

## **Policy 1: Community Services and Facilities**

The nuance of using the word “*balance*” in policy wording was not appreciated. It was not intended to be an actual definition; the Town Council believed Map 1 and the supporting narrative would sufficiently convey the meaning. We hope it would be acceptable to retain the word within the existing narrative in a descriptive manner?

Turning to the overall intention of the policy; whilst the Town Council exercised great care when composing the policy narrative and wording, we did encounter difficulty in accurately conveying the wishes of neighbourhood within the policy itself whilst ensuring it was positively prepared. The principal concern was to avoid the loss of social and community facilities and particularly, a loss to residential use and / or houses of multiple occupation. In unison with this, the policy also seeks to protect the existing social and community facilities from any change of use unless there is a clear and convincing benefit to the neighbourhood.

The stability of the neighbourhood area is based on having an appropriate level and distribution of residential and business uses and the provision of community services and facilities to support them. Tipping this balance will have a negative impact on the vitality and viability of the local area as there would not be sufficient facilities, services and amenity to support it.

In short, the objectives of the policy are to retain the existing number, concentration and uses of community services and facilities, at least at current densities; and to resist the loss of existing community services and facilities to residential use, including houses of multiple occupation and / or to a change of Use Class.

Policy 7 (Community Services and Facilities) of the Adopted North Northamptonshire Joint Core Strategy (JCS) (2016) did not make sufficient provision to address these objectives and, at that time, policy drafting in this neighbourhood plan predated the Kettering Site Specific Part 2 Local Plan. The Kettering Site Specific Part 2 Local Plan was adopted in December 2021. Policy HCW2 (Protection of Community Facilities and Proposals for New Facilities) does establish a flexible and robust policy basis for the protection of existing community facilities. However, the Town Council is anxious that it does not explicitly address the local community's concerns around the loss of these facilities to residential use(s) and / or houses of multiple occupation which would lead to an adverse impact on neighbourhood services, facilities and amenity.

As such, the Town Council would appreciate a view from the Examiner on how we might redress the policy based on your experience. The Town Council are open to alternative policy wording should you recommend and would gladly work with you to develop the policy to its full potential.

## **Policy 3: Development in the Kettering Conservation Area**

Neighbourhood residents had indicated their general satisfaction with existing protections in regard to maintenance of the character and appearance of buildings, but less so with the apparent disregard of such in consideration of the overall appearance of buildings frontages including garden walls, gateways etc. Whilst most modifications, for example those associated with conversion of front gardens to personal offroad parking areas have been implemented in lovely fashion, others less so. Residents' concern is that unless the issue is addressed more directly the appearance of those of the neighbourhood streets falling within the Conservation Area could become impaired.

Policy 3 (Development in the Kettering Conservation Area) was written in the spirit of national, strategic and local policy. The NPPF (para 190(c)) states that plans should set out a positive strategy that takes into account the desirability of new development making a positive contribution to local character and distinctiveness. Para 206 makes reference to local planning authorities looking for opportunities for new development within Conservation Areas to *enhance*, or better reveal their significance. Policy 2 (Historic Environment) of the JCS seeks to ensure the distinctive North Northamptonshire historic environment is protected, preserved and, where appropriate, *enhanced*.

The Kettering Town Centre Area Action Plan echoes this aspiration through Policy 12 (Heritage and Conservation) and cites the Kettering Conservation Area Appraisal as a key document when considering proposals. The Conservation Area Appraisal under para 12.1.6 highlights that inappropriate alterations have led to the loss of locally distinctive features such as garden walls, fences and gates.

Representations received from the local community demonstrated that local people are committed to the preservation and enhancement of the Conservation Area. In addition, they want to ensure that development proposals will not cause harm or loss within this locality. As such, Policy 3 seeks to provide a locally specific approach to the protection, preservation and *enhancement* of this part of the neighbourhood area. The objective of criterion (b) was to restore (where achievable) features that have been lost to *enhance* the special character and distinctiveness of the area (as recognised in the Conservation Area Appraisal).

The Town Council hadn't appreciated that the wording of criterion (b) was perhaps overly enthusiastic and they didn't view it as a 'requirement' because the wording does state '(where achievable)' to provide flexibility within the provision. However, the Town Council would appreciate a view from the Examiner on how we might redress the policy based on your experience. The Town Council are open to alternative policy wording should you recommend and would gladly work with you to develop the policy to its full potential.

#### **Policy 4: Protected Housing Area**

It is unfortunate that we accidentally omitted the key for map 4 (shown as a mini-map on p27 and in main on p34). In addition, we apologise for any disparity between the colours shown on the mini map (p27) and main map (p34). Any illustrative inconsistencies between mini-maps and main maps will be corrected as part of the final grammar, spelling and formatting checks for the 'made' version of the neighbourhood plan.

It is also noted that both the narrative and policy titles for Policy 4 say Protected Housing Areas. There is in fact only one Protected Housing Area and this typing error will also be corrected in advance of the 'made' plan to provide clarity.

##### **The Keys**

Mini Map (p26)	Main Map (p34)
 Conservation Area	 Designated Neighbourhood Area
 Protected Housing Area	 Conservation Area
 Residential dwellings	 Protected Housing Area
 Older People's housing	 Residential dwellings

Please use the above keys as reference points when examining the associated maps for Policy 4 and accept our apologies for this slight inconvenience and / or prior confusion. The mini map (p26) is intended to be a quick reference point for Policy 4, where Map 4 (p34) (the main map) shows additional context. These keys will allow interpretation of both maps and help you establish what each shaded area represents. They will clarify the area proposed (and thus defined) as the Protected Housing Area. It is a small but significant area which the Town Council believe justifiably defined.

St Peter's School, Hawthorne School, Bishop Stopford School and the Fire Station are shown on the mini map because they are recognisable landmarks within the neighbourhood area helping the reader to get their bearings in such a small reference point.

In regard to your question on the meaning of 'residential accommodation', the correct interpretation would be for Use Class C3, Dwellinghouses. It is not the intention of the policy to prevent any change to the internal arrangements of a dwellinghouse, the purpose of the policy is set out below.

With regard to your question on the reference of 'residential land', the intended interpretation was that of the 'curtilage' of a property i.e. the land surrounding the property used for the benefit of those living in the dwelling.

The purpose of including 'residential land' (ne' the curtilage) in this policy was to prevent infill development through the division of a curtilage to protect the distinctive townscape character. As noted above, policy drafting in this neighbourhood plan predates the Kettering Site Specific Part 2 (SSP2) Local Plan and there were no other specific policy protections with this regard at that time.

Subsequently, the SSP2 has been adopted and does make policy provision with this regard through HOU1 (Windfall and Infill Development). However, the protection is to the 'area' of 'Headlands South of Glebe Avenue'. It is not clear whether HOU1 will afford the same protection to the proposed Protected Housing Area and as such the Town Council would like to keep this element of the policy to ensure the range of family dwellings in the locality are retained and to avoid negative impact on local residential amenity.

The overall intention of the policy is to ensure that development in the Protected Housing Area should not;

- through a change of use or redevelopment, result in the loss of existing dwellinghouses to non-residential uses and / or;
- lead to infilling through the division of curtilage.

Non-residential uses include, for the purposes of the policy, residential institutions, houses in multiple occupation, guest houses and other similar uses.

The reason this policy is considered important is as a consequence of the proposed expansion of Kettering Train Station through the Kettering Station Quarter Masterplan. Business and commercial opportunities form part of this scheme. The local community are concerned, given the proximity of the station to the Protected Housing Area, that additional opportunities will be sought for redevelopment and possible change of use to the existing dwellinghouses in the area and, if not with this regard, then, through the possibility of opportunistic infilling that will negatively impact on the distinctive townscape and local amenity.

The Town Council would appreciate a view from the Examiner on how we might redress the policy based on your experience. The Town Council are open to alternative policy wording should you recommend and would gladly work with you to develop the policy to its full potential.