Comment	KBC Response
71. Policy CRA02 South of New Stone House, Duck End	Noted.
Cranford Parish Council agree that this area should be allocated as a possible	
site for locally identified housing needs.	
72. Policy CRA03 Land East of the corner of Duck End and Thrapston Road	Noted.
Cranford Parish Council agree that this area should be allocated as a possible	
site for locally identified housing needs.	N. d.
73. Policy CRA01 Cranford Development Principles	Noted.
Cranford Parish Council are firmly in support of maintaining these development	The 0045 Declement of Decement of the
principles, in particular the settlement boundaries shown on draft proposal map	The 2015 Background Paper recommended
12.4 and all of the HVI areas on proposal map 12.4	HVI080 to be designated as Historically and Visually Important Local Green Space. This
In relation to HVI 080 (view from Barton Rd to Grafton Rd) the council wish to	area was originally identified through work
comment that although they appreciate the area cannot be extended, that the site	undertaken by a third party. This area has
line view on the approach to the village from Barton Rd should be considered in	remained the same throughout the process
relation to the road infrastructure of the proposed J10a and further development	and the assessment reflects the area identified
of Hanwood Park, so that the historical view does remain.	in the Draft Plan following comments to an
	update to the Background Paper in June 2016.
	If this area is adopted in the final Plan as
	Historically and Visually Important Local Green
	Space, this will provide significant protection
	against development on the area of land
	designated, which will maintain the view across HVI080 to Grafton Road.
	HVIDOU ID GIAIIDII KUAU.
199. Policy CRA01 Cranford Development Principles	Noted. The comments in relation to the
Bonded pea shingle for path and road surfaces have a shorter design life than	suggested materials for paths and road
standard asphalt. Therefore if these materials are chosen a higher commuted	surfaces are acknowledged.
sum would be required to cover the additional maintenance burden to	

the highway authority.	
276. Policy CRA02 South of New Stone House, Duck End On behalf of the owner of the site we support the policy to allocate it for residential development to include market and affordable housing.	Noted.
277. Policy CRA03 Land East of the corner of Duck End and Thrapston Road On behalf of the owners of the site we support its allocation for the development of market and affordable housing.	Noted.
355. Policy CRA03 Land East of the corner of Duck End and Thrapston Road The Council's Background Paper on Housing Allocations (May 2018) identifies the above site as being within 400m of an existing Water Recycling Centre in Anglian Water's ownership. Nuisance may be caused by noise, lighting and traffic movements but its most prevalent source will be odours, unavoidably generated by the treatment of sewerage.	Anglian Water were consulted as part of the site assessment process. Discussions were had to determine the extent to which odour and noise from Cranford Water Recycling Centre would impact on the site.
However the SSP2 as drafted does not make reference to how this has been considered as part of the site selection process or how applicants will be expected to address this issue without prejudicing the continued operation of this site and ensuring that the amenity of future residents is not adversely affected. We have undertaken a review of the proposed residential allocation sites (references RA/170 and RA/173) at Cranford St John which has indicated that the site boundaries lie beyond the range at which odour and noise from the operation of Cranford Water Recycling Centre (WRC) would normally be anticipated. There	It was determined that the loss of amenity to residents on this site was minimal and therefore this was not considered a significant issue as part of the site assessment and it would not preclude development. Therefore both sites in Cranford were progressed and included in the Draft Part 2 Local Plan as proposed allocations.
are existing residential properties situated closer to the WRC, for which there is no significant complaint history. Consequently we would conclude that the risk of amenity loss at these sites due to the normal operation of the WRC is minimal.	KBC's Environmental Health team have confirmed there is no complaint history from residents of noise or odour originating from the

We would also suggest further consultation with the local Environmental Health Department who may have more extensive local knowledge indicating existing receptor sensitivity. Water Recycling Centre.

Further discussions have been undertaken with Anglian Water to determine whether changes to the wording of Policy CRA03 are required; as a result of this no changes will be made.

356. Policy CRA02 South of New Stone House, Duck End

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KBC's Environmental Health team have confirmed there is no complaint history from residents of noise or odour originating from the Water Recycling Centre.

Further discussions have been undertaken with Anglian Water to determine whether changes to the wording of Policy CRA02 are

509. Chapter 12.4 Cranford

Section 12.4 of the draft Local Plan refers specifically to Cranford village. It advise of the population statistics and facilities available at the village. The text goes on to identify that, following a Housing Needs Survey in 2016 an over-ridding need for additional smaller properties for market occupiers in addition to those looking for affordable housing options.

We support the proposed option to allow some small scale growth at the village outside the current settlement boundary which will provide the housing need requirement as identified in the 2016 survey. We therefore **Support policy CRA01** with the exception of part iv) as we feel there is no requirement to 'enhance' the gateways into the village via Cranford Road/High Street other than by soft landscaping or a gateway feature as a visual cue to reduce vehicle speeds.

Policy CRA02 and Policy CRA03

We **Object to policies CRA02 and CRA03** which provide for two allocated sites for housing development on the edge of the village.

Policy CRA02 seeks to allocate land south of Stone House for 5 to 6 houses as an exceptions site supported by the minimum number of market houses required to make the scheme viable.

In our view this land is disconnected from the settlement and lies between the two village forms of Cranford St Andrew and Cranford St John. No part of the site abuts or adjoins either settlement boundary and the site is distant from both which serves to demonstrate its relative isolation from both communities and built

required; as a result of this no changes will be made.

Both of the sites that have been promoted have yet to be considered for allocation at any stage during work on the SSP2.. The sites that have been included as draft housing allocations have been included to address the identified need for affordable housing in the village and are supported by the Parish Council. Site assessments of the sites have been undertaken and it has been agreed by Members of Planning Policy Committee that these sites should be allocated. It is acknowledged that both sites are somewhat disconnected from the village, although this was outweighed by the provision of affordable housing. As a result the two sites included in the Draft Plan will continue to be progressed and both of the promoted sites on Duck End and Top Dysons will not be considered any further. The two sites identified in the Plan provide sufficient housing to meet the affordable need and no further allocations are required in the village. In relation to this designation of HVI080, both the Historically and Visually Important Open Space Background Paper (September 2015) and a subsequent update in June 2016 set out the Council's approach the designation of this site as Historically and Visually Important Open Space. This included recommendations put

forms.

The 0.17ha site adjoins a large agricultural building which is used for livestock and will front on to a part of Duck End which as no footway. Future residents from the site will have to walk in the narrow road to access the footway to the south of the site. As a 0.17 ha site the development would represent 35 dwellings per ha which represents a high density for an edge of village development.

We consider this allocation is unsuitable as it is out of character with the form and context of the village and does not represent a natural growth, it is relatively isolated therefore from the two communities, and it is exceptionally close to a livestock barn and on a section of village road with no footway.

Policy CR03 proposes a further allocation on land to the east of the village on a triangular area of land comprising 0.59 ha. The site is proposed for 8 to 10 dwellings.

This site adjoins an existing haulage yard and is proposed to be accessed via High Street/Thrapston Road. In our view the site is well beyond the built form of the settlement and clearly extends the village into the open countryside almost serving to connect it visually with the haulage yard further to the east. The allocation site is required to provide buffer between the proposed housing development and haulage yard to seek to mitigate the adverse effect on the residential environment by noise, dust and fumes. However a series of sharp bends in the road to the west may compromised access visibility pushing the access to the site further east.

Again there is no footway on either side of this reasonably busy road. Given the configuration of the site as slim triangle of land it is not evident that a footway could be created linking the site to Duck End as the extent of site frontage is extremely narrow at this point and potentially obstructed by a sub-station. Even if

forward by a third party and the site has been subsequently identified in the SSP2.

The concerns in relation to the northern part of the site were considered when the site was looked at again in 2016 following the 2015 consultation. However it was concluded that the northern part of the site is important to the context of the village and should not be removed from the site boundary. The importance of this part of the site is recognised as it provides a connection between Cranford St. John and Cranford St. Andrew as well providing a setting for the village structure. This clearly demonstrates the local significance of HVI080.

It is acknowledged that this site is not publicly accessible. Public access is not a requirement of the HVI designation.

It is therefore considered that given the extent of assessment of the site which clearly demonstrate the need to include the entirety of HVI/080 as a proposed Historically and Visually Important Local Green Space the site will be progressed as such and as mentioned above, this site will not be considered as a housing allocation in Cranford.

a connect can be made again there is no foot way to this part of Duck End and further along High Street towards the village and school the footway is precariously narrow and navigates a series of sharp bends in the road.

We oppose the development of this site for village housing as it is remote from the village and physically separated from it by the former railway track. It appears as an isolated incursion in to the open countryside with no obvious pedestrian link to the village and offering a poor residential environment adjoining a haulage yard.

We therefore object to the proposed allocation of site CRA03.

New proposed allocations

Whilst we find the proposed allocations lacking in their location and form in relation to the village to offer either an environmentally attractive is socially acceptable addition there is still a recognized housing need to be met in the village.

In this regard we propose two alternative sites for consideration.

Duck End proposed allocation

The proposed site includes land adjoining the existing settlement boundary at Cranford St John. As such the site is physically and visually linked to the existing village form and will appears as a natural outward but contained growth of the village from its existing edge. The site also allows for the two identities of Cranford St John and Cranford St Andrew as distinct communities located either side of the brook.

The site could provide for up to 10 dwellings including smaller homes. The site

can be well landscaped to ensure a soft edge to the village is retained. A high quality development in a traditional pallet of materials would best suit the site and it Conservation area location. There are a number of mature trees along the road side at Duck End. These are generally poor quality trees. They also have the effect of over-shadowing Duck Lane often resulting in icy road conditions in winter. There is the opportunity here to either widen this part of Duck End to create a slightly wider carriageway and footway (if required as there is a footway on the opposite side of the carriageway) by the removal of the poorer quality trees and replanting vegetation within the landscaped scheme. This would provide for a benefit to highway safety.

We welcome the opportunity to work with the Council officers to further develop this option and a suitable policy wording for inclusion in the next stage of the plan. The site is suitable, available and deliverable and is currently owned by the Cranford Estate.

A site plan is attached showing the area available. The site would be configured to provide for 10 dwellings and suitable landscaping to ensure the site sits well within its rural village context.

Land at Top Dyson

We also propose a potential development site on land at Top Dyson. This land is currently shown as within the Historically and Visually Important Open Space designation (HVI). We object to the inclusion of this land within the HVI later in this statement where our case is set out fully.

The land we propose for development is already significantly affected by the existing development at Top Dysons which over-looks the field to the south and which is highly visible from views to the south. This development is a linear from of local authority housing many of which are no in private ownership and which

we added to the village in circa 1950.

A small development site here would be well located to the village of Cranford St Andrew and within walking distance of the school providing an attractive footpath route across the park. The village hall and tea room are directly opposite and there is good vehicular access on to Grafton Road.

The indicative scheme options below show how a small development offering a range of house types could be configured. This would be a well-landscaped site using local vernacular materials and of a high quality. The development of the site could also offer car parking to support the village hall and café opposite in place of the current road side parking.

We would welcome working further with the Council officers to develop the scheme and a suitable policy wording for inclusion in the next stage of the plan. The site is suitable, available and deliverable and is currently owned by the Cranford Estate.

Policy ENV03

Whilst we fully support and accept the principle of protecting green open space where this is important to the setting of historic buildings or where it is important to a Conservation Area character, we do strongly feel that this should not be a blanket approach where large swathes of land are given this designation when they do not make a specific local contribution in this regard.

The Planning Practice Guidance advises that, "If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space." Cranford has a designated Conservation Area and an accompanying Conservation Area Character Statement. The village is set within open countryside to which

restrictive policies are applied and the land is therefore already protected as necessary through policy designations and no further benefit would be gained by additional designations.

In addition Paragraph 100 of the National Planning Policy Framework (2018) itself sets criteria for the designation of Local Green Space and advises that; "The Local Green Space designation should only be used where the green space is:

- in reasonably close proximity to the community it serves;
- demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and
- local in character and is not an extensive tract of land.

With regard to the criteria above whilst the land is 'reasonably' close to community the arable field has no recreational value, ecological value or any significant historic value. The arable field has no particular landscape beauty and is not covered by any landscaped designation. Its visual appearance is dominated by the backdrop of local authority housing which itself is out of character with the historic village. The arable field off Top Dyson has no public access.

Whilst it is understood that important views within the Conservation Area should be maintained as should the setting of listed buildings, the blanket designation of the arable field under reference HVI080 does not appear to fall within the guidelines for designation. There is limited public access to the land under HVI080. A footpath crosses the land south west to north east, to the south of the brook but the land to the north is entirely without public access. It is notable that the examples of green spaces appropriate for Local Green Space designation as given in the PPG are all types of open space to which public access is available.

(PPG para 013 states "For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis").

Whilst we would accept that the land to the south of the brook affords views towards the village and particularly the church from the footpath, the land to the north of the brook (the arable field) principally provides views across it from the public highway to the ribbon development of former local authority housing to the north which are not part of the historic settlement form. There are no views of the Listed Church or Hall from the arable field.

The justification for the designation of HVI080 in the Sites Specific Proposals Local Development Document - Historically and Visually Important Open Space Background Paper September 2015 accepts (at page 11) that the area for designation is 'relatively large'. In terms of its particular significance locally the justification on page 11 comments that the land provides views of Cranford Hall Park land but as commented above this is only where there is public access to the south of the brook. The further summary on page 41 adds that the site provides views of the church (not previously mentioned on page 11) but again this is only from the southern part of the site. The page 41 summary refers to the land as within the village but also refers to it as land outside the village boundaries which is an obvious contradiction.

There are other areas of open space within the Conservation Area boundary which are not proposed to be further covered by an HVI designation some of which have a greater historic significance such as ridge and furrow. The designation of HVI open space in respect of Cranford is not therefore consistent. The arable field which forms the northern part of HVI080 is a modern construct and historic maps indicate it was first enclosed in 1900 with the houses along Top

Dyson shown as partially constructed on the 1958 O.S. map and completed on the 1970 O.S. map.	
We therefore object to the extent of HVI designation as it applies to Cranford site reference HVI080 which should exclude the northern arable field.	