

For clarity, in the light of all of the representations received, I have separated out my queries below, as follows:

- 1) General Query;
- 2) Plan and Plan-making Queries;
- 3) Policy Queries.

1) General Query

Paragraph 4.0.1 states”

“This written document is also illustrated by a Policies Map (available separately) ...”

No separate Policies Map appears to have been submitted.

- ***Please can you clarify.***

Please accept our apologies – this is an obsolete reference from a concept that a tree diagram might have been of help in navigating the document. In the end the table of contents, taken together with the highlighting of polices with a blue box was considered a far simpler device, sufficient for a neighbourhood of such a modest scale. This reference therefore should have been amended to read thus:

“4.0.1 This section of the HNDP sets out the planning policies (blue boxes) to manage development in the Parish up to 2031. The policies are defined below each HNDP objective. Whilst the policies are divided between the objectives the policies of the plan should and will be read as a whole. This section of the HNDP also includes a number of non-planning - Parish Council Supporting Actions. These are actions that cannot be included in planning policy, but if implemented in other ways they are activities that will complement the HNDP’s planning policies and benefit the parish. Parish Council Actions are highlighted in a different way to separate them from the planning policies.”

2) Plan and Plan-making Query

Detailed representations have been made in respect of the Neighbourhood Plan and the plan-making and consultation process, with a particular focus on the changes made between the Draft and Submission versions of the Plan.

In this regard, I would welcome the Qualifying Body's response to the detailed objections set out in the two Submission stage representations made by [REDACTED] and by [REDACTED].

Please can you comment on the representations made and why, taking the objections set out into account, the Qualifying Body considers that the relevant Policies of the Neighbourhood Plan meet the basic conditions?

In relation to the representations made by [REDACTED] and [REDACTED] during the consultation period, the Steering Group offered an initial response, dated 19 April, together with a second response to their objection that their land be classified again as green space within the plan (as it had been in a preceding planning document) rather than identified for development.

The thrust of the response in correspondence 26 April 2021 from the steering group Chair to [REDACTED] and [REDACTED] is self-explanatory and copied below for your ease of reference:

“Dear [REDACTED]

Thank you very much for your several emails, to which I reply below.

I have taken the liberty of also copying [REDACTED] into the response for completeness, given I understand that [REDACTED] too has interest through ownership of the land to which your questions relate. I trust this is appropriate.

In answering your queries, may I first repeat my preceding response dated 19 April 2021:

“I can readily understand your disappointment that the latest draft neighbourhood plan proposed by the steering group to the village Parish Council does not recommend that your land on Church Road should be part of a future housing development in Hargrave

The consultation and review process that the steering group has followed in compiling this latest draft of the plan is straight-forward: taking advice and information arising from the regulation 14 consultation; listing it all out in the manner proscribed by the authorities; and then amending the plan in light of that feedback and information for consideration by the Parish Council.

From the feedback and information received from statutory bodies and residents, it became apparent that the land you proposed for development on the north side of Church Street, and which the steering group had allocated for development within the earlier draft of the plan (designated as site 3.1 in the draft), is on land which was previously designated as Important Open Space by East Northamptonshire Council within the Raunds Area Plan. That ENC document describes it as land “which provides an important open area within a settlement which separates distinct groups of buildings or parts of the settlement”.

Other feedback received through the Regulation 14 consultation noted that this land is the only remaining open natural green wild space which immediately adjoins the main highway along the northside of Church Street. It also constitutes one of the largest areas designated as Important Open Space in the village.

The Residents’ Survey had demonstrated that the green environment and general rurality of the village are deeply important to the vast majority of residents and must therefore be protected and preserved under the Hargrave Neighbourhood plan. This requirement was further emphasised in feedback gained through the Regulation 14 consultation.

This intent to protect appropriately designated land and preserve the character of the village was correctly reflected in Section 4.6 Objective 6 of the HNP which states “The existing rural and agricultural landscape character of Hargrave is exceptionally highly valued by residents and is recognised as a critical attribute of the Parish.”

The declared intent of the steering group within the initial draft to allocate your site 3.1 for development was therefore found to run contrary to this strong guiding principle.

Consequently, having considered all these points, the Steering Group reconsidered its previous recommendation to allocate your land for new development, and determined after due reflection, that that allocation should not be retained in the updated plan after taking account of the Regulation 14 consultation.”

Picking this up in more detail, I confirm my confidence that the Steering Group have followed the right processes and taken decisions with appropriate diligence and transparency:

- As you know, we originally took your response to the call for sites very seriously purely on its merits, exactly as you had described. Consequently, the Steering Group supported the roadside portion of your land as a potential development site and proposed that portion of land to the village as “allocated for future development” under the Reg 14 consultation held earlier this year.
- As a consequence of that consultation and its feedback, the Steering Group has been obliged to reconsider our original decision in light of the comments and new information received - including that your land had been formally classified as Important Open Space in a preceding ENC plan. This fact was considered alongside some other objections to development of the site – leading to the Steering Group decision that it was no longer able to recommend the land’s inclusion as an allocated development site within the latest draft of the Plan.

- The documents relating to the Steering Group decision and referred to below are all published on the Parish Council website under the Reg 16 section. I am sorry you could not find these documents before. [Hargrave Parish Council | Neighbourhood Plan Reg 16 \(parish-council.com\)](https://www.hargrave-parish-council.com/Neighbourhood-Plan-Reg-16) is the link (hopefully I have correctly copied and pasted it this time for your convenience.)

In the **Consultation Statement** it reads:

- *“From the comments received from this consultee and others, it has become apparent that the land on the north side of Church Street, and which was allocated for development is on land previously designated as Important Open Space by East Northamptonshire Council within the Raunds Area Plan. That ENC document describes it as land “which provides an important open area within a settlement which separates distinct groups of buildings or parts of the settlement”. It is agreed that this land is the only remaining open, natural green wild space which immediately adjoins the main highway along the northside of Church Street, and constitutes the largest area designated as Important Open Space in the village. The Residents’ Survey also demonstrated that the green environment and general rurality of the village are deeply important to the vast majority of residents and must therefore be protected and preserved under the plan. This too was emphasised in feedback gained through the Regulation 14 consultation. This intent to protect appropriately designated land and preserve the character of the village was correctly reflected in Section 4.6 Objective 6 of the HNBP which states “The existing rural and agricultural landscape character of Hargrave is exceptionally highly valued by residents and is recognised as a critical attribute of the Parish.” It has been agreed to remove the site north of Church Street as a housing allocation and reinstate it as a Local Green Space”.*
- Then, in the latest version of the **Neighbourhood Plan** document itself (also published in the same Reg 16 section of the PC website) it indicates as follows:
 - “4.4.8. A call for sites was carried out in Autumn 2020. This resulted in 3 sites being submitted. These are as follows: Site 1 Land north of Church Street Site 2 Land south of Church Street Site 3 Land north of Nags Head Lane*
 - 4.4.9. The sites were assessed by the Steering Group and this initially resulted in identifying 2 sites for allocation in the neighbourhood plan in the Regulation 14 Consultation version. However, during the consultation a number of comments were received that the Steering Group considered carefully. It came to light that one of the sites (Site 1 Land to the North of Church Street) was previously designated as Important Open Space in the village.*
 - 4.4.10. It was therefore subsequently agreed that the site to the north of Church Street should be retained as open space to protect appropriately designated land and preserve the character of the village in accordance with Objective 6 of the Hargrave NDP.”*

- You ask about the source of any objections. Every comment received back from the Reg 16 consultation process has been documented and can be found in the **Appendices to the Consultation document** (this document is also in the same Reg 16 section of the website).

In reaching decisions and making a number of revisions in relation to the feedback received, the Steering Group considered each of the comments in the direct light of the plan policies: policies which in turn had been drafted to express the majority of the village residents' intentions, with those policies having been previously tested in turn with residents' through surveys, presentations and public meetings in order for the steering group to ensure the Plan's policies had correctly captured the intention of the villagers as closely as possible. That work affirmed that there was overwhelming support for those policies (and I thank you for your own previous expression of firm support of those policies, too).

Answering another of your questions very directly: the recommended classification from the Steering Group of your parcel of land within the latest draft of the HNP as "Local Green Space" was taken unanimously as a Steering Group decision and taken in the light of the feedback, the facts and the expert advice we received. In making that assessment, it was found consistent with the prior classification of the land as an "Important Open Area" by the ENC at the earlier date. In the light of no significant change in those circumstances and the strong desire of the villagers to retain green space wherever possible within the settlement boundary, the Steering Group considered its preceding inclusion of your land as a site allocated for development had been incorrect and had not taken correct account of all the facts nor benefitted from the feedback from consultation under Reg 14 at that earlier time.

After the regulation 14 consultation had been completed, the feedback received, and with appropriate amendments to the previous draft plan made, the Parish Council has now reviewed the latest revisions within the draft plan and documentation set before it by the Steering Group at its recent meeting (at which you attended and submitted correspondence). I understand that the PC have determined that they endorse that Plan as it now stands and intend to submit this latest draft to North Northamptonshire Council (NNC) for Regulation 16 processes, testing and consultation to be conducted in turn by the NNC.

[Please note that I am simply unable to respond to questions you ask about the Parish Council meeting itself – it would be entirely inappropriate. If you have questions related to that meeting, then I suggest they should be raised with the PC Chair, [REDACTED], through the Secretary to the PC [REDACTED] with whom I read you are already connected. I note the Clerk's response and her confirmation that your correspondence (and that of [REDACTED]) had been placed before the members of the PC ahead of the meeting for their consideration.]

In turning to the remainder of the processes necessary to "make" a Neighbourhood Plan, I add two more thoughts:

- Firstly, that the plan is still a proposal, as yet unapproved by the NNC: there is therefore the opportunity for you to raise objections directly with the NNC within their Regulation 16 process.
- Secondly, that the Plan – even if/when formalised – does not preclude you making any future planning application in relation to your land. I am sure that any application will of course be considered by the Planning Authorities on its individual merit.

In this next paragraph, forgive me being very candid and direct, [REDACTED], for I am both sorry that the Steering Group had not identified that your land had previously been classified as Important Open Space by ENC before we produced the earlier draft endorsing your development proposal; and I am also a little surprised that you did not draw the Steering Group's attention to that classification within your written response to the Call for Sites. This would clearly have been helpful to the Steering Group members when considering your proposal.

Finally, I am sorry that you disagree with the outcome of the Steering Group's consideration of your submission under the Call for Sites.

However, I am fully confident that the Steering Group has appropriately marshalled the correct facts; has correctly and fully considered your development proposal for this land, together with statutory bodies' and villagers' responses; and has arrived at a clear well-balanced decision founded on the evidence before us, consistent with the policies within the plan, and the aspirations expressed through surveys and consultations with the village.

That has been the work of the Steering Group throughout this process. We have discharged our duties to the very best of our abilities, through a good deal of hard work and careful thought, in good faith, adhering strictly to Neighbourhood Plan legislation and guidelines, with the benefit of expert guidance from experienced consultants, and after listening carefully to and acting in accordance with the villagers' opinions on the future shape of their village and intended quality of life and livelihoods within the Parish.

Nonetheless, the Steering Group members would all certainly accept that none of us are infallible - and no doubt it is for that reason that the next official step of the assessment process thankfully rests with the professionals in NNC. Whilst our Parish Council have confirmed their endorsement, it is the NNC who will determine whether this is a Neighbourhood Plan that they believe is in keeping with Government, County and Local Authority guidance and legal requirements, and whether it forges a Plan which correctly articulates the aspirations of the villagers within that frame of reference.

I know you care deeply about the quality of life in our village, and I therefore respect your disagreement with the Steering Group on this point concerning development of your land for housing. However, whilst exhibiting great respect and empathy for your perspective, I must also emphasise to you that this was a unanimous decision, not driven by any individual, considered carefully and taken in the round by the Group as a whole.

Notwithstanding your considerable disappointment with the Steering Group's decision on this particular point, I trust that you may nonetheless be able to continue wholeheartedly supporting all the *other* aspects of the village plan long into the future."

[REDACTED] specific objections are catalogued in her letter 19 April 2021 (also provided separately to NNC, we understand, and forming part of her request for data under the FoI Act), as being:

1. *"Removes my land from Plot 1 when it meets the criteria set out in the Plan*
2. *Discriminates against me and favours land in the ownership of a speculative developer which does not meet the criteria set out in the Plan*
3. *Purports to include my land as green space, and*
4. *Has taken these steps without notification to, or consultation with, me"*

“Removes my land from Plot 1 when it meets the criteria set out in the Plan”

The steering group acknowledged in its earlier plan that this plot of land IS suitable in many respects for a housing development, which meets the basic criteria of some of the policies set out in the HNP – e.g. roadside not backfill.

However, as formal community consultation and further work by the Steering Group established, there were objections under the Regulation 14 consultation process raised against this land being included as an allocated site for development within the plan, and that the land was considered valuable as green space by members of the village community. Furthermore, it also became evident that the land had been designated as Important Open Space in a previous Raunds Area plan.

Having considered this fact, the steering group considered that nothing had changed since that original classification to diminish the value of this space to the village as a whole, because of the vehement objections under Reg 14 consultation to the site being developed, and the original thrust of the village survey and public consultations which had made clear that the majority of the village were not in favour of development as a whole and wanted the maximum level of green space encompassed within the plan.

In considering both the site to the north of Church Street ([REDACTED]) and to the south of Church Street ([REDACTED]) we note the southern plot was NOT previously designated as Important Open Space, whilst the northern plot was.

This was an important element of the regulation 14 feedback in respect of both sites. It is not an issue of whether the 1996 Raunds plan is legally enforceable or not – it is simply that that plan was in tune with village sentiment at the time, and that same sentiment is continuing to be strongly expressed. The Steering Group considered the will of the community as expressed through consultation and chose to reverse their position which had previously approved the [REDACTED] site, in the light of that sentiment expressed both through the Reg 14 consultation and prior broad survey to retain green space wherever possible. This was a key requirement of community support.

“Discriminates against me and favours land in the ownership of a speculative developer which does not meet the criteria set out in the Plan”

In rebutting the [REDACTED] complaint that the steering group had wrongly preferred the proposal of a developer from outside the village to the proposal of [REDACTED], the steering group notes:

1. Although originally bred in the village, and with family from previous generations who were once residents, neither [REDACTED] nor [REDACTED] are currently residents.
2. [REDACTED] is correct that a developer ([REDACTED]) has bought the southern site from a resident.

Neither of these criteria are relevant in shaping HNP policy nor in influencing the decisions and assessments of the steering group village which do not discriminate in favour or against individuals or corporations. The chief criteria for assessment are the policies written within the document (as founded on the original public survey and later cross-checked through interaction and community meetings by the Steering Group with the public, as well as through formal consultation processes) and the feedback from the consultation conducted under Regulation 14. This process is all as set out in the NPPF, “Plan making”. Table 2 within the “Hargrave Basic Conditions Statement- March 2021”, pages 9 and 10 refers accordingly to these principles. The steering group simply followed due process, consulted early and in a proportionate manner, providing ample opportunity for early and effective engagement between the steering group, parish council members, community, and all stakeholders.

The steering group carefully considered the feedback received at every stage of the policies' and plan's development including public meeting 5th September 2020 and conducted a thorough formal public consultation between 25th January 2021 to 8th March 2021. and amended the draft accordingly before submission to the Parish Council, who considered the plan as a whole and this specific matter prior to submission to the NNC.

It may also be relevant in this examination to also consider, as did the steering group, the consultation feedback H11, which noted that she considered that “to accommodate the stated aims and be viable, I believe that any development [on the northern site] will require about the same depth as that indicated for Plot 2.” i.e. the northern site was considered inadequate for successful development and needed to be bigger/deeper than that shown in the draft plan issued for consultation under Reg 14 in order to accommodate off road parking and safe access onto Church Street.

In fact, the southern side (plot 2) was also subject to feedback (H5) from the Council (ENC) which indicated that the southern side plot should be narrowed and made less deep to a similar depth as had been indicated on the northern site.

Both these comments were taken into account, with the southern site narrowed down, and the northern site noted as being considered as less appropriate for development. The northern site alone was also subject to strong objection on grounds of green space and precedent within the Raunds Plan 1996. This is coincident with the HNOP steering group's own assessment of the northern site as Local green Space (Page 22 section 6 within the Local Green Space document evidences that assessment).

“Purports to include my land as green space”

The decision to include the site as green space was made by way of the steering group's thorough assessment, refer Local Green Space document and reference to the considerations of the Regulation 14 consultation and Residents' survey – all of which emphasised the importance of retaining green space within the village settlement boundary. This site north of Church Street is identified as the largest single area of green space within the boundary and importantly in the heart of the village.

“Has taken these steps without notification to, or consultation with, me”

There was no requirement for the steering group to offer special consultation to [REDACTED] other than the processes of public consultation which applied through the village survey, public meetings, published minutes, draft polices and draft plan publications ahead of the formal public consultation run in strict accordance with regulation 14 requirements and its timescale. To proffer some other additional consultation opportunities outside that provided to all members of the public, stakeholders and landowners would potentially be discriminating in favour of [REDACTED] and against others. Due process has clearly been followed, and of course, further opportunity for public consultation now rests with NNC and its Regulation 16 processes – as has been repeatedly pointed out in response to this item.

3) Policy Queries

Policy HNDP1 – The Policy refers explicitly to the Policies Map (rather than Figure 4, which shows the Settlement Boundary referred to).

- *Should this reference be to Figure 4?*

Policy HNDP 1 – as you correctly suggest, the reference to the (obsolete) Policies Map should indeed be to the Settlement Boundary Map, Figure 4. Please accept our apologies for this error.

A representation has been received in respect of the exclusion of land to the south west of All Hallows Church/west of Rylands and Forge House from the Settlement Boundary.

- ***Please could you comment in respect of this specific objection?***

The village settlement boundary is drawn tightly behind the properties of Rylands, Forge House and Acacia House.

This reflects the village settlement boundary as drawn in the draft Hargrave Settlement Boundary 2007 (figure 3 page 23 HNP refers). In a few locations where housing has been constructed since 2007, that settlement boundary was extended to provide that boundary now proposed at figure 4. As explained in 4.2.1 HNP, in this Plan as well as in the 2007 document, the village settlement boundary has been wrapped tightly around the centre of the village. Moreover, because the Policy HN2P 2 does not support further back land development behind the lines of existing properties, any new development within the village for the period of this Plan to 2031 is to be constrained to roadside development alone - in accordance with the strong feedback of the residents' survey and as supported in public consultation throughout.

Please refer Objective 2 on page 14 of the HNP established from the residents' survey; Policy HN2P 2 on page 25 of the HNP; and the glossary of terms for roadside.

Policy HNDP2 – The Policy refers to “*small-scale roadside infill*” and provides a reference to the Glossary. However, the Glossary only defines roadside infill.

National policy and guidance requires a planning policy to be clear, unambiguous and drafted with sufficient clarity that a decision maker can apply it consistently and with confidence.

- ***Please can you point me to information and/or evidence that provides a clear indication of what is meant by the Policy reference to “small-scale”?***

In defining “Small scale”:

- Page 21 of the document paragraph 4.1.11 it is clear from the residents’ survey that any growth in the village is preferably constrained to between 5-10 homes.
- The emerging Local Plan Part 2 provides an indicative housing figure for Hargrave’s growth of 6-10 houses between 2011 and 2031. Para 4.1.16 refers.
- Although an expansion of 15 have already been built since 2011, a maximum number of a further 6 homes are recommended within this plan for the remaining period to 2031.

Therefore, no single site within the Parish should exceed this number in complying with the HNP.

Policy HNPD3 – Taken together, the first three Policies of the Neighbourhood Plan appear confusing.

Policy HNPD3 allocates residential development land clearly capable of providing for at least 6 dwellings. In addition, Policy HNPD2 designates a Settlement Boundary, within which new development will be supported. However, Policy HNPD1 seeks to limit development in the Neighbourhood Area to no more than 6 dwellings.

As such, there appears to be conflict between the Policies of the Neighbourhood Plan.

- ***Is the intention of Policy HNPD3 to allocate land for 6 dwellings, for more than 6 dwellings, or for less than 6 dwellings, or for any number of dwellings subject to interpretation of the Policy requirements?***

No specific definition of the maximum number of homes within one site has been made within the plan, on the assumption that any planning application will be assessed on the merits of any individual site by the Planning Authority, and the number constrained to that considered appropriate by the expertise of the Planning Officers – up to the maximum quantity of 6 homes being built between now and 2031.

The Steering Group have not sought to constrain any future planning application being submitted to the Local Authority – that is clearly beyond the steering group’s remit. However, any application should adhere to the constraints of HNP Policies - which we consider to include:

- Located within the village settlement boundary.
- Located as roadside infill.
- Containing less than the maximum number of homes that remain to be approved for construction built within the headroom of 6.

That headroom is as drafted at the time of the consultation under Regulation 14.

We agree wholeheartedly with your guidance that we must avoid ambiguity and trust that the explanation above is clear. If appropriate, and of course, subject to your agreement, we will be pleased to strengthen the wording in this document to clarify this intent.

Whilst we note that the allocated site within the plan to the southside of Church Street is capable (alone) of fulfilling this headroom, we have not presumed that any planning application on that site would automatically be granted.

Were an application to be made and granted for that particular site with 6 homes, then the headroom would successfully be filled.

We don’t assume that either this number of 6 will be adopted as a target on any one site, nor that we should be seeking to fetter proposals from landowners with land that complies with the policies but could not contain 6 homes.

Policy HNNDP3 itself appears ambiguous in this regard, contrary to the basic conditions – it refers to “*a limited number of modest scale roadside properties in accordance with the indications of the HNNDP.*” The phrase “*in accordance with indications*” appears open to wide interpretation.

- ***Please can you point me to specific information in respect of how the phrase “key expectations” is meant to be interpreted by a decision maker? Is a “key expectation” intended as a Policy requirement, something that should happen, or something that is a “nice to have” but is not necessary?***

Please consider this re-drafting of HNNDP3 which defines key requirements and expectations.

“HNNDP3

The following details the key requirements and expectations for any development.

Key Requirements:

Disposition: Any development of housing must be within village settlement boundary, roadside, not backfill, with no plans for (and avoiding opportunity to create) later backfill development of the adjacent land or included land within the plot. All development must therefore remain within the village settlement boundary.

Scale: Modest 1–4-bedroom properties. Development should not increase the numbers of dwellings in the village above the 6 additional properties envisaged within the period from December 2019 to 2031.

Infrastructure: does not impose additional burden that overloads capacity of the foul sewers, storm sewers, water, or electricity systems. This includes sustainable design (BREEAM UK Excellent minimum) which places least pressure on existing village infrastructure and drainage.

Any development must be self-sufficient in relation to storm water run-off and include the use of porous materials such as block paving for driveways and provide rainwater harvesting and reuse for the new properties.

Any developer of additional property within the village must be responsible for working with the relevant utility or highway authority to demonstrate independent verification of whether or not the existing infrastructure has capacity capable of meeting their future need before proceeding, and if necessary, arranging provision of adequate infrastructure for the new property to connect into ahead of the development proceeding. Therefore, at the time of submission for planning, the developer (in conjunction with the utilities) must demonstrate that sufficient capacity will be available to reliably service the village and also accommodate the additional planned loading

from the new development. This should include a report from an independent, nationally-recognised engineering consultancy with demonstrable relevant experience, including (but not limited to) an overall engineering calculations made in accordance with the prevailing professional design standards, of the incremental loading, current foul sewer system capacity, storm drain system capacity and current sewerage and storm drain loading; thereby demonstrating either that more than adequate capacity is available to accommodate the new development without detriment or increased risk of flooding, or in the alternative the additional infrastructure needed to support the additional properties.

Traffic: provides off road parking, with safe access and egress onto the street, and avoids imposing unrealistic traffic flow along narrow roads. Provision of ample off-road parking for the homes and their visitors in order to avoid congestion of the village roads in accordance with Northamptonshire's adopted Parking standards. Provision of a singular safe roadside access with good visibility onto the street is essential. Vehicle visibility splays will need to be displayed at 43 m (minimum) from the proposed access in each direction for a road with a 30mph speed limit.

Does not diminish the amenity of adjacent properties or green spaces within the village

Expectations:

The overall architectural style and layout of any development on Church Street must be very carefully considered as there has not been any residential development here since the mid-19th century. Top Farm, the Old Post Office Cottages and Box Tree Cottage all have significant architectural and historic merit within Hargrave village.

The nature of any development must complement and enhance this historic part of Church Street which contains some of the village's remaining pre-20th century architecture and rural appearance.

The Design Code provides additional architectural guidance on which the developer should draw.

Because the carriageway of Church Street is not wide enough for two lanes, the Planning Officer, in conjunction with Highways should consider how this section of road will be made safe for pedestrians, horse riders, cyclists and drivers alike should additional development occur. The Design Guide provides low-cost recommendations for constraining speeding of vehicles through the village and providing safer use for all road users. This would ensure the continued rural nature of this street in accordance with the Hargrave Design Code.

An archaeological investigation in connection with any new development should be produced and submitted, in line with the North Northants Core Strategy policy 2(d).

Any new development should be served by high quality full fibre networks.

As set out, the key expectations in the Policy appear to include a number of vague things to consider, as well as absolute requirements to do what appear as ambiguous things – for example, there is a requirement to demonstrate “*capacity to service the village*” and to demonstrate “*more than adequate capacity*” (which services; why the whole village and not just the development site; what is the existing capacity, etc.)

- ***Please can you point me to information in respect of what is adequate, why a development provide for something more than adequate, how much more and who would determine this/on what basis?***

Please refer to the answer above.

- ***Noting that national policy and advice requires policies to be deliverable,***

please can you point me to specific information and/or evidence that

demonstrates that the key expectations are deliverable?

The requirements are considered deliverable because they rely upon sound architectural and engineering practice applied with sound common sense – nothing requested requires innovative or unavailable technology. Its absence in preceding developments within our village has come from a lack of consideration on the part of developers, and lack of requirement from planning officials (despite objections that request appropriate design to be applied) for developers to be sufficiently considerate of the neighbourhood and community they are enlarging.

The requirements rest within the capability of the competent developers and their advisors to provide. Furthermore, to guide and ease the work of those architects, engineers, and developers we have developed a detail design code in conjunction with AECOM (an internationally renowned firm of engineers and architects), in order to provide specific guidance on appropriate architecture and civil engineering measures for application in conjunction with future developments in Hargrave parish that fall within the timeframe and remit of this plan.

That design code has formed part of the documentation available through the period of consultation and is available through the following link embedded within the Hargrave Parish website (neighbourhood plan archive). HNBP 3 and HNBP 4 both directly refer to application of this Design Code, as do other sections of the document such as paragraphs 4.4.20 and 4.7.7.

[210201_hargrave-final-report-design-codes.pdf](#)

Policy HNDP4 – National and local policy does not require all new development (even in say, Conservation Areas) to enhance character and amenity.

- ***Please can you point me to evidence/information in support of this part of Policy HNDP4?***

HNDP4 states *“Overall new development should enhance the character and amenity of the village, without encroaching on the surrounding countryside and green spaces within the village”*

The steering group and parish council considered this phrase carefully, whilst acknowledging national and local policy does not require every new development to *enhance* character and amenity.

- In the opinion of the parish council and supported by the residents’ feedback, the village is considered to have serially suffered from administration of poor planning decisions and controls which have both permitted planning approvals which have diminished the amenity of the village, and also permitted uncontested changes beyond those initial planning approvals which had demonstrable material (rather than immaterial) bearing on the village and its infrastructure. (e.g. ill-considered changes in hardstanding and drainage designs which have subsequently caused unnecessary flooding of village roads with significant detriment to residents, pedestrians, equestrians, cyclists and drivers).
- National policy and local planning policy are not deigned to cause material damage to our environment and communities. Overall, over time, its intent is to improve the amenity and character of our surroundings.
- The plan seeks to achieve that overall, the effect of new developments in our village should be beneficial towards the quality of life in our village: not damage that quality.
- Taken in the round, planning choices should improve not worsen the pleasure of living and working here.
- Neither is the purpose of planning consent to enable developer profit at the expense of existing residents’ enjoyment of village surroundings and life.
- To this end, the purpose of planning policy is stated in the introductory paragraphs of the NPPF 2021 as being:

“The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs.

At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection.

Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

a) an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.

b) a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

c) an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

Through the neighbourhood plan we seek to ensure these three objectives are all met – should there be economic benefit, there should be also social and environmental benefit.

As a further point to this end, we note that HM Government through the Climate Change Act 2008 required the UK to reduce by 80% its carbon emissions. Then in 2019, secondary legislation was introduced that extended that target to “at least 100%”. This Act therefore requires betterment (or certainly far better than usual) performance and thoughtfulness in design and delivery of new housing and infrastructure in that they must meet these performance restrictions.

It is therefore incumbent upon the village's neighbourhood plan to reflect these requirements as being prerequisites of gaining planning approval for additions to the village.

The wording of HNDP4 currently reads:

“...using sustainable design and technologies. New housing should be environmentally sustainable, providing accommodation that minimises water and energy use and uses renewable energy wherever possible. Sustainable drainage should be used, and new properties should be equipped with charging points and battery storage for electric vehicles.”

We agree however that this (enthusiastic) paragraph should be ameliorated slightly to read:

“...using sustainable design and technologies. New housing should be environmentally sustainable, providing accommodation that minimises water and energy use and uses renewable energy wherever possible. Sustainable drainage should be used, and new properties should be equipped with charging points for EV's. Provision of battery storage from solar generation to aid off-peak charging for electric vehicles should be considered and would be desirable.”

It may also be worth noting at this point that our village is proud to be the home of the first carbon neutral farm in the UK, recognised by Queens Awards and the other bodies of repute.

Whilst I note the Policy requirement for charging points, Electric Vehicle (EV)

batteries are normally located in EVs.

- ***What does the requirement for “battery storage for electric vehicles comprise” and please can you point me to information in respect of the need for/deliverability of this requirement?***

In relation to your specific query, regarding battery storage, the plan anticipates that as part of any developers’ commitment to the provision of low carbon housing that meets the needs of the Climate Change Act, the need for electric vehicle charging will become essential. All new cars from 2030 will be electric, due to government policy. Charging of electric vehicles (EV’s) will inevitably place strain on electricity distribution networks. Mitigation of that strain is likely to include forms of local generation (such as solar panels) as well as shifting of peak demand, including encouragement of night-time charging and the use of local/household battery facilities to store the charge from solar panels and discharge it at night. These technologies are available today, but not routinely deployed. The expectation of the HNP is that developers will consider these and adopt appropriate measures to provide low carbon homes. We would also expect that given the overriding intent of NPPF (refer above) local planning officers should be checking that developers are designing homes that meet legislative requirement and not ignoring this. Either way through our village survey, it was clear that the community expects no detriment from development in terms of the existing village; development that complies with climate change legislation; sustainable solutions that do not damage or diminish the provision of infrastructure services to the existing properties.

Policy HN5 – As drafted, the Policy appears to support development that has adverse impacts on landscape setting so long as some mitigation is sought.

- ***Is this the intention of the Policy?***

Thank you for pointing out the wording of this policy. It is certainly not our intent to support adverse impacts on our village and its landscape. Currently, HN5 reads:

“Development proposals should take into account and respond to their landscape setting. Where adverse impacts are identified, proposals should seek to mitigate any impact.”

Please may we suggest revising this to read:

“Development proposals should take into account and respond to their landscape setting. Where the possibility of adverse impacts are identified, proposals should fully mitigate any negative impact before Planning Consent is granted, in accordance with the intent stated within the NPPF paragraph 8 to *“protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”*”

Policy HNNDP6 – Representations have been received, objecting to the designation of sites 5.1 and 5.3 as Local Green Space.

- ***Please could you comment in respect of the objections to the designation of these two sites as Local Green Space?***

The Triangle – 5.1

The objection to designating this small parcel of land as LGS fails to acknowledge that:

- This is the only remaining portion of green space in this section of the village which has suffered from recent developments removing other spaces.
- It is tightly adjacent to the village hall, which is regular gathering point for our community, and therefore visually and contextually important in reflecting the historic and green character of our village in which homes are set within surrounding green areas.
- The triangle has lovely trees bordering it, with Tree Protection Order, and has provided cover for rabbits, foxes and birds over the years.
- The location softens the linear development between the two main meeting places for the village namely the church & the village hall.
- Given its small nature, and positioned as it is, any built development of this land would be cramped and create a dense urban feel to the centre of the village.

Any development of this tight site would clearly remove these benefits and enjoyments of the community - which is why the LGS sought to protect it within the village plan.

The Residents' Survey comprehensively demonstrated that the green environment and general rurality of the village are deeply important to the vast majority of residents and must therefore be protected and preserved under the plan.

This too was emphasised in feedback gained through the Regulation 14 consultation. This intent to protect appropriately designated land and preserve the character of the village was correctly reflected in Section 4.6 Objective 6 of the HNNDP which states "The existing rural and agricultural landscape character of Hargrave is exceptionally highly valued by residents and is recognised as a critical attribute of the Parish."

The 2006 Raunds Plan (please refer Figure 3 Page 23 in the HNP) indicated that this land was classified as Important Open Space within the heart of the community, and also drew the settlement boundary to specifically exclude this land. This is clear evidence that this small portion of land has continuously been highly valued by the village community.

The settlement boundary has only been drawn to include this portion of land in the current plan because of new development along Church Road in the very recent past. This now makes this portion of land even more crucial to retain for the village and its character.

Site 5.3

In respect of your query regarding Site 5.3 of the LGS (land at the top of Nags Head land) we are not sighted on any formal objection within the Reg 14 or Reg 16 processes to its classification as LGS: other than knowing that this decision does not meet with the agreement of the landowner (██████████) who proposed to develop it. (Should you have a formal objection to inclusion of this plot of woodland as LGS, we would greatly appreciate it being forwarded for our consideration and comment).

From the perspective of the HNP, the LGS defines this as land unsuited to development because it is woodland with designated footpath and bridleway on two sides, which are both well used by dog walkers and others wishing to exercise and enjoy the wildlife and rural nature of the area.

NA9 is part of several circular walks providing differing lengths of walk for various abilities. The bridleway NA15 is another route well used by both walkers and horse riders many times every day.

The wood is rich in insect, animal and plant wildlife and includes butterflies and moths, badgers, deer, nesting birds and many small mammals. It is important that these fields and the woodland are preserved as green spaces at the end of a busy residential lane and bordering walking routes used by many residents.

93% of respondents in the initial survey considered that it is important to retain the existing green spaces within and around the village. This designation of the plot of woodland as LGS at the top of Nags Head Lane reflects that clear intent of village residents.

Policy HNPD7 – Most forms of lighting do not require planning permission.
• ***Please can you point me to information in respect of why part a) of the Policy meets the basic conditions?***

Under Policy HNPD7, Paragraphs 4.7.2 and 3 acknowledge the requirement under NNPPF and NNJCS for addressing environmental requirements.

In the most recent version of the NNJCS (Feb 2016), paragraph 1.8 offers this:

“1.8 While much remains the same, the review of the Core Strategy has resulted in a shift in approach on some issues. The most important changes are summarised below:

...Increased protection for North Northamptonshire’s cultural and environmental assets, through a set of Core Policies at the start of the Plan that seek to protect and enhance assets (Policies 1 – 7)”

and under “Visions” on p26:

“East Northamptonshire will be the heartland of... Diverse, sustainable villages and a living, working countryside...”

Under policy 1 NNJCS “Presumption in favour of sustainable development”:

“When considering development proposals, the LPA will take a positive approach that reflects the presumption in favour of sustainable development contained in the NNPPF... to secure development that improves the economic, social, and environmental conditions in the area, meeting the challenges of climate change, and protecting and enhancing the provision of eco-systems.”

Under the section regarding “landscape character”, this is defined as the result of action and interaction of natural and human factors.” The Northamptonshire landscape character assessment LCA – forms part of the Northamptonshire Environmental Character Assessment and identifies what in a landscape gives a locality its sense of place and makes it different from neighbouring areas. The Residents’ Survey at Hargrave clearly indicated the character of the village in terms of its greenness, its connectedness with surrounding fields, its wildlife, and its overarching tranquility as being those defining features with a unanimous determination to protect these. Paragraph 3.26 of the NNJCS echoes the importance of tranquility as emphasized by the CPRE. Therefore, policy 3 in “landscape character” noted that any development should conserve and where possible enhance the character and policies of local landscape, including the minimisation of light and noise pollution as well as minimizing the visual and traffic impacts.

On this basis, in the tranquil setting of Hargrave, the Parish Council and Steering Group considered it important to reflect similar requirements to protect the environment as those contained in the NNJCS, NNPPF, CPRE and the Residents’ Survey for the purpose of guiding design, development, amendment and maintenance. Our intent is that this guidance is available to developers and officers alike, through the HNPD.

Also, most forms of development tend to be small scale, e.g., householder applications. Planning application requirements are set out nationally and by the Local Planning Authority and national policy; and national policy requires information requirements to be kept to the minimum needed to make decisions.

Policy HDNP7 appears to seek to impose additional requirements on all planning applications. Please can you point me to evidence/information to demonstrate that Policy HNDP7 is deliverable/appropriate, having regard to national policy; and to how the requirements of Policy HNDP7 would be judged, who by and on what basis?

Under the NNPPF and NNJCS, it is clear that development should minimize pollution of all forms. This includes permanent external lighting, traffic pollution, noise, dust, emissions, and ground contamination. These are current requirements. From our perspective we are unable to comment on whether planning officers and developers appropriately and thoroughly consider these matters. However, it is our firm stance that under the Environmental Protection Act 1990, its subsequent amendments and the Climate Change Act 2008, there is a legislative duty for compliance. It is therefore appropriate that in a village where sustainability and environment are uppermost in residents' minds, the plan should overtly support these needs and helpfully interpret them in a local context.

Policy HNPD8

- ***Please can you point me to evidence/information re: how “undue pressure” and “enhanced infrastructure” will be judged (for example, information setting out the current base-line infrastructure for the Neighbourhood Area and information re: pressure/enhancement measurement)?***

We do not consider it to be the role of the HNPD nor the planning officers to carry out engineering assessments to demonstrate that a new development will have no adverse impact on the power, water, or drainage and roadway infrastructure of the village. We do note, however, that the impact on the road is routinely subject to critique and assessment by NNC's Highways department. This commonly results in improved design from a developer with better splays and road safety for residents and road users. Unfortunately, although the storm drainage in our village is also the specific responsibility of Highways, the adequacy of this element of the highways infrastructure when considering a new development has been consistently ignored. The consequence is that the village now experiences routine flooding during any period heavy rainfall. We believe that any new development has an obligation to demonstrate that it does not adversely impact its neighbours through safety and environmental hazard. This obligation no doubt differs in its extent and nature according to the scale and nature of the development itself. Nonetheless, that demonstration should be sufficient to satisfy the planning officers prior to their approval. Residents rely upon planning officers assuring themselves that new developments will not create hazard by way of their burden on existing infrastructure. This policy HNPD8 merely seeks to highlight those existing duties and the need for developers and planning officers to properly consider environmental impacts, whilst setting out the preference of villagers for sustainable solutions (sections 4.8.3 and 4 refer).

- ***Please can you point me to information in respect of how this Policy can be delivered by all development?***

We expect that between developers, designers, architects, local authorities and utilities, the adequacy of the infrastructure is demonstrated to the planning officers' satisfaction. It may be that these matters should form part of the developers' assessment of impact or part of the NNC's assessment of impact in the way that traffic safety is assessed. It appears to be common sense that adequate road and utility provision is available to support any development and in an urban setting has frequently resulted in the need for the developers' contribution through a section 106 or physical construction of an asset enhancement.

Policy HNPD9

How should a decision maker interpret “will be protected”? Presumably this does not mean employing security guards, for example – is it therefore the intention of the Policy to prevent any form of development?

Thank you for identifying the need for improved clarity here. Whilst the second and third paragraphs clearly indicate support for improving community facilities, this opening sentence is intended to prevent their diminishment and we suggest improved wording to HNPD9 that reads:

“All Hallows’ Church and Hargrave Village Hall are highly-valued by the community. Their amenity should not be diminished through any new development. Proposals to enhance and improve these facilities will be supported.

New community facilities will be encouraged, providing they are compatible with existing neighbouring uses.

Where new community facilities are proposed...”