



**Broughton
Neighbourhood Plan
Pre- Consultation
Responses**

**Consultation period Thursday, December 1st 2016
through to Thursday January 19th , 2017**

Pre-Submission Consultation Responses

Total Responses 110 via Survey Monkey

1 separate handwritten letter

4 separate Developer/Agent Responses

1 technical support response from Kettering Borough Council

Statutory Consultees

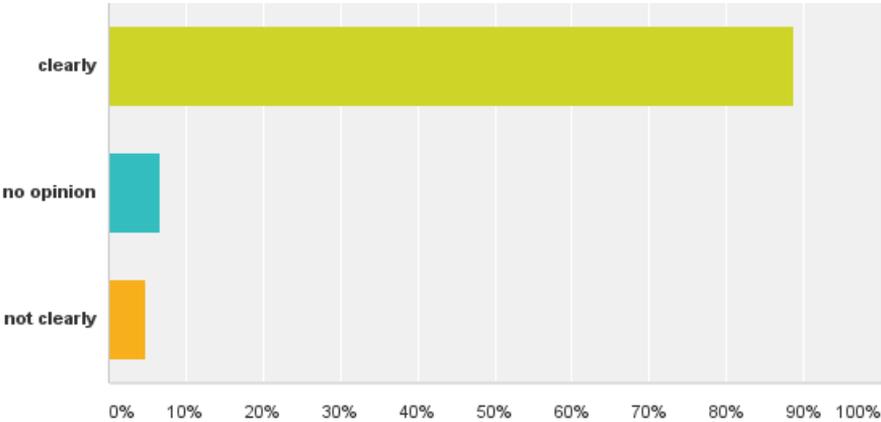
The Broughton Neighbourhood Plan Steering Group would like to thank everyone for their participation in this Pre-Submission Consultation process and for the responses that have come through.

This document is intended for publication in response to the pre-submission consultation exercise and will form part of the Broughton Neighbourhood Plan Consultation Statement (Annexe 1)

Q1: How clearly does the Plan explain the process, consultation and legal status of the document?

Answered: 106 Skipped: 4

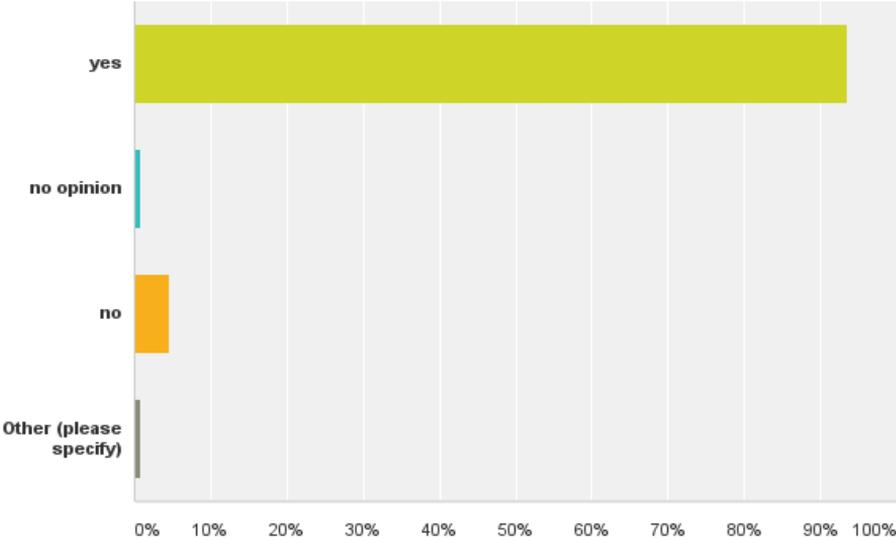
Answer Choices	Responses	
clearly	88.68%	94
no opinion	6.60%	7
not clearly	4.72%	5
Total		106



Q2: Do you agree with the Strategy Plan for the Broughton Neighbourhood Plan (Chapter 1)

Answered: 108 Skipped: 2

Answer Choices	Responses	
yes	93.52%	101
no opinion	0.93%	1
no	4.63%	5
Other (please specify)	0.93%	1
Total		108



Q2: Do you agree with the Strategy Plan for the Broughton Neighbourhood Plan (Chapter 1)

Answered: 108 Skipped: 2

Q2 Individual Responses

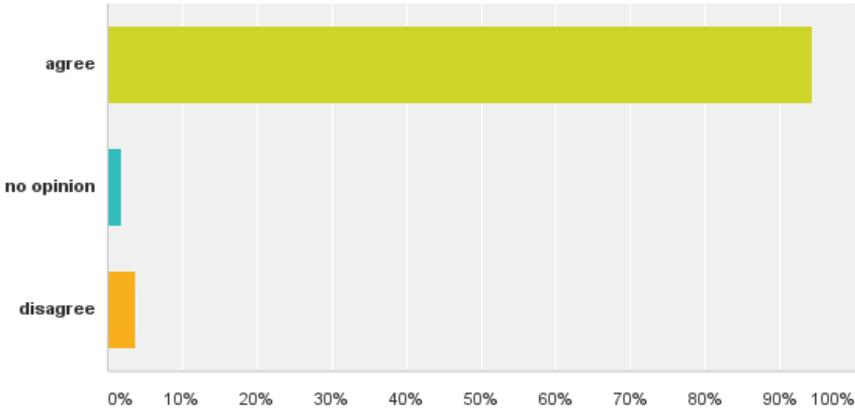
General comment on document as a whole is that it's very fluffy and without clear messages. Lacking clarity. Not entirely sure what the strategy is from this... there's no clear message of how future planning applications will be approached.

Noted

Q3: Do you agree with the sustainability solution for Broughton in Chapter 2

Answered: 105 Skipped: 5

Answer Choices	Responses	
agree	94.29%	99
no opinion	1.90%	2
disagree	3.81%	4
Total		105



Q3: Do you agree with the sustainability solution for Broughton in Chapter 2

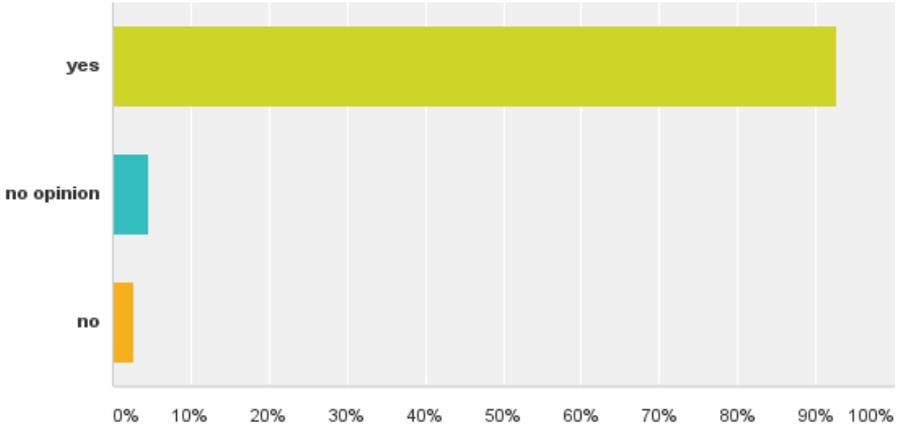
Answered: 105 Skipped: 5

Q3 Individual Responses	
Very strongly - agree that the previous development has been totally unplanned. Kettering B.C. agreed to this, they are at fault. A much better transport system is needed. More buses!	The Broughton Neighbourhood Plan will provide the framework for the delivery of strategic and evaluated development going forward. A local community was unable to do this prior to the Localism Act coming into effect.
In very small scale	noted
In very small scale	noted
some of the proposal	noted
Again this should be summarised clearly. A lot of wordy pages of garble.	noted

Q4: Are you happy with how the historical development in Broughton has been explained (Chapter 3)?

Answered: 108 Skipped: 2

Answer Choices	Responses	
yes	92.59%	100
no opinion	4.63%	5
no	2.78%	3
Total		108



Q4: Are you happy with how the historical development in Broughton has been explained (Chapter 3)?

Answered: 108 Skipped: 2

Q4 Individual Response:

* Broughton does have industry in the Blacksmiths, George James.	noted
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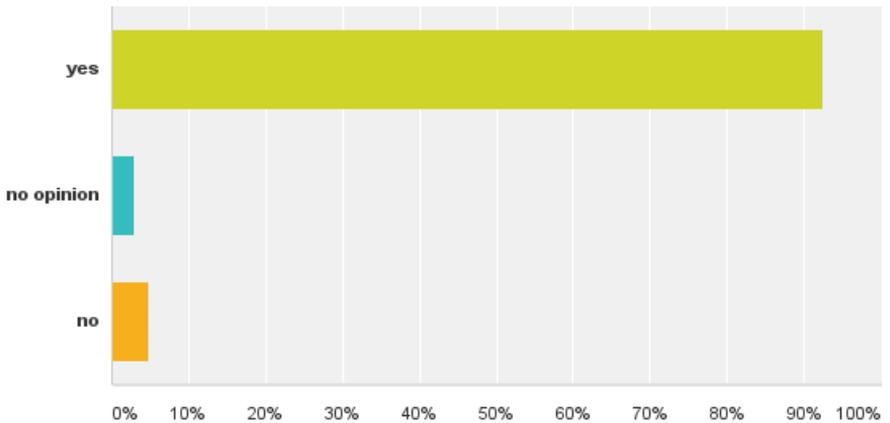
Recent new developments have been highlighted as being out of the traditional theme or style. None of the development in the last 60 years matches the older village properties.	noted
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Very interesting and useful to understand how we have arrived at this point.	noted
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Q5: Do you agree with the key issues defined for Development in Broughton, Chapter 4

Answered: 106 Skipped: 4

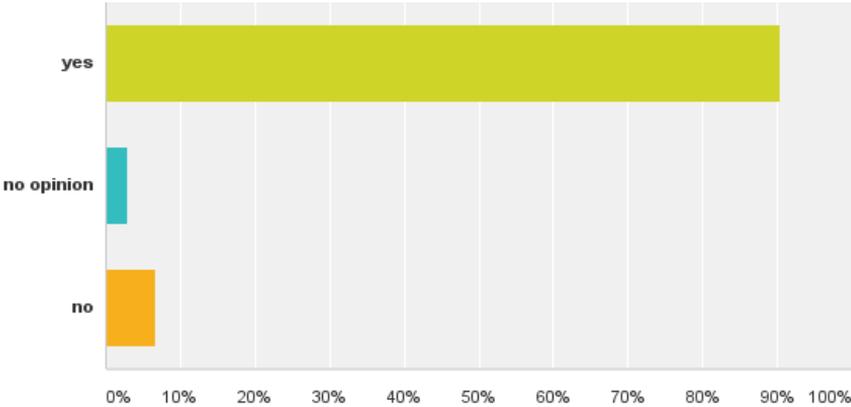
Answer Choices	Responses	
yes	92.45%	98
no opinion	2.83%	3
no	4.72%	5
Total		106



Q6: Do you believe the objectives for Development in Broughton respond to the key issues?

Answered: 105 Skipped: 5

Answer Choices	Responses	
yes	90.48%	95
no opinion	2.86%	3
no	6.67%	7
Total		105



Q6: Do you believe the objectives for Development in Broughton respond to the key issues?

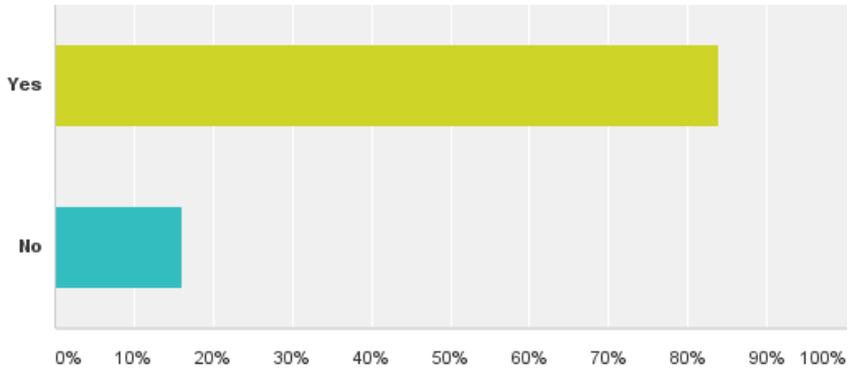
Answered: 105 Skipped: 5

Q6 Individual Responses	
Disagree that there are ample large properties	The Housing Needs Survey provides the fact base for the evaluation
some of the items will work	noted
The plan reports a 63% increase in the number of pitches at the gypsy and travellers site. Perhaps one of the objectives of the plan should be to have a maximum set?	The Plan will advise that the maximum has been reached for sustainability and amenity of the site and will designate that there should be no further development
In the main	
Concerns about schooling, doctors etc if the aim is to provide more housing for local people, school and medical facilities must be addressed	noted
Again lots of information, doesn't appear to be any clarity on what will and won't be developed or considered for development.	noted

Q7: Do you support the list of preferred identified sites for development in Table B (page 35)

Answered: 106 Skipped: 4

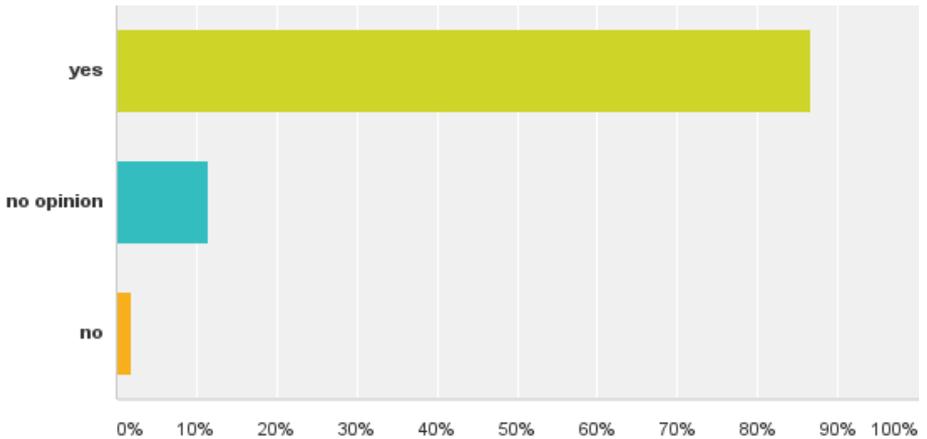
Answer Choices	Responses	
Yes	83.96%	89
No	16.04%	17
Total		106



Q8: Do you agree with the definition for Windfall and Strategic Sites for Broughton in Chapter 5?

Answered: 104 Skipped: 6

Answer Choices	Responses	
yes	86.54%	90
no opinion	11.54%	12
no	1.92%	2
Total		104



Q8: Do you agree with the definition for Windfall and Strategic Sites for Broughton in Chapter 5?

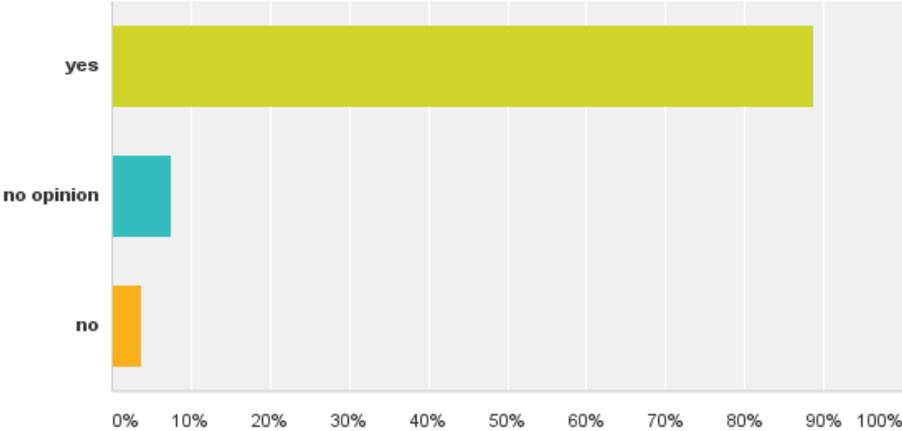
Answered: 106 Skipped: 4

Q8 Individual Responses	
most developments have already been done	This is correct, the rate of development in Broughton has been rapid and the Plan is heavily frontloaded rather than being more favourably phased through the plan period
more details required	noted
The Plan includes a photograph of a property with the caption challenging design in a sensitive location which is actually in the conservation area. How will the plan ensure that future development is in keeping with the heritage scene in Church Street with this as a precedent?	The property in Church Street was approved prior to the Conservation Area Designation by KBC. The Neighbourhood Plan includes Design Principles and states that future development should reflect the core heritage of the village at all times . The Conservation Area regulations will now also apply
Cannot clearly see a definition.	noted

Q9: Do you agree with the principle of a Development Order for the BT Exchange in Church Street?

Answered: 106 Skipped: 4

Answer Choices	Responses	
yes	88.68%	94
no opinion	7.55%	8
no	3.77%	4
Total		106



Q9: Do you agree with the principle of a Development Order for the BT Exchange in Church Street?

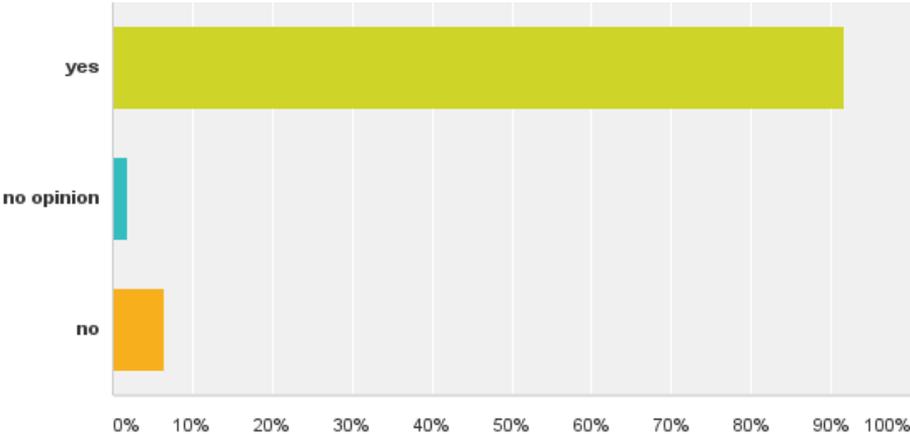
Answered: 106 Skipped: 4

Q9 Individual Responses	
I think this site should be used for a medical centre with a few small starter homes. 5 units rather than 10. It could also have a car park for village residents.	noted
Starter homes for young residents of Broughton would be a good idea	noted
yes but where are 12 houses going?	The location for development through to 2031 is set out in Table B. There is a windfall allocation of 5% which is non determined.
Although they won't simply be able to get rid of the exchange complete if whilst we want phone and broadband lines into our homes.	Infrastructure and technology for broadband and telephones is a rapidly changing industry. We are looking to safeguard the potential of this site when it becomes available and facilitate the opportunity with the landowners.
Agree as long as access to the properties is appropriate in terms of parking	noted
Good idea	noted
Yes, ghastly site that detracts from street. Be good to see it presented in a better way.	noted

Q10: Do you agree with the key issues defined for Traffic, Transport and Highways, Chapter 6?

Answered: 108 Skipped: 2

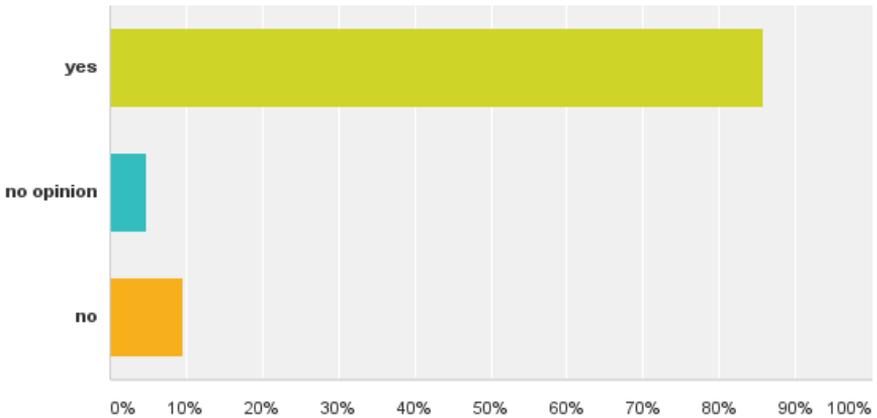
Answer Choices	Responses	
yes	91.67%	99
no opinion	1.85%	2
no	6.48%	7
Total		108



Q11: Do you believe the objectives for Traffic, Transport and Highways respond to the key issues?

Answered: 105 Skipped: 5

Answer Choices	Responses	
yes	85.71%	90
no opinion	4.76%	5
no	9.52%	10
Total		105



Q11: Do you believe the objectives for Traffic, Transport and Highways respond to the key issues?

Answered: 105 Skipped: 5

Q11 Individual Responses	
Map D with the exception of speed control measures outside the Chapel. This would cause major problems for activities of the Chapel. We ask that due consideration be given to provide for parking outside the Chapel which is practically every day of the week plus of course for funeral services and weddings and the rear hall has been used for the last several years as the village polling station at elections	Duly noted. All proposals will be evaluated and will take local conditions and circumstances into account. It is acknowledged that the Chapel does generate parking requirements throughout the week.
Traffic calming measures. A new junction at the Northampton Road end of the village in order to go to Mawsley or Kettering. More buses. A solution to the dangerous crossroads at Pytchley is a very pressing issue	noted
Enforce wilful zig-zag and yellow line parking. Restrict 'on pavement' inconsiderate to disabled and pushchair users. Parking!!	Parking is acknowledged as a village wide issue which Northants Highways Authority is aware of and will consider in their evaluations
Do not agree with change of priority at Wellingborough Road junction	Noted. All options will be evaluated by Northants Highways Authority
Map c - priority is backwards and will cause issues	Noted. All options will be evaluated by Northants Highways Authority
The crossroads at Pytchley should be a priority. If it can be made easier for householders to put in crossovers this would ease some parking issues. Currently the local council does not offer this service any more and private contractors are either very expensive or unwilling due to the level of legislation.	The Pytchley Crossroads is highlighted as a serious issue of concern in the Plan. Noted (crossovers)
Consider one way system through village and Church st	Noted. All options will be evaluated by Northants Highways Authority
C proposed Wellingborough Rd Junction change is dangerous	Noted. All options will be evaluated by Northants Highways Authority
yes some of it	
I agree with the roundabout at the south end of the village onto the Mawsley roundabout. As driving to Mawsley involves driving around in a big circle for us.	noted
At least the Highway Authority accept that the A43 junctions are unsatisfactory and work has started at Moulton on the dual carriageway phase 1	noted
do not agree with the siting of a chicane in Kettering Road and something should be done about Coxs Lane/Gate Lane crossroads as extremely dangerous. Need places to cross road safely on foot	Noted. All options will be evaluated by Northants Highways Authority
Don't believe that a parking bay outside houses on the High Street is in the interest of the home owners	The High Street requires a balance for the satisfactory provision of needs of both businesses and residents. All options will be evaluated by Northants Highways Authority

Q11: Do you believe the objectives for Traffic, Transport and Highways respond to the key issues?

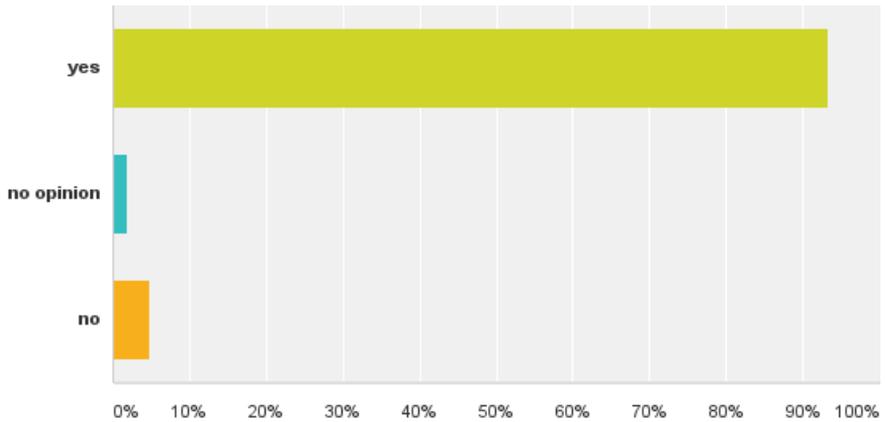
Answered: 105 Skipped: 5

<p>Re change at bottom of Northampton Road (Map C), is there not a danger that traffic coming down N'pton Road will essentially ignore the new priority and proceed without slowing down the High Street ? What does the hatched area outside No. 12 indicate ? (no key is given). The hatched area should embrace a clear 'no parking' zone for safety.</p>	<p>The change in priority in Northampton Road will work in conjunction with the proposed traffic management throttle in Northampton Road and the existing traffic management throttle in Kettering Road. The hatched area refers to a realignment of pavement.</p>
<p>Stop speeding cars and hgvs using Kettering road.</p>	<p>noted</p>
<p>Do not agree with change of priority at Wellingboro Rd junction</p>	<p>noted</p>
<p>I note that there is traffic calming mentioned for high street, but there is nothing for northampton road (south of the junction with wellingborough road), bearing in mind that this stretch leading towards the a43 junction, is subject to major speeding issues and issues of reduced visibilty when exiting properties and roads such as Rathmine Court and Donaldson Avenue. Would it not be pertinent to install / rework the road structure to include so called throttles along this stretch of the village aswell.</p>	<p>There is a proposed traffic management throttle in Northampton Road.</p>
<p>The 2 junctions onto the A43 need to be upgraded before the Business Park at Cransley Furnaces opens.</p>	<p>Noted.</p>
<p>Darlow close green area to be converted to car parking? Conflicts with green plan and principle of reducing traffic exiting and entering High Street. Darlow Residents will be against such a move.</p>	<p>All opportunities will be considered for viability with regard to providing amenity balanced with the wellbeing of residents. The High Street is a critical area for both businesses and residents and for the wider village using the vicinity either for parking or to travel through</p>

Q12: Do you agree with the key issues defined for The High Street, Chapter 7

Answered: 104 Skipped: 6

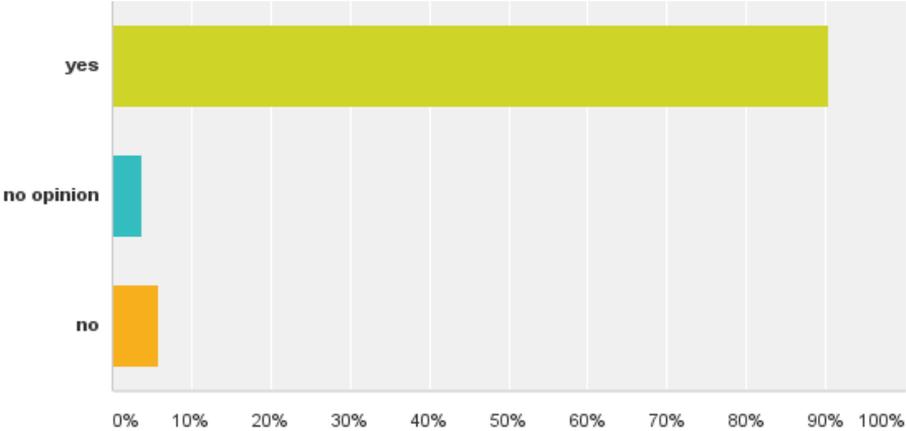
Answer Choices	Responses	
yes	93.27%	97
no opinion	1.92%	2
no	4.81%	5
Total		104



Q13: Do you believe the objectives for The High Street respond to the key issues?

Answered: 104 Skipped: 6

Answer Choices	Responses	
yes	90.38%	94
no opinion	3.85%	4
no	5.77%	6
Total		104



Q13: Do you believe the objectives for The High Street respond to the key issues?

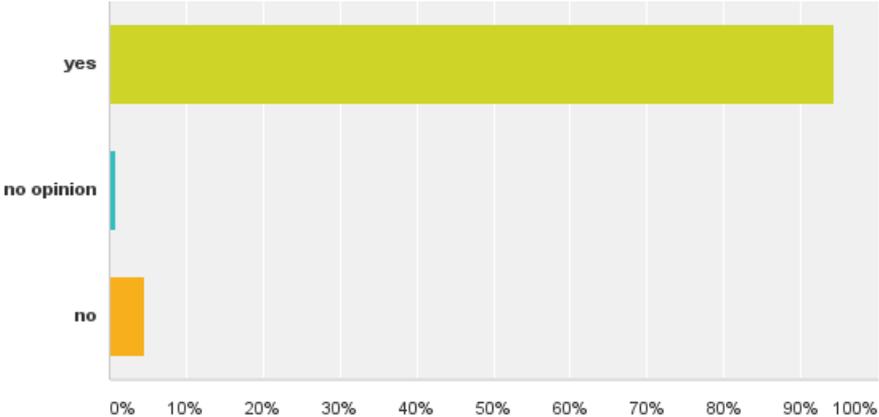
Answered: 104 Skipped: 6

Q13 Individual Responses	
With exception stated in Section II	Noted
Stop or control pavement parking!!	Noted. All residents are asked to park with consideration for others.
Church Street should be considered for traffic calming. Also Gate Lane is becoming a hazard to drive along	Noted
Traffic calming and new position of bus stop could cause major hold ups	Noted. All options will be evaluated by Northants Highways Authority
Parking problems not really satisfactorily addressed Street itself looks uncared for	Noted. Parking is an acknowledged problem. Opportunities for a satisfactory solution are difficult and inhibited by our historic village layout.
lots of thought to work out details to plan space needs more	Noted
New business's should always be encouraged. The village would greatly benefit from a bakery / coffee shop.	Noted
Priority given to North West exit from village.	Noted
Not sure about changed priorities at the junction of Wellingborough Road and Northampton Road.	Noted. All options will be evaluated by Northants Highways Authority
Compulsory purchase of shop at corner of high street and cransley hill.	Noted

Q14: Do you agree with the key issues defined for Green Areas and Important Public Open Spaces, Chapter 8

Answered: 108 Skipped: 2

Answer Choices	Responses	
yes	94.44%	102
no opinion	0.93%	1
no	4.63%	5
Total		108



Q14: Do you agree with the key issues defined for Green Areas and Important Public Open Spaces, Chapter 8

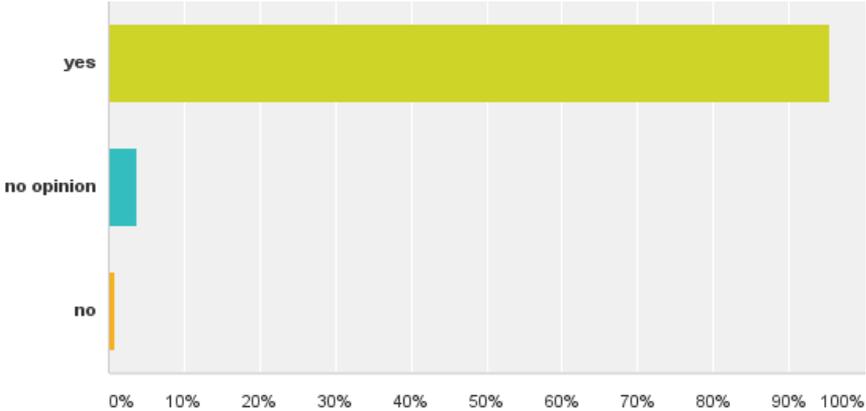
Answered: 108 Skipped: 2

Q14 Individual Responses	
Rural sports and pastimes need to be celebrated and supported	Noted.
we agree that those specified are appropriate	Noted
There's more green spaces to preserve than just the ones highlighted in the plan.	Noted however it is not possible for the Neighbourhood Planning process to designate large tracts of land as green or open spaces.
I think there are other areas of green space that need Protecting; views over rolling countryside attracted us to the village and are an important part of the village feel. Whilst they aren't public land the rights of way are important. Future development that affects the views would be a huge problem.	Noted. It is not possible for the Neighbourhood Planning process to designate large tracts of land as green or open spaces. Open Countryside is subject to separate national development policies. The Broughton Neighbourhood Plan supports and promotes our network of footpaths and highways

Q15: Do you believe the objectives for Green Areas and Important Public Open Spaces respond to the key issues?

Answered: 108 Skipped: 2

Answer Choices	Responses	
yes	95.37%	103
no opinion	3.70%	4
no	0.93%	1
Total		108



Q15: Do you believe the objectives for Green Areas and Important Public Open Spaces respond to the key issues?

Q15 Individual Responses	
All public footpaths and bridleways must be maintained to foster the rural nature of Broughton if it is to be maintained	Noted. The Broughton Neighbourhood Plan strongly supports and promotes our network of footpaths
Page 33-strongly support conclusions! We must keep to these as a minimum!!	Noted

Q16: If you would like to leave your name, please use the box below

Q16 Individual Responses	
D P, xx Carter Avenue	
Question 7 apart from Church Street!!	
K H. I think this is an excellent document. Well done to all the people who have worked on this - congratulations. The drainage system needs improving as the village has developed but the drainage capacity has not been upgraded. The stream at the bottom of my field has combined sewage overflow. Anglian Water needs to be consulted.	
D B. Strongly admire and support this excellent project. Chapter 7 enforce illegal parking outside Co-Op on zig-zag & yellow lines. Chapter 4 agree "totally" we MUST retain green spaces as identified in document. Chapter 4, page 40: agree developments MUST have off street parking but how do you enforce garage use?	
S D (flat xx)	
A R	
B M, Bentham Close. A well thought through document. Suggested parking in Bentham Close is not a good idea. It is a very narrow, winding road. Large delivery vans already struggle to get up the close when several cars are parked. planning permission has been granted for a further house at the entrance to Bentham Close. This house has no garage, facilities and limited parking space. There are already 3 cars parked near the entrance on a daily basis and overnight.	
C I	
D I	
B F	
E H	
S H	
Berrys on behalf of clients Glanmoor Investments Ltd	
M OB	
T D	
Mrs W	
Mr W	
Cs R	

Q16: If you would like to leave your name, please use the box below

R and W H	
R and A S	
J L xx Ivydene Terrace	
We are pleased to see Broughton at the lowest level for potential development. Perhaps the speed warning lights in the village should be changed to the type that show actual speed. Many people are not aware of their actual speed. should like to thank the parish councillors for their time and effort in producing this comprehensive plan.	
K B, xx Churchview	
Please, please Broughton a village	
We do not want to be like Burton Latimer	
J B	
C G	
G U	
S F	
S C	
D.A.K	
C S	
D M	
J C - thank you for all your hard work	
L L	
M R	
U S	
S A	
A Concerned Local Resident	
L H	
J D. What an epic undertaking - congratulations and admiration to the Neighbourhood Plan Steering Committee!	
H I	
C P	
K G	
G T	
No more houses in Broughton, it's a village where people choose to live. That's how it should stay - disgrace ruining people's lives. Greed.	
O W	
G W Oak Close	
M A	
P A	
D H	
J HI	

Separate Letter response

Broughton Parish Council

21 Kettering Rd
Broughton

Re. Broughton Neighbourhood Plan consultation

Dear Sir or Madam,

My apologies for not using a designated form, but there do not seem to be any left. My reason for writing is to express the many concerns that have been voiced by many different users of the chapel premises regarding the proposed location of the traffic calming measure close to the entrance to the chapel.

Our understanding is that, were this to go ahead, it would have a considerable impact on the parking of vehicles outside the chapel premises, preventing any from parking close to the entrance and just one vehicle parked too close would prevent any large vehicle [Fire engine, Truck or Bus] from getting through. Considerable difficulty would be created for the elderly and infirm who struggle with mobility issues, especially in the winter months, this would be for all the different meetings and activities that take place, not only the Sunday services, but also for meetings that take place during the week, including the senior citizen's Lunch Club, the Ladies Circle and the occasional use of our back hall as a Polling Station.

Whilst the consultation has been extended to everyone in the village there are a number of parents, helpers and participants who live just outside the village [e.g. Gt. Cransley], need to use a car and come to our activities and meetings and call in to other village facilities. It would also cause problems for the parents and grand- parents who come to Little Fishes with small children, as well as those bringing and collecting the young people for the youth clubs that we have on Fridays. We are not aware of the need for many to cross the road at this point as most park on the chapel side of the road.

We are also concerned as to what would happen for funerals.

At present there can be quite a few cars parked outside the chapel which do not impact on access to neighbouring properties, but if the proposal were to go ahead, having to park further away would be likely to cause other problems. Parking outside the chapel tends not to take place in the busier traffic times. Having lost part of our land some years ago for the widening of the road, with the detrimental impact that has had on the stonework of the chapel, it now seems somewhat ironic if we would soon not be able to park there.

I must say that I recognise and share your concerns about the need for traffic calming measures and would suggest that the relatively inexpensive solution, which I have seen has been effectively used in many parts of the country, be applied throughout the village, namely, the imposition of mini roundabouts. This would seem to be most appropriate for the main routes through the village, such as Cox's Lane-Gate Lane junction, the Grange Road-Kettering Road, Silver Street-High Street and Cransley Hill-High Street junctions, as well as Baker Ave and Carter Ave junctions on Wellingborough Road and Donaldson Ave on Northampton Road, Cox's Lane - Cransley Hill and others throughout the village.

We would appreciate your due considerations of our concerns and suggestions and remain,

Yours sincerely



B. K. Coe [Chapel Elder]

Duly noted. All proposals will be evaluated and will take local conditions and circumstances into account. It is acknowledged that the Chapel does generate parking requirements throughout the week.

Developer Response – Boughton Estates

Boughton Estates response dated 19th January 2017

Proposal for development of 32 houses on site RA/99 - Kettering Road Allotments (reduced from 161 previously submitted to the SSLDP and discounted by KBC. Houses mixed 2,3,4 and 5 bedroom dwellings

This proposed development is situated beyond the village boundary.

The Boughton Neighbourhood Plan has established the supply of housing provision for the period to 2031 from within the village boundary. This is in conformity with the provisions of the Local Plan Saved Policies RA/3 (restricted infill) and RA/5 (development in open countryside), Joint Core Strategy policy 8 (placeshaping principles), policy 11 (network of urban and rural areas) and policy 13 (rural exceptions).

The Joint Core Strategy establishes a rural housing requirement of 480 for Kettering Borough. Kettering Borough Council provided an assessment of evidenced need for Boughton in the preparation of the Joint Core Strategy of 87.

This proposed development would extend housing much closer to the Waste Treatment Works which serves Boughton and surrounding villages and would be at the furthest point from the centre of the village.

Speculative housing in this area would thereby not provide a significant and meaningful contribution to Boughton and would not be responding to the core objectives, vision and sustainability of the village.

The site assessment for this site is recorded in the bottom tertile of sites and is less favourable than the sites identified in the Boughton Neighbourhood Plan.

BROUGHTON NEIGHBOURHOOD PLAN

REPRESENTATIONS ON BEHALF OF THE BOUGHTON ESTATE IN RESPECT OF LAND AT BROUGHTON ALLOTMENTS

1. These representations and comments have been prepared by Marrons Planning on behalf of Boughton Estates in respect of their land ownership comprising Boughton Allotments.

The Development Proposals

2. Boughton Estate has worked up development proposals for this land as part of the Kettering Part 2 Local Plan consultation, and these are shown on the enclosed Indicative Layout (Plan A). The proposals are at an early stage, and in order to shape the proposed development, Boughton Estates would welcome the opportunity to positively engage with the Neighbourhood Plan Steering Group. On review of the Neighbourhood Plan it is anticipated that the Estate proposals are capable of delivering a number of aspirations set out in the Neighbourhood Plan. At the present time it is anticipated that the site could deliver the following:
 - a. In the region of 32 homes (significantly reduced from the proposals for 161 dwellings which were previously submitted to Kettering Borough Council's SHLAA). Affordable housing would also be provided as part of the scheme.
 - b. A mixture of 2, 3, 4 and 5 bed properties. The current layout comprises six no. 2 bed homes; eleven no. 3 bed homes, thirteen no. 4 bed homes and two no. 5 bed homes. We are aware of the Neighbourhood Plan Group's aspirations for a mix of housing to accommodate families including smaller properties to accommodate young people, single occupancy and later life occupancy. It is currently proposed that 53% of the dwellings on the layout would be 2 or 3 bed properties, but we would welcome the opportunity to discuss housing mix further.

- c. The provision of off site traffic calming measures and a new pedestrian footway on the eastern side of Kettering Road (further information is provided below and a highways report is enclosed with these representations)
- d. Relocated allotments, with the potential to increase the number of plots and to improve the quality of allotments, for example by providing off street parking spaces, water connections etc.
- e. Provision of horse grazing paddock which would suit the village boundary.
- f. A high quality design that is capable of harmonising with the surrounding vernacular, for example through the use of sympathetic building materials and the provision of two storey, not three storey, properties.
- g. Properties set back for off road parking and fronting on to Kettering Road to complement the existing build line. This could also help mitigate the issue of speeding vehicles in this part of the village which is a concern for the Neighbourhood Plan Steering Group. The layout and presence of built development in this location should slow down the traffic.
- h. Suitable parking in the form of garages and off road parking.
- i. Dwellings with gardens and an attractive entrance with open space.

Broughton Neighbourhood Plan

The Approach to New Housing in the Village

- 3. The Neighbourhood Plan states at page 25 that a further 87 houses are required in Broughton and that taking into account the development of 60 homes at Cransley Green, this leaves a residual requirement of 27 homes.
- 4. It is our understanding that as part of the Part 2 Kettering Local Plan process, Kettering Borough Council has identified a need for 480 dwellings in the rural parts of the Borough up to 2031. After accounting for completions, commitments and a windfall allowance, the Council is proposing to allocate 143 dwellings in the Local Plan. At present, the Borough Council is in the process of assessing sites and asking landowners or their agents for more information to justify any future housing allocations. To our knowledge, a particular quantum of development for specific rural villages has not yet been determined by the Council. We are aware of the Neighbourhood Plan Group's concerns about further housing development in the village, but we also note on page 24 the local preference for strategic direction over

"random" development. With the current village infrastructure, Boughton is one of the more sustainable rural settlements in the Borough and therefore suitable for additional housing growth during the plan period. Boughton Estates would therefore welcome the opportunity to work with the Neighbourhood Plan Group to deliver a development for the type of housing that is wanted and needed in the village. The proposals also have the potential to deliver improvements for the village in terms of traffic calming and allotment provision, further detail on which is set out below.

Traffic Calming

5. It is noted that speeding along Kettering Road was highlighted as an issue in the Neighbourhood Plan Consultation Process. In response to this, the Traffic/Transport/Highways General Policies seeks to introduce a range of traffic management measures in the vicinity of the allotments site (depicted on Map B, page 56). The Policy also seeks to provide improved pedestrian safety features in the village.

6. A Technical Note on Highways has been produced by Peter Brett Associates in relation to the potential development of the Allotments site. The Note, enclosed with these representations, proposes a number of improvements that could be delivered as part of the scheme:
 - The provision of rumble strips on Kettering Road.
 - The relocation of the speed activated warning sign further north.
 - A footway connection from the proposed development to the existing footway that terminates south of the site, would enable safe access between the village, the proposed development and the relocated allotments.

7. We note that the Neighbourhood Plan has aspirations for some alternative solutions, notably the narrowing of the carriageway on Kettering Road to slow down traffic. The potential for traffic calming measures along this part of Kettering Road is an issue that Boughton Estates would welcome further engagement on with the Neighbourhood Plan Steering Group, in order to explore the various options.

Allotment Provision

8. On page 68 of the Neighbourhood Plan, the protection and expansion of the availability of allotments is highlighted a key issue from consultation. On page 75 it is

confirmed that “the plan will seek to retain these [allotment] plots and encourage further availability of allotments to promote a healthy lifestyle, primary local sustainability and environmentally friendly use of the land.” The Green Spaces Policies on page 81 states that “areas currently designed as allotments will be protected from future development unless suitable land of equivalent suitability and amenity is provided.” This element of the policy is considered to conform with both national planning policy and the recently adopted North Northamptonshire Joint Core Strategy Review (Policy 7). The Plan also supports any additional land made available for new allotments.

9. As set out above, it is proposed to increase the quantity and quality of the allotments meaning the proposals would comply with the Neighbourhood Plan as well as local and national planning policy. Boughton Estates would welcome any input on the current demand for allotments and how this could be met on the site, together with any comments about the type of qualitative improvements that could be made as part of the proposed relocation.

Summary and Conclusions

10. Boughton Estate is proposing to develop their land off Kettering Road for around 32 new dwellings. The proposals would also incorporate allotments which would offer both qualitative and quantitative improvements, as well as traffic calming measures. A housing allocation in this location could help to secure these benefits, and Boughton Estates is keen to engage with the Neighbourhood Plan Steering Group to discuss the proposals, which are still at a formative stage.

INDICATIVE LAYOUT



Residential Layout & Allotment Grazing Indicative A3 @ 1:1250

Kettering Road, Broughton

TECHNICAL NOTE

Job Name: Broughton Estate Sites

Job No: 38624

Note No: TN001

Date: 11.07.16

Prepared By: S Lowes

Subject: Site Specific Part 2 Local Plan: Access Assessment – Broughton Allotments, Broughton (Site Reference RA/099a)

Item	Subject
1.	<p><u>Introduction</u></p> <p>Peter Brett Associates LLP has been commissioned by Boughton Estate to provide an access assessment relating to the Broughton Allotments site to assist with acquiring planning allocation for up to 28 dwellings at the proposed development.</p> <p>Kettering Borough Council (KBC) is currently in the process of reviewing planning policies affecting the Borough and is preparing the Site Specific Part 2 Local Plan. The Site Specific Part 2 Local Plan will allocate land for housing, employment, retail, leisure and community facilities.</p> <p>This site, ref RA/099a as shown on KBC's Location Plan (Appendix A) has previously been suggested to KBC as a potential site for housing development and this site has been taken forward for consideration as a housing allocation through a site assessment process. The findings of this assessment work have included a recommendation that further assessment of the proposed accessibility of the site is undertaken with regard to its proximity to a junction with a major road and a possible requirement for traffic calming methods on the approach to the proposed access and also for the existing neighbourhood.</p> <p>This access review has been undertaken using available information including Ordnance Survey Data, Google Earth and information gathered from a site walkover.</p>
2.	<p><u>Access Review</u></p> <p>The Broughton Allotments site is currently accessed off Kettering Road, Broughton, approximately 80m to the south of the junction of Kettering Road and the A43.</p> <p>No public rights of way cross the site. However, in the roadside verge is a shared Footway / Cycleway (linking Boughton with Kettering) which runs alongside the west bound carriageway of the A43. This enters the village of Boughton at the junction of Kettering Road and the A43 and continues as a footway along the northbound lane of the carriageway past the proposed site access.</p> <p>A footway alongside the southbound carriageway terminates approximately 60m to the south of the proposed site access.</p> <p>Kettering Road is urban in nature and is currently subject to a 30mph speed limit. This changes from the National Speed Limit coming from the junction of Kettering Road with the A43 approximately 25m to the north of the proposed site access at a 'gateway' feature which includes a visual form of road narrowing. This is located as shown on drawing no. 38624/001 Broughton Allotments – Proposed Development Access (Appendix B).</p>



TECHNICAL NOTE

Item	Subject
	<p>Existing street lighting extends along Kettering Road from the village of Broughton up to the junction of the A43 on the southbound side of the carriageway.</p> <p>The site frontage is bounded by a mature hedgerow.</p> <p>A speed activated warning sign is located approximately 50m to the south of the existing access. It was noted that this was not working on the day of the site walkover.</p> <p><u>Public Transport</u></p> <p>The site is currently on the route of the no. 10 service and the number X10 service operated by the travel company Stagecoach which provides links between West Hunsbury and Kettering and West Hunsbury and Market Harborough respectively. The nearest bus stops to the site are located approximately 95m to the south of the proposed site access.</p>
3.	<p><u>Existing Access</u></p> <p>The existing access is located as shown on drawing no. 38624/001 (Appendix B).</p> <p>Approximately 30m to the north of the existing access is an existing track (formally part of the main Kettering Road before construction of the A43 was undertaken) which provides access to land to the north of the proposed development site.</p> <p>A lamp column is positioned to the immediate south of the existing access and evidence on site suggests that associated ducting runs underneath the existing access.</p> <p>A ditch runs along the frontage of the proposed site and it is likely that the southbound lane of Kettering road drains directly to it via kerb gully outlets. The ditch is considered to be piped underneath the existing access although this was not determinable from the site walkover.</p> <p>Northamptonshire County Council (NCC) has its own highway design guides:</p> <ul style="list-style-type: none"> • Estate Road Construction – Construction Requirements and Specification for Adoptable Highways • Local Highway Authority Standing Advice for Planning Authorities – Domestic Vehicle Accesses Serving 1 to 5 Dwellings. <p>Both documents should be read alongside national guidance contained in Manual for Streets (MFS) and Manual for Streets 2 (MfS2) and the Design Manual for Roads and Bridges (DMRB). In this case, guidelines for visibility set out in Manual for Streets are appropriate for use.</p> <p>Approximate highway visibility at the existing access has been measured from the Ordnance Survey (OS) data using the approximate location of the existing access shown on drawing 38624/001 and in accordance with Manual for Streets:</p> <ul style="list-style-type: none"> • Section 7.5 - Stopping Sight Distance (Table 7.1 Derived SSDs for Streets) • Section 7.7 – Visibility Splays at Junctions <p>The required visibility for a road with a design speed of 30mph (48kph) is 43.0m x 2.4m which can be achieved in both directions from the existing access.</p> <p>Due to the close proximity of the change down in speed limit from 60mph, the access</p>



TECHNICAL NOTE

Item	Subject
	<p>has been assessed using a design speed of 37mph (60kph) and a required visibility of 59.0m x 2.4m to ensure that if actual road speeds were higher in this location, sufficient visibility could still be provided. This can also be achieved in both directions.</p> <p>Crashmap.co.uk has been searched and has confirmed that there have been no incidents recorded for Kettering Road in the vicinity of the existing access to the site.</p>
4.	<p><u>Proposed Access</u></p> <p>The existing access will be upgraded to a simple priority junction and will be designed in accordance with Manual for Streets principles which are appropriate for lightly trafficked residential streets. Therefore the following parameters will be used:</p> <ul style="list-style-type: none"> • 5.5m wide carriageway • 2.0m wide footway • 6.0m junction radii <p>Visibility at the existing access is adequate for current requirements as set out in Manual for Streets.</p> <p>KBC have raised concerns regarding the location of the site and the junction of the A43 with regard to required junction improvements and traffic calming along Kettering Road.</p> <p>Traffic calming along Kettering Road could be provided through the use of Granite Sett rumble strips as detailed in NCC's Estate Road Construction – Construction Requirements and Specification for Adoptable Highways located at the gateway feature coming into Broughton to the north of the existing access and at 60m intervals along Kettering Road.</p> <p>Traffic speeds would be further influenced and slowed by the physical presence of dwellings from the proposed development fronting onto Kettering road orientated as shown on drawing no. 38624/006 – Indicative Internal Road Alignment (Appendix C)</p> <p>The relocation of the speed activated warning sign from its current position to north of the proposed access would be beneficial in slowing vehicles before they reached the access into the proposed development.</p> <p>Management of the existing mature hedgerow would also be required to maintain visibility.</p> <p>With the relocation of the allotments further north to accommodate the proposed housing development. It is proposed that Boughton Estate will provide access through the proposed housing development along with a dedicated parking area for allotment users. This is shown indicatively on drawing no. 38624/006 (Appendix C).</p> <p>A footway connection from the proposed development to the existing footway that terminates at the extents of Broughton village will be provided to enable pedestrian access to and from the site and to existing bus stops serving the village.</p>



TECHNICAL NOTE



DOCUMENT ISSUE RECORD

Technical Note No	Rev	Date	Prepared	Checked	Reviewed (Discipline Lead)	Approved (Project Director)
38624/TN001	-	11.07.16	S Lowes	H Elliot Sackeyfio	R Henry	R Henry

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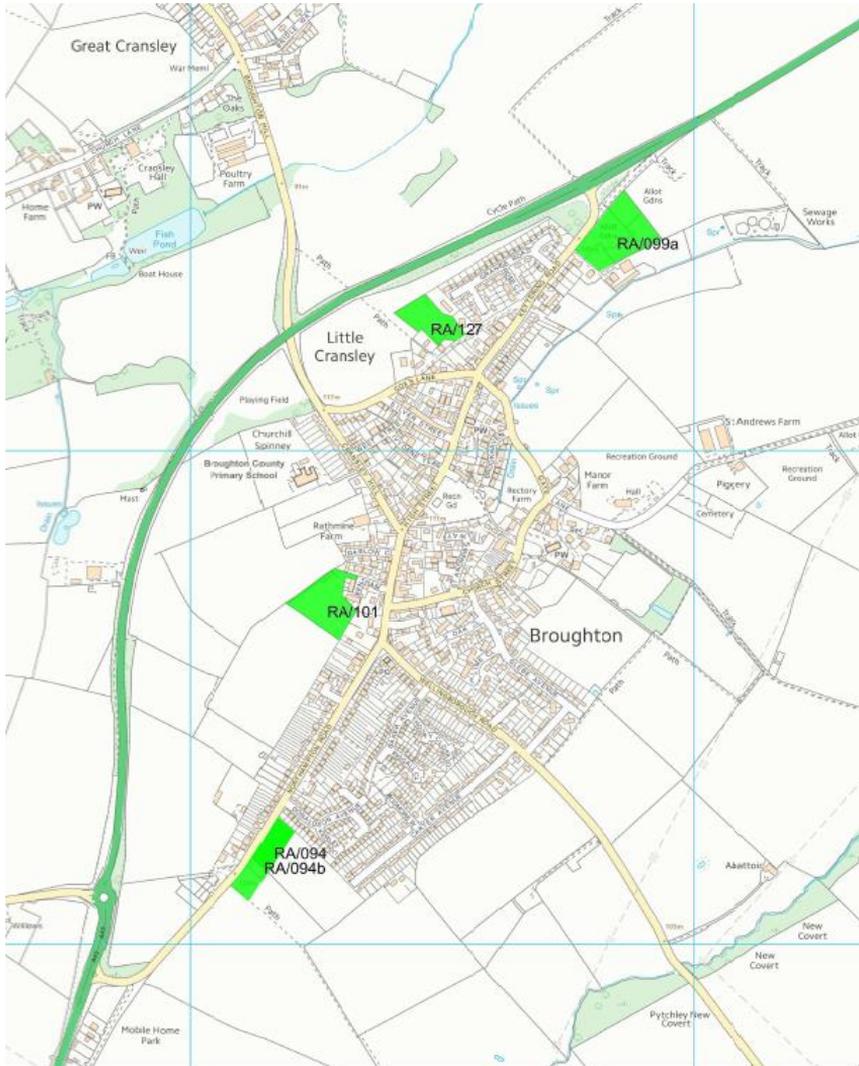
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TECHNICAL NOTE

Appendix A

Location Plan – Site Ref RA/099a



Title: Broughton Housing Sites - Amended

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Developer Response – Aitchison Raffety

Aitchison Raffety response dated 17th January 2017

Proposal for development of 26 houses on site RA/127 –The Paddock, Little Cransley (increased from 10 previously submitted to the SSLDP. Non-identified housing mix)

This proposed development is situated beyond the village boundary.

The Broughton Neighbourhood Plan has established the supply of housing provision for the period to 2031 from within the village boundary. This is in conformity with the provisions of the Local Plan Saved Policies RA/3 (restricted infill) and RA/5 (development in open countryside), Joint Core Strategy policy 8 (placeshaping principles), policy 11 (network of urban and rural areas) and policy 13 (rural exceptions).

The Joint Core Strategy establishes a rural housing requirement of 480 for Kettering Borough.

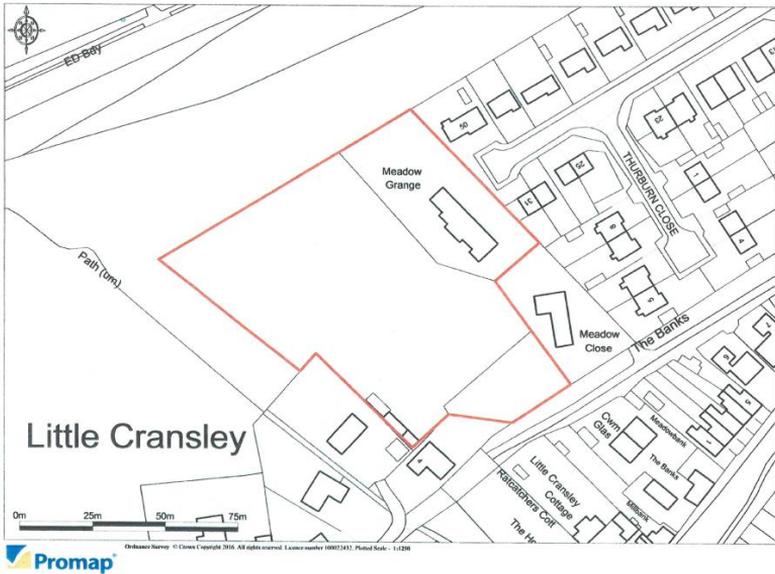
Kettering Borough Council provided an assessment of evidenced need for Broughton in the preparation of the Joint Core Strategy of 87.

The agent refers to the Cransley Green (Redrow) development as the basis for recommendation for further development. All parties are reminded that the village was overwhelmingly opposed to the Cransley Green development and a further extension to this site would only serve to stress this area which has been significantly and detrimentally altered by this development (failure of KBC to provide a 5 year housing land supply provision). What was previously a mature boundary with individual housing of substantial scale has now become a sprawl of non characterful, off the shelf stock housing. Churchill Spinney (another site adjacent to Cransley Green) was discounted at the time of the SSDLP as it was considered to be delivering an excess of development in this area. Further speculative development in this area of the village would deliver an urbanisation effect, is not responding to a required need, would not provide a significant and meaningful contribution to Broughton and would not be responding to the core strategies, vision and sustainability of the village.

The site assessment for this site is recorded in the bottom tertile of sites and is less favourable than the sites identified in the Broughton Neighbourhood Plan.

Developer Response – Aitchison Raffety

Land at Meadow Grange, Grange Road, Little Cransley, Northamptonshire, NN14 1PH



**TOWN AND COUNTRY PLANNING (GENERAL) NEIGHBOURHOOD PLANNING REGULATIONS 2012
AND THE LOCALISM ACT 2011**

Representations on the Pre-Submission Broughton Neighbourhood Development Plan

On behalf of SMDL New Homes

1. INTRODUCTION

- 1.1 We are responding to the consultation on the pre-submission draft Broughton Neighbourhood Plan on behalf of our client SMDL New Homes. Our client wishes to develop land identified by Kettering Borough Council in its emerging Site Specific Local Plan and within the draft Neighbourhood Plan as site RA/127: The Paddock, Meadow Close. We seek the inclusion of the site for residential development within the Neighbourhood Plan and set out below our comments in support of its allocation.
- 1.2 Aitchison Raffety has carried out an extensive dialogue with Kettering Borough Council during their preparation of the Site Specific Local Plan and in addition undertook pre-application consultation on the various aspects of the site. On the 26 November 2016, at the Policy Committee, the Council supported the assessment of the site for housing in the Site Specific Local Plan acknowledging the role of Broughton Neighbourhood Plan in identifying the opportunities for development in the village. Councillors endorsed the 'next steps' as outlined in Section 5 and 6 of Appendix 1 of the report.
- 1.3 Section 5 of the recent Policy Committee report supports the principle of the development of site RA/127 for residential use, recommended further work to be completed, and for planning officer at the Council to continue to engage with the Neighbourhood Plan group about the emerging Neighbourhood Plan. Since that meeting we have confirmed to the Borough Council that the number of dwellings to be provided on the site would be 20 in order to reflect the density of the adjoining site which has now been developed
- 1.4 We welcome the opportunity to put forward comments as part of your pre-submission consultation, and congratulate you on a generally well-thought-out plan that offers a clear planning policy direction for the village. However, we do feel that there are some important omissions from the plan which we bring to your attention in our comments set out below. We trust that you will take our comments on-board in progressing to the next stage of the plan, with the aim of ensuring Broughton maintains its village identity, character and status whilst accommodating required levels of housing growth. We would welcome an opportunity to meet with the Neighbourhood Plan Group to discuss matters further.

2. DEVELOPMENT IN BROUGHTON

Relevant Planning Policy

- 2.1 Paragraph 184 of the National Planning Policy Framework (NPPF) requires Neighbourhood Plans to be in general conformity with the strategic policies of the local plan for the area. At the present time, the statutory development plan comprises the North Northamptonshire Joint Core Strategy (adopted July 2016) and the Local Plan saved policies of 1995. While not part of the Development Plan, some regard can also be given to the emerging Site Specific Local Plan and various Supplementary Planning Documents.
- 2.2 The National Planning Policy Framework (paragraph 159) requires local planning authorities to have a clear understanding of housing needs in their area. It states that planning authorities should prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, together with a Strategic Housing Land Availability Assessment (SHLAA) to establish realistic assumptions about the availability, suitability and likely economic viability of land to meet the identified need over the plan period.
- 2.3 In the consideration of sites National Planning Practice Guidance provides further guidance to Councils in the identification of appropriate land to meet development needs with emphasis on sites which are: available, achievable and suitable. These criteria are explained further below:

Available – the issue is whether there is knowledge of any legal or ownership issues that might prevent the sites development. Generally, a site is considered to be available if the land owner has indicated it will be released for development in a timely fashion. A site owned by house builder should suggest greater certainty in this regard.

Achievable – the issue is whether there is confidence that the site will be developed during the period of the Local Plan.

Suitable – the issue is whether the development of the site would contribute to the creation of sustainable, mixed communities.

3.0 CURRENT NEIGHBOURHOOD PLAN STATUS

- 3.1 Section 4 of the draft Neighbourhood Plan lists the various sites identified for potential development based on consultations carried out by Kettering Borough Council in 2011, as part of preparation to update their Local Plan. These are identified on Table A. The Neighbourhood Plan confirms that the list is indicative and does not provide a basis of presumption to build, and that KBC refrained from specific allocations for development in light of the emerging Broughton Neighbourhood Plan.
- 3.2 The Broughton Neighbourhood Plan 'preferred opportunities', which are those within the village boundary in conformity with the Joint Core Strategy, are set out on Table B of the Neighbourhood Plan.
- 3.3 Site RA/127 within the draft Neighbourhood Plan is contained on Table C. Table C represents a range of sites discarded for being either beyond the village boundary, or which are considered

constrained or unsuitable in deliverability or sustainability terms. As I have indicated, this is no longer the position ~~with regard to~~ our client's land.

- 3.4 The Neighbourhood Plan (page 34) states that "the commencement of ~~Croxley~~ Green (Site RA/098) and other applications already approved since the rural housing target set by the Joint Core Strategy has resulted in a front-loaded process which is unfortunate".
- 3.5 We acknowledge that your analysis of Site RA/127 (set out within Table C) is based on the Borough Council's consultation draft of 2011. The assessment of potential sites contained within the Neighbourhood Plan appears to have been based on the ~~Site Specific Proposals~~ Development Plan Document (DPD) of 2012, which was prepared before the implementation of the ~~Redrow~~ Homes site (RA/098). We understand that when the ~~Site Specific Proposals~~ DPD was reviewed in 2013, there appeared to be support for small-scale housing allocations within the village. The preferred sites within the DPD were identified as this site RA/127 and the ~~Redrow~~ site to the west RA/098. ~~With regard to~~ the site, the allocation for residential development was subject to finding a suitable access.
- 3.6 Given that the Neighbourhood Plan was based upon the council's consultation which was carried out over five years ago, we request the Neighbourhood Plan steering group reconsider site RA/127, as RA/098 has since been developed and our site can no longer be considered as "beyond the village boundary". In this period the council has been considering sites in the area as part of preparing its Local Plan; the emergence of this is covered in further detail in the following section.

4.0 THE EMERGING LOCAL PLAN (PART 2)



Extract taken from recent Planning Policy Committee Meeting; Appendix 1 Maps, showing the location of potential housing sites (in relation to the emerging Site Specific Part 2 Local Plan)

- 4.1 Aitchison ~~Ref: RA/127~~ has been promoting Site RA/127 for inclusion within the Borough Council's Strategic Housing Land Availability Assessment (SHLAA) which forms an element of the emerging Local Plan.
- 4.2 On the 26 November the local authority held a Policy Committee meeting with the purpose of updating members on the assessment of sites for the allocation of housing land in the villages for inclusion in the draft Site Specific Part 2 Local Plan; and for members to endorse the 'next steps' as outlined within Section 5 and 6 of Appendix 1 of the committee report.
- 4.3 For the benefit of the Neighbourhood Plan Steering Group we have listed these sites which were contained within the committee report, in the paragraphs below. Quotation set out in italics has been taken directly from the report, and is presented against National Planning Practice Guidance assessment criteria.

Site RA/094b: Land south-east of Northampton Road, Broughton

- 4.4 This site is located along Northampton Road, and represents a similar site area to site (RA/094) which represents the frontage of the previously discounted site of the same name, although site RA

Available: *Recent work has confirmed that site RA/094 is in three separate ownerships. The site promoter of the largest parcel of land has indicated that they wish for the previously discounted larger site RA/094 to be considered for allocation, with an indicative yield of 55-65 dwellings provided".*

This suggests that the availability of the land is unlikely to be collectively agreed in a timely manner.

Achievable: *"The deliverability of the site is dependent two factors, the first being the co-operation between land owners to agree to make the site available for allocation. The other factor is that there is a pumping station located in the middle of the site, owned and operated by Anglian Water. A buffer free of development up to 15 metres is also required and this therefore affects the net developable area of the site. In any case, Anglian Water also do not wish to have this land considered for development, this therefore leaves two parts of the site with the potential for allocation. In relation to the area south of the pumping station no information has been received from the land owner and so it is not evident whether this land is available for development".*

Suitable: *"In relation to the area south of the pumping station no information has been received from the land owner and so it is not evident whether this land is available for development. The site must be weighed up against the findings for site RA/094 which included the suitability of such a scale of development in the village as well as its distance away from the village centre relative to other sites".*

Site RA/099a: Broughton Allotments

- 4.5 *"This site was previously considered as part of site RA/099a, a larger site which included the allotments and the area of land to the north. However, it was considered that this would result in the loss of the allotments and does not connect well to the rest of the village. Although*

subsequent to this, at the January 2014 Planning Policy Committee it was resolved that the smaller site be assessed, with potential for approximately 21 dwellings at 15 dwellings per hectare (dph), although further information now received from the site promoter indicates an increase of up to 28 dwellings (20 dph)".

Available: Based upon information contained within the councils Committee meeting report, it would appear that the site is available.

Achievable: "It is apparent that one significant issue is that of the site access, where through consultation with NCC Highways, this site was given an 'amber' RAG rating, suggesting that access is constrained but can be overcome with suitable mitigation. This is due to the proximity of the site to the A43, traffic calming would be required, although more details of this would need to be submitted at the planning application stage but could be established through suitably worded development principle requirements in any SSP2 allocation policy".
"Further consultation with Anglian Water has raised an issue regarding asset encroachment, particularly in relation to the risk of odour from the Broughton Water Recycling Centre, located approximately 130m to the north-east of the site. It has been recommended by Anglian Water that a more detailed assessment of the risk of odour and potential impact on residents is required prior to development of the site.

Suitable: "The relocation of the allotments is potentially disruptive to the users of this facility, despite the provision of a replacement facility; this site has some constraints to overcome. On balance, other sites are located closer to the village centre may be deemed to be preferable to this site".

Site RA/101: Land to the rear of 22 High Street, Broughton

- 4.6 The site is located to the west of Broughton and represents and extension of the village settlement boundary.

Available: Based upon information contained within the councils Committee meeting report, it would appear that the site is available.

Achievable: "The potential yield of this site is 12 dwellings; however, through further assessment on this site it is evident that the most significant constraint for this site is access. This is based on comments received from NCC Highways, who have given the site a 'red' RAG rating and state that further development to the rear is not suitable as Bentham Close is currently too narrow and not capable of being improved to adoptable standards".

Suitable: "The site promoter has provided information in an attempt to address this issue, although NCC Highways maintain the view further intensification of Bentham Close would be resisted.
It is considered that at this stage, development to the rear of Bentham Close is not considered to be achievable and the site should not be progressed for allocation".

Site RA/127: The Paddock, Meadow Close, Broughton

- 4.7 Following the commencement and development of site RA/098: land to the east of ~~Crookley~~ Hill by ~~Bedson~~ Homes, existing development now lies to the east, west and south of site RA/127; and as such the development of RA/127 would be defined as 'infill' and is no longer located outside the village settlement. This is illustrated in the diagram directly below.



Location and extent of Site RA/127 (represented by red line boundary) showing the potential for infill development following the recent development of site RA/098 Little ~~Crookley~~.

- Available: The site is controlled by our client who wishes to bring the land forward for housing development. ~~Further more~~ our client is SMDL Homes and National Planning Practice Guidance states 'a site owned by house builder should suggest greater certainty in this regard'.
- Achievable: "Access to this site is dependent on the demolition of Meadow Grange off Grange Road; ~~however~~ it has been confirmed by the site promoter's agent for this site, that the residents of this property are aware of this and that access can be made off Grange Road to serve the development. This would be the preferred approach by NCC Highways".
- The loss of the bungalow can also potentially be re-provided on site RA/127 as part of a responsive development mix, should a market need be demonstrated.

"The issue of noise has been highlighted by KBC Environmental Protection Team, given the site's ~~close proximity~~ to the A43, although not significant, it is likely to be addressed through appropriate mitigation measures at planning application stage".

"For this site, there is a concern in relation to the proposed density of the site. In 2014, it was identified that the anticipated yield for the site would be 10 dwellings. However, as part of the information submitted by the agent for this site, the proposed yield is considerably higher than this, at 26 dwellings".

Suitable: Paragraph 6 of the National Planning Policy Framework (NPPF) states the purpose of the planning system is to contribute to the achievement of sustainable development. Broughton is a sustainable settlement with shops, bus services and a school. The site is within walking distance of these services and facilities.

In terms of constraints, there are no Listed Buildings, Tree Preservation Orders or Public Rights of Way on the site. The Broughton Conservation Area boundary is located to the south of the site; the boundaries are separated by the access track which connects to Kettering Road.

Crucially, the recent implementation of the ~~Berkow~~ scheme RA/098 has materially altered the appearance of this part of the village (especially when approaching Broughton from the north). As a direct result RA/127 will be surrounded by residential development to the east, west and south; any development on the site would constitute in-fill development. It is therefore logical to conclude that limited infilling in this instance would not have any detrimental impact upon the village nor wider area. Additionally, the infilling proposed on this site could create a defensible northern boundary to the village, especially when considering that the A43 is located a short distance to the north of the site.

- 4.8 The Committee Report recommended that further work be completed on the three sites in Broughton as described and that officers continue to engage with the Neighbourhood Plan Group.
- 4.9 As part of this further work we have continued to engage with the Borough Council's case officer. The case officer has since acknowledged that the provision of 20 dwellings for RA/127 is appropriate based on an assessment to calculate the average dwellings per hectare in Broughton. This density would also ensure that potential development of the site would be in keeping with the character of the area and the overall objectives of the Neighbourhood Plan. We have confirmed that this level of development is acceptable to SMDL Homes. We seek the inclusion of our client's site for 20 dwellings within Chapter 4 of the Neighbourhood Plan.

5 SUMMARY

- 5.1 We would be very grateful if the Neighbourhood Plan would ~~take into account~~ our comments and representations in respect of the emerging policies of the Neighbourhood Plan. We request that the Neighbourhood Planning Steering Group takes the opportunity the plan preparation offers to plan positively for the future. With the national agenda to boost significantly housing supply and pressure for sustainable sites to be brought forward, the development we seek would be sustainable and logical for Broughton within the plan period.
- 5.2 As our response has illustrated the local planning authority are currently progressing the Site Specific Local Plan and at the recent Policy Committee, Members supported housing development on Site RA/127. Paragraph 184 of the National Planning Policy Framework requires neighbourhood plans to be in general conformity with the local plan. As part of the

Strategic Housing Land Availability Assessment (SHLAA) the council are continuing to review sites RA/094b, RA/101, and RA/127 as the recent committee report shows.

- 5.3 Site RA/127 provides an appropriate location for housing development, given that the recent development of Little ~~Crookley~~ has effectively altered the settlement boundary. The site represents an infill development opportunity and is therefore considered to be within the settlement of the village as a direct result of the ~~Redrow~~ scheme having been implemented. Pre-application discussions have shown that access into the site is possible and is considered by the council as appropriate.
- 5.4 As one of the Neighbourhood Plan's key goals is to ensure that sites which are brought forward over the plans period retain the villages identity, character and status; we consider our clients site represents the most appropriate location for housing provision given that it is now an infill opportunity.
- 5.5 The site accords with Government guidance in the consideration of sites; with emphasis placed upon availability, achievability and suitability. Site RA/127 meets ~~this criteria~~ and accords with policy set out within the NPPF; it is thereby considered appropriate for housing development.
- 5.6 We request that the Steering Group acknowledge the change in status relating to Site RA/127 as currently shown in Chapter 4, Table C; and include it as an identified site for housing within the Neighbourhood Plan. To include the site acknowledges the clear changes which have taken place in this part of Broughton and development will not materially increase the scale of housing development in the village which would harm the clear intentions of the Neighbourhood Plan and Joint Core Strategy policies.

Developer Response – Savills (Taylor Wimpey)

Savills response dated 19th January 2017

Proposal for development of

A) 50 houses on site RA/127
–Land West of Darlow Close
and Cransley Hill

And

B)) Proposal for development
of 50 houses on site RA/094
Land South of Northampton
Road (increased from 15
RA/094b) previously
submitted to the SSLDP. Non-
identified housing mix

A) 50 houses on site RA/127 –Land West of Darlow
Close and Cransley Hill

This proposed development is situated beyond the
village boundary.

The Broughton Neighbourhood Plan has established the
supply of housing provision for the period to 2031 from
within the village boundary. This is in conformity with
the provisions of the Local Plan Saved Policies RA/3
(restricted infill) and RA/5 (development in open
countryside), Joint Core Strategy policy 8 (placeshaping
principles), policy 11 (network of urban and rural areas)
and policy 13 (rural exceptions).

The Joint Core Strategy establishes a rural housing
requirement of 480 for Kettering Borough.
Kettering Borough Council provided an assessment of
evidenced need for Broughton in the preparation of the
Joint Core Strategy of 87.

This area of the village has seen significant development
with the very recent large scale Cransley Green
(Redrow) development which is nearing completion at
the start of this plan causing significant issues for the
flow of traffic movements around the Cransley
Hill/Cox's Lane/High Street areas. Stressing this area
further with unidentified and surplus speculative
additional housing is not responding to a required need,
does not serve to deliver a strategic solution for
Broughton and will not be responding to the vision and
sustainability of the village.

Developer Response – Savills (Taylor Wimpey)

Savills response dated 19th January 2017

Proposal for development of
A) 50 houses on site RA/101 –
Land West of Darlow Close
and Cransley Hill (non-
identified housing mix)

And

B) Proposal for development
of 50 houses on site RA/094
Land South of Northampton
Road (increased from 15
RA/094b) previously
submitted to the SSLDP. Non-
identified housing mix

B) Proposal for development of 50 houses on site RA/ Land South of Northampton Road

This proposed development is situated beyond the
village boundary.

The Broughton Neighbourhood Plan has established the
supply of housing provision for the period to 2031 from
within the village boundary. This is in conformity with
the provisions of the Local Plan Saved Policies RA/3
(restricted infill) and RA/5 (development in open
countryside), Joint Core Strategy policy 8 (placeshaping
principles), policy 11 (network of urban and rural areas)
and policy 13 (rural exceptions).

The Joint Core Strategy establishes a rural housing
requirement of 480 for Kettering Borough.
Kettering Borough Council provided an assessment of
evidenced need for Broughton in the preparation of the
Joint Core Strategy of 87.

The Rural Masterplanning Report assessment for this
site found that it represented an urban extension to the
village and was distant from the village. Speculative
housing in this area would thereby not provide a
significant and meaningful contribution to Broughton
and would not respond to the core strategies, vision
and sustainability of the village.

The site assessments for these sites are recorded in the
second tertile of sites and are less favourable than the
sites identified in the Broughton Neighbourhood Plan.



Broughton Neighbourhood Plan Steering Committee
12 Baker Avenue
Broughton
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Northamptonshire
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Dear Sir/ Madam,

Response to Broughton Neighbourhood Plan Pre-Submission Consultation

I write on behalf of Taylor Wimpey UK to provide representations in response to the Broughton Neighbourhood Plan Pre-Submission Consultation.

General support is given to the Parish Council for preparing a Neighbourhood Plan (Neighbourhood Plan). Detailed responses are provided in response to the questions posed.

1) How clearly does the Plan explain the process, consultation and legal status of the document?

The Neighbourhood Plan explains that the existing Parish Plan carries very limited weight in the determination of planning applications.

Page 6 provides a summary of the Neighbourhood Plan preparation process including the consultation completed. Pages 6 and 7 explain that the Neighbourhood Plan has to comply with European legislation whilst also having regard to national policies, and planning practice guidance. It also explains how the Neighbourhood Plan fits within the existing and emerging planning policy context in Kettering and North Northamptonshire as part of the Development Plan in the determination of planning applications.

Additional reference could be made to the requirement for the Neighbourhood Plan to meet the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990, specifically the requirement to have regard to heritage assets (Listed Buildings and Conservation Areas), and for the Neighbourhood Plan to contribute to the achievement of sustainable development.

2) Do you agree with the Strategy Plan for the Broughton Neighbourhood Plan (Chapter 1)

The Neighbourhood Plan sets out the following individual core strategies for the Neighbourhood Plan:

- Maintain village status and rural identity;
- Development of small properties responding to local needs;
- Create a sustainable community in Broughton;
- Confirmation and protection of important green spaces for the future;
- Safeguard our village heritage for future generations;
- All new development must become an Asset to the village; and
- Continue to encourage Highways Authorities to implement improved infrastructure and design.

Broad agreement is given to the above strategies however it is requested that consideration is given to the following comments.



It is considered that the strategy should not be restricted to the delivery of small properties only.

As part of the Census 2011 it was reported that the existing dwelling stock at Broughton comprises predominantly of 3 bedroom dwellings, with similar amounts of 2 and 4+ bedroom dwellings and very few 1 bedroom dwellings (Source: Neighbourhood Statistics: Number of Bedrooms (QS411EW)); this is also noted within the Housing Needs Survey completed for Broughton in 2013.

In terms of housing need it is acknowledged within the Housing Needs Survey that the responses received and analysed only illustrate a 'snapshot' of housing need at that specific point in time and therefore the Housing Needs Survey may not be representative of the current need in the village.

The North Northamptonshire Strategic Housing Market Assessment (Update 2015) has identified a need for approximately 70% 1 and 2 bedroom dwellings, 30% 3 bedroom dwellings and limited 4 bedroom dwellings across Kettering Borough. Housing mix is a matter discussed at page 138 and 139 of the recently adopted North Northamptonshire Joint Core Strategy. It is stated at paragraph 9.26 that the "demographic evidence of 'need' does not take account of the aspiration of many households to have a spare bedroom, for example to provide a home office, give a young family the opportunity to expand or to enable older people to have a carer to stay".

Paragraph 9.26 states that "flexibility will be supported provided that developments provide a significant proportion (generally at least 70%) of small and medium sized properties (1-3 bedrooms), which will provide the more affordable market housing options to meet identified needs. Proposals for higher proportion of larger (4+ bedroom) dwellings should be supported by evidence in relation to the existing housing stock."

It is considered that the strategy for the Broughton Neighbourhood Plan should be changed to seek a range of house sizes and types to respond to local needs and aspirations. In order to deliver this revised strategy, larger sites should be allocated within the Neighbourhood Plan to enable the delivery of a wide range of house types and importantly the delivery of affordable housing.

Taylor Wimpey suggests that the following sites should be allocated for residential development:

- Land West of Darlow Close and Cransley Hill
- Land South of Northampton Road

3) Do you agree with the sustainability solution for Broughton in Chapter 2

The National Planning Policy Framework explains that "pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life...". Chapter 2 of the Neighbourhood Plan 'Sustainability Solution for Broughton' primarily focuses upon the delivery of housing. It specifically seeks the construction of "the right type of housing going forward maximising the potential of the remaining available sites and delivering an increased supply of the required type of housing".

Some support is given to draft sustainability solution as it seeks to readdress the housing mix to "...achieve a full spectrum of type of dwellings..." (page 16). However when taking into consideration the size and expected capacity of the draft site allocations, listed at Table B on page 35, it is considered unlikely that a meaningful supply of affordable housing would be delivered in Broughton in the period 2017 to 2031. For this reason it is considered that the proposed sustainability solution is not seeking to meet the social dimension of sustainable development.

'Sustainability Core Policy 1' as stated on page 17 only makes reference to development on small scale infill sites within the village boundary, an objection is raised against this policy. As detailed in response to Question 1, it is considered that it would more beneficial to pursue a 'sustainability solution' which seeks to deliver a wide range of house sizes and types to respond to both local needs and aspirations. This could be achieved through the allocation of larger sites which would enable the delivery of both market and affordable

housing. It is considered that this revised solution can be implemented in a sustainable way to accord with the Neighbourhood Plan 'core strategy' to maintain the village status and rural identity of Broughton.

Taylor Wimpey suggests that the following sites should be allocated for residential development:

- Land West of Darlow Close and Cransley Hill
- Land South of Northampton Road

4) Are you happy with how the historical development in Broughton has been explained (Chapter 3)?

No comments are made in response to Question 4.

5) Do you agree with the key issues defined for Development in Broughton, Chapter 4

Chapter 4 of the Neighbourhood Plan identifies the following matters as 'key issues':

- Residential growth in Broughton and the perceived 'surplus of 3, 4 and 5 bedroom dwellings' (page 25);
- Design and quality of new development;
- Coalescence with Kettering; and
- Historic character of Broughton.

'General Development Policies and Design Principles' are proposed in response to the above issues.

Policy 2 should be revised to meet local needs and aspirations for housing in Broughton. As part of the Basic Conditions set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 there is a requirement for the Neighbourhood Plan to be in general conformity with the strategic policies contained within the development plan for the area. In preparing the Neighbourhood Plan consideration has therefore been given to the saved policies from the Kettering Local Plan (1995) and the National Planning Policy Framework (the Framework). However, the Framework requires policies within Local Plans to be given weight proportionate to their degree of conformity with the policies contained within it. It is noted that there are a limited number of saved Kettering Borough Council policies remaining and the Borough Council has started to prepare a new Local Plan which has the potential to alter the existing spatial strategy for the rural area of Kettering.

The North Northamptonshire Joint Core Strategy has established a requirement for 480 dwellings to be delivered in the rural area of Kettering over the plan period. Kettering Borough Council has previously sought comments from the public about the possible spatial strategy for the rural area. Paragraph 9.3 of the 'Site Specific Proposals LDD Housing Allocation Assessment of Additional Sites and Update (2013)' consultation document states that *"...of the two alternatives identified the dispersed option emerged as the preferred approach for delivering growth. Nevertheless, there were some objections to the three sites identified"*. It is considered that there remain unresolved objections to the emerging spatial strategy for the rural area and at Broughton, as such limited weight should be given to it.

Brief reference is made to the sustainability credentials of Broughton on page 13 of the Neighbourhood Plan. It is our opinion that the village is relatively sustainable as it benefits from the following facilities and can support additional residential development.

- Broughton Primary School
- Local retail including Central England Co-Operative Store, Hairdressers, and take away restaurants.
- Local employment
- A Village Hall
- Two Churches
- A Public House
- Public Open Space, recreation facilities and allotments.
- Bus links

It stated at page 13 that "reliance on the car is now essential for our primary connectivity for work, education and leisure and is becoming increasingly so". An objection is raised against this statement because there are regular bus links available to the services and facilities at Kettering.

The Neighbourhood Plan sets out at Table B that provision will be made for 94 dwellings over the period 2011 to 2031, inclusive of a 5% windfall. Policy 30 of the North Northamptonshire Joint Core Strategy establishes a requirement for 40% affordable housing to be delivered on schemes of 11 or more dwellings. Objection is raised to the proposed allocations due the limited likelihood of affordable housing being delivered. It is considered that the Neighbourhood Plan should seek wider opportunities for positive improvements in Broughton which can be delivered alongside new residential development.

Taylor Wimpey suggests that the following sites should be allocated for residential development.

Land West of Darlow Close and Cransley Hill

This site offers the opportunity to deliver:

- Improvement of the existing vehicular and pedestrian access to Broughton Primary School via Cransley Hill;
- A new parent 'drop off and pick up parking area' within the site;
- A Children's play space adjacent to the school and central public open space;
- An area of additional staff/ overflow parking;
- Approximately 50 dwellings of a range of house sizes and tenures, including affordable housing.

Land South of Northampton Road

This site offers the opportunity to deliver:

- Approximately 50 dwellings of a range of house sizes and tenures, including affordable housing; and
- The provision of public open space and new local area of play.

Policy 7 seeks to reiterate the provisions of Northamptonshire County Council's Parking Standards (September 2016) through the requirement for garages to have internal dimensions of 6m x 3m. It is considered that the Neighbourhood Plan should defer to the Highways Authority's standards rather than duplicate policy, for this reason the policy should be removed.

Policy 8 seeks "satisfactory" visitor parking provision, it is assumed that visitor parking provision would be in accordance with Northamptonshire County Council's Parking Standards (September 2016). The policy also requires the delivery of on street parking solutions which will not adversely impact on existing neighbouring and resident amenity. Again the Neighbourhood Plan should defer to the Highways Authority's standards rather than duplicate policy, for this reason the policy should be removed.

6) Do you believe the objectives for Development in Broughton respond to the key issues?

Broad support is provided to the objectives listed on page 39 however as discussed previously, it is considered that the Neighbourhood Plan should plan to meet local needs and aspirations.

7) Do you support the list of preferred identified sites for development in Table B (page 35)

Taylor Wimpey does not support the list of 'preferred sites for allocation' identified at Table B.

Taylor Wimpey has two sites under their control within Broughton which offer the potential to deliver market housing, affordable housing, and open space; the benefits associated with each site are set out below. It is acknowledged that the Neighbourhood Plan aspires to maintain the character of the village and it is considered that these sites could be sensitively developed to achieve this strategy.

Suggested Allocation: Land west of Darlow Close, Broughton

This site has been submitted to Kettering Borough Council as part of the Call for Sites Update 2016 as a possible location for residential allocation.

This site is considered to be a suitable location for development, which is both available and achievable. Concept sketches of the site have been shared with the Parish Council and Kettering Borough Council which illustrate the opportunity to incorporate key benefits for Broughton which include:

- Improvement of the existing vehicular and pedestrian access to Broughton Primary School via Cransley Hill;
- A new parent 'drop off and pick up parking area' within the site;
- A Children's play space adjacent to the school and central public open space;
- An area of additional staff/ overflow parking;
- Approximately 50 dwellings of a range of house sizes and tenures, including affordable housing.

It is requested that this site is allocated within the Neighbourhood Plan.

Suggested Allocation: Land South of Northampton Road, Broughton

This site has been also been submitted to Kettering Borough Council as part of the Call for Sites Update 2016 as a possible location for residential allocation.

This site is considered to be a suitable location for development, which is both available and achievable. It offers the opportunity to incorporate benefits for Broughton which include:

- Approximately 50 dwellings of a range of house sizes and tenures, including affordable housing; and
- The provision of public open space and new local area of play.

It is requested that this site is allocated within the Neighbourhood Plan.

The majority of sites listed at Table B already benefit from planning permission and relate to sites which will deliver a single or couple of dwellings with the exception of Land East of Cransley Hill. Two sites further sites have been identified at Carter Avenue and Church Street to deliver small scale residential development however it is understood that ongoing feasibility work is still to be completed.

North Northamptonshire Joint Core Strategy establishes a threshold of 11 of more dwellings for affordable housing to be triggered. With the exception of Land East of Cransley Hill (Redrow site), none of the sites identified on Table B will meet this threshold. Reference is made to the Carter Avenue delivering affordable housing but it could equally deliver market housing and there is no certainty about this site being redeveloped.

8) Do you agree with the definition for Windfall and Strategic Sites for Broughton in Chapter 5?

Page 42 of the Neighbourhood Plan states that proposals for 4 or more dwellings would be treated as windfall sites, and sites within the village boundary providing 3 or fewer dwellings would be treated as windfall opportunities. These thresholds are very low and do not relate to overarching policies contained within the North Northamptonshire Joint Core Strategy, for example Policy 30 establishes a requirement for 40% affordable housing to be delivered on schemes of 11 or more dwellings.

9) Do you agree with the principle of a Development Order for the BT Exchange in Church Street?

Page 43 of the Neighbourhood Plan refers to the proposed Development Order of the 'current BT Exchange' it is unclear whether BT is willing to relocate its operations at the site and no supporting evidence has been published alongside the Neighbourhood Plan to support the Development Order. A note of the Parish Council meeting held on 18th March 2015 stated that *"a response had been received from the company's property manager confirming that the facility was likely to be required for the foreseeable future with no plans for any*

decommissioning following the roll out of digital services in the village". It would therefore seem unlikely this proposal will be delivered in the foreseeable future.

In addition, it is also stated on page 43 that "At the start of this plan, it is not possible to legally designate that these properties remain open market properties in perpetuity to prevent them falling to housing association or buy to let ownership, but this aspect will be kept in review as part of the monitoring exercise conducted every 5 years. Should legislation change, and it is still possible to do so, this status will be enabled in order to maintain these properties as the open market asset to the village that they are intended to be". This sentiment is reflected in Policy 11. This is not considered to be an example of positive planning and it does not reflect a commitment to the delivery of the social dimension of sustainable development.

10) Do you agree with the key issues defined for Traffic, Transport and Highways, Chapter 6?

No comments are made in response to this question.

11) Do you believe the objectives for Traffic, Transport and Highways respond to the key issues?

No comments are made in response to this question. Please see the detailed response provided to Question 13.

12) Do you agree with the key issues defined for The High Street, Chapter 7?

No comments are made in response to this question.

13) Do you believe the objectives for The High Street respond to the key issues?

One of the key objectives of the National Planning Policy Framework is to support a prosperous rural economy. The objectives listed on page 67 seek to respond to the issues raised within the Neighbourhood Plan however there is no mention of a strategy to promote non-vehicular trips to the High Street, the most sustainable option.

Objection is raised in response to High Street General Policy 21 which states that "No new additional road access or driveway with egress directly into the High Street between Cransley Hill and Wellingborough Road will be permitted" as this policy is unnecessarily restrictive. As discussed earlier in this letter Taylor Wimpey is promoting land to the West of Cransley Hill and Darlow Close for residential development. Illustrative plans have been shared with the Parish Council which show the opportunity to widen the existing access road to Broughton Primary School and provide an area of parking intended to be used for school 'drop off and pick up'. It is considered that this proposal would reduce parking pressures along Cransley Hill during the morning and afternoon. Consequentially this has the potential to alleviate parking pressures at the High Street.

Kettering Borough Council has established its own 'Local Requirements for Planning Applications' in 2015. This states that Transport Statements will be required for applications seeking approval for 10 to 14 dwellings, and Transport Assessment will be required for application seeking approval for 15 or more dwellings. Paragraph 32 of the National Planning Policy Framework states that "development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe".

14) Do you agree with the key issues defined for Green Areas and Important Public Open Spaces, Chapter 8?

No comments are made in response to this question.

15) Do you believe the objectives for Green Areas and Important Public Open Spaces respond to the key issues?

No comments are made in response to this question.

If you have any queries regarding the content of these representations please do not hesitate to contact me. It is requested that I am kept up to date with the progress of the Neighbourhood Plan.

Yours faithfully



Lydia Voyias BA (Hons) MPlan MRTPI
Senior Planner

Enc.

- Site Location Plan Land West of Darlow Close and Cransley Hill
- Concept Sketches for residential development at Land West of Darlow Close and Cransley Hill
- Site Location Plan for Land South of Northampton Road



- Site boundary
2.7ha (based)
- Proposed new access
off Cranley Hill
- Primary vehicle route
- Existing staff parking area
- Proposed parent drop-off area
- Additional staff/overflow parking
- Staff access
- Drop-off access/loop
- Local Area for Play (LAP)
- Green spaces/landscapes buffers
- Residential development
- Public squares/food point



Taylor Wimpey

West of Cranley Hill, Broughton

SK001 - Concept sketch layout

November 2016

1:1250 (A3) (approx)



- Site boundary
2.78ha (based)
- 1 Proposed new access
off Cranley Hill
- 2 School sign
- 3 2m wide pedestrian footpath
- 4 Additional tuff/overflow parking
9 spaces
- 5 Staff access
- 6 Children's play space
Local Area for Play (LAF)
- 7 Proposed parent drop-off area
34 spaces • with seating
- 8 School access • pupils
- 9 School access • adults/visitors
- 10 Planted buffer

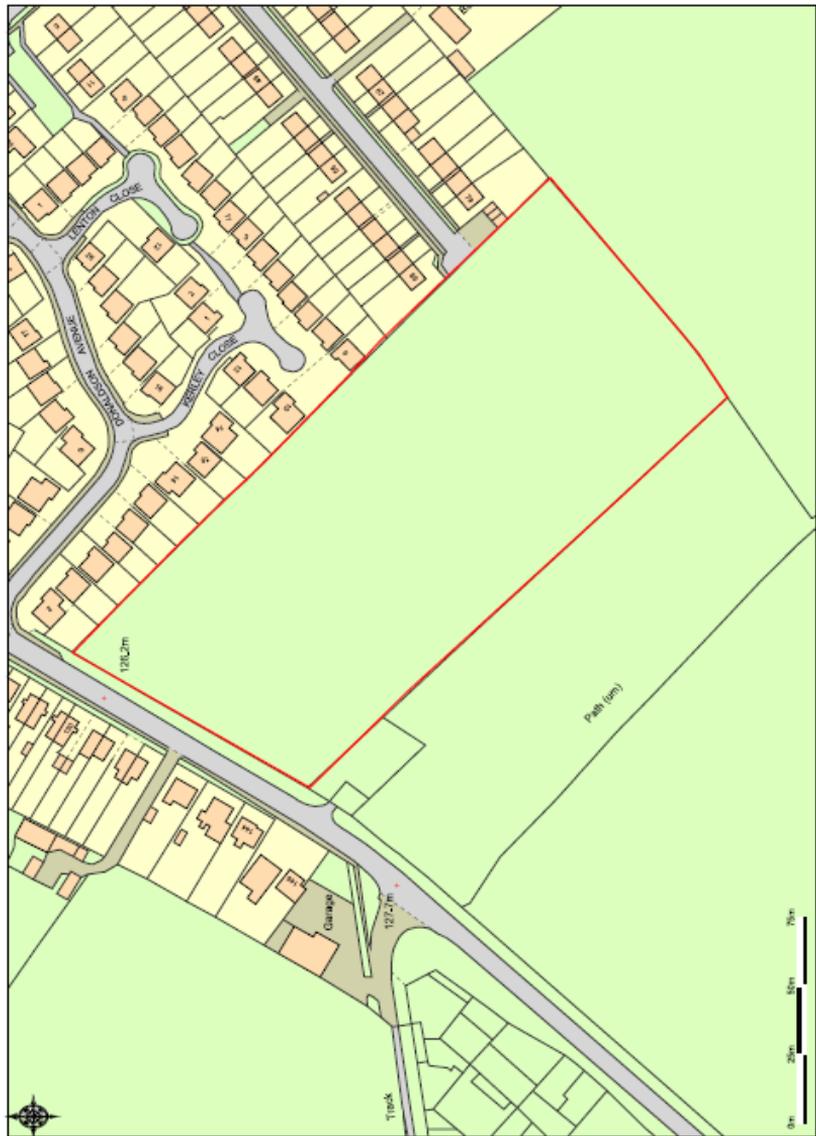


Taylor Wimpey

West of Cranley Hill, Broughton

SK002 - Entrance area concept sketch
November 2016

Land South of Northampton Road, Broughton



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Developer Response – Berry’s on behalf of Glanmoor Investments Ltd

The Agent has responded using the survey template supporting the draft Neighbourhood Plan and without further comment.

Thank you for your comments.

Developer Response – Gladman Developments Ltd

Gladman response dated
19th January 2017

Agent response with
commentary
No representation for
development

Thank you for your comments.
Our SEA and Basic Conditions documents are complete
and LGS is supported with background documents.

Introduction

This letter provides Gladman Developments Ltd (Gladman) representations in response to the first draft version of the Broughton Neighbourhood Plan (BNP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.

Gladman requests to be added to the Parish Council's consultation database and to be kept informed on the progress of the emerging neighbourhood plan. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy.

Gladman would like to offer their assistance in the preparation of the neighbourhood plan for the submission version of the neighbourhood plan and invite the Parish Council to get in touch regarding this.

Legal Requirements

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the BNP must meet are as follows:

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.*
- (d) The making of the order contributes to the achievement of sustainable development.*
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*

National Planning Policy Framework and Planning Practice Guidance

The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account the latest and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.

The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 49 of the Framework is clear that *'relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites'*. This applies not only to statutory development plan documents but is also applicable to emerging neighbourhood plans. This has also been confirmed in the High Court.

Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

Planning Practice Guidance

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the BNP's ability to meet basic condition (a), (d) and (f) and this will be discussed in greater detail throughout this response.

Relationship to Local Plan

The current development plan that covers the Broughton Neighbourhood Plan area and the development plan which the BNP will be tested against, is the Kettering Borough Development Plan. Consisting of the North Northamptonshire Joint Core Strategy (Part 1 Local Plan), saved policies from the 1995 Local Plan and the emerging Site Specific Part 2 Local Plan.

The Site Specific Part 2 Local Plan is still in its infancy with a formal draft yet to be published. The plan will define a settlement boundary for Broughton and may allocate further sites to those identified within the BNP if deemed necessary. Under Section 38 (5) of the 2004 Planning and Compulsory Purchase Act, which states:

'if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached or published (as the case may be).'

These allocations would take precedence over those in the BNP in the event that the BNP is 'made' prior to the adoption of the Part 2 Local Plan. Allocation of reserve sites during the production of the BNP should be considered and would minimise the likelihood of further sites needing to be allocated through the Site Specific Part 2 Local Plan and provide the flexibility to respond to any changing market conditions throughout the duration of the plan.

Broughton Neighbourhood Plan

Gladman suggests that before submitting the BNP to the Council for examination the format of the plan should be simplified to make the plan clearer and easier for a potential user of the plan. The policies currently read as a series of bullet points scattered throughout the plan. Paragraph 17 of the Framework states:

'plans should be kept up to date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency.'

Further, the policies of a plan should be clear and concise, as PPG clearly states:

*'A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. **It should be concise, precise and supported by appropriate evidence.** It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood plan area for which it has been prepared.'*
(our emphasis)

Policies should not be overly prescriptive to the extent that could be considered restrictive. Gladman suggest a more consistent format for each policy to make clear to what land use factors the policy relates, this is currently not the case and could be found not to meet basic condition (a) at examination.

Kettering Borough Council has identified 87 dwellings will be needed in Broughton over the plan period. To accord with the positive approach of the Framework it is important that this figure is considered a minimum, a fact supported by the Slaugham Neighbourhood Plan in Mid Sussex. The examiner's report stated that:

"Given that the strategic objective of the plan refers to "at least 130", I assume it to be a minimum. If it were to be a maximum this would not allow for the flexibility the Framework seeks in responding to changing conditions."

Considering this, it may be necessary to allocate reserve sites to come forward should preferred sites fail to deliver. Gladman contends that in its current form the BNP is contrary to the basic conditions of neighbourhood plans as some of the policies are not in accordance with the Framework and these will be addressed below.

10. Strategic Site Core Policy

This policy seeks to classify sites of four or more dwellings as strategic sites and states only the BNP can designate strategic sites. No windfall sites that are classified as 'strategic' will be permitted to come forward. This does not accord with the positive approach of the Framework and Gladman questions what evidence the Parish Council is using for this designation; why is four dwellings the threshold and not five or six for a 'strategic' site. Planning policy guidance states that:

'Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan...'

Further, the inclusion of a strategic policy would be beyond the remit of neighbourhood plans and without sufficient evidence Gladman recommends that this policy is deleted or reworded to reflect the positive approach of the Framework. Each site should be considered on a site by site basis and demonstrably sustainable development should not be precluded from coming forward in accordance with the presumption in favour of sustainable development. Gladman recommends the following wording for the Parish Council's consideration:

'Windfall sites will be considered on a site by site basis and permitted where the benefits of a development are not significantly outweighed by the adverse impacts of a scheme, in accordance with the Framework.'

Green Spaces General Policies

The map that relates to the green space policies within the plan is not clear and does not distinguish which will be the parcels of land which will receive the protection of the Local Green Space designation and which are the other green spaces which have been identified, which do not hold the same level of protection of LGS. It will be important to distinguish this upon the map as the protection of a LGS affords further protection, that is equivalent to Green Belt, than other green spaces that do not warrant the same designation.

26. Local Green Spaces

In order to designate land as LGS the Parish Council must ensure that it is able to demonstrate robust evidence to meet the national policy requirements set out in the Framework. The Framework

makes clear at Paragraph 76 that the role of local communities seeking to designate land as LGS should be consistent with the local planning of sustainable development for the wider area. Paragraph 76 states that:

*'Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. **Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period**'(our emphasis)*

Further guidance is provided at §77 which sets out three tests that must be met for the designation of LGS and states that:

The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:

- *Where the green space is reasonably **close proximity** to the community it serves;*
- *Where the green area is **demonstrably special** to a local community and holds a particular **local significance**, for example because of its beauty, historic significance, recreation value (including as a playing field), tranquillity or richness of its wildlife; and*
- *Where the green area concerned is local in character and **is not an extensive tract of land.**' (our emphasis)*

The requirements of the Framework have now been supplemented by the advice and guidance contained in the PPG. Gladman notes paragraph 007 of the PPG which states:

'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines the aim of plan making.'

Of further note is paragraph 015 of the PPG(ID37-015) which states:

'Paragraph 77 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently, blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name.'

Designation of LGS should not be used as a mechanism to designate new areas of Green Belt (or similar), as the designation of Green Belt is inherently different and must meet a set of stringent tests for its allocation (paragraphs 82 to 85 of the Framework). The issue of whether LGS meets the criteria for designation has also been explored in a number of Examiner's Reports across the country and highlight the following decisions:

- The Blackwell Neighbourhood Plan Examiner's Report recommended the deletion of two LGS designations measuring approximately 19ha and 32ha respectively and found both designations did not have regard to national policy which states that LGS should only be used where the area concerned 'is not an extensive tract of land.'¹
- The Seldlescombe Neighbourhood Plan Examiner's Report recommended the deletion of a LGS measuring approximately 4.5ha as it was found to be an extensive tract of land.²
- The Oakley and Deane Neighbourhood Plan Examiner's Report recommended the deletion of a LGS measuring approximately 5ha and also found this area not to be local in character. Thereby failing to meet 2 of the 3 tests for LGS designation. ³
- The Alrewas Neighbourhood Plan Examiner's Report identifies that both sites proposed as LGS in the neighbourhood plan 'in relation to the overall size of Alrewas Village' to be extensive tracts of land. The Examiner in this instance recommended the deletion of the proposed LGSs which measured approximately 2.4ha and 3.7ha.⁴
- The Wantage Neighbourhood Plan Examiner's Report recommended the deletion of all LGS designations due to a lack of an insufficient, proportionate and robust evidence. ⁵
- The Drakes Broughton Neighbourhood Plan Examiner's Report recommended the deletion of a LGS designation described as 'Strip of green field adjacent to...' as there was insufficient evidence to show how the site was demonstrably special to the local community and held a particular local significance.⁶

Gladman contends that at this time there has been no evidence produced to demonstrate how the parcels of land designated for LGS are considered to meet the necessary requirements for LGS designation and until this evidence can be demonstrated the LGS designations should be removed from the plan; a fact supported by the previously referenced Wantage and Drakes Broughton examiners reports.

¹ <http://www.backwell-pc.gov.uk/public/images/backwell-neighbourhood-plan-examiners-report.pdf>

² <http://www.rother.gov.uk/CHttpHandler.ashx?id=22996&p=0>

³ <https://www.basingstoke.gov.uk/content/doclib/1382.pdf>

⁴ <https://www.lichfielddc.gov.uk/Council/Planning/The-local-plan-and-planning-policy/Neighbourhood-plans/Downloads/Alrewas/Alrewas-Neighbourhood-Plan-Examiners-Report.pdf>

⁵ <http://www.whitehorsedc.gov.uk/sites/default/files/Wantage%20NP%20Report%20Final%2030.7.16.pdf>

⁶

<http://www.wychavon.gov.uk/documents/10586/0/Drakes+Broughton+and+Wadborough+with+Pirton+NP+Examiner%27s+Report.pdf/626b4e5e-6f61-ae32-3301-599e123bb8c1>

Strategic Environment Assessment

In allocating sites for development, it will be necessary to produce a Strategic Environment Assessment scoping report to distinguish whether there will be any significant effects of the plan on the environment.

The preparation of Neighbourhood Plans falls under the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) that require a Strategic Environmental Assessment (SEA) to be undertaken where a Plan's proposals would be likely to have significant environmental effects. The need for an SEA should be established early in the Neighbourhood Plan preparation process though the completion of a Screening Assessment, ensuring that a Neighbourhood Plan's proposals have been fully considered against all reasonable alternatives where an SEA would be required.

The PPG specifically states that a SEA may be required where:

- **A neighbourhood plan allocates sites for development**
- The neighbourhood plan area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- The neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

Gladman considers that without the Screening Assessment being made available it is difficult to establish whether an SEA is required. We therefore take this opportunity to inform the Parish Council that any failure to comply with the requirements of the SEA Regulations would result in the Plan being in breach of EU regulations and therefore be contrary to basic condition (f).

If it is identified that an SEA is required, then the Parish Council will need to ensure that the BNP is compatible with the SEA regulations. The SEA Regulations make clear at section 12(2) that:

'the report shall identify, describe and evaluate the likely significant effects on environment of – (a) implementing the plan or programme; and (b) reasonable alternatives taking into account the objectives and geographical scope of the plan or programme.'

Should a SEA be deemed to be required the Parish Council should ensure that it assesses each reasonable alternative in a consistent and transparent manner detailing the reasons why some alternatives have progressed and others have been rejected. Gladman wishes to draw attention to the recent Stonegate judgement where the Henfield Neighbourhood Plan was quashed on SEA grounds, relating to the process undertaken and hence failure to comply with EU law.

Conclusions:

Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the BNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.

Gladman is concerned that the plan in its current form does not fully comply with basic conditions (a), (d) and (f). A SEA scoping report will need to be produced to ensure the plan complies with EU regulations and the plan lacks the evidence to designate windfall sites of 4 sites or more as 'strategic' sites or to designate sites as LGS.

Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

Yours Faithfully,
Richard Agnew
Gladman Developments Ltd
r.agnew@gladman.co.uk

Technical Support Response – Kettering Borough Council

Broughton Neighbourhood Plan Pre-submission Consultation (December 2016)

Comments by Development Services, Kettering Borough Council

The following response provides some general observations on the document and more specific constructive comments on certain aspects of the document, these are referenced accordingly. Officers are happy to elaborate further on any points raised and provide further guidance upon request

<p>General comment - Evidence Base</p>	<p>Clearer links need to be made between the evidence base and the policies in the plan to demonstrate why options have been chosen.</p> <p>The evidence base for the Neighbourhood Plan will be scrutinised during the Examination, making clear links will help the Examiner in understanding and supporting the Plan.</p> <p>Work to date on the Site Specific Part 2 Local Plan has involved the preparation of evidence documents. The relationship between these documents and the evidence prepared for the Neighbourhood Plan needs to be clear. Where different options are proposed to those favoured through the Local Plan evidence base you are advised to be clear why the options selected are the most appropriate.</p> <p>The evidence base is not included in the consultation; this should be provided when the plan is submitted.</p>	<p>Noted</p> <p>Evidence Base is constructed to demonstrate linkage with Plan and will be submitted with the Plan</p>
<p>General comment</p>	<p>The wording of some policies requires further work. More specific comments on these policies can be found further on in this response. Policies need to be clear, unambiguous, positive and capable of being delivered. They will be used to determine planning applications so the purpose and wording of the policy needs to be clear.</p> <p>Policies should be worded in a positive manner. This can be achieved by using the phrases such as ‘planning permission will be granted provided that...’ or ‘development will be encouraged where it...’ and ‘the neighbourhood plan supports...’</p> <p>The term ‘development’ has a specific legal meaning. Neighbourhood Plan policies can only influence development which requires a planning application. The Neighbourhood Plan can deal with other areas but these should be kept separate from the policies which will be used to determine planning applications. For example policies 17 and 18 are statements of intent rather than policies which could be used to determine planning applications. These could be included in the supporting text rather than policy.</p> <p>It would be worth referring to the Locality document on writing policies for further detailed advice on writing planning policies. This document is available using the following link:</p>	<p>Noted</p> <p>Policies have been recrafted to be clear, positive, unambiguous and capable of being delivered</p>

<p>General comment</p>	<p>http://mycommunity.org.uk/wp-content/uploads/2016/08/Writing-planning-policies-v51.pdf</p> <p>Policies in the Neighbourhood Plan don't need to repeat national policy or policy already included in the development plan. For example policies in the Joint Core Strategy (JCS) deal with issues such as protecting amenity (Policy 8).</p> <p>Some of the policies are repetitive, it would be better if they were consolidated to avoid repetition. It would be clearer if each individual policy had its own policy box to provide a clearer distinction, these individual policies could then be followed by supporting text/justification.</p>	
<p>Basic conditions</p>	<p>When the Neighbourhood Plan is submitted to the Local Planning Authority it will need to be accompanied by a statement setting out how the Neighbourhood Plan meets the basic conditions. The National Planning Practice Guidance provides advice on preparing the basic conditions statement: https://www.gov.uk/guidance/neighbourhood-planning--2#basic-conditions-for-neighbourhood-plan-to-referendum</p> <p>Planning Aid has also prepared the following guidance documents on writing a basic conditions statement. http://www.ourneighbourhoodplanning.org.uk/storage/resources/documents/How_to_write_a_basic_conditions_statement.pdf</p> <p>http://mycommunity.org.uk/wp-content/uploads/2016/08/Approaches-to-writing-a-basic-conditions-statement.pdf</p>	<p>Basic Conditions Statement has been issued</p>
<p>Page 5</p>	<p>The map needs copyright information. It appears the map used did originally show the copyright and licensing details, although this is no longer shown. Therefore the original map needs to be reinstated as per the map in the Neighbourhood Plans section on the Kettering Borough Council website.</p>	<p>Noted</p>
<p>Page 6</p>	<p>The Neighbourhood Plan will be part of the Development Plan not sit alongside it. It will sit alongside the Site Specific Part 2 Local Plan. It won't inform planning policy it will be planning policy. The plan is not a legal document it is a statutory planning document.</p>	<p>Noted</p>

Page 7	<p>The rural housing figure in the JCS covers the whole rural area and the work undertaken in distributing the figure is still on-going through work on the Site Specific Part 2 Local Plan. An update on site assessments in the rural area, including Broughton, was presented to Planning Policy Committee on 23rd November 2016. The work provided to the Parish Council on housing numbers for Broughton was based on work done in the preparation of the JCS and looked at natural population growth then, taking into account capacity of villages to accommodate additional development on sites identified through the SHLAA. It is not a definitive figure for the plan period and does not include an allowance for windfall development which would be in addition to any allocations made.</p>	Noted. The Neighbourhood Plan provides for a surplus delivery of housing and an additional provision for windfall.
Page 7	It is not clear why the period 2011-2030 is used when the JCS period is 2011-2031.	Corrected
Page 8	The area designation was available on the Council's planning web-pages but was not on the separate consultation portal.	Noted
Page 10	<p>Further detail needs to be provided regarding the Strategic Environmental Assessment (SEA) process. The basic conditions statement will need to set out how the obligations have been met. Based on the consultation response received from Historic England the Parish Council commenced work on a SEA; however no reference has been made to this through the consultation. The Parish Council will need to ensure that the requirements of the SEA process are met prior to submitting the Neighbourhood Plan.</p> <p>It will also need to be clear how the Neighbourhood Plan meets the Basic Condition of demonstrating that the plan contributes to sustainable development.</p>	<p>Noted</p> <p>The SEA process is now complete.</p> <p>Refer to previous comment re Basic Conditions Statement</p>
Page 17	<p>The policy needs to be clear as to what the 'primary core principle of the focused sustainable solution for Broughton' is, to allow the policy to be applied. It is currently ambiguous and would be difficult to apply when considering a planning application.</p> <p>Reference to the Broughton Housing Needs Survey should also refer to future assessments of need to future proof the policy.</p> <p>Do you intend to define 'small scale' in this policy?</p>	Noted
Page 7 & 25	<p>The rural housing figure in the JCS covers the whole rural area and the work undertaken in distributing the figure is still on-going through work on the Site Specific Part 2 Local Plan. The work provided to the Parish Council on housing numbers for Broughton was based on work done in the preparation of the Joint Core Strategy and looked at natural population growth, then taking into account capacity of villages to accommodate additional development on sites identified in the SHLAA. It is not a definitive figure for the plan period and does not include an allowance for windfall development which would be in addition to any allocations made.</p>	Noted. The Neighbourhood Plan provides for a surplus delivery of housing and an additional provision for windfall.

<p>Page 32 (and Table B)</p>	<p>In relation to the sentence regarding KBC considering small type housing for social housing properties on the site at Carter Avenue. No formal decisions have been made on how this site would come forward yet but initial feasibility work undertaken highlights that approximately 6 smaller properties could be accommodated on the site.</p> <p>Is the Neighbourhood Plan intending to allocate this site? If the site is being allocated then further information would need to be provided to demonstrate availability of the site and assessment of this site compared to other sites which have been promoted for development.</p>	<p>Noted. Refer to Site Assessment work</p>
<p>Page 16</p>	<p>It is unclear what the status of the sustainable solution for Broughton is. The wording for this is currently in the supporting text and is not written as a policy so couldn't be applied as such.</p> <p>The aims of this focused sustainable solution need to link clearly with the policies in the plan. These policies refer to the focused sustainable solution so it needs to be clearly defined to enable the policies to be applied. Again it will also need to be demonstrated how the Neighbourhood Plan contributes to sustainable development to meet the requirements of the basic conditions</p> <p>It would be beneficial to provide additional information in the text on Housing Needs, this section refers to the need for smaller scale housing but it would be helpful to provide more detail on the type of housing required, for example is it 1 bed and/ or 2 bed and/or 3 bed that are required?</p>	<p>Noted The Sustainable Solution for Broughton has been clarified and highlighted.</p> <p>Noted. Refer to Basic Conditions Statement</p> <p>Noted</p>
<p>Page 33</p>	<p>KBC did not make a decision on sites in Broughton at the January 2014 Planning Policy Committee in light of the outstanding appeals and preparation of the Neighbourhood Plan but has continued to update site assessment work which was last reported to Planning Policy Committee on the 23rd November 2016. Work on the Site Specific Part 2 Local Plan is on-going. A consultation on the draft plan is scheduled to take place in June/ July 2017, followed by Pre-Submission consultation October/ November 2017. It would be helpful to provide the reference for the source of table A and the date of the document.</p>	<p>Noted. Reference made.</p>
<p>Page 34</p>	<p>See above comments in relation to the housing figure.</p> <p>The text refers to preferred opportunities in table B which are designated by the plan but it is unclear whether the intention is to allocate these sites for development. If sites are to be allocated then there needs to be a policy allocating them. Further detail also needs to be provided on the timescale for delivery of these sites. When in the plan period it is anticipated that these sites would come forward?</p> <p>-</p>	<p>Noted.</p>

Page 34 & 35	Gypsy and Traveller provision. The number of pitches in the Borough was 55 in 2011, a number of additional permissions have been granted since then. KBC can provide an update on request.	Noted
Page 35	See comments above in relation to the housing figure. Windfall – an allowance was made for windfall in the figure included in the JCS for the rural area. The rural housing work previously provided was based on capacity on sites promoted for development. The allowance for windfall is separate to the sites being considered for allocation. An update on rural housing numbers and site assessments was presented to Planning Policy Committee on 23 rd November 2016. http://www.kettering.gov.uk/meetings/meeting/1501/planning_policy_committee	Noted. A windfall allowance is included in the Neighbourhood Plan
Page 36 - Table C	Evidence will need to be provided to demonstrate why the sites identified in table B are better options than those considered through the Site Specific Part 2 Local Plan and shown in Table C. The conclusions in relation to the sites in table C are confusing as they seem to be retaining the sites as potential allocations which does not reflect what the introductory paragraph says. Is it the intention that these are reserve sites?	Noted. The Tables have been clarified
Page 39	Policy 3 – It isn't necessary to have a policy which states that the golf course is not considered to be a brownfield site. The definition of previously developed land is set out in the NPPF. This policy doesn't fit with the surrounding policies.	
Page 40	Parking – Policy 7 This is very restrictive. Have NCC Highways supported this approach? Evidence would need to be provided to support this policy.	NCC Highways have reviewed the plan and have provided us with their comments which we have incorporated.
Page 40 – point 9	The justification for the criteria should be in the supporting text, not the policy.	Noted
Page 42	Evidence will need to be provided to demonstrate why the threshold of 4 has been selected for sites to be considered as strategic sites.	Noted – Evidence and qualifying criteria of context provided

Page 44 – Policy 11	Is it the intention that the Neighbourhood Plan will allocate the BT Exchange in Church Street? If so, a policy should be included allocating this site. This policy could also include development principles for the site. If the site is being allocated then further information would need to be provided to demonstrate availability of the site and assessment of this site when compared to other sites which have been promoted for development.	Noted – please refer to Site Assessment work
Page 44 – Policy 11 - Neighbourhood Development order	The policy refers to the preparation of the Neighbourhood Development Order (NDO). This NDO will need to be prepared in accordance with the regulations and therefore should also be consulted upon as required by the regulations.	Noted. The NDO will be submitted with the Plan
Page 45 - policy 12	This is a definition of windfall development rather than a policy by which a planning application can be determined through.	Noted
	The first part of the sentence which refers to the Local Plan does not need to be in the policy, this should be in the supporting text. Evidence should be provided to justify the inclusion of this policy.	Noted
General comment	Village boundary – Does the NP intend to define the village boundary or is it the intention that this will be defined through the Site Specific Part 2 Local Plan? An update to the Settlement Boundaries: Background Paper was presented to Planning Policy Committee on 2 September 2015, the report is available to view using the following web link: http://www.kettering.gov.uk/meetings/meeting/1379/planning_policy_committee	Noted The Plan will define the village boundary incorporating the KBC boundary definition principles
Traffic/Transport/Highway General Policies	See general comments on policy writing.	Noted
High Street	The Village Centre concept doesn't really follow through in the policy wording for this chapter. Which area is covered by this? It would be helpful to show the area where the plan is seeking to establish the village centre zone. See general comments on policy writing.	Noted and clarified
Page 67	Policies 21 and 22 are very restrictive; there will need to be evidence to justify why this is required in this area. Have NCC Highways been consulted on this approach? Policy 25 – See comments above regarding policies and what constitutes development.	NCC Highways have reviewed the plan and have provided us with their comments which we have incorporated.

<p>Green Areas and Important Open Spaces</p>	<p>It will be important as part of the evidence base to set out how the areas that you are designating as Local Green Space fit with the criteria for designation set out in the NPPF (Paragraph 77). All sites need to be brought up to the same level in terms of information as to how they meet the tests set out in the NPPF. This could be done through a table which lists the NPPF criteria and sets out whether each of the sites meets the criteria. Some sites are listed in the policy on Local Green Space but the supporting text doesn't make reference to them being identified as being Local Green Space</p> <p>The NPPG also recommends that landowners are contacted at an early stage about proposals to designate part of their land as Local Green Space. Have landowners of these sites been contacted?</p> <p>The map showing the open spaces also needs to be included in the document.</p> <p>The wording of the policies needs to be reviewed in light of the general comments above on policy writing and format and content of policies.</p> <p>References to Broughton Common and the percentage of semi-natural grassland lost in the area and across England are ambiguous.</p> <p>It is understood the LWS designation at Highcroft Farm was not due to the number of rare species of invertebrates, but in fact related to the land being a remnant of high-quality lowland meadow with sufficient invertebrate interest to meet the Local Wildlife Site criteria base.</p> <p>Is there any evidence that indicates that the US bomber crashed at Highcroft Farm, and what is the significance of this if it was on this land?</p>	<p>Noted and clarified the Report for Highcroft Farm is attached in the evidence base</p> <p>The history has been clarified.</p>
<p>Appendix Page 84</p>	<p>A document should be included which sets out which sites have been considered for development, how the assessment was undertaken and why the options chosen are the best sites.</p> <p>Local green space – Evidence needs to be provided as to how the areas identified meet the tests set out in the NPPF, see: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities).</p> <p>See general comments regarding the evidence base.</p>	<p>Site Assessment Report will be included in the evidence base supporting documents</p>

Pre-Submission Consultation

Statutory Consultee Responses

Consultee	Comment	Response
Anglian Water	<p>General comments We note that the adopted North Northamptonshire Core Strategy already includes a borough wide policy relating to water supply, water quality and wastewater infrastructure (Policy 5) and a policy relating to water efficiency (Policy 9).Therefore it is not considered necessary to include similar policies in the Neighbourhood Plan.</p> <p>Strategic/Windfall General Policies Policies 12 -15 outline criteria for windfall housing proposals within the Parish but does not identify any specific sites for these purposes. We would comment on any proposals for housing which include proposals for 10 or more dwellings as part of the planning application process.</p> <p>Broughton Neighbourhood Plan -Green Spaces The figure on page 69 of the plan identifies an area of land adjacent to Broughton Water Recycling Centre (sewage treatment works) as green space.</p> <p>It would be helpful if the Neighbourhood Plan explained in what circumstances development in the vicinity of designated local open space/green spaces would be acceptable. As part of which it would be helpful to include reference to utility infrastructure provided by Anglian Water.</p>	<p>Thank you for your comments.</p> <p>The Broughton Water Recycling Centre sits beyond our village boundary in open countryside.</p> <p>The Neighbourhood Plan will not designate any sites for development beyond the village boundary as we are not demonstrating a local need that will require us to provide an exception site allocation. However, over and above this position, we do have grave reservations about the capacity of the Centre as the village is subject to various existing issues and complaints relating to overflow, odours and raw sewage. The scale of development in Broughton and surrounding areas that this plant serves has increased significantly and it would be prudent to provision for a degree of future proofing. The site also sits in fully open and sloping landscape and is fully visible from the higher ground in Broughton. We do not believe it to be appropriate for this and other reasons to build any further housing beyond the existing boundary in this direction.</p>
NCC Schools Service	No Comment	
English Heritage	No Comment	
Environment Agency	EA have reviewed the information submitted and consider the Neighbourhood Plan for Broughton is unlikely to result in significant environmental impacts	Thank you for your comments.
Fields in Trust	No Comment	
Garden Society	No Comment	

Pre-Submission Consultation

Statutory Consultee Responses

Consultee	Comment	Response
Highways Agency (Highways England)	Highways England notes the 87 dwellings have been allocated within the NNJCS to be delivered across Broughton over the Plan period. However, the Neighbourhood Plan has identified a total of 94 dwellings to be delivered of which 60-65 dwellings will be allocated to the Land to the east of Cransley Hill site. HE does not consider that this level of housing will impact upon the operation of the A14.	Thank you for your comments
JPU	No Comment	
KBC Community Services	No Comment	
KBC Environmental Care	No Comment	
KBC Environmental Health	No Comment	
KBC Housing Strategy	No Comment	
Nat. Soc. Of Allotments	No Comment	
National Grid UK Gas Distribution	From the consultation information provided, the gas distribution pipeline and overhead power line falling within the village boundary do not interact with any of the proposed development sites. Whilst there is no implication for National Grid Gas Distribution's Intermediate/High Pressure apparatus, there may however be Low Pressure (LP)/Medium Pressure (MP) Gas Distribution pipes present within proposed development sites.	Thank you for your comments
Natural England	Natural England does not have any specific comments on this draft Neighbourhood Plan	Thank you for your comments.
NCC Archaeology	No Comment	
NCC Minerals & Waste	No Comment	
NCC Natural Development	No Comment	

Pre-Submission Consultation

Statutory Consultee Responses

Consultee	Comment	Response
NCC (Trans & Highways)	Some minor corrections on phrasing and terminology Recommendation for the Neighbourhood Plan to make reference to the Parking Standards document Request for the traffic movement ma to show Mon to Fri two-way averages to allow better comparison with other traffic flows at other sites	Thank you for your comments. We have updated our draft with your recommendations and corrections.
NCC (Walking & Cycling Officer)	No Comment	
NHS, Hertfordshire & South Midlands Area Team (GP Services)	No Comment	
NHS, Nene Clinical Commissioning Group (Secondary Care)	No Comment	
NCC (Minerals & Waste)	No Comment	
North Northants Badger	The North Northants Badger Group are generally supportive of the plan aim to retain the village identity and also support the aim of improving local ecology. The Group also understands that the plan is limited in nature by other housing allocations within and progressing through the plan system at a Borough level, and, that, in view of the closing date, are unable to submit any formal comments.	Thank you for your comments.
Northamptonshire Fire & Rescue	No Comment	
Northamptonshire Police	No Comment	
Sport England	It is important that the Neighbourhood Plan reflects national policy for sport as set out in the NPPF with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, ' A Sporting Future for the Playing Fields of England – Planning Policy Statement '. http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/	Thank you for your comments. The Neighbourhood Plan is designating the School Playing Fields + High Street and Podmore Play areas as LGS specifically to maintain and promote sport and exercise in young people. The Village Hall Playing Field is already protected by a Fields in Trust agreement .

Pre-Submission Consultation

Statutory Consultee Responses

Consultee	Comment	Response
The Ramblers	No Comment	
The Wildlife Trust	No Comment	
The Georgian Group	No Comment	
The Victorian Society	Historic England will provide comments via the SEA	Noted.
The Society for the Protection of Ancient Buildings	No Comment	
The Twentieth Century Society	No Comment	
Ancient Monuments Society	No Comment	
British Archaeology	No Comment	
Historic England	HE have responded to the consultation on the SEA scoping document, and as the results of the SEA will determine the site allocations which you decide to bring forward we shall reserve any comments we may have until this has been concluded.	Noted.
Town & Parish Councils		
Cransley	No Comment	
Pytchley	No Comment	
Walgrave	No Comment	
Orlingbury	No Comment	