



## **WOODFORD CUM MEMBRIS 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 Woodford cum Membris Neighbourhood Plan.

All of the responses summarised below were considered by the examiner when preparing his assessment of, and recommendations towards, the Woodford cum Membris 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](http://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
Network Rail	Comment	Network Rail owns, maintains, renews and enhances the railway infrastructure in England, Wales and Scotland. No comments.
Mr Paul Grazier	Support	Support current Policies Map in Submission Neighbourhood Development Plan. The village confines offer very little in the way of future development.
Sport England	Comment	<p>Government policy within the NPPF identifies how the planning system can facilitate social interaction and create healthy inclusive communities. Encouraging communities to become more physically active is an important part of this process and providing enough sports facilities is vital to achieving this aim. Positive planning for sport, protecting unnecessary loss of sports facilities and an integrated approach to new housing and employment land with community facilities is important.</p> <p>It is essential that the neighbourhood plan reflects and complies with national policy for sport. Sport England has a statutory role in protecting playing fields and the presumption against their loss and provides guidance for developing planning policy for sport (link supplied). Evidence in the form of need assessments and strategies for indoor and outdoor sports should be up to date and a neighbourhood planning body should use local authority evidence if available. Where evidence does not exist neighbourhood plan policies should be based on a proportionate assessment in consultation with the local sporting and wider community.</p> <p>Links to Sport England guidance for assessing needs and design guidance for new and improved sports facilities provided.</p> <p>New housing developments will generate additional demand for sport. Where capacity is limited planning policies should look to ensure new or improved facilities are secured and delivered. Actions should accord with any approved local or neighbourhood plan policy for social infrastructure. Consideration should be given to how new development, especially housing, will provide opportunities for healthy lifestyles in line with the NPPF and PPG. Links to relevant sections of NPPF and PPG and Sport England's Active Design guidance provided.</p>

Historic England	Comment	<p>The neighbourhood plan includes a number of designated heritage assets and the strategy should safeguard the elements that contribute to the importance of these assets. The District Council's conservation officer is best placed to assist in developing the neighbourhood plan. At this point Historic England does not consider it is necessary to be involved. Advise speaking to staff at Northamptonshire County Council's Historic Environment Record to provide details of designated assets and locally important buildings, archaeological remains and landscapes. It may also be helpful to involve voluntary groups in producing the neighbourhood plan.</p> <p>The local authority may also be able to provide general support. National PPG is clear that where relevant, neighbourhood plans need to include enough information about local heritage to help guide planning decisions and put broader strategic heritage local plan policies into action at a neighbourhood scale. If appropriate this should include enough information about local non designated assets to guide decisions.</p> <p>Link to Historic England guidance on neighbourhood planning provided.</p>
National Grid	Comment	<p>National Grid owns and operates the high voltage transmission system in England and Wales, operates the Scottish high voltage transmission system and owns and operates the gas transmission system. National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p>An assessment has been carried out of National Grid's electricity and gas transmission apparatus and has identified that it has no record of such apparatus in the neighbourhood plan area.</p> <p>Whilst there are no implications for National Grid's gas distribution intermediate/high pressure apparatus there may be low pressure/medium pressure gas distribution pipes present within proposed development sites. Contact details for gas distribution network and the electricity distribution operator are provided.</p>
Anglian Water	Comment	<p>Anglian Water only provides potable water to Woodford cum Membris Parish, the views of Thames Water who are responsible for wastewater services should also be sought.</p>
	Comment	<p>Policy WH12 Infrastructure All development sites require a connection to the water supply network. Depending on the location and scale of proposed development improvements may be required to the existing water supply network. Contributions for upgrades or strategic schemes will be</p>

		obtained through provisions of the Water Industry Act 1991. Policy states that new development is required to make all necessary contributions to infrastructure improvements, including water supply, which is supported.
Daventry District Council	Comment	Policy map confines Note that confines have been amended in two locations, however, there are a number of areas (9) where the confines are still not considered to be appropriate.
	Comment	Policy WH1 Local Wildlife Sites should be given appropriate weight in line with the NPPF. Supporting text and Appendix 1 refer to LWSs, however, if the intention is to give weight to them, the policy should also make reference. Potential wording is suggested.  Reference should be made to the Biodiversity SPD for Daventry District.
	Comment	Policy WH2 The assessment of non-designated heritage assets should be available as supporting evidence. In view of the status of the local list it is recommended that the assets are removed to the supporting text or an appendix and shown on a map. Potential wording is suggested.
	Comment	Policy WH3 Supporting text is insufficiently detailed to enable plan users to comply with the policy. A more detailed assessment of local character should be available. The detail of both criteria lacks precision, the policy or supporting text should identify specific positive aspects that should be retained.
	Comment	Policy WH4 There is inconsistency in referencing between the policy, policies map and appendix. The green infrastructure network should be shown on a neighbourhood area wide map and the policies map to assist decision making and policy implementation.  The final part of the policy should reference flood risk impacts as advised by the Environment Agency and Lead Local Flood Authority.  Potential wording is suggested.
	Comment	Policy WH5 'Significant wider landscape views' and 'important local historic landscape features' should be identified on the policies map and illustrated with photos.

		The policy or supporting text should refer to the Special Landscape Area and it should be shown on the policies map.
Comment	Policy WH9	The policy should be more precise about where it applies. Criterion a) should specify that replacement buildings should be on the same site/footprint as the original. Potential wording is suggested.  The supporting text is missing.
Comment	Policy WH10	Supporting text should provide further detail of appropriate evidence such as viability assessment and market view.
Comment	Policy WH11	There is inconsistency in the references to Local Green Spaces in the policy, policies map and Appendix 3. Comments are made about three specific Local Green Spaces. The assessment in Appendix 3 is insufficient to demonstrate compliance with the first and third criteria in paragraph 77 of the NPPF. Map in Appendix 3 is unclear.
Comment	Policy WH12	The Council cannot require this of development through the planning application process. Infrastructure referred to is governed by statutory requirements, companies and organisations. The policy does not impose a threshold and would apply to all proposals. The tests relating to S106 are strict and must directly relate to the proposed development. Potential wording is suggested.
Comment	Policy WH14	Policy should make provision for loss where the uses are no longer viable including evidence of viability and a market view, in line with policy WH10. Policy should reference the policies map which identifies the local shops. The relevant use classes should be referred to in the policy.
Comment	Policy WH17	Policy does not break down the 'B' use classes and should exclude B1(a). Supporting text should provide further details of appropriate evidence such as viability assessment, market view and time period. Potential wording is suggested.
Comment	Policy WH18	Policy supports life-work units on existing employment sites but this may create conflict between users. Potential wording is suggested.
Comment	Appendix 1 Local Wildlife Sites	

		Mapping colours are confusing. Both the Taylor Wimpey and Upton Close sites north of Byfield Road are identified as LWSs.
	Comment	General It would helpful if every paragraph and separate parts of each policy were numbered.
Thames Water	Comment	Policy WH12 Infrastructure Thames Water supports this policy and its requirement to demonstrate that there is adequate water supply and capacity to meet additional need.
Gladman Developments Ltd.	Comment	<p>A neighbourhood plan must be tested against the basic conditions before it proceeds to referendum. The NPPF states that neighbourhood plans should be in conformity with strategic priorities for the wider area and deliver sustainable development to meet needs. Local and neighbourhood plans should meet objectively assessed needs and be flexible to adapt to rapid change. PPG updates make it clear that neighbourhood plans should conform with national policy and take account of up to date housing needs evidence in delivering sustainable development. Neighbourhood development plans should support strategic development needs set out in local plans.</p> <p>Neighbourhood plans should set a clear and positive vision and policies should provide a practical, predictable and efficient framework for decision making. Plans should proactively drive and support sustainable economic development and respond positively to wider growth opportunities. Local planning authorities will need to set out their strategic policies to ensure an up to date local plan is in place as quickly as possible and the neighbourhood plan should ensure it is aligned with the strategic needs and priorities of the wider area to support sustainable growth.</p> <p>PPG updates refer to parts of the evidence base that are required to support neighbourhood plans and what measures a qualifying body should take to review the plan when the evidence base becomes less robust. Where a review is intended, a policy should be included detailing anticipated timescales. PPG makes it clear that plans should not contain policies restricting housing development in settlements or preventing other settlements expanding. Gladman has reservations about the WNP's ability to meet basic condition a).</p> <p>Current development plan relevant to the WNP is the West Northamptonshire Joint Core Strategy adopted in December 2014, which provides the overarching spatial strategy for Daventry, South Northamptonshire and Northampton. Policy R1 sets out the spatial</p>

		<p>strategy for the rural areas and identifies a housing need of approximately 2360 dwellings in Daventry District to 2029. Further guidance will be subject to the provisions of the Daventry Local Plan Part 2.</p> <p>DDC considers that the rural housing needs have been met, however, the requirement is not a ceiling and DDC may still require additional housing allocations. The WNP will need to ensure sufficient flexibility to avoid being superseded by the Part 2 plan.</p> <p>In terms of the WNP some policies do not reflect the requirements of national policy and guidance.</p>
	Comment	<p>Policy WH5</p> <p>The policy does not define important local historic landscape features on a policy map. A distinction should be made between international, national and locally designated sites. Further flexibility should be incorporated into the policy otherwise it is overly restrictive. Potential wording is suggested.</p>
	Object	<p>Policy WH6</p> <p>Oppose use of settlement boundaries if they preclude sustainable development, which is contrary to the Framework. Development limits arbitrarily restrict suitable development on settlement edges, contrary to the positive approach to growth in the Framework and is contrary to basic condition a). A more positive approach would be to support demonstrably sustainable development adjacent to the main village.</p> <p>It is unclear why local housing need is limited to small scale affordable housing, which is overly restrictive; suggest deletion of criterion.</p>
	Comment	<p>Policy WH12</p> <p>Infrastructure delivery is a strategic matter and should be dealt with by the LPA and infrastructure bodies. Contributions can only be sought where they would make the development acceptable where it might not otherwise be. Suggest deletion of policy for LPA to deal with through Section 106 agreements.</p>
DLA Town Planning Ltd.	Object	<p>Infrastructure section</p> <p>The neighbourhood plan needs to have a policy or strategy to delivery flood management infrastructure otherwise it does not adequately respond to the NPPF. It also misses an opportunity to deliver sustainable development and make existing development more sustainable.</p>

		<p>Pool Farm is located off Farndon Road in Hinton. DLA Town Planning and land owners have been in discussions with the Flood and Water Management Team at Northamptonshire County Council about the flood alleviation project for Woodford Halse and Hinton which have suffered from recent flood incidents. One of the projects involves land at Pool Farm being used for flood water storage.</p> <p>There is no identified funding source to deliver the flood alleviation schemes. Developer funding as part of residential development is one option considered by NCC and the only realistic prospect of delivering the needed flood management infrastructure. Details of an indicative scheme are attached.</p> <p>NPPF encourages a proactive approach to mitigate and adapt to climate change including using opportunities offered by new development in both local and neighbourhood plans.</p> <p>Due to a large development off Byfield Road there may not be an appetite for more development and the site has not been pushed for allocation in the neighbourhood plan. Flooding is a big issue and the neighbourhood plan could have engaged with flood management infrastructure more positively. There is no realistic prospect of delivering the infrastructure needed and the neighbourhood plan should have considered alternative methods of delivery. We recommend a criteria based policy that provides a framework for considering proposals that deliver flood management infrastructure. Potential wording is suggested.</p> <p>Representation to Regulation 14 sought this type of approach. The Consultation Statement acknowledges flood risk is an issue but relies on the NPPF and WNJCS policy BN7. The latter seeks to prevent flood risk worsening but does not address the proactive delivery of new flood infrastructure.</p>
Environment Agency	Comment	<p>Groundwater</p> <p>The area is not particularly sensitive to groundwater pollution. The main concerns will be protecting groundwater that provides the base flow for the River Cherwell. There are areas of historic landfill/contamination which are within the protected employment areas. Any development would require further investigation. Note the requirement to protect groundwater in policy WH8(d), no specific comments to modify the text.</p>
	Comment	Water Framework Directive



		<p>Policies WH1 or WH4 could reference this and its key objectives. In policy WH4 there is an opportunity to promote a linked up approach with the catchment host organisation and Environment Agency Catchment Co-ordinator to enhance the environment and address key issues that contribute to failures in WFD status (details supplied).</p> <p>An important consideration is the ability of sewer infrastructure to accommodate and treat increased effluent from new housing and the potential impact on receiving waters. The area appears to be served by Byfield sewage treatment works. Policy WH12 or supporting text presents an opportunity to recommend that developers consult relevant sewer undertakers regarding capacity and to provide the information with a planning application. The council should consider the response if timescales allow to avoid issues such as sewer flooding which could result in WFD failures.</p>
	<p>Comment</p>	<p>Water body information: Cherwell  Current ecological status is 'poor' with an objective to reach 'moderate' status by 2021. It is affected by point source pollution from sewage treatment works discharge; and diffuse sources pollution from agricultural livestock. The water body is classed as 'at risk' of eutrophication and 'probably at risk' from invasive species. Detailed list of WFD water body summary is attached.</p> <p>NPPF states that the planning system should contribute to and enhance the environment by preventing new and existing development from contributing to or being put at unacceptable risk from unacceptable levels of water pollution. Planning policies and decisions should be informed by adequate site investigation information prepared by a competent person.</p>
	<p>Comment</p>	<p>Agricultural advice and capital grants opportunities  The Northamptonshire Uplands Natural Character Area has issues with pollutants in the water environment with surface water drinking sources affected by agricultural pesticides and nitrates. Funding from the countryside stewardship scheme can encourage land use changes. Effects on the water environment in the upper reaches contribute to water quality effects lower down in the Thames catchment.</p> <p>Efforts need to be made to ensure agriculture retains nutrients and pesticides on the land. Land near rivers and streams should be maintained as flood meadows. Livestock should be prevented from drinking directly from water course which can cause issues below. Damage to roadside verges can transfer pollutants to river and efforts should be</p>

		made to maintain drainage features.
	Comment	Early pre-application discuss on all proposals is extremely important to ensure initial issues can be resolved and planning applications run smoothly. More detailed comments will be provided as sites come forward.
Fisher German on behalf of Mr & Mrs Northrop	Comment	<p>Representation relates to land belonging to Mr and Mrs Northrop at Hinton Road, Woodford Halse.</p> <p>A neighbourhood plan must be tested against the basic conditions before it proceeds to referendum. The NPPF states that neighbourhood plans should be in conformity with strategic priorities for the wider area and deliver sustainable development to meet needs. Local and neighbourhood plans should meet objectively assessed needs and be flexible to adapt to rapid change. PPG updates make it clear that neighbourhood plans should conform with national policy and take account of up to date housing needs evidence in delivering sustainable development. Neighbourhood development plans should support strategic development needs set out in local plans.</p> <p>Neighbourhood plans should set a clear and positive vision and policies should provide a practical, predictable and efficient framework for decision making. Plans should proactively drive and support sustainable economic development and respond positively to wider growth opportunities. Local planning authorities will need to set out their strategic policies to ensure an up to date local plan is in place as quickly as possible and the neighbourhood plan should ensure it is aligned with the strategic needs and priorities of the wider area to support sustainable growth.</p> <p>PPG updates refer to parts of the evidence base that are required to support neighbourhood plans and what measures a qualifying body should take to review the plan when the evidence base becomes less robust. Where a review is intended, a policy should be included detailing anticipated timescales. PPG makes it clear that plans should not contain policies restricting housing development in settlements or preventing other settlements expanding.</p>
	Comment	<p>We welcome that the site is located within the village confines, as a result the principle of development is acceptable subject to design.</p> <p>Policy HS22 is the adopted policy for the area which identified Woodford Halse as a 'restricted infill village' where only small scale development within the village confines is</p>

		<p>supported. HS22 will be replaced by policy in the DSCLP. Welcome that this is reflected in draft policy WH6. Neighbourhood plan should go further and allocate sites for residential development to ensure the plan has a clear development strategy. Clients' land is available and suitable for development; adjoining sites have been progressed and developed for residential development. Development of flood zone 1 would create a positive use and end to the village.</p> <p>Note that the site is within a character area (policy WH3). Whilst it does not preclude development, the site does not make a positive contribution to the area's character and should be removed from the character area. It low quality and sensitive redevelopment would make a positive contribution and provide much needed housing. We welcome that the site is not allocated or designated for any other uses. The open space notation is located on the client's site, it would be better placed on the junction of Hinton Road and Phipps Road.</p> <p>Client is interested in bringing forward part of the site for residential development. A previous application was withdrawn but the principle was welcomed by the parish council. There is significant potential for the site to be brought forward for self-build, about which the neighbourhood plan is quiet. The plan should encourage self-build within the confines.</p> <p>The site makes little contribution to the village, it has no public access and it has been proven to be of no local ecological value. Part is designated flood zone but there are significant benefits of bringing the western part of the site forward for modest residential development, which could be in the form of self build for local residents. Client is keen to work with the Parish and District Councils.</p>
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