Section Title - Introduction Number of responses - 8

Total number of Objections - 3 Total number of Support - 1 Total number of neither Object nor Support - 4

Summary of main points

Desborough Town Council – Why is this being pushed through now when KBC will disappear plus it is based on consultations in 2009 so by 2019 it will be 10 years out of date? Timetable is tight so little chance for changes to be made. (id 234 & 250)

Braybrooke Parish Council – Regret that policy on the allocation of gypsy and travellers sites has been excluded from this document. Aware of the difficulty KBC has had in resolving this issue, and that deferring consideration is politically expedient. But as a matter of principle allocation of land for this purpose should be treated as part of the land allocation as a whole not as an afterthought or special issue. (id 267)

General comments

Objection (1) (id 49)

The context of the plan

- No reference to good design which is a fundamental requirement of our build environment (1) (id 7)
- KBC should take into account revised NPPF. It is recommended KBC give due consideration to the amount of planned development across the Borough notwithstanding the provisions within the JCS. (1) (id 480)

Duty to Cooperate

 The Council should continue to engage with neighbouring authorities and documentation to justify compliance with the Duty to Cooperate (1) (id 480).

Sustainability Appraisal (SA)

- A key aim of the SA is to make the plan more sustainable. SA will need to include housing related sustainability objectives. This will be relevant to policies relating to housing requirement, affordable housing, larger sites and allocations that are expected to make a contribution to housing land supply. If these policies do not score positively other more sustainable options should be considered. Concern raised about delivery at SUE's and level of affordable housing delivery. Burton Latimer has historically delivered and at 30% affordable housing. (id 282)
- NPPF requires local plans to be informed throughout their preparation by a SA. SSP2 should be based on an SA process that clearly justifies

its policy choices. Failure to undertake satisfactory SA has resulted in plans failing at examination or being subject to legal challenge. Site selection process should not arbitrarily discount sites. (id 553)

Implications of New National Planning Policy Framework

Design – Section 12 of the NPPF places great emphasis on the importance of good design. Plans should, at the most appropriate level, set out a clear vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.

Sustainability Appraisal – Paragraph 32 of the NPPF requires Local Plans to be informed throughout their preparation by a sustainability appraisal which meets the relevant legal requirements.

Summary of officer comments

It has been agreed that a separate Gypsy and Traveller allocations policy be prepared to enable the SSP2 to progress while the Gypsy and Traveller Accommodation Assessment is updated.

It is important that work on the SSP2 continues, this plan once adopted will cover the period until 2031, and will therefore continue after any change in local government structures takes place. Work on the SSP2 began in 2009 but the evidence base and consultation has continued to be updated during this time and therefore is not out of date.

In terms of design the SSP2 needs to be read alongside the NPPF and JCS which cover design issues; the SSP2 shouldn't repeat existing policy. A larger number of policies in the plan deal with detailed design matters, e.g. Policy RS04 and site allocation policies which include development principles.

The SA will not cover housing requirements or SUE's as these have already been subject to SA through work on the JCS. The SSP2 is a part 2 local plan and will not re-cover issues considered through the JCS.

The consultation on the draft plan was an informal stage in the preparation of the plan. SA has been undertaken alongside the preparation of the plan as set out in paragraphs 1.16-1.18 of the draft SSP2. The final SA report will be consulted on alongside the Pre-submission plan. Sites have been assessed against the SA criteria and have not been arbitrarily discounted. The scope of the SA will reflect the scope of the document and will not cover issues which have been assessed through the preparation of the JCS (Part 1 Plan).

The SSP2 is a part 2 local plan and will not consider issues which have been addressed through the Part 1 Local Plan. Any review of the amount of planned development will take place through a review of the JCS not the SSP2.

Next steps

• Sustainability Appraisal Report and Habitat Regulations Assessment will accompany the consultation on the Pre-submission Plan