



CRICK VILLAGE NEIGHBOURHOOD PLAN

Summary of responses received at Regulation 16 stage (submission)

Regulation 4(3)(b)(iii) of the Neighbourhood Planning (Referendum) Regulations 2012 (as amended)

The following table comprises a summary of the responses received to the submission consultation of the Crick Village Neighbourhood Plan.

All of the responses summarised below were considered by the examiner when preparing his assessment of, and recommendations towards, the Crick Village Neighbourhood Plan. Where significant representations were received the summary and conclusions provided by the respondent have been used to populate the tables below. The summary of comments reflects the views put forward by the consultee and are abridged as faithfully as possible to ensure that the purpose of the original representation is maintained. The responses can be reviewed in full on the DDC website at:

www.daventrydc.gov.uk/neighbourhoodplanning

Responses received to the submission consultation that were submitted to the Independent Examiner.

| Respondent | Support/Object/ Comment | Summary of response |
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| ANCER SPA Ltd. on behalf of Butchers Pet Care Ltd. | Object | Object to para 101, CRICK 8 and para 131(c). The neighbourhood plan does not contribute to the achievement of sustainable development or local employment opportunities for existing and future residents. The neighbourhood plan recognises that the creation of workplaces in or outside the village would be beneficial but does not acknowledge the role of the Eldonwall and Dockham Way employment areas. Reference should be made to this in paragraph 101 and Policy CRICK 8 and the plan should make it clear that the future of the employment areas will be dealt with through a future Crick Commercial Area NDP and the emerging Settlements and Countryside Local Plan Part 2a. Progress must be made on the Crick Commercial Area by the District Council. |
| ANCER SPA Ltd. on behalf of London Metric Property Ltd. | Object | Object to para 101, CRICK 8 and para 131(c). The neighbourhood plan does not contribute to the achievement of sustainable development or local employment opportunities for existing and future residents. The neighbourhood plan recognises that the creation of workplaces in or outside the village would be beneficial but does not acknowledge the role of the Eldonwall and Dockham Way employment areas. Reference should be made to this in paragraph 101 and Policy CRICK 8 and the plan should make it clear that the future of the employment areas will be dealt with through a future Crick Commercial Area NDP and the emerging Settlements and Countryside Local Plan Part 2a. Progress must be made on the Crick Commercial Area by the District Council. |
| | Support | Support Policy CRICK 2 and the removal of the 'Important green buffers' from the previous version because they have not been subjected to rigorous analysis and could unnecessarily constrain development. |
| Anglian Water | Comment | Anglian Water only provide potable water to Crick Parish, the views of Severn Trent Water should also be sought on the neighbourhood plan. It is noted that the neighbourhood plan includes a number of policies which are intended to be used to determine planning applications within the parish. No comment on the draft policies. |
| Canal and River Trust | Support | Support Policy CRICK 2. Note that two Local Green Spaces adjoin the Grand Union Canal (Cracks Hill and Jubilee Wood) and that neither designation includes the canal and towpath. This is the most appropriate approach because the canal within the neighbourhood area is a small part of |

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| | | the wider canal network and has a distinctive character, value and use which is far wider than the plan area and the local Crick community. Its inclusion would not reflect the advice in paragraph 77 of the NPPF. |
| Daventry District Council | Comment | Rail freight terminal is incorrectly referenced as being east of Junction 18 of the M1 in paragraph 18, it should be 'west'. |
| | Comment | Reference to the Biodiversity SPD should be amended to 'Biodiversity Supplementary Planning Document for Daventry District (May 2017)' in paragraph 106. |
| | Comment | With reference to policy CRICK 1 criterion 1, the District Council is reviewing the landscape evidence which may result in changes to the special landscape area. The Part 2 Local Plan is, however, unlikely to be adopted until late 2018. |
| | Comment | CRICK 2 should reflect the NPPF and an amendment is suggested to the policy. Proposed LGS5 should be deleted or the boundary amended to exclude the pavilion and adjoining land to allow for expansion. Proposed LGS7 and LGS8 are not considered to fully meet NPPF para 77 criteria because they are not demonstrably special at this stage. They should be deleted and could be given alternative protection under policy CRICK 4. Proposed LGS14 will be protected under policy CRICK3 which would allow development and alternative provision. |
| | Comment | References to the Sports Field should be consistent between policies CRICK 2 and CRICK 4. Identify facilities listed in policy CRICK 4 on a map. |
| | Comment | Due to the strict tests for S106 agreements the projects listed in policy CRICK 5 cannot be addressed by S106 unless it can be demonstrated that they are directly impacted by the development. CIL is more flexible. Amendments to the policy are suggested to meet national policy. |
| | Comment | Much telecommunications development is permitted development and not subject to planning control. The requirements under parts 3, 4 and 5 of policy CRICK 7 could not be required by the District Council. |
| | Comment | Policy CRICK 8 is not consistent with the WNJCS because it would not support rural businesses in new build premises. Amendments to the policy are suggested to be consistent with the WNJCS. |
| | Comment | Policy CRICK 10 should provide more detail about the types of buildings that would be suitable for conversion to avoid the conversion of unsuitable modern agricultural buildings to residential use. An amendment to the policy is suggested. |
| | Comment | An amendment is suggested to policy CRICK 12 to be compatible with national policy regarding a need to ensure that development does not increase the risk of flooding elsewhere. The District |

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| | | Council has not adopted the Northamptonshire County Council parking standards, although they are used as a guide. This should be reflected in the policy. |
| | Comment | There is clear national legislation, policy and guidance dealing with designated heritage assets, therefore parts 1 and 2 of policy CRICK 13 are unnecessary. The policy should concentrate on non-designated assets of local interest and how they can be conserved or enhanced, in line with their status and the NPPF. An amendment to the policy is suggested. |
| | Comment | All maps should have an appropriate source acknowledgement or Ordnance Survey licence number. The boundary of the Special Landscape Area should be shown on the Proposals Map. |
| Trevor Finney | Comment | Concerned that development would be allowed under policy CRICK 5 in order to achieve village projects. Policy CRICK 8 would also allow more development in the village. If policy CRICK 9 was aimed at meeting the needs of existing residents it would be fair, however, it is likely to lead to more new people moving to the village. New housing development outside the village under policy CRICK 10 would lead to it getting larger. Policy CRICK 11 requires a mix of housing types to meet local need, however, it still allows for more development. |
| Gladman | Comment | Reference is made to the basic conditions, NPPF, Planning Policy Guidance, WNJCS and emerging Part 2 Local Plan. Whilst DDC currently considers that the rural area housing needs have been met, this requirement should not be considered as a ceiling as this would not accord with the national policy imperative to significantly boost the supply of housing. DDC may still require site allocations to deliver additional housing to meet identified market and affordable housing needs. The neighbourhood plan should allow for flexibility so that it is not superseded by the adopted Part 2 Plan. |
| | Object | Do not support the vision and objectives because they are distinctly anti-development and fail to consider the settlement's responsibility to assist sustainable development. The plan seeks to deliver significant local community infrastructure improvements, however, makes no provision for new housing or economic development. Without financial contributions the aspirations are unlikely to be implemented. |
| | Object | Object to policy CRICK 1 which in criterion c, does not allow development on prominent sites on the edge of the village to protect profile, skyline and views. New development can often avoid eroding openness and character. Question the purpose of the policy which seeks to contain physical growth within a tightly defined settlement boundary. Landscape is subjective and without further clarity to some of the criteria, there are likely to be inconsistencies in decision making. The policy should be criteria based in relation to protected wildlife or geodiversity sites |

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| | | and landscape areas and protected according to status. It does not align with the NPPF and PPG because it is contrary to three of the basic conditions. |
| | Object | Some of the proposed LGS designations under policy CRICK 2 do not meet all the requirements for designation. The evidence to support their designation is not robust or detailed enough, at least four of the parcels are extensive tracts of land and do not meet the NPPF's requirements. Reference is made to LGS issues considered by neighbourhood plan examiners. |
| | Object | Support the principle of such a policy, however, the plan does not promote development beyond existing permissions, it is difficult to see how Crick Village will benefit from policy CRICK 5. The plan is an opportunity to guide development needed over the plan period and beyond. The approach should be reconsidered to allocate housing land or reserve sites. |
| | Object | Policy CRICK 9 supports residential development within the settlement boundary subject to criteria. Oppose the use of boundaries if they would preclude otherwise sustainable development. Using development limits to arbitrarily restrict suitable development on the edge of settlements is contrary to the Framework and basic condition a). Referencing local survey results does not constitute appropriate evidence for limiting development. Sufficient flexibility should be built into the policy. |
| | Support | Pleased to note that concerns raised during last consultation regarding zero carbon design into policy CRICK 12 have been resolved. |
| | Object | Support general thrust of policy CRICK 13, however, criterion 2 should be deleted because it is not within the remit of a parish council or neighbourhood plan group to determine whether listed building consent should be granted or refused. The policy does not accord with national policy. Paragraphs 132-134 of the NPPF refer to designated assets; paragraph 135 applies to non-designated assets. The policy should make a distinction between designated and non-designated heritage assets because there are two separate balancing exercises. |
| | Comment and object | Recognise the role of neighbourhood plans as a tool for local people to shape development of their local community, however, this must be consistent with national planning policy and the strategic requirements for the wider area. Concerned that in its current form the plan does not comply with basic conditions a) and d), national policy and guidance and does not contribute to the achievement of sustainable development. |
| Diane Irwin | Object | The settlement boundary to the rear of Blue Cedars, Main Road, Crick bisects the rear garden and ignores the property boundary, which is well established and mature trees provide screening. The boundary is shared with an adjacent site which is under construction for 8 houses |

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| | | and bungalows. The boundary is illogical and ill thought out, any development of the garden could be designed so that it does not conflict with policies 1-13, in particular CRICK 9 criterion 3. Draft settlement boundary should be re-considered for these reasons. |
| Marrons Planning for Hazelton Homes | Object | Site off Main Road Crick has been promoted through the Strategic Housing and Land Availability Assessment Call for Sites in 2016. It is well related and would be a logical infill development in a sustainable location. It is around 1.18 hectares and could accommodate about 27 houses, including 8 affordable units. Planning permission has already been granted for 7 dwellings on land to the north east of this site. The site is in a sustainable location, close to services and facilities, the distances to which are easily walkable. There are strong boundary features and existing built form. It is not located within a flood zone, unconstrained by agricultural land quality, ecology, geology, landscape features, contamination, utilities or topography. Presence of a listed building to the south west of the site would inform the final scheme. The site is designated countryside and predominately used for grazing; it does not have any special protection (it is outside the Special Landscape Area). Grant of planning permission for the 7 dwellings means that it has limited relationship to the open countryside. Consideration should be given to designating the site for residential development. |
| Natural England | Comment | No specific comments on the draft neighbourhood plan. Reference is made to an annex which covers issues and opportunities that should be considered when preparing a neighbourhood plan. |
| Northamptonshire County Council | Comment | <p>Response is on behalf of departments of the County Council on which development designated in the plan would have an impact, including Education, Fire and Rescue, Libraries and Broadband. Response is based on 'Creating Sustainable Communities' document, the County Council's Planning Obligations Framework and Guidance Document. This sets out the County Council's approach to S106 planning obligations for delivering County Council provided infrastructure.</p> <p>In terms of education provision the County Council has statutory responsibility for primary and secondary provision. Contributions will usually be required from housing development to support extension of or improvements to existing schools and pre-schools serving the development and/or building new facilities for significant proposals. Development in Crick would be served by Crick Primary School, which at June 2017 is operating at 87% capacity, providing sufficient capacity to accommodate pupil projections to 2021/2022. Development planned beyond this may require additional capacity to be created within existing primary schools and a</p> |

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| | | contribution towards primary education provision may be required to ensure sufficient capacity remains. Development would be served by Guilsborough School for secondary education, however, it is expected that this school will have very limited capacity to accommodate pupil growth projections to and beyond 2020/2021. New development may require additional capacity to be created and therefore a contribution may be required. Secondary education is now funded through CIL according to the level and mix of housing, level of pupils generated and provision demand in the area. Reference is made to the Department of Education multipliers for contributions. |
| | Comment | Regarding fire and rescue, new development and associated infrastructure will result in increased population and traffic movements. This will place additional demands on Fire and Rescue Services and will impact on the Service's ability to maintain the Standards of Operational Response, including community risk from fire and road traffic collisions. Funding comes from a variety of sources, but this only allows the Service to maintain service delivery based on current population levels. Developer contributions to Fire and Rescue Service buildings and equipment is now collected through CIL, however, contributions towards installation of fire hydrants and sprinkler systems comes through S106; these should be installed at the same time as other water infrastructure. Locations of hydrants and sprinkler systems must be agreed prior to installation and designed into development at masterplan stage and enforced through a planning condition. |
| | Comment | Where development generates additional need and library space requirement, NCC requires contributions towards costs of providing new, extended or improved library facilities. Reference is made to the Library Strategy to 2021 and National Library Tariff formula. |
| | Comment | In terms of broadband new housing and commercial development is required to be directly served by high quality fibre networks. Measures must be introduced at the earliest opportunity to provide the required specification for all new developments to receive superfast broadband services. Early registration of development sites is essential. Details are provided of providers. |
| | Comment | Regarding other infrastructure requirements for which NCC has a statutory responsibility, including highways, S106 obligations would be handled directly by the respective areas of the Council. It would be useful to liaise directly with these departments to ascertain contributions. |
| Mrs Jacqueline Smith | Support and comment | Reference to members of neighbourhood planning group should be included. Various points made regarding wording of policies and supporting text, some of which are corrections to road and place names. |
| Sworders | Object | Satisfied that the neighbourhood plan is in general conformity with the basic conditions, |

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| | | <p>although there are some concerns. Removal of the important green buffer areas from the proposals map is a good amendment and will allow flexibility for future development. However, it is noted that the proposals map does not allow any potential residential growth outside the proposed settlement boundary which may be needed in a sustainable location like Crick over the plan period. The plan should have designated potential sites for future residential development, and as a minimum, designate some reserve sites in the event that the District Council falls short of the 3 year housing supply over the Local Plan period. The plan fails to have sufficient regard to national policy or contribute to the achievement of sustainable development.</p> |
| <p>Tyler Parkes for Delisle Estates Ltd.</p> | <p>Object</p> | <p>Objects to the designation of land at Elms Farm under policy CRICK 2 part c (reference site 3 on proposals map). Designation will be unnecessary once development of the appeal site takes place and designation prior to implementation would be inappropriate. The land will be gifted to the Parish Council to be managed as open space under a legal agreement. Until the permission is implemented the site has no recreation value, it detracts from the setting of the listed building, has no prospects of improvements to habitats and wildlife and makes no contribution to the beauty of the area given that it is obscured by fencing. The land is privately owned and not accessible to the general public. It does not fulfil the objectives for designating local green space. The policy and proposals map should be amended to remove the site.</p> <p>Disappointed that the landowner was not notified of the consultation, which is not in keeping with national planning policy guidance, leading to clients being disadvantaged.</p> |