

EARLS BARTON NEIGHBOURHOOD PLAN CONSULTATION STATEMENT APPENDIX 13

June 2014





Earls Barton Neighbourhood Plan: Pre-Submission (Reg 14) consultation – Table of Statutory Agency comments and responses					
Policy/ Doc Ref.	Response Ref.	Name & organisation of respondent	Comments	Response by EBNPSG	Suggested changes to the Draft NP
6.9	STAT1	Annely Robinson - Hertfordshire & South Midlands Area Team NHS England	<p>In contact with both Earls Barton GP practices. Earls Barton Surgery (small branch surgery of Abbey Medical Centre in Wellingborough) is already operating at capacity (premises landlocked and no prospect to extend), only have very limited ability to accept new patients. Potential new residents are therefore most likely to register with the larger Earls Barton Medical Centre.</p> <p>Earls Barton Medical Centre patient grown rapidly and due to becoming a training practice and are close to reaching their capacity. Proposed increase in housing would stretch them beyond their premises capacity, however space for expansion is available.</p> <p>Therefore will be seeking contributions from the developer under s106 to make these schemes favourable to the NHS England in order to financially assist Earls Barton MC to extend their existing premises.</p>	<p>Policy 6.9 provides for developments to mitigate their impact and for new facilities to be provided if the need is identified. Healthcare contributions have been identified for the main allocation site and requested as part of the s106 agreement for the application on this site. Other contributions will be monitored through s106 and also CIL when this comes into force.</p>	No Changes Required

6.1	STAT2	Edward Dade – Northampton Borough Council	<p>Do not believe that the pre-submission Neighbourhood Development Plan conflicts with the strategic objectives of Northampton Borough Council’s Development Plan, and therefore raise no objections to the Plan’s content.</p> <p>Specific comments provided to Questionnaire 6.1 On reviewing the criteria I note that “areas of land with planning permission ... will be excluded” (criterion F). I would suggest that sites with planning permission should be included within the Village Boundary to enable future development proposals to be determined in accordance with those policies of the Plan that apply to land within the Village Boundary. It is not clear from the criteria whether “E. Proposed allocation of housing and sports and leisure land” are included or excluded from the village boundary – this simply needs rewording for clarity.</p>	<p>Noted</p> <p>Considered that criterion F is valid to identify the village boundary line. This covers land outside the village boundary that if not developed should be subject to the policies of the plan when planning permission is applied for. If development does take place then a review of the boundary line will be undertaken and these areas incorporated within it. Criteria E should include the housing and sports and leisure land and be clarified.</p>	<p>Proposed Change p16 6.1 E. ‘Proposed allocation of housing and sports and leisure land <u>will be included.</u>’</p>
6.2			<p>The policy appears to contribute substantially to meeting the housing and employment needs of Earls Barton over the plan period. It is also framed in a positive manner. The policy makes reference to a “first plan review”. The Parish Council’s aspiration to</p>	<p>Noted</p>	

6.3			<p>maintain an up to date Neighbourhood Plan is admirable, however strictly speaking there is no formal process for reviewing a Neighbourhood Plan as set out by the neighbourhood planning regulations. Therefore a 'review' of the Neighbourhood Plan is in fact the preparation of a new Neighbourhood Plan to replace an existing Neighbourhood Plan. There is therefore no formal mechanism to ensure the Parish Council actually goes ahead and carries out the review/replacement plan. Policies are required to provide a clear indication of how a decision-maker should react to a development proposal. I would suggest that the aspiration to deliver "live/work units or any alternative use" (in the event that there is insufficient demand for a small business centre) should be tied to some other indicator – perhaps as part of the monitoring of review set out in chapter 8 to provide clarity about when it may be appropriate to release that land for live/work units.</p> <p>I support the policies in general terms. However I have the following comments to make: Good practice indicates that policies should be written in a positive manner. The policy permits development based on a list of specific criteria which a proposal "does not" achieve. This could be reworded to explain what a proposal <u>does</u> deliver.</p>	<p>Agreed. A review mechanism would enable the Parish Council to decide whether a full replacement plan is necessary due to the amount of change that has occurred.</p> <p>A review on the basis of the length of time the land has been marketed for a particular use after a specific time would be an indicator to provide clarity on the appropriate release of land for other uses.</p> <p>Agreed.</p>	<p>No Changes Required</p> <p>Proposed Change p17 bullet point 3. '(if after the first plan review <u>mid-point of the plan</u> there is insufficient demand <u>demonstrated by the developer through marketing evidence</u> consideration should then be given to the provision of ...)'</p> <p>Changes Required – word policies more positively</p>
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6.5			<p>Policy EB.GD2 refers to “small in scale”, but it is not clear what site area / no. of units is considered to be small scale.</p> <p>6.5 I support the principle of identifying Local Green Spaces however the NPPF places some specific criteria for designating such areas. To ensure the policy is robust, I suggest explaining how and why those green spaces are locally significant. This is reasonably self-explanatory for some of those spaces listed, such as allotments, playing fields. However the significance of other spaces is not evident – for example, those spaces described as “land at...”</p>	<p>Agreed – 10 dwellings is the definition of a major development by WBC</p> <p>An assessment was undertaken on all green space which is available to download from the website. It is not felt necessary to put the explanation of why the land is significant within the plan however a reference to the evidence might provide clarity.</p>	<p>Proposed Change P19 EB.GD2 2nd bullet – ‘be small in scale (<u>not more than 10 dwellings</u>)</p> <p>Proposed Change p22 Evidence. After ‘Methodology for Designating ... - August 2010’ ‘<u>Earls Barton Neighbourhood Plan Local Green Space Assessment 2013</u>’</p> <p>P16 After ‘Consultation Feedback:’ <u>‘* Evidence referred to after each policy can be downloaded from the Earls Barton Neighbourhood website evidence base – www.earlsbartonneighbourhoodplan.org.uk’</u></p>
6.6			<p>6.6 I acknowledge the purpose of the policy, however I suggested it should be re-worked to be phrased in a positive manner where possible</p>	<p>See response above to 6.3</p>	
6.8			<p>6.8 Ensure policies are phrased positively.</p>	<p>See response in 6.3</p>	
6.9			<p>6.9 It is interesting to see a policy of this sort in a Neighbourhood Plan and helps to show how the plan will be implemented.</p>	<p>Noted</p>	

			<p>assets (listed buildings, Scheduled Ancient Monuments etc) and non-designated assets (buildings of local interest. Note objective to protect and conserve the best heritage assets – this should be strengthened as follows, <i>Protect, conserve and enhance the natural, built and historic environment, including key landscapes, natural resources, areas of natural habitat or nature conservation value and both designated and non-designated heritage assets.</i></p> <p>Policy EB.D1 second and third paragraphs should be strengthened as follows; <i>Protect, conserve and enhance the natural, built and historic environment, including key landscapes, natural resources, areas of natural habitat or nature conservation value and both designated and non-designated heritage assets.</i></p>	<p>Incorporate suggested change to objective within revised plan</p> <p>Incorporate suggested change to policy within revised plan</p>	<p>the best heritage assets and environmental features within the Parish <u>natural, built and historic environment, including key landscapes, natural resources, areas of natural habitat or nature conservation value and both designated and non-designated heritage assets</u> and promote high quality design in all new developments.</p> <p>Proposed Change. P21 1st bullet point <u>'demonstrably respect protect, conserve and enhance the local character of the surrounding area reinforcing local distinctiveness, drawing on the characterisation of the village and its environment set out in the Earls Barton Conservation Area Appraisal and the Northamptonshire Current Landscape Character Landscape Assessment wherever relevant; natural, built and historic environment, including key landscapes, natural resources, areas of natural habitat or nature</u></p>
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			<p><i>Demonstrably protect, conserve and enhance the setting and views of All Saints Church and its Saxon tower as well as other designated and non-designated heritage assets.</i></p> <p>EH welcomes inclusion of SAM referred to above in Fig. 3 and 4 but requests that Conservation Area Boundaries are also shown on these plans</p> <p>Policies EB.GD1 and EB.D1 make reference to the character of the village (EB.GD1) and local character (EB.D1). Approach welcomed but feel a consistent terminology should be used by referring to local character. This approach will be usefully reinforced by expanding upon the local character of Earls Barton in the supporting text for the Justification for the Environmental & Design Policy at 6.4. This section already refers to the 2003 Conservation Area Character Appraisal which is adopted Supplementary Planning Guidance; this reference is</p>	<p>Incorporate suggested change to policy within revised plan</p> <p>Add Conservation Area Boundary to Fig. 3. No element of the boundary will be present on Fig4.</p> <p>Amend Policy EB.GD1 to refer to local character.</p>	<p><u>conservation value and both designated and non-designated heritage assets.</u></p> <p>Proposed change p21 2nd bullet point ‘<u>demonstrably respect protect, conserve and enhance</u> the setting and views of All Saints Church and its Saxon tower as well as other key features within the Conservation Area <u>designated and non-designated heritage assets;</u></p> <p>Proposed Change. P14 Fig3. Add Conservation Area boundary to this plan. Increase size of the plan to cover 2 pages so that more legible. Reduce size of inset.</p> <p>Proposed Change. P19 EB.GD1 1st Bullet point. ‘it is of a scale, massing, density and design in keeping with the <u>local</u> character of ...’</p> <p>Proposed Change. P19 EB.GD2 6th Bullet point. ‘does not adversely affect the <u>local</u> character of the surrounding ...’</p>
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			<p>welcomed. It should also refer to the Local List of Heritage Assets Supplementary Planning Document adopted in October 2013 by the Borough Council of Wellingborough. Discussion on the Character of Earls Barton should refer to designated and non-designated heritage assets including areas such as New Barton which have a particular character resulting from the boot and shoe industry.</p>	<p>Expand justification section in 6.4 to refer to Local List of Heritage Assets SPD adopted October 2013 and also refer to designated and non-designated heritage assets such as New Barton and historical character links to the boot and shoe industry.</p>	<p>Proposed Change P18 Justification: '...have an adverse impact on the size, form, <u>local</u> character and setting...'</p> <p>Proposed Change P20. Justification: 'A Conservation Area Character Appraisal was adopted by the Borough Council of Wellingborough in 2003 <u>and a Local List of Heritage Assets was adopted in 2013 both as</u> Supplementary Planning Guidance. <u>As well as a rich array of designated heritage assets, located more within the centre of the village, there are also non-designated heritage assets including areas such as New Barton which reflects the character and history of the boot and shoe industry.'</u></p>
	STAT7	Roslyn Deeming – Natural England	<p>Introduction: 1.5 Sustainability Appraisal – submitted initial response dated 23 April 2014. Advised that NP should be subject to SEA. However, after seeking further advice from our planning specialist now advise that SEA in our view is not required.</p>	Noted	

			<p>Natural England is satisfied that the requirements of the SA Directive Section 10 have been met.</p> <p>Habitat Regulations: Suggest that the introduction include a brief section on the Habitat Regulations Assessment Screening Report carried out as part of NP process. Helpful if the plan could specify the inclusions in the plan which have been made as a result of the HRA screening report so clear that appropriate mitigation measures have been included in the plan.</p> <p>Section 1.4 5th bullet point should include the protection, enhancement and creation of important biodiversity assets as well as open space. Plan should also identify existing local green spaces as well as those which are to be created as part of the plan.</p> <p>2. About Earls Barton Section should mention some of the important biodiversity assets particularly the Nene Valley Gravel Pits SPA which is of international importance. Helpful to include a summary on the importance of the existing open space and green space within the village.</p>	<p>Noted</p> <p>Agreed.</p> <p>Agreed</p> <p>Plan does identify existing local green spaces Policy EB.OS1 just designates them as such</p> <p>Agreed</p> <p>Assessment of open space provided within the evidence base. Not considered necessary to provide this within the plan.</p>	<p>Proposed Change. P8 1.5 Sustainability Appraisal. Add section below - Add.1</p> <p>Proposed Change. P8 1.4 'The protection, <u>enhancement and creation of important biodiversity assets as well as</u> open spaces (nature reserves, allotments, sports pitches, play areas, parks and recreation areas)</p> <p>Proposed Change. P11 after Services and Facilities. <u>'Environment and Upper Nene Valley Gravel Pits Special Protection Area.</u></p> <p><u>The centre of the village is located just over a mile from an internationally designated site for wintering birds. The Special Protection Area runs from Peterborough to</u></p>
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			<p>Objectives Generally support the plan's objectives – welcome the Design Objective which aims to protect and enhance the natural environment – consider this follows the recommendations set out in the HRA Screening Report.</p> <p>6.4 Environmental and Design Policy – welcome this policy particularly the provision to respect and enhance the local landscape character.</p> <p>6.5 Open Spaces Policy – Generally welcome this policy as provides recreational and green spaces. These will divert some of the pressure for recreation away from the SPA which follows recommendation set out in HRA screening report. Helpful to give an indication of Local Green Space primary use.</p>	<p>Noted and Agreed.</p> <p>Noted</p> <p>Agreed. For LGS where primary use is not provided add this in</p>	<p><u>Northampton and is home to a variety of endangered species. Previous surface mine workings have formed lakes which now provide habitats for a range of species and improved biodiversity. This sensitive environment needs to be carefully managed especially in the light of considerable development pressure along the valley.'</u></p> <p>Proposed Change. P22 EB.OS1</p> <p>'O7 <u>Public realm</u> land at the end of Compton Way O8 <u>Public realm at the Knoll</u>, Land between Corden Crescent and Dowthorpe Hill</p>
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			<p>Suggest a further sentence required for this policy 'should monitoring identify detrimental impacts on the Nene Valley Gravel Pits SPA as a result of recreational disturbance associated with new development, additional green space provision will be provided as required'</p> <p>6.9 Developer Contributions Policy Generally welcome this particularly related to provision for environmental improvements minimising impacts to the SPA</p> <p>Monitoring – suggest monitoring indicators include that for recreational use of land within and immediately adjacent to SPA as recommended in the HRA screening Report.</p> <p>(Further email sent by Natural England on 09.06.14 to agree wording on monitoring mechanisms)</p>	<p>Not agreed. This policy provision would be unworkable and undeliverable as it would require the purchase of green space land by the Parish Council. Suggest alternative.</p> <p>Noted</p> <p>Agreed – but link this to monitoring for the wider SPA through the Local Plan/CSS</p>	<p>O9 <u>Public realm</u> land on the corner of Elizabeth Way and Manor Road</p> <p>O10 <u>Open Countryside</u> land between High Street and Churchill Road</p> <p>Proposed Change. P21 6.5 Open Space Policy – justification after 2nd para add <u>'Should monitoring identify detrimental impacts on the Upper Nene Valley Gravel Pits SPA further mitigation measure may be required.'</u></p> <p>Proposed Change P28 Insert following sentence in last paragraph second sentence. <u>'for the policies developed. For example, the impact of additional recreational pressure resulting from new development within the Earls Barton Neighbourhood Area should be monitored through the wider local plan process as part of the cumulative impact of</u></p>
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					development on the Upper Nene Gravel Pits SPA. In this way'
6.1	STAT8	Paul Wood – North Northamptonshire Joint Planning Unit	Criteria E: appears to be some defining text omitted? Presumably this is implying that housing, sports and leisure land is considered to be located within the village boundary? No additional comments other than this point of clarification. Policy otherwise supported as being compliant with CSS Policy 1.	Agreed	See change proposed under STAT2 6.1
6.2			CSS does not provide a specific housing requirement for Earls Barton. This is part of the indicative rural requirement of 1,210 dwellings across the Borough between 2001 and 2021. For the JCS review it is proposed to identify a housing requirement for the larger villages, including Earls Barton, based on local survey information. Initial work undertaken alongside the Borough Council of Wellingborough and Parish Council, utilising the extrapolated findings of the Housing Needs Survey, has identified a 20 year plan requirement of 256 dwellings (64 x 5 [sic 4]) for Earls Barton. The fact that Policy EB.G1 makes provision for up to 280 dwellings, exclusive of 120 completions between 2011-14, implies that the Parish is planning positively, as required by the NPPF. With regards to the allocation area itself, this looks a logical, sustainable, area for development in the context of the village where residents would be in close proximity to green space and employment opportunities alike as well as having good	Noted	

6.3			<p>connectivity through direct access onto the A4500.</p> <p>No issues with the Policy. This is supported.</p>	Noted	
6.4			<p>Policy EB.D1 - understood that the main allocation (EB.G1) already has planning consent reflective of the preferred choice of residents. On this basis, subsequent development is likely to be of a small scale and these criteria as drafted may cause viability issues. However, these policies are laudable and reflective of the desire to ensure development which does occur is to high standards and sustainable.</p>	Noted	
6.5			<p>Table 2 - it seems that Earls Barton as a village has grown by 13% 1991-2011. However, of this, only 0.64% growth occurred 2001-11 (is this data is correct?). This fall in recent growth may be reflective of the impacts of the recession on the implementation of the CSS which seeks to direct housing growth to Wellingborough town. Although it is true that the supporting text states the village has grown significantly over the last few decades, maybe some further clarification is needed in this respect.</p> <p>In terms of Policy EB.OS1 – this itself looks logical and no further comments to add. This is supported.</p>	<p>Figures are correct and is reflective of the limited infill development which has occurred during this period and also the impacts of the recession. Could also be an error in the census figures?</p> <p>Not considered necessary</p> <p>Noted</p>	No Change Required
6.6			<p>Policy as drafted appears appropriate in the context of the supporting text and</p>	Noted	

6.7			<p>development aligned to a village. This is supported.</p> <p>Agreed that villages such as Earls Barton should contribute to the economic growth of the Borough and making provision for additional employment land is appropriate in this context.</p> <p>Policy EB.E1 – this appears a logical location which offers good accessibility and the opportunity for new residents (at the Grange) to work close to home, meeting sustainability objectives.</p> <p>Policy EB.E2 – Development of a small business centre is supported to provide employment opportunities for local residents and contribute to the overall economic growth of the Borough.</p> <p>Overall the Policy is supported.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>	
6.8			<p>The supporting text to the policy outlines an ambition to improve accessibility and connectivity through footpaths and cycleways but policy does not seek to address this specifically. Maybe the policy could/should be updated to make provision for this ambition as the hook for achieving these objectives?</p> <p>The supporting text also outlines how the (whole) village is becoming more congested but the policy itself appears to focus only on specific parts of Earls Barton and seeks to restrict development at identified areas of constraint so as to not exacerbate existing problems. In addition, the Policy objective is</p>	<p>The provision of new cycle and pedestrian access routes from the new development is dealt with in policy EB.G1 and it is not felt necessary to repeat this within EB.T1</p> <p>A solution of providing further parking in the village centre has been considered by the EBNPPG however without control of land or the potential ability to</p>	<p>No Change Required</p> <p>No Change Required – See STAT9 6.8 & Gen. for justification</p>

6.9			<p>to provide better parking and access, and, by definition, it would suggest additional parking provision should be sought in the village but the policy does not appear to do so? There appears a disconnect between Policy objectives and justifications which need to be addressed in the policy if ambitions are to be realised. For this reason the policy is not supported. CSS Policy 13 provides a more generic policy in this respect which may be of use if reviewing Section 6.8.</p> <p>Projects identified which reflect local priorities and collecting financial contributions from development to deliver these is supported, subject to compliance with CIL regulations. This Policy appears compliant with CSS Policy 6.</p>	<p>purchase or compulsory purchase appropriate land any allocation would be meaningless. EBNPPG has worked with Highways Authority to make justification for 'areas of constrained access' more robust.</p> <p>Noted</p>	
6.2	STAT9	Esme Cushing – Northamptonshire County Council	<p>Highways notes that the final bullet of the Site Specific Allocation Policy for 'The Grange' refers to a scheme of car parking within the development that will minimise on-street parking to ensure safe and free movement of all vehicles throughout the development; however it does not outline what level of parking provision should be provided by developers.</p> <p>The Neighbourhood Plan Stakeholder Group may consider implementing a policy on parking standards within new developments to give greater clarity. Alternatively, implementing a policy on the design of the development may be more appropriate to ensure that the carriageway widths are wide</p>	<p>Would need to meet the maximum standard of 1.5 space averaged across the development</p> <p>The development of the Grange is unlikely to exacerbate parking issues in existing residential areas. Therefore any detailed scheme should consider the access and</p>	<p>No Change Required</p> <p>No Change Required</p>

			<p>enough to accommodate on-street parking safely within the new development.</p> <p>Highways welcomes reference in objectives for development to increase accessibility within Earls Barton and to other areas through improved sustainable transport links; however Policy EB.G1 does not currently refer to improving access to public transport which will be important to reduce trips by private car.</p> <p>X4 service currently runs along the A4500 adjacent to the site, which offers excellent links to Northampton and Wellingborough and beyond. Provision should be made within the policy for bus stops to serve the site to encourage the use of public transport as an alternative to the private car.</p>	<p>parking requirements of future residents. It is not for the NP to be overly prescriptive on how to achieve this - either through off street parking or formalised on street parking – the developer should address this through detailed designs providing a scheme that minimises informal on-street parking.</p> <p>X4 bus stop is opposite entrance to Grange on Northampton Road. A permissive right of way for pedestrian access across the sports and leisure facility will be granted to make access to this easier.</p> <p>The X4 also runs along Northampton Road and bus stop currently exist opposite the existing entrance the to the Grange playing fields. This is within 400m of the housing development. A permissive right of way will be provided to make access to the bus stops</p>	<p>Proposed Change. P17 after 6th Bullet point. <u>'A permissive right of way for pedestrians to cross the Sports and Leisure facility to access the bus stop on Northampton Road to maximise the use of public transport and reduce the reliance on private vehicles.'</u></p> <p>No Change Required</p>
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6.8			<p>Highways supports objective of NP for Transport and Parking to increase accessibility within Earls Barton and to other areas through improved transport links. However, note that Policy EB.T1 appears only to deal with implementing 'areas of constrained access' to limit on-street parking and does not make reference to improving public transport or cycling and walking links, or indeed the consideration of a wider policy for parking within the village going forward. For example, development of off-carriageway parking sites in the village centre as appropriate, as mentioned in Policy EB.DC1.</p> <p>NCC of the opinion that policy EB.T1 could be challenged without a sound evidence base. Suggest that parking surveys be carried out to demonstrate the level of parking availability in the areas of concern to determine the exact core area. Relying on policy documents does not give the local context which is needed.</p> <p>In order to achieve the modal shift to sustainable modes referred to within the Plan, further transport policies should be considered and included within the Neighbourhood Plan to address these</p>	<p>on Northampton Road more direct</p> <p>Policy ED.G1 refers to enhanced cycle and walking links to the village centre from the main development. It is not considered necessary to repeat this in a transport policy. Wider parking policies have not been included for the reasons outlined below.</p> <p>Parking Survey undertaken changes to 'areas of constrained access' made as necessary.</p> <p>It is not considered necessary to reiterate policies within the Transport Plan or indeed policy 13 of NNCS which</p>	<p>No Change Required</p> <p>Proposed Change p25 at the end of Justification. <u>'Parking surveys were undertaken in May 2014 to justify the location of the areas where parking pressures are acute.'</u> Proposed Change p26 Insert at end of Evidence. <u>'Earls Barton Parking Survey Report – May 2014'</u></p> <p>No Change Required</p>
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6.9			<p>outstanding elements, to provide a more robust Neighbourhood Plan. These should be in line with those in the Northamptonshire Transportation Plan and its associated daughter documents.</p> <p>Highways notes that policy EB.DC1 refers to prioritising development contributions for additional car parking provision associated with the village centre – however the Neighbourhood Plan does not allocate possible locations for such car parking provision.</p> <p>To improve the Plan it should consider possible locations for such car parking provision with the aim of coming to a preferred location within the plan, as this would enable the costs of such improvements to be worked up further which would be helpful with securing funding.</p>	<p>require developments to contribute to a level of modal shift. Travel Plans will provide the detail of these proposals.</p> <p>No site for additional parking has been allocated within the plan due to the fact that to allocate a site requires an agreement with a landowner otherwise it is unlikely to be deliverable.</p> <p>Opportunities have been explored however further possibilities may occur over the plan period. It is not considered appropriate to allocate a site at this point but to work on options and build this into the review of the plan in due course</p>	No Change Required
Gen.			<p>Additional comments - The Vision and Objectives section of the Plan refers to walking in the third objective, a reference should also be made to cycling (page 12).</p> <p>Informally Highways understand that many people Park and Ride in the village centre to</p>	<p>Agreed.</p> <p>The NP has considered the allocation of sites for further long term parking</p>	<p>Proposed Change. P12 3rd Bullet point. 'Maintaining a compact village which <u>where it is walkable easy to walk and cycle</u> and where sustainable development..'</p> <p>No Change Required</p>

			<p>use the bus services which serve Earls Barton.</p> <p>Gaining further intelligence regarding the level of this use, and determining whether further allocation of land for long-term parking uses is appropriate, is something that the Neighbourhood Plan does not appear to have considered. Understanding and tackling these issues would be a good opportunity to make public transport routes more attractive and reduce parking issues in the village centre, which may bring benefits to the 'areas of constrained access' recognised in the Plan.</p> <p>Suggest that it would also be useful to identify any walking or cycling improvements that have been identified through the Neighbourhood Plan process and an indication of the desire to provide links from new development sites to the village centre on the Strategy and Key Proposals Maps (Figure 3/4, page 14-15).</p> <p>Typo/editorial issues P5 6: should read 'including a site specific allocation'</p> <p>P6 1.1 Location & History. 'The latter provides <u>quick</u> access to'</p> <p>P10 Second paragraph: Would question whether mean that production has</p>	<p>or additional central parking capacity however collecting this further evidence and intelligence was not deemed to be worthwhile at this stage as the allocation of a central site would require land owner agreement or the ability to CPO and EBPC was not in a position to deliver either. Therefore the policy would not be deliverable.</p> <p>Agreed. Walking and cycling routes from Elizabeth Way and the Pygthle would be helpful to put on the main plan (Fig3)</p> <p>Agreed</p> <p>Not agreed. The sentence indicates that the A45 provides quicker access to major national routes</p> <p>Barkers is Indian owned and some of the production has</p>	<p>Proposed Change. P14 Fig3 Add Walking and Cycling routes from new Grange Allocation to the village centre.</p> <p>Proposed Change. P5 6. '...including <u>a</u> site a specific allocation policy for the ...'</p> <p>No Changes Required</p> <p>No Changes Required</p>
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			<p>transferred out of the Country actually means County?</p> <p>P11 Car Ownership and Public Transport. First paragraph: 'The X4 Stagecoach service runs from Milton Keynes to Peterborough and is an hourly <u>service.</u>' The nearest train stations are at Wellingborough (<u>Midland Main Line</u>) which is 5 miles away and Northampton (<u>West Coast Main Line</u>) 10 miles away.</p> <p>P13 Objectives – Access: 'through improved transport links, and <u>provide</u> better parking and access to the centre of Earls Barton'</p>	<p>transferred to the sub-continent therefore Country is correct.</p> <p>Agreed</p> <p>Agreed</p> <p>Agreed – Grammatically incorrect</p>	<p>Proposed Changes. P11 1st Para. 'The X4 Stagecoach service runs from Milton Keynes to Peterborough and is an hourly services service.' 'The nearest train stations are at Wellingborough (<u>Midland Mainline Main Line</u>) which is 5 miles away and Northampton (West Coast Mainline <u>Main Line</u>) 10 miles away'</p> <p>Proposed Change p13 Access Obj. "through improved transport links, and <u>provide</u> providing better parking ..'</p>
	STAT10	Daniel Oladejo – Environment Agency	<p>Recommend comments are considered together with those of letter dated 16th January 2014 (ref. AN/2014/118644/01). Water Quality – Any future development within the neighbourhood Planning boundary should be undertaken in a way which does not cause deterioration to the Swanspool Brook, Sywell Brook or River Nene. Note draft promotes SUDs which can help to reduce diffuse pollution. AW Services should be consulted to establish if existing system has sufficient physical capacity.</p>	<p>Noted. AW has responded separately and discussion taken place with developer for the Grange on water supply no capacity issues raised.</p>	<p>No Changes Required</p>

			<p>Water Resources – NP should take into account the availability of potable water supply. AW Services should supply advice as to whether new sources of water will be required for the future. Every opportunity should be taken to build water efficiency into new developments.</p> <p>Welcome plans' reference to new developments achieving level 4 of Code for Sustainable Homes.</p>	<p>AW have not indicated that new water sources would be required. AW recommend highlighting need for water efficiency design to be incorporated into all new development</p> <p>Noted</p>	
	STAT11	Heather Webb – Nene Valley Nature Improvement Area	<p>Interest is founded on achieving a net gain in biodiversity, ecological connectivity and green infrastructure within the NIA. Earls Barton has almost no neighbourhood-scale accessible green space as defined by Natural England's Accessible Natural Green space Standards. Earls Barton itself has no accessible natural greenspace sites over 2ha in size. While no sites qualify as accessible natural greenspace pleased to see proposals under EB.OS1 to designate a range of Local Green Space.</p> <p>Concerned however about the lack of accessible greenspace within and surrounding the village an implications for SPA. Appreciate that it is not feasible for most villages to create new 2ha natural green spaces – therefore suggest that Parish Council considers investigating the desires and needs of local dog owners. Different 'dog walking loops' could be established around or through the village. Providing high quality infrastructure within the village could reduce the need for residents to drive</p>	<p>An assessment of the likely 'dog walking loops' was made as part of the HRA screening report. As the allocation of the major housing growth is to the north of the village it is less likely that residents will extend</p>	No Changes Required – see STAT7

			to SPA or Sywell Country Park and reduce visitor pressure on sensitive SPA.	their walks regularly to include the SPA. It was accepted by NE that this was a probable consequence of this location for development and that other mitigation and monitoring would be put in place to protect the SPA.	
6.2 Grange	Gen. STAT12	Sue Bull – Anglian Water	<p>Pleased to see inclusion in Vision and Objs section – minimising the effects of development on the environment, such as climate change mitigation – recommend highlighting the need for water efficiency design to be incorporated into all new development.</p> <p>Approached by developer’s agent for the Grange – foul drainage solution identified that requires upgrades to the network. Upgrades to the water supply network for the development have also been discussed. SUDs system should be used for surface water disposal – note and support reference in plan to the use of SUDs Confirmed in consultation to WP/2013/0510 that sufficient capacity at Billing Water Recycling Centre to treat foul drainage flows and that upgrades would be needed to foul</p>	<p>Noted</p> <p>This is covered by the Sustainability Check List in NN SPD on Sustainable Design. Water efficiency does not form part of a key element of the plan therefore it is not appropriate to highlight this further</p> <p>Noted</p> <p>Noted</p>	No Changes Required

			network in order to take the flows to the WRC. Recommend a drainage condition on any planning permission.	Noted	
Gen.	STAT13	Mr Alex Munro – Borough Council of Wellingborough	<p>Key challenge has surrounded the identification of an appropriate approximate housing figure to enable it to contribute a suitable and proportionate level of housing for the Borough aligned with the sustainability of the village. We consider that the plan has achieved this.</p> <p>Introduction We would recommend that a paragraph is inserted at the very beginning that first welcomes the reader to the Earls Barton Neighbourhood Plan, sets out clearly what it means for the people of Earls Barton and very succinctly summarises who has produced it and for what purpose rather than reiterating the thrust of the Localism Act (which is explained in both the preface and a little later in the first section).</p> <p>Figures 1 and 2 should be larger in scale to the extent that details such as place names and road numbers are legible.</p> <p>The content of Section 1.3 would benefit from a clearer structure. Recommend that a description of the relevant 'Basic Conditions' is included as a bullet list within this section, as well as an explanation of what they mean.</p> <p>Recommend that a clear bullet list of the relevant (likely) adopted policies that the</p>	<p>Noted</p> <p>Agreed</p> <p>Agreed</p> <p>Agreed</p> <p>Agreed – add bullet point list of adopted policies</p>	<p>Proposed Change. P6 Delete Introduction. Add section below - Add.2</p> <p>Proposed Change p14/15 Produce revised or enlarged versions</p> <p>Proposed Change. P8 Delete 1.3 Neighbourhood Plan Alignment with Current Policy – Add section below Add.3</p> <p>Proposed Change p8 – see Add.3 below</p>

			<p>plan will be tested against at examination is included (NPPF, Adopted CSS, saved policies of the BCW Local Plan) prior to the overview of the emerging policy that the plan has had sight of.</p> <p>Recommend the removal of the brief reference to the housing targets for the Plan from this section and instead include a more detailed explanation of how the target has been derived in Section 2</p> <p>In terms of Section 1.5, the following text should be added ‘Neighbourhood Plans are not statutorily subject to sustainability appraisal <u>although they are required to demonstrably achieve sustainable development</u>’</p> <p>Recommend the removal of the first section of the paragraph that begins ‘Between August and October 2013 three major applications...’. It is clear from the path each application followed that the outcome of these proposals was very much led by the emerging plan and not vice versa.</p>	<p>the plan will be tested against.</p> <p>Agreed.</p> <p>Agreed. Further rewriting required also for STAT7 in relation to HRA Screening.</p> <p>Agreed – delete to ...option2</p>	<p>Proposed Change p8 1.5 Sustainability Appraisal -add <u>‘although they are required to demonstrably achieve sustainable development’</u></p> <p>Proposed Change. P9 Para 6 ‘Between August and October 2013 three major applications were submitted to the Borough Council of Wellingborough for housing developments within the village. One was aligned to the emerging Neighbourhood Plan option 2.’ ‘, a Preferred Option consultation was carried out in October <u>2013</u>’</p>
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		<p>Section 2 Recommend that this section is used to set out 'A Housing Target for Earls Barton'. We consider it is important to give this calculation a greater level of prominence in the Plan particularly considering the lack of an up-to-date adopted housing target as part of any higher level development plan policy. Summarise key findings of evidence and cross reference appendix 3.</p> <p>Would welcome the provision of a succinct and original background paper in support of the plan demonstrating how the methodology set out in the NNJPU paper 'Identifying a Rural Housing Target for the Joint Core Strategy' has been applied to reach this figure and captures the joint work undertaken to date. We would be prepared to work further with the parish to ensure that this is drafted in such a way so as to continue to support both the policy provisions of the adopted Core Strategy</p> <p>Keen to see greater prominence given within the plan to both the vision and the related objectives. We would recommend you refer to pages 19-21 of the CSS for an example of formatting.</p> <p>Keen for Figure 3 to be renamed as the 'Key Diagram' and strongly urge you to enlarge it to cover two pages</p> <p>6.1 Whilst there is no national level guidance that sets out a clear methodology to be</p>	<p>Agreed..but put in Section 3</p> <p>Draft Background Paper to support the submission of the Plan</p> <p>Agreed</p> <p>Agreed</p> <p>Agreed</p>	<p>Proposed Change P12 – Add section below at Add.4</p> <p>Proposed change – Reference Background report 'Earls Barton Neighbourhood Plan – Determining a Housing Target' See Add.4</p> <p>Put Objectives in boxes to stand out</p> <p>Format Fig 3 over 2 pages.</p> <p>Proposed Change p16 6.1</p>
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			<p>applied to the review of settlement boundaries, we would be keen for the rationale applied within the plan to be further justified within the supporting text.</p>	<p><u>'Settlement boundaries are a well utilised planning tool for guiding, controlling and identifying limits to development for an individual village. They form a line that is drawn on a plan around a village, which reflects its built form, this is also known historically as a 'village envelope'. Earls Barton's village boundary has been informed by the previous boundary identified for the Borough of Wellingborough Local Plan (1999) and the criteria used for defining this boundary have been adopted and slightly amended. The main allocation site has been included within the revised village boundary line and other minor amendments have been made to reflect changes which have occurred during the intervening years.'</u></p> <p><u>'The village boundary for Earls Barton is set out on the Proposals Map (Fig.3) and it is closely related to the main built up area with defined by the following criteria for identifying and defining which land is within or</u></p>
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			<p>We would once again question the inclusion of any peripheral Local Green Space that is not identified in the existing settlement envelope (primarily the playing field to the east of Station Road)</p>	<p>This is allotment land to the south of Station Road. It is important to have consistency to the village boundary and the inclusion of Local Green Space within the Boundary where it is adjacent to the village is deemed to be positive.</p>	<p>outside the village <u>envelope boundary</u>.</p> <p>No Changes Required</p>
			<p>To maintain consistency in the application of policy we would recommend that such an eventuality would serve as a trigger for the review of the plan that would primarily seek to realign the settlement boundary and review all other policy accordingly.</p>	<p>This is what the plan envisages – perhaps not immediately but at a standard review point.</p>	<p>No Changes Required</p>
			<p>EB.G1 Recommend that this policy is illustrated by an inset map of the site to clearly set out its extent and boundaries, as well as its indicative layout</p>	<p>Agreed – Use illustrative Layout in DWH DAS</p>	<p>Insert Illustrative Layout Plan after Policy EB.G1</p>
			<p>Wording of EB.G1 to take account of Highway comments</p>	<p>Agreed</p>	<p>Take account of Highway comments – See STAT9</p>
			<p>Evidence supporting this policy should comprise any background work justifying the ability of The Grange to deliver a sustainable development of this size - should also allude to the viability work that was undertaken to support the policy.</p>	<p>Agreed – reference DWH Design and Access Statement supporting the planning application of the site</p>	<p>Proposed Change p17 add at the end of 1st paragraph. <u>The density of development at the ‘Grange’ at 34 dwellings per hectare is considered to be in keeping</u></p>

			<p>EB. GD1 First Bullet point – Unclear if it is seeking to protect against any salient in the built line then this should be managed by either the alignment of the settlement boundary or the preclusion of backland or garden land from development.</p> <p>Fourth Bullet Point - suggest that the wording is altered as follows to help circumvent this issue:</p> <p><i>“Where a Design and Access Statement is required in support of the application, it can be demonstrated that the proposal meets the criteria set out in the North Northamptonshire Sustainable Design SPD checklist”</i></p>	<p>Agreed – delete end of last sentence</p> <p>Agreed</p>	<p><u>with the adjacent housing and a Design and Access Statement submitted in support of an application for the site demonstrates how a sustainable development will be delivered. An initial viability appraisal carried out by the Parish Council indicates that the scheme can provide a significant contribution of land (6ha) for sports and leisure facilities as well as meeting other planning obligations.’</u></p> <p>Proposed Change p19 EB.GD1 ‘... and does not involve the outward extension of the built up area of the village’</p> <p>Proposed Change P19 EB.GD1 4th Bullet Point <u>‘Where a Design and Access Statement is required in support of the application, it can be demonstrated that the proposal meets the criteria set out in the North Northamptonshire Sustainable Design SPD checklist’</u></p>
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		<p>EB.GD2 The relevant comments relating to EB.GD1 apply</p> <p>EB.D1 bullet point all references to sustainable drainage solutions in the plan could reasonably be removed bearing in mind the projected date of adoption.</p> <p>Suggest removing this part of the policy as the LPA will not be able to monitor on-going waste management activities on site. Instead, if this is the crux of this criterion, it may instead need to be altered to ensure that waste receptacles are able to be stored off-street as a maximum.</p> <p>EB.LB1 - general purpose of this policy is supported, albeit on review recognised that the criteria included in the policy replicate a number set out in Policy 13 of CSS therefore</p>	<p>Agreed</p> <p>Retain references to sustainable drainage solutions as these requested in the SEA/HRA screening process and SuDs Approval Body is unlikely to be established before 2015 at the earliest.</p> <p>Requirement stated by EA in their response to SEA Screening. Proposals required to enable waste hierarchy reduce – reuse – recycle to be implemented. This is a requirement in policy 14 NNCSS therefore delete</p> <p>Agree partially. – retain criteria for LB1 as it relates specifically to the village centre.</p>	<p>Proposed Change P19 EB.GD2 5th Bullet Point <u>'Where a Design and Access Statement is required in support of the application, it can be demonstrated that the proposal meets the criteria set out in the North Northamptonshire Sustainable Design SPD checklist'</u></p> <p>No Changes Required</p> <p>Proposed Change p21 6th bullet point – delete 'provide for sustainable on-site waste management'</p> <p>Proposed Change p24 Policy EB.LB1 'that diversify and enhance the range of local shops and services (A1-A5</p>
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			<p>recommend their removal. Where possible we also feel that, subject to rewording, there is scope for this policy to tighten the protection afforded to both local community facilities (along with a recommendation that you explore the listing of certain community assets on BCW's register) as well as the retention of not just local retail but the mix of shops and services within the centre (A1-A5).</p> <p>EB.E1 - would suggest that an inset map of the site is included in support of this policy.</p> <p>EB.T1 - Recommend that the inset maps showing the areas of constraint are moved from the Appendix 4 and inserted into this section to illustrate the policy more clearly.</p> <p>EB.DC1 - suggest that the policy is reworded as follows to accurately capture the relationship between CIL and S106s and reflect the role they play in securing new infrastructure and facilities:</p> <p><i>"In Earls Barton, new development will be supported by the timely delivery of infrastructure, services and facilities necessary to provide a balanced, more self-sufficient community. Financial contributions will be sought from developers through a combination of S106 Agreements and</i></p>	<p>Change wording to policy to provide greater protection for local community facilities. Insert text within justification for EB.D1 to explore the local listing of certain community assets if appropriate.</p> <p>Agreed</p> <p>Consider moving see if the larger plan shows these more clearly</p> <p>Agreed</p>	<p>Use Classes) for the <u>and variety of local community facilities</u> will be supported</p> <p>Proposed Change p20 – Justification. Add after new sentence for STAT6 <u>The Parish Council will explore the potential to expand the list of local community heritage assets, where appropriate, in collaboration with the Borough Council.</u></p> <p>Inset Plan to be inserted – Request WBC provide plan</p> <p>Move inset plans to policy area if larger Proposals Plan does not show them sufficiently</p> <p>Proposed Change p27 EB.DC1 replace the first part of the policy with <u>'In Earls Barton, new development will be supported by the timely delivery of infrastructure, services and facilities necessary to provide a balanced, more self-sufficient community. Financial contributions will be sought from developers through a combination of</u></p>
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			<p><i>Community Infrastructure Levy contributions to a level that adequately mitigates any impact on existing infrastructure and contributes towards new local facilities where additional need will be generated. Contributions for local community facilities gained through S106 Agreements or available CIL money will be focused on assisting the delivery of the following projects as a priority;”</i></p>		<p><u>S106 Agreements and Community Infrastructure Levy contributions to a level that adequately mitigates any impact on existing infrastructure and contributes towards new local facilities where additional need will be generated. Contributions for local community facilities gained through S106 Agreements or available CIL money will be focused on assisting the delivery of the following projects as a priority:’</u></p>
	STAT7	Add.1	<p>As part of the sustainability appraisal process a Strategic Environmental Assessment and Habitats Regulation Assessment screening exercise were undertaken to determine whether, under EU law, significant impacts were likely to accrue from the Neighbourhood Plan policies. Due to the scale and nature of the development proposed in the plan it was concluded and agreed by the statutory authorities that a Strategic Environmental Assessment was not necessary. The Habitats Regulations Assessment screening report also concluded that there were no <i>Likely Significant Effect</i> arising from the plan providing the following policy measure were included within the plan;</p> <ul style="list-style-type: none"> i strengthen the objective committing to the protection, enhancement and management of nationally and internationally protected sites. ii a policy to ensure the allocation of significant sports and leisure land as well as open space and strategic landscaping and buffered land to provide sufficient recreational space for new residents iii monitor the recreational use of land within and immediately adjacent to the SPA and ensure appropriate mitigation measures are put into place if any detrimental impacts to the SPA are identified. 		

STAT13	Add.2	<p>The Neighbourhood Plan aims to create a clear vision for the Parish for the future establishing planning policies to realise this vision and build an even better place to live, work and visit for all. A Neighbourhood Plan Steering Group, sponsored by the Parish Council was set up in January 2012 and a Project Group, made up of members of the community has been developing the plan through a series of consultations with the community as a whole.</p> <p>The Neighbourhood Plan will cover a 20 year period (2011 – 2031) and should be reviewed approximately every 5 years. Whilst it has not been formally ‘made’ the draft plan has been developed and based on significant research and robust community engagement and consultation and therefore it should, from this point forward, form a reference point for development within the village and act as a material consideration for planning applications. Once the plan has been made it will form part of the statutory development plan and provide a basis for the determination of planning applications influencing where and how development takes place within the village.</p>
STAT13	Add.3	<p>Neighbourhood Plan Requirements and Alignment with Current Policy</p> <p>The Government’s intention, set out in the Localism Act which became law in 2012, was for local communities to have a greater say in how their towns and villages developed through Neighbourhood Planning. However, these plans also have to be in line with higher level planning policy they cannot exist in a vacuum or isolation. This means that they must conform to European Union regulations on Environmental protection and Habitats conservation and have regard to national planning policy. The Neighbourhood Plan will be tested at examination against the;</p> <ul style="list-style-type: none"> • National Planning Policy Framework • North Northamptonshire Core Spatial Strategy (2008) • Saved Policies of the Wellingborough Local Plan (1999) as amended in 2004. <p>In order to meet regulation requirements Neighbourhood Plans are obliged to demonstrate that certain ‘<i>Basic Conditions</i>’ have been fulfilled in order that it can progress to a referendum of the local community. These Basic Conditions ensure that the Neighbourhood Plan has been properly conceived and produced and require that the Plan;</p>

			<ul style="list-style-type: none"> • must be appropriate having regard to national policy • must contribute to the achievement of sustainable development • must be in general conformity with the strategic policies in the development plan for the local area • must be compatible with EU obligations including human rights requirements <p>Emerging policy is also a material consideration for the Neighbourhood Plan to evaluate and consider. The North Northamptonshire Core Spatial Strategy which covers the period 2001 – 2021 is currently under review and the Neighbourhood Plan has had full regard to this and the evidence base underpinning this work. The Wellingborough Local Plan is at the first stages of development, however, previous work including the Preferred Options Site Specific Proposals Development Plan Document and the Saved Policies of the Wellingborough Local Plan 1999 as amended in 2004 have been fully considered.</p> <p>While planning applications are still determined by the Borough Council of Wellingborough, once made the Neighbourhood Plan provides the local framework to guide where development should go and how it should be delivered according to the community's wishes.</p>
	STAT13	Add.4	<p>Determining a Housing Target for Earls Barton</p> <p>The NPPF states that 'Neighbourhood Planning provides a powerful set of tools for local people to ensure they get the right types of development for their community.' It also requires that any plan should be aligned with the strategic needs and priorities of the wider area and that it 'should not promote less development than set out in the Local Plan ..'</p> <p>The Earls Barton Neighbourhood Plan seeks to positively provide for the needs of its existing residents while also allowing a limited amount of expansion to provide for the wider needs and priorities of the local area. The emerging North Northamptonshire Joint Core Strategy will eventually confirm the strategic approach to housing growth in the plan area. In advance of the completion of the Core Strategy the task set for the Parish Council was to objectively identify and meet the development needs of Earls Barton through a positively prepared neighbourhood plan. This has been achieved through close joint working with both the North</p>

		<p>Northamptonshire Joint Planning Unit and the Borough Council of Wellingborough. In addition the plan has been informed by the emerging evidence base that will support the Core Strategy.</p> <p>In summary, the quantum and mix of housing proposed in Earls Barton is informed by the following evidence:</p> <ul style="list-style-type: none">- Identifying a Rural Housing Target for the Joint Core Strategy- Rural Housing Targets for Wellingborough's Principal Villages- Earls Barton Neighbourhood Plan: Determining a Housing Target- Earls Barton Rural Housing Survey October 2012 <p>The key report 'Earls Barton Neighbourhood Plan: Determining a Housing Target', sets out the methodology used in arriving at a housing target for the plan and links together the other evidence sources set out above..</p> <p>In total, it considers the emerging housing targets for Wellingborough to 2031, local needs and constraints and the ability to bring forward community benefits for the village through a comprehensively planned village extension. A total housing target of 391 (see appendix 3) including completions and existing commitments will result in a 17% increase in the size of the village which is similar, in absolute housing completions, to the previous 20 year period. While accommodating significant objectively identified housing need the plan also seeks to balance the effects of growth and maintain the rural character of the village which many residents greatly cherish.</p>
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