respect of noise, vibration, smell, light or other pollution, loss of light or overlooking.

One of the main areas of concern raised relates to noise and disturbance associated with the occupancy of the site. No commercial activities will be undertaken from the site. The potential sites identified through this process, are for residential occupancy and not for a mixed commercial/ residential occupancy. Careful attention will need to be given to the layout of any site if progressed to ensure it is designed for residential occupancy only. The site is unlikely to generate any greater levels of noise than any other single dwelling development within the settled community. Notwithstanding this, if progressed, careful consideration will need to be given to the layout of the site, particularly with regards to boundary treatment, pitch layout and vehicular access.

Concerns have been raised about existing problems in the area with noise, littering, disturbance, drinking and littering. This is not a reason for this site not to be progressed and nor would it be for the erection of a single dwelling house within this location. The site is located within an established mixed residential/ commercial area and is suitable for residential occupancy either as a Gypsy/ Traveller pitch or by the settled community.

In terms of construction noise, noise and disturbance associated with the construction of one Gypsy/ Traveller pitch would be less than that associated with the construction of a new dwelling for the settled community.

A number of concerns have been raised in respect of loss of privacy to existing dwellings close to the site. To ensure the privacy of occupier of existing dwellings is maintained, careful consideration will need to be given to site layout, appropriate boundary treatment and landscaping if the site is progressed.

Lighting would need to be provided on the site, and consideration would need to be given at design stage if the site were progressed to the type, location and level of lighting proposed to ensure no adverse amenity issues result.

Some concern has been raised regarding pollution. If progressed, the site would be allocated for residential purposes only, thus no greater health implications would result to existing occupiers of nearby dwellings than if the site were developed for housing for the settled community.

The Police have raised concerns regarding the footprint of the site being small and this may result in issues with Fire Regulations. Whilst smaller than a normal pitch, it is considered at this stage that there is sufficient space within the site for it to be designed to meet the required Fire Regulations. Any future design of the site would need to adhere to the Model Standards for Park Homes which influence siting of mobile homes as well as the provision for water standpipes, hydrants, fire extinguishers etc. In addition, the Police are also concerned about the north boundary to the site being the wall of the next door building. Again careful consideration to the design and boundary treatment in this regard will need to be considered if the site is progressed.

#### **Character**

Significant concerns have been raised about the use of the site for Gypsy and Traveller accommodation being out of keeping with the character of the area as caravans with the design and layout would have no visual similarities to the existing character of the area. The site is in a visible location along Crown Street, however with careful consideration to the design, layout and provision for landscaping, such a development would not result in an adverse visual impact.

Reference is raised in the consultations that the site is a green site. The site is previously developed land, given its existing and historical use as a garage for car sales and repairs.

#### **Impact on Church of St Andrew**

The site is located immediately adjacent to the curtilage of The Church of St Andrew and is located approximately 3 metres from the shared boundary to the curtilage listed hall and approximately 35 metres from the listed church.

English Heritage in their consultation response have advised the site could affect the setting of the church which is grade II listed and the impacts need to be carefully considered.

Section 66(1) of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 requires Local Planning Authorities to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses.

The existing site is currently used for commercial purposes, including car sales and repairs and there are existing single storey structures within the

curtilage of the site. Given this existing use, it is not considered, subject to careful planning at design stage, in particular to boundary treatment that a single Gypsy and Traveller pitch will have any greater impact on the setting of the church. The resultant development would be single storey and less intense than its current use. If the site were to be progressed, conditions could be applied to any planning permission restricting caravan numbers, materials, boundary treatment and landscaping. Subject to careful planning, it is considered that the setting of the Church of St Andrew will be preserved.

### **General Comments**

Integration and friction between the Gypsy/ Traveller community and the settled community has been raised along with associated issues such as perception of the area. Integration of Gypsy and Travellers with the settled community is essential. CLG 'Designing Gypsy and Traveller Sites Good Practice Guide' 2008 emphasises the importance of sites being integrated into the settled community to help reduce tensions and help tackle myths and stereotypes of the Gypsy and Traveller community. Integration will instead encourage a greater sense of community with shared interests. The site meets these requirements given its location within an established residential area with easy access to local facilities. Careful consideration at design stage to the layout, taking into account the principles set out in the Good Practice Guide will help to encourage integration.

The Good Practice Guide also states that the national shortage of sites has led to unauthorised encampments and development which at times has created tensions between the Gypsy and Travellers and the settled community. The allocation of sites for Gypsy and Travellers accommodation will reduce the extent of unauthorised encampments and thus reduce tensions.

Loss of property values, saleability and increased insurance costs are not relevant planning considerations.

A concern is raised about the assessment work is included being heavily weighed towards proximity to local services and does not address the needs of Gypsies and Travellers. The assessment criteria used reflects the advice contained within the CLG's 'Gypsy and Traveller Sites Good Practice Guide' and CLG's 'Planning Policy for Traveller Sites'. The Good Practice Guide emphasises the importance of sites being sustainable, and located close by to local facilities and the local community. This is further reinforced in 'Planning Policy for Traveller Sites' which emphasises that Gypsy and Traveller Sites need to be sustainable, economically, socially and environmentally.

Concerns over the future responsibility for keeping the site clean and tidy and associated management are also raised. Any sites that will be allocated through this consultation process could be operated as either local authority run sites or private sites. Notwithstanding this, experience has shown that occupiers of approved sites within the borough maintain their sites in a clean and tidy condition as do the settled community.



With respect to the keeping of animals, the size is not of sufficient size to include any grazing land for horses etc. Any animals on the site would be akin to what you would expect from a household from the settled community.

**Recommendation**

Site should be progressed. Issues of viability will be determined by the market.

**Name of Site:** Beatrice Road, Kettering (KET030)

**Summary of Comments**

**Objections**

Total number of objections (294)

**Issues raised/ comments:**

**General Location**

- Residential area is unsuitable for a Gypsy site (65)
- Inappropriate location near a school (15)
- Sites should not be put in town centres (1)
- Travellers don't want to live with the settled community and want large pitches (5)
- Site would be better used for housing (5)
- Site is too close to businesses (1)
- Site is too close to houses (8)
- Site should be used for housing (1)
- Site would be better used as garaging/ car parking for the area (1)

**Scale of Development**

- Site only has capacity for one pitch. Gypsies like to live in communities and the site will either not be used or will be used for more than one pitch (15)
- site could extend onto adjoining land (6)
- With large family units, small pitches may become overcrowded (9)
- The site only provides 1 pitch which is not realistic as Travellers travel in groups (3)
- Over development of the site (15)
- There is already over crowding in Brambleside (1)

**Highways**

- Disruption to traffic with vehicles entering the site being wide (1)
- Vehicular access to the site will be difficult and is inadequate and local roads are narrow(16)
- Inadequate space within the site for the turning of vehicles and caravans and emergency services(1)
- Sites should have 2 access points in accordance with the Good

#### Practice Guide (1)

- Concerns over access for emergency vehicles (1)
- Increase in the number of commercial vehicles (1)
- Increased traffic and congestion / highway safety implications(230)
- Existing parking problems and there will be increased parking requirements (219)
- Loss of garages will result in parking problems (1)
- Impact on local footpaths (1)

#### **Amenity**

- Disruption/ noise/ and disturbance to local area (227)
- Loss of privacy (19)
- Increase in smell / pollution (4)
- Concerns over potential business uses being operated (2)
- Disruption during construction works (1)
- Contrary to NPPF and CSS as will have an unacceptable impact on living conditions of neighbouring properties (1)
- Potential for animals would put pressure on vulnerable people and noise (2)
- Concerns over hazardous fires – flammable gas bottles (1)
- Concerns over refuse management / litter(2)

#### **Character**

- Loss of buildings on the site (1)
- Green site (1)
- Out of keeping with the character of the area – design, materials and layout uncharacteristic contrary to the NPPF (233)

#### **Impact on Facilities and Infrastructure**

- Local school are already over subscribed (16)
- Impact on the school (2)
- Local doctors are at capacity (3)
- Concerns over cost of provision of utilities and services (4)
- Issues with Water/ sewage/ utilities – will there be plumbing (2)
- Site would put local public services under strain (1)

#### **General Comments**

- Negative impact on property values (48)
- House / car insurance will rise (1)
- Negative impact on the local community (14)
- Negative impact on the perception of an area (1)
- Development will affect reputation of the area (1)
- Emotional distress (2)
- Cultural differences between Gypsies and settled community create challenges for integration (14)
- Overcrowding of sites has led to serious social tensions (3)
- Assessment work is heavily weighted towards proximity to local amenities and does not address the other needs of Gypsies (3)

- Unsuitable for traveller needs (4)
- Local businesses will suffer (3)
- Site does to comply with DCLG Designing Gypsy and Traveller Sites Good Practice Guide May 2008 or policy B of Planning Policy for Travellers Sites March 2012 DCLG (2)
- Site is too isolated from other Gypsy sites in the area (1)
- More cost effective to provide larger pitches for example 9 pitches (1)
- Environmental Impact Assessment is required (1)
- Question whether the cost is proportionate to the aim to be achieved (1)
- Question if site will be a permanent site or a transit site (1)
- Concerns over management of the site – 1 pitch sites cannot be managed effectively (1)

A number of general concerns have been raised which relate to the perception of the Gypsy and Traveller community. These comments have not been summarised individually as they are perceptions rather than fact.

### ***Supporting Comments***

Total number of supporters (9)

### **Issues raised/ comments**

None.

#### Loddington Parish Council

- Agree. We agree with the potential sites identified but we do not think that we are qualified to assess which should be allocated as Gypsy and Traveller sites as we may not know or understand any issues with these sites. The communities near the sites would need to answer this question.

#### Braybrooke Parish Council

- Agree the site should be allocated to Gypsy and Traveller accommodation

#### Environment Agency

- All potential sites should be allocated as Gypsy and Traveller sites as they are located in flood Zone 1 Proposed developments greater than 1 hectare located in Flood Zone 1 NPPF Paragraph 103 requires applicants for planning permission to submit a Flood Risk Assessment when development is greater than one hectare located in Flood Zone 1 defined by Technical Guidance to the NPPF as having a low probability of flooding. The proposed scale of development may present risks of flooding on-site and/ or off site if surface water run-off is not effectively managed. Guidance on the requirements of the FRA can be found at [www.environment-agency.gov.uk/static/documents/Utility/FRAGuidanceNote1\\_v3.1.pdf](http://www.environment-agency.gov.uk/static/documents/Utility/FRAGuidanceNote1_v3.1.pdf) Proposed developments less than 1 hectare located in Flood Zone 1. These development sites are less than 1 hectare located in Flood Zone 1, (low probability of river and sea

flooding as defined in the NPPF. The main flood risk to consider is usually the management of surface water run-off. Drainage from the new development must not increase flood risk either on-site or elsewhere. Government policy strongly encourages a SuDS approach to achieve these objectives. Guidance on how to address specific local surface water flood risk issues may also be available through the Strategic Flood Risk assessment or Surface Water Management Plan produced.

County Archaeological Advisor

- I agree with all the allocations within Option 3 Potential sites. The sites, apart from the Rothwell site, will not have any detrimental impact on any known archaeological remains.

**Officer Comments**

No assessment has been made of the consultation responses. The owner of the site advised at the start of the consultation process that the site was no longer available for the use of Gypsy and Traveller accommodation.

Since the consultation, planning permission has now been granted for the site for 6 one bedroom flats (KET/2013/535 decision date 01.11.2013).

**Recommendation**

This site is no longer available and should not be progressed.

**Name of Site:** Depot at Mawsley Lodge, Loddington (LOD021)

**Summary of Comments**

**Objections**

Total number of objections (7)

**Issues raised/ comments:**

**General Location and Sustainability**

- No shop in the village (3)
- The very small shop in the village only sells the basics (1)
- No public transport to and from the village. Only have a minibus service which serves the village one morning a week (3)
- Sites location would encourage the use of the private vehicle (1)
- The site is not accessible and it is unclear how the site has scored 'only moderately well in terms of accessibility' (1)
- Site is located in the open countryside (1)
- Site is detached from services and facilities (1)
- Nearest one stop shop 2.5 to 3 miles away (2)
- Provision of pedestrian/ cycle links is costly (1)
- There is no pathway from the site to the village. (1)

- The closest pathway to the site is 450 – 500 metres away (1)
- Loddington does not have a secondary school (1)
- Long distance to walk to the primary school along grass verges (1)
- Walking to the village on 60 mph roads would be dangerous (1)
- Access road to the site is a country road which does not have a 30 mph speed limit and has no existing safe pedestrian links (2)
- Site undermines the principles behind policies 9, 10, 13 and 17 of the NNCSS (1)
- Travellers will not have any interaction with village life (1)

### **Highways**

- Question where a safe access could be provided into the village (1)
- The access road is untreated and dangerous in the winter months (1)
- Increased traffic – local roads are unsuitable and can't cope and will give rise to adverse highway safety implications (1)
- Existing vehicular access will need widening (1)
- No access road to the site (1)

### **Amenity**

- Contamination requires further investigation (1)

### **Impact on the Historic Environment**

- Grade ii Listed Building (Loddington Hall) in close proximity (1)

### **Impact on Facilities and Infrastructure**

- Village school is oversubscribed and all year groups are full (3)

### **Scale of Development**

- Site is too small (1)

### **Drainage**

- Sewerage system is full to capacity and inadequate (5)
- New sewer line will need to be laid to Loddington or Mawsley (1)

### **Trees/ Ecology**

- Disruption to wildlife – further investigation required (2)
- Mature trees on site would need protecting (1)

### **Viability**

- Site is financially unviable (1)
- Costly to develop – sewage, contamination (1)

### **General Comments**

- Villagers will be surrounded by sites with options proposed for Orton and Rothwell (1)
- Following analysis of the scoring of sites suggest that the site be excluded from the alternative options list (1)
- Council should use their own land (1)

- Site is preferable to BR007 in terms of sloping to drainage and road access (1)
- Could be a good seasonal site (1)

Natural England.

No opinion. Comments:-

- There is a traditional orchard to the south of the site which is a priority habitat (1)
- The site makes an important contribution to the green infrastructure network and local biodiversity (1)

Loddington Parish Council

- Q3. Agree. We agree with the potential sites identified but we do not think that we are qualified to assess which should be allocated as Gypsy and Traveller sites as we may not know or understand any issues with these sites. The communities near the sites would need to answer this question.

### ***Supporting Comments***

Total number of supporters (1)

- Sewage capacity – septic tanks are often used on sites without problems (1)
- Access track is the only real constraint – this can be upgraded (1)

### **Officer Comments**

#### **General Location and Sustainability**

The site is located in the open countryside, being located approximately 400 metres along Harrington road to the edge of Loddington Village. National and local policy both direct development of Gypsy and Traveller sites to be located within sustainable locations. The CLG 'Designing Gypsy and Traveller Sites Good Practice Guide' 2008 recommends that sites are developed within or close to the settled community to improve integration and co existence. This site does not provide for this with the closest dwelling being located in excess of 300 metres from the site.

Conflicting information has been provided as part of the consultation as to whether there is a local shop in Loddington. There is a local shop operating in Loddington from Main Street. The shop sells basic convenience foods and is open Monday, Tuesday, Thursday and Friday 10.30 am to 6.00 pm and on Saturdays 10.30am to 3.00pm. The site is located approximately 885 metres from the shop. Given the limited opening times and limited size of the shop, this shop was not included in the assessment; instead the Co-Op in Broughton which is located more than 4.6 km away has been identified as the closest convenience store. If the shop in Loddington had been included within the assessment, the site would have performed better in respect of its location to facilities in the original assessment exercise.

In terms of access to public transport, a consultation comment has advised

that Loddington is only served by a minibus service which serves the village one morning a week. The original assessment recognised that there was a limited bus service through Loddington, but nonetheless there is a bus service that runs through village which gives any future residents of the site the opportunity to use public transport, as is the case with any member of the settled community who lives in Loddington. The assessment work does recognise that the site is located some distance from the bus stop (between 44 – 800 metres) and the scoring reflects this (a neutral score was given).

The detailed assessment recognises that there is no secondary school within Loddington Village. The assessment identifies Montsaye Academy as the closest secondary school located approximately 4.8km from the site.

Concerns have been expressed in the consultation regarding the site not being connected to Loddington village by a footpath. There is no footpath connecting the site to Loddington Village and this is recognised within the assessment criteria. The assessment criterion does however recognise that a safe pedestrian access could be provided to the site along Harrington Road. If the site were to be progressed, the cost of such a provision would need to be investigated further, however such mitigation measures would improve both the accessibility of the site and encourage any future occupiers to walk to Loddington village.

The overall assessment for accessibility to pedestrian / cycle links, public transport and settlement hierarchy identifies the site performing moderately well. This is because the site is located reasonably close to Loddington Village, there is the option of providing a footpath to Loddington village and Loddington is served by public transport, albeit limited. It is however recognised with any open countryside location, there will be greater reliance on the private car than sites that are located within or immediately adjacent to towns and this is reflected in the assessment on accessibility. In terms of identified sites within the open countryside this site scores favourably.

### **Highways**

Concerns have been raised as part of the consultation that a safe vehicular access could be provided to the site. Northamptonshire County Council have been consulted on the scheme and advised that a satisfactory access can be provided to the site with some improvement works undertaken.

In terms of the capacity of Harrington Road and other nearby roads, both Northamptonshire County Council Highways and the Highways Agency have confirmed that these roads have the capacity to accommodate the additional traffic generated by this site. Whilst the road may not be treated over the winter months, the same is the case for many other country roads within the locality.

### **Amenity**

The issue of contamination has been raised. This issue has been recognised within the assessment criteria, however can be mitigated against and this could be secured via a condition on any future planning application submitted.

### **The Historic Environment**

Concern has been raised about the impact the development of the site would have on Loddington Hall (grade II listed building). The site is located approximately 500 metres (as the crow flies) from the curtilage of the Grade II Listed Loddington Hall. The site will not be visible directly from Loddington Hall. Neither Northamptonshire County Council Archaeological Department nor English Heritage have raised any comments on this ground.

### **Impact on Facilities and Infrastructure**

Concerns have been raised that Loddington Primary School is too small to accommodate additional children as it is already over subscribed. As part of the consultation on the site Northamptonshire County Council Education raised no objections in respect of the capacity of local schools to accommodate additional children.

### **Scale of Development**

A concern has been raised that the site is too small for Gypsy/ Traveller accommodation. The site has an area of 3050 square metres. It has been identified through the assessment work that 650 square metres of land is required on average to accommodate one pitch, thus the site is of an ample size to accommodate 4 pitches. In terms of site size CLG's 'Designing Gypsy and Traveller Sites Good Practice Guide' 2008 states that there is no one ideal size of site, and experience suggests that a maximum of 15 pitches is conducive to providing a comfortable environment, however smaller sites can be successful.

### **Foul Drainage**

Concerns have been raised about the capacity of the existing sewage system in the area and the proximity of the site to the existing apparatus. Anglian Water have been consulted on the assessment work and have confirmed that significant off site sewerage works will be required to connect the site up. Whilst this can be provided, it will have cost implications. For these reasons, in the assessment criteria the site scores poorly.

### **Viability**

The site will be costly to develop in both respect of contamination and providing the required access to foul drainage infrastructure. These costs will have implications for the viability of developing the site.

The owner of the site has now advised that the site is no longer available for use as Gypsy and Traveller accommodation.

### **Trees/ Ecology**

The site is previously developed land. If the site were progressed its careful design will ensure that any important trees that make a positive contribution to the character of the landscape/ area can be retained.

With respect to ecology and the comments made by Natural England, The Wildlife Trust were consulted as part of the assessment criteria and advised



that the development of the site and associated ecological implications could be successfully mitigated against and such mitigation could be secured by condition.

### **General Comments**

All Council owned land within 2km of local shops and primary schools have been considered as part of the initial identification of potential sites.

The site is located sufficiently far away from sites identified within Rothwell and Orton not to result in any over concentration for villages in Loddington. The site identified in Mawsley Lodge is located over 3 km from sites identified in Orton and Rothwell.

### **Recommendation**

The site is no longer available and should be discounted.

**Name of Site:** Highways Agency Land, Orton Road (ROT010)

### **Summary of Comments**

#### ***Objections***

Total objections (19)

#### **Issues raised/ comments:**

#### **Accessibility**

- No safe footpath to Rothwell (1)

#### **Highways**

- Poor access/ no access (5)
- Too close to A14/ junctions (6)

#### **Noise**

- Noise from A14/ pollution (5)

#### **Character/ visual impact**

- At main entrance into the town, would create bad image (3)

#### **Ecology**

- Lies within the River Nene Nature Improvement Area (1)
- Impact on Slade Brooke (1)

#### **Flooding**

- Site is prone to flooding/ flood risk assessment for KET/2013/0210 shows flooding potential (14)

#### **General concerns**

- Risk of expansion into adjacent fields (2)
- Has been used in the past by Gypsy and Traveller families without success (1)
- Has been granted permission for a lorry park why is it being considered as a traveller site (1)
- Flooding, noise and access constraints cannot be overcome, should be red site (2)
- Small sites create isolated groups within an established community and would not make for good social cohesion (1)

Rothwell Town Council:

- Too close to A14 with poor access off Orton Road and would be noisy for people living in caravans.
- Prone to flooding and liable to spread out of the designated site onto adjoining fields.

Nature Development Officer, Nene Valley Nature Improvement Area – Site is located within the Nene Valley Nature Improvement Area and should not be progressed for ecological reasons.

### ***Supporting Comments***

Total supporting comments (1)

- Interested in purchasing the land and living on the site. (1)

### **Officer Comments**

#### **Accessibility**

There is currently no safe pedestrian access into Rothwell and walking would involve crossing the A14 slip roads. This was recognised in the original assessment of the site. The site scores \*\* for pedestrian/ cycle links.

#### **Highways**

There is currently no vehicular access to the site but vehicle access has existed in the past. NCC have advised that access would need to be 70m from the roundabout and that the previous access may need to be moved closer to the roundabout due to the proposed truck stop access. However it is considered that suitable access to the site could be achieved.

#### **Noise**

Environmental Health have advised that noise from the A14, slip road, the roundabout and the truck stop access will be difficult to mitigate against. A noise assessment would be required but likely mitigation would be an acoustic fence 2m higher than the roadway. The Highways Agency will not allow this on the highway boundary and it would be required within the site at a lower level, depending on site levels this could mean a 6 metre high fence enclosing the site.

**Character/ visual impact**

The site is located on land significantly lower than the highway and it is not considered it would have a significant impact on the gateway to the town. If necessary landscaping could be required as part of a planning application.

**Ecology**

The site is located in the Nene Valley Nature Improvement Area. Ecological surveys would be required if the site was progressed to ensure there would be no unacceptable impact from development.

**Flooding**

The site is in flood zone 1 and located outside areas shown as at risk of flooding for the flood risk assessment for KET/2013/0210. The Environment Agency has not raise concerns in relation to flooding.

The Highways Agency has provided additional information in relation to this site and has raised concerns in relation to ecology, drainage, sewage, waste disposal and contamination. They have also identified the need for access to the pond located east of the land where highway drainage outfalls to. There is currently no suitable access to this pond and the site provides the opportunity to provide suitable access.

**Recommendation**

In light of the comments received from the Highways Agency and Environmental Health it is recommended that this site is not progressed as an allocation.

**Name of Site:** Land at A14 J4, Rothwell (ROT011)

**Summary of Comments****Objections**

Total number of objections (19)

**Issues raised/ comments:****Highways:**

- Traffic safety issues - too close to A14 junctions (1)
- Would inhibit any further development of the road and bypass system around Rothwell. (2)

**Ecology**

- Impact on Slade Brooke (4)

**Noise**

- On A14 so would be too noisy for people living there/ pollution from traffic

(8)

**Flood risk**

- Site is in floodplain where water rises to 3 foot/ floods/ flood risk assessment for KET/2013/-210 shows risk of flooding (18)
- Cost in light of flood risk would be extensive (1)

**Visual Impact**

- On approach to Rothwell so wouldn't create a good impression to visitors (1)

**General concerns**

- Was originally proposed as a Lorry Park, this would have brought jobs to the town (1)
- Site is too large with potential to increase its size (3)
- Residents would be effected by the smell of the bio recycling plant (1)
- Should be a red site due to constraints (2)
- This is allotment land which must remain that way. (3)

Rothwell Town Council:

- This area is in a flood plain and last year water was 3' high.
- Too noisy for caravan dwellers and pollution could seriously damage the Slade Brooke

Harrington Parish Council – Too near to the A14 and A6 junctions, motorists, children and animals are at risk.

Nature Development Officer, Nene Valley Nature Improvement Area – Site is located within the Nene Valley Nature Improvement Area and should not be progressed for ecological reasons.

Environment Agency – Site falls within Flood Zone 2 and 3 therefore should not be considered as a potential site.

**General Comments**

- Would allow families to settle as a group and build a social community, is within reach of local amenities and follows similar model to The Pastures.

Broughton Parish Council – Site scores well and constraints relating to noise from A14 can be overcome as many households and businesses border the A14.

**Officer Comments**

A feasibility study was completed for this site in January 2012.

**Highways**

NCC highways have been consulted and they have advised that safe access can be achieved and that the highways network has sufficient capacity.

There are no plans for a bypass south of Rothwell, therefore this is not a reason to discount the site.

### **Ecology**

The site is located in the NIA and the Nature Development Officer for the NIA has commented that the development should not go ahead for ecological reasons. The NIA covers a large area and location within the NIA is not, on its own, a reason to discount the site. Further assessment would be needed to determine the ecological value of the site and the impact any development would have on the objectives of the NIA.

### **Noise**

The A14 is located adjacent to the northern boundary of the site. The Environmental Health Officer has advised that a noise survey is required; however the site is sufficiently large for this to be mitigated. A bund will be required (likely to be 3 m high) and this can easily be achieved on the site with re-modelling.

### **Flooding**

Parts of the site are located in flood zones 2 and 3 and the Environment Agency has commented that the site should not be progressed. The remainder of the site is located in flood zone 1. A detailed flood assessment would be required and site would need to be designed to ensure development is located outside flood risk zones.

Further discussions with the Environment Agency have taken place. The EA have advised that because only a part of the site is located in flood zone 3 development could be allocated outside this area. This would leave the development falling in flood zones 1 and 2. Table 2 of the National Planning Policy Framework classifies Caravans, mobile homes and park homes intended for permanent residential use as 'Highly vulnerable', with Table 3 considering this type of development appropriate in Flood zone 2 if the Sequential Test and the Exception test is passed.

A sequential approach could also be applied to the site locating any development in flood zone 1. With regards to the access point being located in flood zone 2, if the Sequential Test is passed the access and egress from the site will need to be considered in the site-specific flood risk assessment which forms part of the Exception Test.

### **Visual Impact**

The site is located below the level of the road and visibility of the site from the roads into Rothwell is limited. It is not considered that development of the site would result in an unacceptable impact.

### **General concerns**

The proposed lorry park is located on Orton Road at junction 3 of the A14. Expansion of the site – any unauthorised development outside the site would need to be dealt with separately and this does not impact on the suitability of the site itself for development.

The anaerobic digestion plant is a significant distance from the site, parts of southern Rothwell are closer to the plant than this site.  
The land is not used as allotment land.

**Recommendation**

The site is located close to services and facilities and would therefore be a sustainable location. There are significant costs involved in providing services to the site. If the site is progressed flood risk issues would need to be overcome and further assessment would be required in relation to ecological impact.

**Name of Site:** Harrington Road, Rothwell (ROT/013)

**Summary of Comments**

**Objections**

Total number of objections (29)

**Issues raised/ comments:**

- Whole site should be red (2)

ROT013a:

- The existing site is on other peoples land, blocks access (9)
- It has been refused planning permission/ does not have planning permission (15)
- Occupation should not lead the choice of sites, this sends out the wrong message (5)
- Policy H of Planning Policy for Traveller Sites states that sites should not be enclosed to give the impression the site and its occupants are deliberately isolated from the rest of the community. The current proposals are contrary to this (1)
- Would be piecemeal and therefore unsustainable (1)
- Would impact on sale of homes on adjacent site (1)
- In an oversubscribed area (1)

ROT013b:

- Boundary of town/ gateway so would not look good to visitors/ trade (14)
- Close to A14/ A6 so noise/ pollution would be a problem (7)
- Residents would be effected by smell from the bio recycling plant (1)
- Access unsafe (1)
- Disused airfield at Harrington should be used instead (1)
- Close to A14/ A6 junctions so traffic safety is an issue (1)
- Adjacent to housing/ would be overlooking (2)
- Would block assess to the small triangle of land east of the A14 (1)

Rothwell Town Council:

- ROT013a - This is on other peoples land, blocks access and has been refused planning permission

- ROT013b – Noisy for people in caravans, located at entrance to historic town so inappropriate, would block access to triangle of land adjacent to A14.

***Supporting Comments***

ROT013a

- Site is near local facilities without impacting on small villages (1)
- 2 illegal caravans should constitute the 2 pitches required (1)

ROT013a & b

- Up to 13 pitches with easy access for travelling and the least disturbance to residents are preferable to sites which are located adjacent to or adjoining residential properties. (1)
- Agree as it keeps the existing site at Rothwell. Only concern is the impact the adjacent residential site will have on the existing community. (1)
- Good access to major roads and away from residential areas (1)

NCC Archaeology – ROT013 – Development will have a negative impact on the historic environment however this impact can be mitigated by the imposition of an appropriate archaeological condition.

***General Comments***

- Would allow families to settle as a group and build a social community, is within reach of local amenities and follows similar model to The Pastures.

**Officer Comments**

**General location**

The Designing Gypsy and Traveller Sites Good Practice Guide (CLG, 2008) sets out the Governments advice on designing good Gypsy and Traveller sites. This document states that where possible, sites should be developed near to housing for the settled community as part of main stream residential developments. The document highlights the need for sites to be close to schools and healthcare facilities and to promote integration and co-existence with the settled community. The document also supports the identification of small sites which are known to work well for single extended families.

The site is close to existing services and facilities and is in a sustainable location. The site is adjacent to proposed housing and it is not considered that this would be piecemeal development. Design should ensure the occupants are not isolated from the community.

**Visual Impact**

The site is located at the entrance to Rothwell, however the land is lower than the adjacent road and visual impact could be minimised by appropriate screening.

**Access**

NCC Highways has advised that safe access to the site can be achieved.

**Noise**

ROT/013a: The Environmental Health officer has advised that a noise survey and mitigation will be required. Development is likely to need an acoustic barrier.

ROT/013b: The Environmental Health officer has advised that noise is a major issue. Noise assessments would be required. Based upon the proposed residential scheme to the east of the site over half the site is unlikely to be usable due to noise from the A14, Rothwell Road and the A6/ A14 roundabout. Substantial bunding would be required on the southern and western boundaries of the site.

**Contamination**

ROT/013a: The Environmental Health officer has advised that a contamination survey (associated with the construction of the A14) would be required. Existing hard standing on the site, if this is retained it is likely to be clear from contamination.

ROT/013b: The Environmental Health officer has advised that a contamination survey would be required. Whole site is likely to be contaminated from works associated with the construction of the A14.

The anaerobic digestion plant is a significant distance from the site. Existing residential properties in Rothwell are closer to the plant than the proposed site.

**General concerns**

House prices – this is not a land use planning consideration

**Ownership:**

ROT013b:

The owners of site ROT013b have confirmed that this site is not available and therefore this area is not deliverable.

ROT013a:

This area of land was previously maintained by the Highways Authority but they are not the landowners. When a highway extinguishes under Common Law the adjoining land owners are deemed to own to the centre of any highway. In this case the land is split between the adjoining land owners. Landowners have confirmed that the site is not available.

**Recommendation**

The site is in a sustainable location and would be suitable for the proposed use subject to appropriate mitigation. However the site is not available. It is therefore not considered appropriate to progress the site as an allocation in the Site Specific Proposals LDD.



**Name of Site:** Allotments south of Meadow Road, Rothwell (ROT037)

## **Summary of Comments**

### **Objections**

Total number of objections (41)

### **Issues raised/ comments:**

#### **General location**

- Out of town sites would be better (1)
- Is at the entrance to the historic town and inappropriate/ would not make a good impression/ will effect businesses and visitors coming to the town. (4)

#### **Impact on allotments**

- Allotments have been used for 70 years and have a waiting list, important part of Rothwell community, have been awarded £10,000 for improvements, shouldn't be lost/ goes against KBC policy to encourage allotments/ would destroy the allotments/ have a significant impact on the allotments/ was given to the people of Rothwell by the Lord of the Manor/ allotments are identified in KBC: Background Paper: open space and allotments (37)
- Having the access through the allotments would be unsuitable/ costly/ impact on the security of the allotments (9)
- Using western section would not be compatible with the allotments (2)

#### **Highways**

- Access very close to A14 slip road would be unsafe/ unsuitable (7)

#### **Noise**

- Noisy with A14/ Noise assessment for KET/2013/0210 highlight need for insulation/ pollution from A14 (9)

#### **Flooding**

- Area identified is in the floodplain (8)

#### **Ecology**

- Would impact on protected species e.g. bats (1)
- Impact on habitats/ Slade Brooke (2)

#### **Amenity**

- Site is very close/ too close to existing properties in Meadow Road (16)
- Loss of privacy/ noise (3)
- Overlooking of adjacent properties (1)

#### **Archaeology**

- Archaeology (1)

#### **General concerns**

- Site was donated to the people of Rothwell by the then Lord of the Manor (1)
- Unused sites should be used first e.g. Cohen's yard (1)
- Logical location would be to extend the site at Harrington Road (1)
- Would impact on existing resources/ services (1)
- Increased population leads to increased crime (1)
- Large site vulnerable to self expansion (2)
- Should be a red site and removed from alternatives list (2)
- Property will devalue/ saleability (4).
- Potential for expansion (1)
- Cost of sewage works would be high (1)

Rothwell Town Council:

- Large site would destroy Brachers allotments which are thriving with a waiting list.
- Land was given to the people of Rothwell by the then Lord of the Manor.
- Goes against KBC's policy to encourage allotments.
- Even if only western section was approved access would be through the centre of the allotments and the two uses are not compatible
- Allotment access is inadequate for additional use as it is off A14 junction 4 slip road.
- Site is too close to properties on Meadow Road and would also be overlooked.

Harrington Parish Council – Should be moved away from the junction and numbers of pitches reduced, we note that the roadside is heavily wooded and should not cause the same risk of danger to motorists, children and animals as in ROT011.

Nature Development Officer, Nene Valley Nature Improvement Area – Site is located within the Nene Valley Nature Improvement Area and should not be progressed for ecological reasons.

### **General Comments**

- Would allow families to settle as a group and build a social community, is within reach of local amenities and follows similar model to The Pastures.

Natural England:

- This would involve development over an area of allotments.

### **Officer Comments**

#### **General location**

The Designing Gypsy and Traveller Sites Good Practice Guide (CLG, 2008) sets out the Governments advice on designing good Gypsy and Traveller sites. This document states that where possible, sites should be developed near to housing for the settled community as part of main stream residential developments. The document highlights the need for sites to be close to

schools and healthcare facilities and to promote integration and co-existence with the settled community. The document also supports the identification of small sites which are known to work well for single extended families.

While the site is close to the entrance into Rothwell it is set back from the main route into the town to the rear of the allotments and existing housing and would not be visible on the route into Rothwell.

### **Impact on allotments**

Access to the site would need to be through the allotments. The allotments currently have locked gates at their entrance. Provision of suitable access through the allotments is likely to require upgrading to the access road and may impact on existing allotments. Provision of a shared access through the allotments is likely to be problematic if the gates are to continue to be locked.

### **Highways**

NCC Highways were consulted and have advised that safe access to the site could be achieved.

### **Noise**

The site is adjacent to the A14 and mitigation of noise impacts would be required. If the site is progressed a noise assessment would be required as part of a planning application. Noise mitigation may have a significant impact on the developable area of the site.

### **Flooding**

The site is located in flood zone 1. The Environment Agency has been consulted and has not raised concerns in relation to flooding on this site. If the site is less than 1ha the main issue to consider is surface water runoff. If the site is greater than 1 ha a flood risk assessment would be required.

### **Ecology**

Ecological assessment would be required as part of a planning application and where appropriate mitigation required. The site is located in the NIA but is separated from the Slade Brooke by the A14, it is also surrounded by residential development, proposed residential development and allotment land. The benefits the site could offer in terms of connecting existing habitats are therefore limited but some ecological enhancement could be incorporated into the site.

### **Amenity**

The site is located to the rear of properties along Meadow Road and Edinburgh Close. The nearest part of the western part of the site is approximately 28m from the nearest property. It is considered development would not result in overlooking or loss of privacy for properties in Meadow Road and Edinburgh Close.

The layout for the residential development to the west of the site includes dwellings which back onto the western edge of the site. The site would need to be designed to ensure there is no unacceptable impact on amenity of the

future occupiers of the adjacent development or the occupiers of the site.

### **Archaeology**

NCC Archaeology advised that the site is unlikely to impact on the historic or cultural environment.

### **General concerns**

Property value is not a material planning consideration.

The size of the site could accommodate up to 13 pitches based on a pitch size of 650m<sup>2</sup> however it is likely that noise mitigation would reduce the size of the site and result in a reduction of the number of pitches located on the site. It is not considered that this level of development would put excessive pressure on facilities given the current size of the town.

Expansion – any unauthorised development outside the site would need to be dealt with separately and this does not impact on the suitability of the site itself for development.

Alternative sites have been considered.

Cost of sewage provision - Anglian Water have indicated there is sufficient capacity to accommodate this level of growth.

In relation to the site being gifted by the Lord of the Manor – if the site was progressed as an allocation this would need to be looked into further.

KBC policy to promote allotments – development should only occur on the western side of the site which is not used as allotments.

### **Recommendation**

Access to the site is a significant issue which would be difficult to overcome. Noise mitigation would also significantly reduce the developable area. It is recommended that this site is not progressed as an allocation.

**Name of Site:** Former Service Station, Desborough Road, Rothwell – ROT039

### **Summary of Comments**

#### ***Objections***

Total objections (112)

#### **Issues raised/ comments:**

#### **General location**

- Adjacent to existing housing and amenities/ too close to houses (15)
- Small sites create isolated groups within an established community and would not make for good social cohesion (1)
- It is recognised that Gypsies and Travellers do not want to live within the settled community (2)
- Close to a school (1)

- Out of town sites would be better (2)
- Site should be developed for private or affordable housing (2)

### **Contamination**

- Cost of cleaning land before building/ contaminated land (14)

### **Highways**

- Access on a bend would be hazardous/ on busy road/ garage closing reduced the hazards on this road it is not sensible to increase traffic again/ there have been accidents on this bend/ increase in vehicles would impact on the safety of residents (95)
- Where will cars/ vehicles park (1)

### **Noise**

- Noise (2)

### **Character/ visual impact**

- Desborough Road is a main entry to the historic town and is characterised by the open spaces of the cricket ground. Would have a detrimental impact on the character and profile of the town. (84)
- Unacceptable high density and overdevelopment of the site (81)
- Negative visual impact (81)
- Proposed development is out of character in terms of the appearance compared with existing development (83)
- Would have a detrimental impression to any new home or business owners moving to the area and we foresee closure of some shops and businesses (2)

### **Amenity**

- Impact on residential amenity – privacy, noise and disturbance (83)
- Overlooks adjacent properties (5)
- Views would adversely affect residential amenity and neighbouring owners (84)
- Is next to cricket ground and public footpath/ would impact on these amenities/ would be detrimental to the cricket club/ football ground (98)

### **General concerns**

- Risk of overspill onto cricket field (3)
- Amenities are at capacity (1)
- Impact on house prices (3)
- Schools are full (1)
- Medical centre is at capacity (1)
- Conflicting information on whether the site is proposed for 1-2 or up to 10 (2)
- Should be a red site and discounted (2)

### **Rothwell Town Council:**

- This former garage is contaminated land and would need to be cleaned before use which would make it unviable.

- Site is overlooked by properties.
- Would interfere with the enjoyment of the cricket ground and Fanny Joyce's lane

### **Officer Comments**

#### **General location**

The Designing Gypsy and Traveller Sites Good Practice Guide (CLG, 2008) sets out the Government's advice on designing good Gypsy and Traveller sites. This document states that where possible, sites should be developed near to housing for the settled community as part of main stream residential developments. The document highlights the need for sites to be close to schools and healthcare facilities and to promote integration and co-existence with the settled community. The document also supports the identification of small sites which are known to work well for single extended families.

The site could be identified for housing/ affordable housing; however there is equal need to provide suitable sites to meet gypsy and traveller accommodation need and no reason to discount sites simply for this reason.

#### **Contamination**

The site was previously used as a petrol station and an assessment of contamination and appropriate mitigation would be required as part of a planning application. It is not known whether the petrol tanks remain and if they do this will have cost implications, however it is not considered that this would make development completely unviable.

#### **Highways**

Concerns have been raised in relation to the access to the site and increased traffic. The site was previously used as a service station and the access into the site remains. NCC highways have been consulted and they have advised that access is possible from Desborough Road, adjacent to the access with the cricket ground and that re-configuration of the access may be required to give a more defined way in. They have advised there are no highway capacity constraints for a development of this size.

#### **Noise**

The site is adjacent to existing housing and there are no significant noise sources in the vicinity. It is not considered that additional vehicle movements to and from the site would have a significant impact in terms of noise as the site is adjacent to a B road.

#### **Character/ visual impact**

Concerns have been raised relating to the character and visual appearance of the development. The site is in a visible location on a main route into Rothwell, however appropriate design and landscaping would ensure that there is not an unacceptable visual impact. The site currently sits higher than the adjacent land and consideration will need to be given to land levels if the site is progressed.

In terms of density, the consultation document stated that 1-2 pitches could be accommodated on the site. This would not result in a high density of development. The 'up to 10 pitches' set out in the background paper is too high and the numbers set out in the consultation document set out what the site could achieve based on the size of the site.

### **Amenity**

The site is located adjacent to the cricket pitch; concerns have been raised as to the impact of the development on the cricket pitch. The cricket pitch access is adjacent to the site and development would need to be designed to ensure there is no impact on visibility. The key concern relating to the adjacent cricket pitch would be in terms of amenity of the occupiers of the site, the site would need to be designed to ensure privacy. There is no reason to suggest that a site in this location would impact on the amenity of people using the cricket pitch or walking along Fanny Joyce's Lane. Overlooking of footpaths and open spaces by adjacent properties is encouraged by planning policy to provide natural surveillance.

Overlooking – 68-74 Desborough Road face the site, the front of these properties is 24m from the site and it is not considered that the proposal would result in overlooking of these properties. The side of 66 Desborough Road is 15m from the site. It is not considered that development would result in overlooking of this property. There is sufficient distance between the site and surrounding properties to ensure the site could be designed so that it is not overlooked by surrounding development.

### **General concerns**

Overspill – any unauthorised development outside the site would need to be dealt with separately and this does not impact on the suitability of the site itself for development.

House prices – this is not a land use planning consideration

Capacity of amenities, school, and medical centre – The proposed site is small and would not have a significant impact on capacity of amenities. NCC education has been consulted and has not raised concerns with the capacity of the school.

### **Recommendation**

The cost of mitigating contamination is likely to be the greatest constraint on the site in terms of suitability. However the site is in private ownership and is not available for development. It is therefore recommended that the site is not progressed as an allocation because if the land is not available it will not be deliverable.

### **Discounted options**

### **Summary of Comments**

### **Objections**

Total objections (20)

- Some of the discounted options would be more palatable to local communities/ which are more suitable than those identified as suitable. (2)
- East Kettering SUE should be included and a small proportion of the affordable housing should be made Gypsy and Traveller accommodation (1)
- Equal distribution of sites across the Borough should be a factor in to decision making. (1)
- Further dialogue with neighbouring authorities is needed (1)
- There are sites which have been discounted which could be used. There are too many pitches in the rural area with no good links to facilities and inadequate roads. (1)
- Some of these sites would be suitable as transit sites (1)
- Discounted options should not have been included (1)
- Council seems to have a predisposition towards the concentration of traveller sites. BRO009 and CRA005 prove this flawed thinking still exists. (1)
- BRO009 and other sites should be reconsidered – criteria are flawed.
- Disappointed more sites have been identified in the vicinity of Desborough (1)
- Object to sites in Kettering (2)

Avalon Allotments: total number of comments(7)

- Site should not be considered (3)
- Properties have been devalued (2)
- Access via Scott Avenue would not be appropriate (1)
- Site was discounted because people in the area did not want it, why has the other end of Rothwell had 6 sites chosen (1)
- Allotment land which is in short supply so should not be allocated (3)

ROT012 (6)

- This would be perfect as has a shop, McDonalds and A14 would provide good travel links (3)
- Would provide a good size facility (1)
- Would provide privacy and community living and reduce opportunity for community hostilities (1)
- There are walking and cycle links to Rothwell and Desborough (2)
- Would make a good transit sites where links to local facilities are less important (5)
- Not adjacent to residential area (1)
- Could be landscaped (1)
- Site is separated from the road by McDonalds (1)
- Has been discounted without regard to positive aspects (1)
- The site is an adequate distance from the road and is accessed from a slip road not the A14, ROT013 has the same score, why has this not been discounted. (1)



DES040 (1)

- Would provide a good size facility (1)
- Would provide privacy and community living and reduce opportunity for community hostilities (1)

KET 016 and 022 (5)

- Would provide privacy and community living and reduce opportunity for community hostilities (1)
- Would lend themselves to small transit sites where requirements for public transport and cycle links are unimportant (5)

BRO009 (1)

- Entrance on to A43 would be dangerous. (1)
- Village already has one site, no need for any more (1)

KET019 (1)

- Orion way already has traffic problems (1)
- Should be rejected on access and safety grounds (1)

KET015 (1)

- Sustainable location, close to public transport and employment, has few constraints. (1)
- Settlement hierarchy assessment is wrong – should have double tick (1)
- Not clear where housing aspiration comes from as not identified in Site Specific Proposals LDD (1)
- Should be re-appraised (1)

DES/014 (1)

- Not clear why land needs to be purchased to access site and no information on funds available to do this. Should be re-assessed. (1)

WIL034 (1)

- No explanation as to why the site is not available. Should be re-assessed. (1)

Braybrooke Parish Council:

We feel some of the discounted sites could be looked at further

- Both KET016 and KET022 would lend themselves to small transit sites where the requirement for public transport and cycle links are unimportant – in every other regards they are excellent sites
- ROT12 would also be an attractive option in this regard – set back from the road but with the facilities of the service station at hand. We are aware that employees at the McDonalds adjacent to this site often walk or cycle from Rothwell and Desborough to work and so it is proven to be accessible if necessary to the amenities of a local town
- BRO007 – Abattoir site should be considered as it only needs a footpath
- KET030 – Roughton Close should be considered as the objection was overlooking. An appeal at Braybrooke was passed on this point so a

precedent has been set

- KET036 – Baron Close should be considered for the same reasons as KET030
- KET023 – London Road should be considered for the same reasons as KET030
- ROT039 – Desborough Road, Rothwell should be considered as it is close to amenities, has good access, good local facilities and few constraints

Broughton Parish Council – ROT012 should be brought back into consideration. Constraints could be overcome, one of which is noise from the A14. Many existing households and businesses border the A14.

### ***Supporting Comments***

Total support (26)

- Sites have failed criteria so should not be progressed/ have been discounted for good reasons/ are unsuitable. (10)
- Agree ROT038 should be discounted (1)
- Agree Greenfields should be discounted/ should be closed down/ is unsuitable (4)
- Any permanent provision for housing transitory populations in substandard accommodation is unsustainable. Temporary pitches to facilitate travelling communities is however sustainable (1)
- Discounted sites in Rothwell should remain discounted (1)
- ROT038 is unsuitable because of access difficulties (1)
- ROT012 is on A14 and access are heavily used, would aggravate overloaded carriageways (1)
- No need to provide sites (1)
- Agree with sites which have been discounted except KET015 which is owned by NCC but discounted because it is not available, surely it could be considered for Gypsy and Traveller accommodation, BRO009 only constraint is access to services and facilities, it is recognised Gypsy and Travellers do not want to live with the settled community and prefer to use their own transport, site is brownfield and should be green, KET026 should be amber as although it is expensive there are no other constraints, GED004 few constraints which are difficult to justify, such as overlooking from footpath, positioning and size make the site favourable and should be amber (2)
- Agree we should not have big sites in the open countryside because of lack of infrastructure and contrary to CSS (1)

KET015 – Is available for housing so should be available for consideration for Gypsy and Traveller needs (1)

KET032 and KET 036

- Overlooking from flats not a real constraint as I'm sure this affects many other properties close to the flats. Likewise fire regulations can surely be overcome (1)

BRO009

- Should be looked at again if BRO008 and BRO007 not used. Surely access to minor roads as there is a farm connecting to underpass into Broughton. Not long distance to walk into Broughton(1)

KET 016 and 022 should be looked at further (1)

- Would lend themselves to small transit sites where requirements for public transport and cycle links are unimportant (2)

ROT012 should be looked at further (1)

- Would make a good transit sites where links to local facilities are less important (1)
- Set back from road with facilities at hand, there is access by foot to Rothwell for amenities of the local town (1)

Rothwell Town Council agree the Rothwell discounted sites should not be progressed as potential sites.

Barton Seagrave Parish Council appreciates the need to look at smaller potential sites but believes there is a minimum critical mass of land which can be suitable for housing family units

Geddington, Newton and Little Oakley Parish Council consider static sites for gypsies and travellers to be a good thing, allowing them to integrate with the wider community. However the Parish Councillors concur with your recommendation to reject the two proposed sites in Geddington.

Harrington Parish Council – Agree discounted sites should not be progressed. All sites have been subject to the same stringent examination including Millwinds at Harrington. We have maintained over 20 years that this is an unsuitable site. The application of these objective criteria gives the same conclusion. We hope there are no further suggestions that it should be used as a traveller site. The more smaller sites there are, in sustainable and contained areas, that can be enforced, the better for all. We hope the traveller community has been similarly encouraged to engage in this exercise.

Wilbarston Parish Council - Strongly agree with WIL034 being discounted.

Loddington Parish Council – Strongly agree discounted sites should not be progressed.

Braybrooke Parish Council – GREENFIELDS - We totally support the exclusion of this site from any possibility of becoming an approved site and would request that it is returned to its original state as soon as possible. We do so for all the reasons you have used in your consultation document. We know that you will maintain and continue your efforts to close this site down and that firm and positive action to negate any possible further appeals which would lead to further delay in its closure

Nature Development Officer, Nene Valley Nature Improvement Area – Agree

– KET016 and KET022 are located within the Nene Valley Improvement Area and have sensitive ecological features which make them unsuitable for development.

NCC Archaeological Advisor - I agree with all the allocations within Option 5 discounted sites. The exclusion of Geddington GED003 is particularly beneficial for the historic environment. A number of the other excluded sites would have also had a detrimental impact on the historic environment although this could have been mitigated by the imposition of an appropriate archaeological condition.

### **General Comments**

KET015 (1)

- Site is in a sustainable location close to the town centre, facilities and employment. Should have scored double tick for settlement hierarchy. Not clear where aspiration for housing comes from as this was not identified as housing site in Site Specific Proposals LDD and no record of planning permission on the site. Should be re-appraised as a potential site (1)

ROT012 – Site compound off A14 north of ESSO (4)

- Site has been discounted without considering positive aspects. Site is adequate distance from A14 and there appears to be a footpath into Rothwell. The site has more ticks than ROT013 and should be re-assessed. (1)
- Set back from road with facilities at hand, there is access by foot to Rothwell for amenities of the local town (1)
- Would make good sites with access to communities and good transport links (1)

DES014 – Land south of Desborough (1)

- Not clear why additional land needs to be purchased to unlock the site and therefore not available (1)

WIL034 – Queens Road, Wilbarston

- No explanation as to why the site is not available. Why was it assessed if it is not available (1)

KET016 & KET022 (3)

- Would make small transit sites where the requirement for public transport and cycle links is not important (1)
- Would make good sites with access to communities and good transport links (1)
- Why have Kettering sites been discounted? (1)

Westfield Farm (BRO009) (2)

- Site is outside village and less likely to cause disruption to local residents (1)

- Access on to A43 unsuitable/ unsafe (1)

English Heritage:

Welcome the discounting of a number of sites as they have potential to harm various heritage assets:

KET016 – Appears to lie within the setting of the Grade II registered park and garden of Wicksteed Park and could have an impact on the significance of the setting of the park.

WEE001 – Lies within Weekley Conservation Area, close to a number of listed buildings and the registered park and garden of Boughton House. This is likely to be an inappropriate site to develop in terms of its impact on the significance and setting of the above heritage assets.

GED003 – adjoins Geddington Conservation Area and is likely to be an inappropriate site to develop in terms of its impact on the significance and setting of the conservation area.

GED004 – lies near the north end of Boughton House Registered Park and Garden and is likely to be an inappropriate site to develop in terms of its impact on the significance and setting of the park and garden.

WIL034 – is situated opposite Wilbarston Conservation Area and could have negative impacts on the significance and setting of this heritage asset.

**Officer Comments**

**Objections**

It is noted that some respondents felt some discounted options would be more palatable to the local community.

East Kettering SUE has been considered in the alternative sites assessment table.

Equal distribution of sites was considered through the site search criteria.

Need for further dialogue with neighbouring authorities is noted. Neighbouring Planning Authorities will continue to be consulted as the plan progresses.

The assessment has sought to identify sites in sustainable locations and the assessment criteria seek to identify the most sustainable sites in locations with access to services and facilities.

Discounted options have been included to show the range of options which were considered. This is necessary as through the plan making process local authorities are required to consider all reasonable alternatives.

The site search has sought to identify a more dispersed provision of sites. There is only one existing site which is located close to BRO009 and CRA005.

BRO009 was discounted because the highway access is not acceptable for a more intensified use. The site is also poorly related to village facilities due to

the A43.

Desborough was not included in the search area but sites with existing temporary permissions were included because it is important all reasonable alternatives are considered.

Kettering is a sustainable location. The Designing Gypsy and Traveller Sites Good Practice Guide (CLG, 2008) sets out the Governments advice on designing good Gypsy and Traveller sites. This document states that where possible, sites should be developed near to housing for the settled community as part of main stream residential developments. The document highlights the need for sites to be close to schools and healthcare facilities and to promote integration and co-existence with the settled community.

Avalon Allotments – This site was discounted because it is not available.

ROT012 – this site was discounted due to issues with noise and pollution and an objection from the Highways Agency that the access is substandard. Comments have not provided evidence to overcome these issues and therefore there are no changes to the assessment.

DES040 – This site has been discounted because it is not available.

KET 016 – Is located entirely in flood zone 3. The NPPF requires development to be directed away from areas at highest risk of flooding. The NPPF technical guidance identifies caravans and mobile homes for permanent use as highly vulnerable. Development for highly vulnerable used should not be permitted in flood zone 3.

KET 022 – Access to this site cannot be achieved. No evidence has been submitted which could overcome this constraint.

BRO009 – Site has been discounted. Comments relating to entrance on to the A43 are noted.

KET019 – Site has been discounted – concerns in relation to traffic and access are noted.

KET015 – The landowners have aspirations for housing on this site. An Environmental Statement Screening Opinion has recently been submitted for the site.

DES/014 – To gain access to the site an area of land would need to be purchased as the existing highway does not link to the site.

WIL034 – The site is required for an alternative use and is therefore not available.

BRO007 – NCC have advised that suitable access to this site cannot be achieved. It has therefore been discounted.

KET030 and KET036 – Overlooking is an issue which needs to be considered on a site by site basis. An appeal which has been allowed because of overlooking in one instance does not set precedence. Development of these sites would result in an unacceptable level of overlooking.

ROT039 – This site is not available for development and therefore has not been progressed.

***Supporting comments***

Support for discounted options is noted.

Standard of accommodation is not an area for discussion. The need identified is for permanent residential pitches and therefore temporary pitches would not adequately meet this need.

BRO009 – Site has been discounted because the access to the site is not suitable for an intensified use.

KET026 – Site has been discounted due to viability. Sites identified need to be deliverable and the high cost of the site is such that it is not considered that the site would be viable and therefore would not be deliverable.

GED004 – There are significant constraints on this site and comments have not demonstrated how these could be overcome. Landowners have confirmed this site is not available.

Comments in relation to the size of sites and a minimum critical mass are noted.

***General comments***

KET 015 - Comments in relation to scoring for settlement hierarchy are noted. This will be amended. However as set out above this site is not available for the proposed use.

ROT012 – Positive aspects of the assessment have been considered, however when balanced against the negative aspects the site was considered unsuitable as set out above.

Reasons for discounting some of the sites in Kettering are set out in the Background Paper and on individual site assessment sheets.

**Recommendation**

No changes to discounted sites.

## Appendix 4 – Sustainability Appraisal

### Summary of Comments

#### **Objections**

Total objections (8)

- BRA027 has not been assessed in the context of extensive existing sites around Braybrooke and adjacent to KBC's boundary (1)
- No sites within residential areas of towns and villages (1)
- KET023 garden is very old with wildlife, old trees and pond so impact on biodiversity. Area should be a Conservation Area (1)
- KET023 methodology is not relevant to an urban habitat and it is incorrect to report the proposed development would have no impact on local biodiversity. The site supports several species of national importance e.g. bats, common frogs, hedgehogs, house sparrows, song thrushes and starlings. Two of the trees also have TPO's, it would be difficult to see how access could be provided without damaging these. The house is subject to a conservation order for listed buildings. Facilities such as school and hospital are at capacity (1)
- The town and its Council are being dictated to by EU directives. Think about impact on schools (1)
- BRO006 – unsuitable location at the entrance to the village. Would detract from amenity of adjacent footpath (1)
- BRO007 – significant road safety issues. Poor visibility and sight lines (1)
- BRA028 and BRA029 are not within 2km of a health centre. Road access is single track with no pavements (1)
- Criteria do not take into account 'Designing Gypsy and Traveller Sites Good Practice Guide'. Local Authorities should 'promote peaceful and integrated coexistence between the site and the local community' (1)
- Sustainability Appraisal does not evaluate proximity to existing GT settlements (1)
- BRO008 – Site has double tick for biodiversity but two ecology experts disagree with your assessment. Surveys should be completed prior to further consideration of this site. Wildlife margin needs protecting (1)

#### **General Comments**

- There appears to be no assessment of sustainability or more suitable alternative uses for the sites (1)
- A criteria based selection is reasonable providing it would stand up to scrutiny (1)

### Officer Comments

#### **Objections:**

Comments in relation to BRA027 are noted however this site has now been granted planning permission.



The Designing Gypsy and Traveller Sites Good Practice Guide (CLG, 2008) sets out the Government's advice on designing good Gypsy and Traveller sites. This document states that where possible, sites should be developed near to housing for the settled community as part of main stream residential developments. The document highlights the need for sites to be close to schools and healthcare facilities and to promote integration and co-existence with the settled community. The document also supports the identification of small sites which are known to work well for single extended families.

KET023 – these issues have been considered in the individual site assessment sheet.

Impact on schools is considered through the plan making process and NCC Education have been consulted. Pressure on schools needs to be balanced with the need for additional housing/ accommodation and where appropriate extensions/ new schools identified to meet additional need.

BRO006 – Design of site could ensure there is no impact on amenity of the adjacent footpath.

BRO007 – NCC Highways have advised that access to this site is unacceptable and that insufficient visibility cannot be mitigated.

It is noted that BRA028 and BRA029 are not within 2km of a health centre this was recognised in the assessment of the sites. The original assessment also recognised that there are not safe walking routes from these sites.

Criteria seek to promote peaceful and integrated coexistence between the site and the local community by identifying sites in sustainable locations which allow for integration between the settled and the Gypsy and Traveller community.

The sustainability appraisal criteria do not include an assessment of proximity to existing Gypsy and Traveller sites. The assessment has sought to provide a more dispersed provision through focusing the site search away from areas where there are currently a larger number of sites.

BRO008 – Impact on ecology has been considered in the individual site assessment sheet.

**General comments:**

The assessment is based on the Sustainability Appraisal criteria and therefore considers all aspects of sustainability.

<b>Assessment of Alternative Sites</b>		
<b>Site Name</b>	<b>Comments</b>	<b>Conclusion</b>
Scrap yard off the A43/ Cohen's Yard	Site is a strategic employment site and has planning permission. KET/2006/0193 - Redevelopment site to provide for uses B1, B2 (Industrial), B8 (Storage) C1 (Hotel), car parking, landscaping, nature area, and alterations to access	Land owners have confirmed that the site is not available.  This is a strategic employment site and while the site has not yet been delivered it is anticipated that once the economy recovers from recession this site will make an important contribution to employment land in the Borough.
Rockingham Road- Close to the boys club where 2 properties have been removed	Landowners have aspirations for alternative use.	The site is not available.
Horse Market car park	Located on Queens Street	This site is identified in the Kettering Town Centre AAP as SSQ5 which is allocated for commercial, potential for a hotel/ road and junction improvements.
Council car park	Land is designated as site CQ2 in the Kettering Town Centre Area Action Plan.	The car park currently provides essential car parking for the town centre and is not available.
Along the A14 just before you get to Tesco's there is a 2.2 acre plot of land for sale	This site was considered through the assessment as KET019.	This site has been considered and discounted. No information has been supplied which would alter the original assessment.
Behind the Argos warehouse on the by pass	Landowners contacted to determine availability.	Land owners have confirmed that the site is not available.
Behind the Harvester pub	Landowners contacted to determine availability.	Land owners have confirmed that the site is not available.
Campsite near Warkton village	Landowners contacted to determine	Landowners have confirmed that this

	availability.	site is not available
Within or around Kettering East		This is being investigated further.
Fields around Mawsley	The site search focused on brownfield land, land for sale and publicly owned land.	There is no justification for considering sites around Mawsley that do not fit the search criteria in isolation. If the criteria for searching for sites are expanded this assessment would need to apply to fields around all settlements with access to a school and shop.
Waterside Enterprise Zone, Northampton	This site is outside the Borough and therefore cannot meet the Borough's Gypsy and Traveller Accommodation need.	No further assessment required.
Disused airfield	Landowners contacted to determine availability.	Landowners have confirmed disused airfields are not available.
Disused airfield at Harrington	This site was considered through the assessment as HAR035.	This site has been considered and discounted. No information has been supplied which would alter the original assessment.
Shooting club adjacent to the leisure village.	This area is currently used for leisure purposes. The area is identified in the Kettering Town Centre AAP as STQ1 and STQ2.	The site is not available.
Spare land near BP garages adjacent to the A509 junction with the A14.	This site was considered through the assessment as KET019.	This site has been considered and discounted. No information has been supplied which would alter the original assessment.
Disused railway just opposite the Woodford turning off the A509 junction.	Precise location unclear but not a sustainable location.	No further assessment required.

Near A14/M1	No specific sites identified. The site search focused on brownfield land, land for sale and publicly owned land within 2000m of a school or shop.	Where areas of land adjacent to the A14 fitted the search criteria they were assessed. The M1 is outside the Borough and therefore sites near this cannot meet the Borough's Gypsy and Traveller Accommodation need.
KBC owned commercial sites	No specific areas identified. All KBC owner land was considered in the initial search for sites.	No further assessment required.
Land at Gypsy Lane opposite the crematorium in Rothwell Road	Landowners contacted to determine availability.	Landowners have confirmed that this site is not available
Sites on A14/ A6 junction after Rothwell and proposed truck stop	No specific areas of land identified. Two sites at this junction were considered through the consultation.	The most appropriate sites at this junction were considered through the original assessment.
Windmill Cottages/Old Piggeries, Cranford Road, Burton Latimer	This site is used by an existing business and there is no indication that this site will become available for use as a Gypsy and Traveller site.	No further assessment required.
Isham end of Station Road	No specific area of land identified but beyond the Pocket Park land along Station Road is located outside the Borough.	Located outside the Borough.
Cranford Road, Burton Latimer, by Think Environmental	No specific area of land has been identified. The area of land south and west of Blackbridge farm has been identified as a Strategic Employment Site in the emerging Joint Core Strategy and there is currently an application on this site for 109,000sqm	The land around Think Environmental has been identified for strategic uses and is not available for consideration to meet Gypsy and Traveller accommodation needs.

	employment development. Land East of Blackbridge farm has been identified in the Kettering East Master Plan as land reserved for Strategic Road Infrastructure.	
Weekly Glebe Playing Fields	These are well used playing fields.	The site is not available.
Land in front of Weekly Glebe Playing Fields	This area is used to access the playing field/ for car parking for users of the playing fields.	The site is not available.
Plot of land on Buccleugh Estate	Contact Landowners.	Landowners have confirmed sites not available.
Old Cattlemarket on Northfield Avenue	This land has been redeveloped for commercial/ retail uses.	The site is not available.