

Responses to Examiners Procedural Note Questions 27/11/2022

Question 1

From my initial appraisal of the Plan, the Policies Map does not show the boundaries of the Plan area and appears to be based on the Conservation Area. To assist me in considering the policies it would be helpful if you could provide me with a map showing the Plan area with the Conservation Area marked. I am presuming that there is a small area cut out from the conservation area. Would you confirm that this is correct.

LPA Answer – Please see attached map ‘Harlestone Neighbourhood Area and Conservation Area’. I am confirming that there is a small area cut out from the conservation area.

Question 2

Policy H3 lists six properties. Would the QB confirm that these are identified as potential non-designated heritage assets. Paragraph 4.15 refers to the aspiration of having these assets included in the Local List. Would the LPA confirm their procedure for Local Listing and comment on whether the 6 properties satisfy their criteria.

QB Answer -

Yes, these are identified as non-designated heritage assets.

The SG has liaised with the Heritage Policy Officer at the LPA. We have completed Local Listing Assessment forms for each item and the LPA have assessed their ‘Thematic value’ against council adopted criteria used to identify heritage assets for the local list (which were formulated in accordance with current best practice as set out by Historic England in their Historic Environment Advice Note 7: Local Heritage Listing, most recent edition 2021).

All assets have met the threshold for Local Listing.

This is what the LPA said: “As they will go through two rounds of consultation as part of the NDP process their identification will provide them with weight should there be any proposals which affects their special interest.

At some point WNC will be rationalising the former district and borough council approaches to local listing, and at this stage there should be capacity to formally adopt them onto the local list. Until this happens, the assets which are included in the NDP will have policy protection as “non-designated heritage assets”.

LPA Answer – The former Daventry District Council adopted a set of criteria in 2017 for assessing non-designated heritage assets with a view to producing and maintaining a Local List. A process for nominating and adopting assets as part of conservation area appraisals was also formally endorsed by the Council, and assets were subsequently identified through this activity. In order to be put forward onto the list, each asset must reach a score of 125 or more, which provides a clear threshold. NDP groups which wished to nominate local assets were encouraged to utilise the adopted criteria, to clearly evidence that the assets held sufficient heritage interest to be considered for the Local List. We can confirm that the

Harlestone NDP group undertook to assess their nominated heritage assets against the criteria and that the six assets identified in the plan all met the scoring threshold.

West Northamptonshire Council is currently undertaking an exercise to create a harmonised single set of criteria for nomination. Until such a time when these are formally endorsed, the Council is advising groups to continue using the criteria for their geographical area (i.e former Daventry, South Northants or Northampton Borough).

Question 3

Policy H4 includes several views selected by the Steering Group in addition to those included in the CAAMP. Would the QB let me have the criteria they have used to select the additional views and descriptions to justify their selection.

QB Answer

Policy H4 Out of 150 respondents to the Village Survey 92% felt that it was “very important” to protect the views into and from the village.

Harlestone’s long history of farming has resulted in the layout of the villages we see today. With its hills and valleys, nestled clusters of houses, comprising the original farmhouses surrounded by farm workers cottages and these groupings of dwellings separated by undulating pastures all of which remain largely unspoilt make this a beautiful, tranquil and unique village, and contribute to its sense of place. The Steering Group have taken the view that the unique feature of clusters of housing separated by undulating local green spaces should be included in Important Public Views, consequently this association has been further depicted in the following: **IV9, IV10, IV11**.

As the Northampton urban expansion moves closer to Harlestone the need to protect its seclusion has been recognised in the Settlements and Countryside Local Plan (Part 2). One particular policy is to retain “green wedges” between the urban sprawl and the village. CAAMP have used **IV24** to highlight the “seclusion” of Upper Harlestone. The Steering Group felt that other Long Views are necessary to identify the “seclusion” in other directions of both Upper and Lower Harlestone and for that reason the following additional views were included: **IV25, IV26, IV29, IV30**.

CAAMP identified two Long Views of the Repton designed Harlestone Park now forming part of the Golf Club but the Steering Group felt that **IV19**, also part of the original Park and having architectural merit should be included.

IV 27 is an attractive avenue of beech trees which is instantly recognised by anyone who walks through Harlestone Firs. It is also possibly the most photographed scene which changes dramatically throughout the seasons creating a golden carpet of leaves in the Autumn.

IV28 is another Long View which demonstrates “seclusion” but also depicts one of the last remaining farms (Mill Farm) in the foreground with Railway Cottages in the background.

Question 4

Policy H5 I have noted the LPAs comments on these sites that together they amount to an extensive tract of land. I will consider the value of the sites on my site visit. At this stage I will comment to say that for a site to be designated as a Local Green Space it has to be of particular importance to the community. It is not usual practice to designate agricultural land where the only public access is via a public footpath. Would the QB confirm that they have consulted the landowners of the sites proposed as LGS.

QB Answer –

Policy H5 We note that the Examiner has said that it is not usual practice to designate agricultural land as LGS. With respect we would suggest that the reason for this may be that it is not the “norm” for agricultural land to be situated within the confines of a village and for that reason designation of agricultural land is likely to be rare. We would also add that during our extensive 3 year learning curve which has included seminars, research and informal meetings with WNC, at no time has it been said that agricultural cannot be designated as LGS, the only restriction that we are aware of relating to the type and area of land is that referred to in NPPF 102 (c).

On the question of an “extensive tract of land” we have responded in detail to the LPAs comments in our responses to Regulation 16 comments. See below:

In our response to these comments the Steering Group feel that they should make reference to the pertinent comments made by WNC within the Regulation 14 responses which were as follows:

“Each of the LGS have been individually assessed against the NPPF 2021. It is agreed that the following local green spaces would meet the tests as set out in Para 102 NPPF; LGS1, LGS4, LGS5, LGS6, LGS9, LGS10, LGS11, LGS12, LGS14, LGS16 and LGS18”.

In the case of the remaining LGS, that is LGS2, LGS3, LGS7, LGS8, LGS13, LGS15, LGS17, WNC stated *“Further information would need to be provided to support how the LGS meets the test in particular how these are demonstrably special for the local community and also cross referencing to appropriate parts of the conservation area appraisal”.* Subsequently the Steering Group provided extensive additional evidence in Appendix 7 to satisfy NPPF 102 and WNC acknowledged this.

On the final point made by WNC relating to the cumulative impact of designating so many LGS the Steering Group respond as follows:

NPPF 102 c) states that the LGS must be “local in character and is not an extensive tract of land”

The NPPF provides no guidance on what constitutes an “extensive tract of land” so the Steering Group have looked further afield for such guidance.

The Open Spaces Society (OSS) states that “The criteria may differ between settlements depending on their physical size and population. The areas would normally be fairly self-contained with clearly-defined edges. Blanket designation of open countryside adjacent to settlements will not be appropriate. There is a no minimum size limit for LGS.” An independent examination in to a Neighbourhood Plan concluded with the inspector deciding not to designate an area as LGS because he considered its size of 19 hectares (46.95 acres) as an extensive tract of land.

As regards it being an "extensive tract of land" the **Planning Practice Guidance (PPG)** states that "there is no hard and fast rule about the size of a local green space. There is no set maximum nor minimum size limit but the site needs to be 'local' in character".

With the exception of LGS 7 and 8, the other sixteen designated Local Green Spaces are "self-contained with clearly-defined edges". They are mostly historic closes formed by the Enclosure Acts and divided by hedgerows, fences, stone walls and natural features such as woodland and the Harlestone Brook. For this reason the Steering Group have formed the view that they do not constitute an "extensive tract of land".

The Steering Group recognise that the boundaries to LGS 7 and 8 may not meet the OSS criteria of being "fairly self-contained with clearly-defined edges" and may need to reconsider their inclusion within the LGS designation.

The individual designated LGS areas we have noted are relatively small, all well under the 19 hectares mentioned. Please refer to the table of designated LGS areas, appendix 7.

We can confirm that in 2021 the Steering Group wrote to the landowners advising them that within their ownership were areas of land which were to be designated as LGS within the Neighbourhood Plan.

Engagement has continued via Zoom meetings, invitations and attendance at our Exhibition and regular contact by the QB with representatives from the Althorp Estate.