

Submissions to KBC Consultation on draft Site Specific Part 2 Local Plan – August 2018

Para 1.3 (under Purpose and Content)

We regret that policy on the allocation of gypsy and travellers sites has been excluded from this document. We are aware of the difficulty KBC has had in resolving this issue, and that deferring consideration is politically expedient. But as a matter of principle the allocation of land for this purpose should be treated as part of land allocation as a whole and not as an afterthought or special issue.

Para 3.6 Re-use and Redevelopment of Rural Buildings.

Paras 3.11 and 3.12 appear to contradict each other. 3.11 says "there is a policy vacuum regarding ... conversion of existing buildings for new buildings not linked to diversification..... " yet 3.12 says "there is no need for SSP2 to include ...". The 2012 Background Paper proposed very good and strict criteria on this subject. If such policy is not now entirely superseded by legislation, it should be reinstated as local policy. Otherwise there could be a loophole allowing residential development that bypasses planning controls.

Policy RS01(k) Parking

Parked cars are now, in many places, the dominant feature of the street scene even in villages. So we enthusiastically support this statement of policy. But nowhere can we find references to where it is an actual problem or any detailed policies to deal with it. Should not the problem areas be specified, with specific appropriate policies for these areas covering the provision of off-street parking on private property and public facilities?

Para 12.42 and the Braybrooke map

Minor errors do not affect the thrust of this plan but undermine its credibility so should be corrected. In 12.42 it would be more accurate to say the historic core of the village is centred round the grade 2* listed church in the North (*other listed buildings are Bridge House, Wantage House, 2 Newton Way and the Road Bridge*) and the grade 2 listed Old Rectory in the South (*other listed buildings are Bleak House and Pipewell Cottage*). The map omits the redevelopment of what is still shown as the Primary School, and the two back-built large houses to the south-east of School Lane

12.2 Braybrooke

A significant visual feature of present day Braybrooke is parked cars, especially down Griffin Road during pub opening hours, and at night along School Lane. Cars are parked on pavements forcing pedestrians into the road. With blind corners at School Lane/Griffin Road and at the Village Hall, this is dangerous. Part of the answer may be police enforcement but there is a design/planning issue in the provision of off-road parking. Recent planning decisions (approvals, rejections and even the present proposed housing allocation) seem to ignore the point. We suggest

that the problem should be noted in this plan, and policies put in place to resolve it. In that way future planning applications should be forced to address it.

Policy BR02 – allocation of RA/128 to housing.

On 31 July a village meeting, attended by about 50 people, discussed the SSP and focussed particularly on the redrawing of the village boundary to include this land, and the associated allocation to housing.

The overwhelming majority would object to the proposal for the following reasons:

- Safety concerns over the position of the proposed access on Griffin Road
- Development of this site will not preserve or enhance the character of the conservation area and its setting.
- Development of this site will detrimentally impact the setting of the grade II listed Rectory
- Absence of any housing allocation requirements or identified unsatisfied need.
- Lack of local amenities and infrastructure.
- Proximity to public house (one of only two community buildings in the village): potential for impacts on new residents from noise, and on viability of public house due to potential of noise complaints from new residents.
- Impact on biodiversity of the site

A full response covering these points will be made in due course. (see below).

The allocation of RA/128 – Top Orchard, Braybrooke

A village meeting attracting about 50 Braybrooke residents on 31 July 2018 concluded that Top Orchard is unsuitable for any scale of development and should not be allocated for development or included within the village envelope. They therefore objected to the extension of the village envelope to allow for development, for the following reasons.

a) There is no need. Policy 11 of the JCS states:

“Development in the rural areas will be limited to that required to support a prosperous rural economy or to meet a locally arising need, which cannot be met more sustainably at a nearby larger settlement;”

Development on RA/128 would not comply with this policy. There is no indication within the plan that this site will be developed for people working locally within the rural economy, or that they will provide houses to meet a local need.

Section 4 of the Draft Site Specific Part 2 Local Plan notes that within the rural area 140 houses are required to meet the housing allocation targets. The calculated housing to be provided in rural areas by the draft plan is 170-171. So three houses in Braybrooke are not required to meet the wider housing allocation for the Borough. It should also be noted that Braybrooke has provided 16 new houses in the last five years, including 4 shared ownership homes, a significant amount for a village of its size.

Policy RA/04 requires new development to allow connections to be made for future development on the edge of settlements. This builds in additional development expectations for this site and sets a precedent for further unsuitable development in this location.

b) Character of the village. Policy 11 of the Joint Core Strategy requires development to have consideration for the existing character of the settlement. Policy RS/01 of the Draft Site Specific Part 2 Local Plan requires development to show consideration and be sympathetic to the existing size, form, character and setting in the village. Development on this site will not comply with either of these policies. The historical character of the village is of linear development along the main routes, focusing on the two historic cores. The closes and back land development are late 20th century and early 21st century, and have eroded the character of the village. This erosion of character should not be exacerbated by another back land, close style development behind houses on Griffin Road and Latimer Close, with no building frontage onto the existing roads in the village.

c) Impact on the historic environment. Site RA/128 is within the setting of the Grade II listed rectory and much of it has historically been associated with the Rectory, whose principle elevation it faces. The historical approach to the Rectory was through it. Redevelopment will impact the setting and ability to understand the historic and evidential value of the Rectory, and therefore its significance. This will be exacerbated by the need for new access into the site against the current boundary of the Rectory, confusing the historic circulation associated with the grade II listed building and visually severing the green space from the current Rectory gardens,

removing the ability to understand the historic relationship between the two spaces. Historic fabric related to the gardens and drive to the Rectory could be lost.

Development of RA/128 is also likely to impact the character of the conservation area. Its open space is an important part of the setting, and the creation of close style, back land development here will be detrimental to the historic plan form of the southern core of the village.

Therefore, the allocation of site to development is contrary to policy 185 and any development on it is likely to be contrary to national planning policy as defined in sections 16 paras 193, 194, and 196 of the NPPF (revised).

d) Access. Vehicles would not be able to safely leave or enter the site as they will not be able to pass at the entrance. This would be exacerbated by the already significant issues with car parking due to the presence of the pub and village hall within 20m and 65m of the access respectively. Both have limited on-site parking and most users of both use Griffin Road to park. A blind corner 50 m to the north, and a busy junction 25m to the south of the access, make traffic movements in this area dangerous. There has been a number of accidents, including people overshooting the blind corner, and knocking over the wall to the front of 27 Griffin Road. To make the access safe, trees fronting the road would have to be removed, and a highways style junction created, which would detrimentally impact the character of the conservation area and village.

e) Amenity. The proximity of the new development to The Swan public house is likely to result in the loss of amenity to new residents from noise from the public house, particularly during the summer months where the garden is regularly used. The pub is an important community asset and relies on large parties as part of its business. If restrictions are placed on it due to the presence of new houses nearby, this will affect its ability to attract large parties and therefore its viability.

f) Infrastructure. Policy 11 of the Joint Core Strategy requires any development to take account of existing infrastructure. Policy RS/01 requires new development to take into account the level of existing infrastructure and services in the individual villages, as well as the proximity of these to larger settlements. We do not believe development on RA/128 will comply with either of these policies. Braybrooke has limited local services: both shop and school have been lost in the past 15 years. Residents look to Desborough and Market Harborough for services but both are stretched by development there: for example the Desborough surgery is no longer taking new patients.

g) Biodiversity. As the site has been left unmanaged for a large number of years it has become a significant area for wildlife. Seven species of bats have been identified in the area, and bat foraging routes through the site have also been identified. We are not confident that enough is understood about the biodiversity value of the site to enable this to be allocated for housing without significantly harming the natural environment.

In summary it is asserted that development on this site is not compatible with national and local policy, and as such this land should not be included within the village envelope, and should not be designated for residential development.