



Clipston 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 Clipston Neighbourhood Plan.

All of the responses summarised below were considered by the examiner when preparing his assessment of, and recommendations towards, the Clipston 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 WNC website at: [Daventry District Council - Submitted Neighbourhood Development Plans \(daventrydc.gov.uk\)](http://daventrydc.gov.uk)

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

Respondent	Support/Object / Comment	Summary of response
CNP01 Faye Tan	Comment	Suggested edits to Pg. 50/51 (Buildings 15 and 16 don't appear on the key) and Pg. 65 (The Church does have Broadband connection) to improve clarity of document.
CNP02 England	Sport Comment	<ul style="list-style-type: none"> • Requires NP to reflect and comply with NPPF Para 96 and 97 • Sport England is a statutory consultee in protecting playing fields and presumption against the loss of playing fields • NP should refer to the local planning authorities Playing Pitch Strategy and have planning policy that reflects it within the NP. Based on proportionate assessment, setting out sporting provision is required to ensure the current and future needs of the community are met. New and improved sports facilities proposed must be fit for purpose. • New housing will generate additional demand for sport, if existing sport facilities do not have capacity to absorb the additional demand. Policies should be set to ensure that there are new sporting facilities or improvements to existing sports facilities • Any new development especially for new housing should consider how any new development will provide opportunities for people to lead healthy lifestyles and create healthy communities. • Reference should be made to Active Design and its 10 principles to help ensure

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		design and layout of development encourages and promotes participation in sport and physical activity.
CNP03 Anglian Water	Comment and Object to ENV 7	<ul style="list-style-type: none"> • Policy CC2 supports the inclusion of SuDS into the policy for all housing and employment developments, which help to reduce the flooding of surface water and sewer water. • Policy HBE2 – No objection to the principle of residential development on this site. • Policy HBE4 – Point M – the reference to the inclusion of SuDS wherever possible is fully supported and reflects comments made at Regulation14. • Policy EN7 – Objection to the policy. The plan identifies Clipston water recycling centre as a wildlife site. This site is in Anglian Water ownership and is an essential sewerage treatment facility serving Clipston. Operational development and associated infrastructure will continue to be required by Anglian Water. Reference to development proposals not damaging or preventing wildlife connectivity in with the identified are would conflict with this. Land in Anglian Water ownership (see map) should not be included in the area 'Biodiversity sites for which the corridor provides wildlife connectivity'.
CNP04 Mr & Mrs Halls	Support	<p>Support the Neighbourhood Plan and in particular Policy HBE2 Site allocation for 10 dwellings include 4 affordable units.</p> <p>Considered to be suitable site for ensuring limited expansion. The mix of private and</p>

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		<p>affordable units limited in size and bedroom numbers is welcomed.</p> <p>Support is also given to Policy HBE1 and HBE3 in restricting development as far as possible within the confines.</p>
CNP05 Clipston Primary School	Support	<p>In summary supports the neighbourhood plan with specific comments relating to the following:</p> <ul style="list-style-type: none"> • Support the vision of recognizing the importance of climate change and mitigating its impact • Support the plans vision of safety of schoolchildren as referenced in several Para's and in CA12 • Policy ENV 1 support Haddon Fields and Church Yard as Local Green Spaces • Policy ENV 3 support the inclusion of fields as an Important Open Space • Policy HBE2 (and Para 10.30 + 10.55) Proposed allocated site for 10 dwellings will contribute to the school's intake both in the short term and longer term and is sustainable in its approach. Interested in the 4 affordable dwellings and ensuring private dwellings are suitable for young families with primary school age children. • Policy CF1 Support the policy and the retention of the school

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CNP06 England	Historic Object	<p>Resubmission of Regulation 14 comments:</p> <ul style="list-style-type: none"> • Proposed allocation site D2 lies adjacent to the scheduled monument of Clipston Medieval Settlement and contains non-designated assets ridge and furrow that relates and makes a positive contribution to the significance of the scheduled monument. This needs to be reflected in supporting evidence (Environmental Inventory and its scoring) • The presence of the ridge and furrow in the allocation is not in accordance with Policy ENV 2 or ENV 5 • Allocation is considered to be unsound • Recommend mapping of ridge and furrow in FIG 8.1 and 11.2 is modified to include the field unit and environmental inventory scoring and that the site allocation assessments are adjusted to reflect significance of the feature • Selection of the site as preferred allocation will then need to be reconsidered. If it remains the preferred allocation it will need to be justified in relation to national, local and neighbourhood plan policies.
CNP07 Mr N Carr	Object	<ul style="list-style-type: none"> • Proposals map has been drawn too restrictively and not in conformity with Table 3 criteria in Local Plan Part 2 and Basic Conditions • Village confines should be redrawn to include 3 additional areas (See Plan, indicated

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		<p>in blue) – North end of Chapel lane, Marecroft and site on corner of Gold Street and Naseby Road)</p> <ul style="list-style-type: none"> • Areas identified are 'read' as being part of Clipston and not open countryside • Drawing the confines too tightly will restrict development in Clipston and not allow housing development in the plan period.
CNP08 Marrons on Behalf of Mr Hudson and Miss Johnson	Object	<p>In its current form, the Clipston neighbourhood plan fails to meet some basic conditions required for the plan to proceed to referendum including having regard to national policies and contributing to the achievement of sustainable development.</p> <p>The NP fails to meet two basic conditions relating to the housing requirement and site allocation.</p> <ul style="list-style-type: none"> • Housing Requirement – The plan is pursuing an un-evidenced housing requirement which fails to have regard to the spatial strategy. There is no evidence that provides a rationale for housing need or an understanding of the role of Clipston as an 'other village' or the role in the strategic distribution of growth for the district or the local context and circumstances. • Site Allocation – The plan is allocating sites without appropriate site assessment or sustainability appraisal. The site assessment identifies 16 sites but doesn't include methodology to describe how judgements will be made. There is also inconsistencies in the treatment of sites e.g site D1 and D2.

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		<ul style="list-style-type: none"> • Lack of methodology to explain judgements as well as inconsistencies in the evidence base to understand the rationale for the decisions taken to arrive at the allocation. • The proposed allocation is in close proximity to the scheduled monument. It is entirely inappropriate for development based upon its historical importance and presence of ridge and furrow. No assessment has been undertaken to assess the impact of development in this location on the significance of the scheduled monument or its setting. • The plan does not look at the effect of the loss of the site and its development on the scheduled monument. It does not consider how harm might be removed or reduced or considers or make clear that the public benefits outweigh the harm. • There are a number of inconsistencies in the treatment of the scheduled monument within the site selection process (Site I and B) • Site D2 Land at Marecroft, number of areas where the D2 performs more poorly than the assessment indicates. • No assessment provided to establish whether housing need could be secured across multiple sites, only identifies sites with capacity of 10+ - 8 sites then dismissed from assessment. • Policy HBE2 refers to Fig 5 to indicate the extent of the site, which appears to be larger than assessed. • Allocation site also has ridge and furrow and would be in conflict with ENV 2 and ENV

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		<p>5. SEA does not address the loss of this in its assessment.</p> <ul style="list-style-type: none"> • Policy ENV1 Haddon Fields is an extensive tract of land and would not meet the tests set out in NPPF to be identified as a local green space. • Only supports the preparation of a neighbourhood plan which meets basic conditions. • Not appropriate for the neighbourhood plan to determine housing requirement with disregard for emerging strategy for Daventry or the role played by Clipston. • Policy HBE2 identifies a site significantly larger than assessed within the SSA and SEA (Site D2 and extension to the west include the area identified as Site D1) • This results in significant issues in demonstrating suitability of the allocation given it has not been correctly assessed. • The NP has not undertaken a suitable assessment of heritage impacts associated with the allocation within HBE2, particularly given the site is protected as a non-designated heritage asset by policy ENV5 due to the well preserved ridge and furrow. • Site assessment framework doesn't consider the benefits and disadvantages in a balanced manner, it also includes a number of inaccuracies in the assessment. • NP should assess whether further housing is required and redrafted with policies and following further evidence suitable allocations that meet identified housing need. • Representation should be read as an objection to the CNP, with further work and

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		amendments to be made in order for the NP to meet its basic conditions.
CNP09 West Northamptonshire Council (formerly Daventry District Council)	Comment	<p>It is considered that the policies within the Neighbourhood Plan, are broadly consistent with the policy approach of an 'other' service village as set out in Policy RA3 in the Settlements and Countryside Local Plan Part 2 Adopted February 2020.</p> <p>It should be made clearer how the findings of the SEA have been taken into account into the development of the plan and further reference to the scheduled monument should be made specifically within the allocation policy and heritage policy.</p> <p>Comments on policies are below:</p> <ul style="list-style-type: none"> • A reference to the adopted conservation area should be made, particularly within the heritage and design policies as well as any updating of maps (including the conservation area boundary) and their designations. • Suggested amendments to policies CC2, CC6 and CF1 to ensure they do not conflict with national or local policy. • Suggested amendments to policies CC3, CC4, CC5, HBE4, ENV8, CF2, TRS1 and BE3, to add clarity, be more concise or factually correct, ensure longevity of policy or to avoid conflict between NP policies. • Amendments to Policy HBE1 and village confines map to ensure it aligns and is clear with the advice set out in the Local Plan Part Policy RA3 and Table 3. • Policy HBE2 - The proximity of the allocated site to the scheduled monument should

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		<p>be clearly referenced within this policy. Appropriate measures should be taken to ensure the setting of the designated heritage asset is enhanced when plans for the design, layout and landscaping of the site are formulated and reflected within both the policy and the supporting text. Reference the ridge and furrow in D2 and the contribution it makes to the scheduled monument. Suggested additional amendments to the policy are to ensure there is an appropriate cross reference to the local plan and to ensure future proofing of the policy</p> <ul style="list-style-type: none"> • Recommend that the following policies are combined to improve the clarity of the policy, HBE3 with HBE1, BE2 and BE4, ENV4 and ENV5 (or include additional text to the policy) or place in community actions (Policy BE5). • Policy ENV1, remove Haddon Fields as a local green space, as it does not meet the tests set out in the NPPF. Place in ENV3 as an Important Open Space. • Policy ENV2 This policy would benefit from being separated out and distinguishing between natural and historic environment as both may have a different policy approach. • Policies map - include the extent of Scheduled Monument on this map to give the policies map and its allocation a wider context. • Appendices - Appendix 1-5 should be separated out from the plan and placed in the 'Supporting Document' section. Document SD-2 should be included with Appendix 6-13 which form part of the plan. • Appendix 8 The allocated site D2 is covered by entry 095 in the Environmental

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		Inventory. There is no mention of the ridge and furrow earthworks or the contribution this parcel of land makes to the setting of the scheduled monument. The land doesn't appear to have been considered in a comparable way to other parcels that have similar attributes.
CNP10 Environment Agency	Comment	Regulation 16 Plan, reflects the comments made in our response to the Draft neighbourhood plan and therefore have no more detailed comments to make in relation to the Plan.
CNP11 West Northamptonshire Council (formerly Northamptonshire County Council)	Comment	<p>The plan seeks to allocate one site for 10 dwellings as well as allowing infill and small scale redevelopment.</p> <ul style="list-style-type: none"> • Education – Any housing coming forward may place additional pressure on a demand and availability of school places (early years, primary, secondary and sixth form). Developer contributions (S106 /CIL) may be required to effectively mitigate the impact of new development and ensure the demand is met. • Fire and Rescue – New development and associated infrastructure will increase in population and traffic movements which will increase risk which places additional demands on the fire and rescue service. Response sets out the increased community risk from fire and increased community risk from road traffic accidents. Where direct impact on infrastructure provision relating to housing developer contributions towards fire and rescue buildings and equipment will be required through S106. • Libraries – Council will require through S106 contributions towards costs of provision of new, extended or improved library facilities to support delivery of growth. Also sets

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		<p>out minimum standards and construction costs.</p> <ul style="list-style-type: none"> • Broadband – Vision for County is to be leading edge of global digital economy with 40% full fibre connectivity. It is essential that new development are served by high-end full fibre network. Early registration of development sites are encouraged (links supplied) and all ducting works are carried out in co-operation with installations of standard utility works. • Other infrastructure required which the Council has a statutory responsibility (eg Highways) S106 requirements will be handled by respective Council departments.
CNP12 Mr Kilsby	Support	<p>Considers neighbourhood plan meets the requirements as identified by detailed consultation with the village and supported by the SEA. The neighbourhood plan meets all the basic conditions.</p> <p>Drainage of the proposed development site, is in an area of low / very low flood risk and the plan provides defenses of land on either side of the field</p> <p>Commentary also provided on the types of wildlife found on neighbouring land.</p>