



## **Kilsby Review Neighbourhood Development 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 Kilsby Review Neighbourhood Development Plan.

All of the responses summarised below were considered by the examiner when preparing his assessment of, and recommendations towards, the Kilsby Review Neighbourhood Development 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.

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

<b>Respondent</b>	<b>Support/Object / Comment</b>	<b>Summary of response</b>
KRNP01 Natural England	Comment	<ul style="list-style-type: none"> <li>• No specific comments on this draft neighborhood plan.</li> </ul>
KRNP02 Historic England	Comment	<ul style="list-style-type: none"> <li>• Area covered includes a number of important designated heritage assets. The strategy should safeguard elements that contribute to their significance.</li> <li>• Recommend speaking to LPA planning and heritage team and Historic Environment Record.</li> <li>• Links provide to Historic England guidance notes on heritage at a neighbourhood level.</li> </ul>
KRNP03 National Highways	Comment	<ul style="list-style-type: none"> <li>• Principal interest is safeguarding operation of the A5, M1 and M45 in the area (the strategic road network).</li> <li>• Note that this is an update of the adopted Kilsby NDP and that it has been prepared in accordance with the WNCJS and Daventry SCLP.</li> <li>• Note that no new sites have been allocated, however HNS 2020 identified a need for c20 dwellings. Given this limited growth proposed, do not consider that there would be any material impacts on the strategic road network in the area.</li> </ul>
KRNP04 North Northamptonshire Council Development Management	Comment	<ul style="list-style-type: none"> <li>• Response follows guidance in adopted planning obligations framework and guidance document “Creating Sustainable Communities Jan - 2015”, which sets out the council’s approach to developer contributions.</li> <li>• General comments: <ul style="list-style-type: none"> <li>○ Plan builds on WNCJS and SCLP (Part 2) for the Daventry area. Although the draft NP does not make specific site allocations, it acknowledges that growth will be needed to ensure Kilsby remains vibrant and sustainable, providing it is of an appropriate scale.</li> <li>○ Recommend that Objective 7 is amended to other other types of developer contributions, such as S106 to ensure the full impact of development can be mitigated.</li> </ul> </li> </ul>

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		<ul style="list-style-type: none"> <li>• Education: <ul style="list-style-type: none"> <li>○ Any new housing coming forward in the plan period may place additional pressure on school places. Developer contributions may be required to support investment in new, enhanced and/or improved infrastructure.</li> <li>○ It may be necessary for the council to forward fund key infrastructure ahead of development, in which case, developer contributions will be required to retrospectively support delivery.</li> </ul> </li> <li>• Libraries <ul style="list-style-type: none"> <li>○ Where major new development generates additional need and library space, contributions will be required towards cost of providing new, extended and/or improved library facilities to support growth. This may include contributions towards community managed libraries.</li> <li>○ National library tariff formula applies.</li> <li>○ Where new housing development directly affects infrastructure provision, developer contributions towards library facilities, services, buildings and equipment will be required through S106 planning obligations.</li> </ul> </li> <li>• Superfast broadband <ul style="list-style-type: none"> <li>○ New development must be served by high quality full fibre networks. Early registration of development sites with broadband network providers is important. Ducting works should be carried out in co-operation with standard utility installations.</li> </ul> </li> <li>• Other infrastructure requirements <ul style="list-style-type: none"> <li>○ Developer contributions and planning obligation requirements for other statutory council infrastructure would be handled directly by their respective areas within the council.</li> </ul> </li> </ul>

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KRNP05 Richborough Estates	Object	<ul style="list-style-type: none"> <li>• Object to requirement in objective 3 to protect and maintain any ridge and furrow fields, it is contrary to national policy.</li> <li>• Policy K3 relies heavily on the Design Code. Significant concerns about the way the Code has been prepared, including lack of adherence to guidance in National Model Design Code and obvious public engagement. It is used as de facto policy but has not been tested either as part of the NP or an SPD, which is contrary to the NPPF. Detailed concerns about the code and therefore K3's approach to density and some of the key views. One of these is across the client's site which was not identified by the council's landscape officer as an important view.</li> <li>• In not allocating a housing site policy K4 fails to adequately provide for identified local housing needs. Need is likely to be higher now than in the 2020 housing needs report. Client's site would deliver more than the identified need for market and affordable homes. Submission includes details of outline planning application.</li> <li>• Part 1 of policy K5 does not properly reflect the NPPF. It should take a more balanced approach to the loss of heritage assets as per the NPPF which allows recording of the significance of assets which would be lost wholly or in part.</li> <li>• Related to comments on policy K4, part 2 of policy K6 needs to exclude any land allocated outside the confines although this is not a basic conditions matter. The final part is contrary to the NPPF because it links character and setting outside the confines with archaeological significance. This would effectively prevent any development if there is any archaeological significance. References to archaeological significance should be deleted.</li> <li>• Part 3 of policy K6 requires significant areas of ridge and furrow to be sustained and enhanced, contrary to the NPPF. Policy should use the term "significance" as a measure of value of a heritage asset rather than "significant"; this is a general term and could confuse non-experts. Conservation area appraisal SPD shows the client's site as containing ridge and</li> </ul>

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		<p>furrow, however, it is outside and not visible from the conservation area. It is unclear why the conservation area appraisal would cover this because it is 200m away with no intervisibility. Ridge and furrow would not be an over-riding constraint providing there is adequate provision for recording. It is a low value non-designated heritage asset and only one area is on the council's local list. Policy K6 only allows for sustaining and enhancing sites deemed significant. Policy should refer to significance and the NPPF does not bar development for any type of asset including those of the highest significance. It is down to what is proposed, harm involve and its significance. Part 3 of policy should be removed.</p>
<p>KRNP06 West Northamptonshire Council Planning Policy</p>	<p>Comment</p>	<ul style="list-style-type: none"> <li>• Some of the text which has been removed from section 2 provides useful context and could be re-inserted.</li> <li>• Suggest a clarification in section 4 that all policies have been subject to a degree of modification and that one has been deleted.</li> <li>• Policy K3 requires clarity on whether it applies to all development in the neighbourhood area or only in the confines. Recommend a change so that it is applied proportionately.</li> <li>• All maps require reference to appropriate Ordnance Survey licensing.</li> </ul>
<p>KRNP07 Avison Young on behalf of National Grid</p>	<p>Comment</p>	<ul style="list-style-type: none"> <li>• An assessment has been carried out on National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.</li> <li>• National Grid has identified that no assets are currently affected by proposed allocations within the neighbourhood plan area.</li> </ul>
<p>KRNP08 Barby and Onley Parish Council</p>	<p>Comment</p>	<ul style="list-style-type: none"> <li>• Supports strong design in the local area. Pleased to see that design codes have been incorporated into the revised NDP.</li> </ul>