

HARLESTONE NEIGHBOURHOOD DEVELOPMENT PLAN

Submission Draft Version

Neighbourhood Plan Examiner's Questions by Independent Examiner, Rosemary Kidd

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16 December 2022

Harlestone Neighbourhood Development Plan Examiner's Questions

Following my assessment of the Neighbourhood Plan and representations, I would appreciate clarification and comment on the following matters from the Qualifying Body and/or the Local Planning Authority as appropriate. In order to ensure openness and transparency of the examination process, these questions and the responses should be published on the Council's website.

In addition to questions, I am including proposed modifications to the wording of policies and the justifications where I consider it necessary, in order to give the QB and/ or LPA the opportunity to respond, if they wish, in advance of receiving my examination report. A full explanation will be included in my examination report of the reasons for proposing the modifications.

1. **Vision, Issues and Objectives** – This is a very lengthy section with a number of repetitive statements including a list of issues in the middle of the Vision and Objectives. It should be recognised that the consultations have raised a wide range of issues and concerns and it is not possible to address them all through the neighbourhood plan. Some may already be covered by strategic policies. The draft HNBP includes a number of objectives that are not delivered through the HNBP and are worded in a style that would be more appropriate to a Core Strategy.

The Vision and Objectives are the starting point of the plan itself and should be written so as to highlight those important local matters that are to be delivered through the Plan. They should steer the preparation and direction of the policies. The objectives should be focused on what is deliverable through the Plan and should not include matters that are not to be addressed in this Plan.

To improve the clarity and focus of the section I am proposing to recommend that this section should be reviewed and revised to set out the vision for the parish as an aspirational statement for the plan area in 2030. This should be followed by a clear and succinct list of objectives that are relevant to the plan. The issues should be placed in a separate section that precedes the Vision and Objectives.

I would like to offer the QB the opportunity at this stage to review the objectives and to draw up shorter, more succinct objectives that are closely related to the themes or the plan's policies. Would the QB liaise with the LPA on this and let me have a list of no more than 10 objectives.

In addition, I am proposing to revise the Vision as follows. Would the QB and LPA confirm that this is acceptable.

Vision: “By 2030, Harlestone will be a thriving and sustainable rural community where the natural and built environment makes a positive contribution to agriculture, the landscape, conservation and the preservation of our heritage.”

2. **Policy H1** – there appears to be some text missing from points d) and k), would the QB supply please.

Would the QB explain what is meant by the term “special character” in the first paragraph of the policy part i). I consider that further explanation is required to enable the policy to be applied consistently by decision makers. It may be clearer to combine the paragraphs i) and ii) as suggested below.

The latest NPPF advice is that developments should be designed to “sustain and enhance the significance of heritage assets”. Would the QB confirm that they accept this form of wording should be used in the policy and elsewhere in the plan instead of “preserve/ protect and enhance”.

Would the QB and LPA comment on the proposed revisions.

“Development should be designed to be of a high quality and reflect the design of the buildings in the local area and should be integrated into the environment. Development will be supported that has regard to the Harlestone Design Guidelines, other design policies of the Development Plan, particularly Policy ENV10, and the following design principles, where appropriate and proportionate to the development:”

Revise b) to read: “*sustain and enhance the significance of.....*”

3. **Policy H2:** I am proposing that this policy should be consistent with the NPPF and use the term “sustain and enhance” and to cross reference the strategic policies and HCAAMP. Would the QB and LPA confirm acceptance of the following revision:

Revise the first paragraph of the policy to read: ***“To sustain and enhance the character or appearance of the Harlestone Conservation Area, development in or adjacent to the Conservation Area should be in accordance with the policies of the development plan, in particular Policy BN5 of the WNJCS and Policy ENV7 of the DSCLP and the following requirements: a) to d)***

Add after point d): ***“Development proposals should have regard to the Harlestone CAAMP.”***

4. **Policy H4:** I have considered whether this policy is unduly restrictive. As most of the Plan area is included in the Green Wedge or Special Landscape Area, I have concluded that it would be appropriate to word it in terms of “proposals not being supported that unacceptably harm the view”. It would be helpful to include some description of what features or qualities should not be harmed. The policy could also give support to enhancement proposals. Would the QB and LPA comment on the suggested form of wording:

“Important Public Views are listed below and shown on the Policies Map. Development proposals will not be supported that unacceptably harm the character, quality and integrity of these views or their viewpoints at publicly accessible locations. Development proposals should include appropriate mitigation measures to reduce any unacceptable impacts that may arise from the development. Measures to enhance and improve Important Public Views will be supported.”

In view of the importance of the Green Wedge and Special Landscape Area, it would be helpful to plan users to include a paragraph in the justification referencing Policies ENV2 and ENV3 and describing the purpose of the Green Wedge and Special Landscape Area. Would the QB and LPA agree the wording of this please.

5. **Policy H5** – I have carefully considered the appropriateness of designating areas of open countryside as LGS and the cumulative effect of the proposed designations. I have also considered the protection that is afforded to the areas from development through strategic policies on housing development and conservation area. I will make my decision on the appropriateness of the proposed designation following my site visit.

6. **Policy H6** It is considered that Policy H6 is not in conformity with the Local Plan policies. It refers to sites “outside the Conservation Area” and does not differentiate between development in Lower Harlestone and the rest of the plan area where the countryside Policy RA6 applies. The policy should use the same term of “village confines” as Policy RA3. Furthermore, Policy H6 is considered to be vague and imprecise as it does not define “infill and existing housing plots” and states that proposals will be “considered” rather than that they will be supported. It would also be helpful to plan users to include reference to Policy RA5 which covers the Renovation and Conversion of Existing Buildings within Settlements.

As the NDP does not define village confines, it is suggested that a cross reference to the criteria in Table 3 of the DLP Part 2 should be included in the justification. Would the QB confirm this is acceptable.

Revise Policy H6 as follows:

“Residential development will be supported where it meets the following criteria in addition to those in Policies RA3 and RA5 (for proposals in and adjacent to the village confines of Lower Harlestone), and RA4 and RA6 (for sites in the countryside) of the Adopted Settlements and Countryside Local Plan (Part 2) for Daventry 2011- 2029: Criteria a) – d).”

7. **Policy H7** The policy seeks to promote the provision of housing for local older people through the conversion of an existing building or dwelling and the provision of single storey or other suitable housing. It is considered that point i) of the policy is vague and imprecise. It is unclear what the “range of housing options” entails or how “local older people” are to be defined. It is not stated whether the development under point iii) is to be considered as exceptional development or whether it has to accord with other policies of the Development Plan like point ii).

Paragraph 4.30 of the justification to the policy states that the Neighbourhood Plan Survey has shown that there is a prediction for a need for more homes for the elderly in the Plan area in the future but no evidence in the form of a detailed Housing Needs Survey has been carried out to quantify this.

Would the QB and LPA confirm that the following revisions to Policy H7 are acceptable:

“Housing development that meets the needs of older people will be supported where it accords with other policies in the Development Plan, in particular through:

- a. ***“The conversion or adaption of an existing building or dwelling, including the sub-division of a dwelling; and***
- b. ***“The provision of single storey accommodation or a residential annexe or residential adaptation to accommodate the needs of the resident.”***

8. **Policy H8** – I consider that the policy is unnecessary as it does not add any locally specific requirements on energy efficiency to those set out in Policies S10 and S11 of the WNJCS and the Heritage Policy ENV7 of the DLP. I am proposing that it should be deleted.
9. **Policy H10:** the Policies Map does not show the location of the village facilities. I will be proposing that the properties and their curtilages should be shown. Is it intended that the Golf Club should relate to the clubhouse only? It is noted that you have not included a clause supporting the improvement of these facilities. Is that an oversight?
10. **Policy H11:** The term “appropriate rural diversification” is not defined in the policy or justification, other than that the use is appropriate to a rural area. It is therefore considered that the policy is vague and imprecise and would not be capable of being interpreted consistently by decision makers. Would the QB and LPA confirm that they accept the following revision to Policy H11 to improve the clarity of the policy:

“Development proposals that sustain and enhance the diversification of the rural economy will be supported where they accord with Policy R2 of the WNJCS and where:

Delete criterion a)

Revise criterion c) to read “The development will not have an *unacceptable* adverse impact on”

Criteria b) and d) unchanged.

11. **Policy H12:** Would the QB and LPA comment on the following revision to improve the clarity of the policy:

“Any Community Infrastructure Levy raised by development within Harlestone parish and paid to Harlestone Parish Council will be used to improve the following local community infrastructure: criteria a), b), c).”

12. **Section 5:** This section would be better termed "*Community Aspirations*" and paragraph 5.1 revised accordingly.

"A few issues have been raised whilst preparing the HNDP *that cannot be addressed through the neighbourhood plan policies*. However, these are matters that are important to the residents of the Parish.....HNDP.