

Warmington Neighbourhood Plan – Summary of Regulation 16 consultation replies.

Representations from statutory consultation bodies.

7 representations were received from the following statutory consultation bodies:

- National Grid;
- Natural England;
- Northamptonshire County Council as Lead Local Flood Authority;
- Northamptonshire County Council as Mineral Planning Authority;
- Northamptonshire County Council as Highway Authority;
- Northamptonshire County Council, Development Management; and
- Anglian Water Services Ltd

National Grid does not raise any particular concerns and just provides general information about gas and electricity mains and supplies in the area for developers to take into account.

Natural England does not have any specific comments on the Neighbourhood Plan.

The Lead Local Flood Authority we would thank the authors for considering comments they have made at an earlier stage in the Plan process and including their recommendations on flood risk within the plan. Their opinion is that the draft meets the ‘basic conditions’ and they have no further comment to make.

Northamptonshire County Council, as Mineral Planning Authority, considers Section 1 should make reference to the Northamptonshire Minerals and Waste Local Plan being part of the development plan along with the North Northants JCS and associated plans. They consider this section should also reference that minerals and waste matters are specifically excluded from neighbourhood plans and that where the neighbourhood plan references proposals for development in policy that this excludes minerals and waste related development. They note the plan seeks to designate an area highlighted in yellow on Map 7 (and given the reference 20) as important local space. They point out the northern half of this area is allocated for mineral extraction in the Northamptonshire Minerals and Waste Local Plan and which as an adopted local plan has been through consultation and independent examination and been found sound. The County Council as Minerals and Waste Planning Authority therefore objects to this designation and, as such, considers it fails to meet the basic conditions requirement. They have no objection to the southern half of the proposed area of important local space outside of the minerals allocation being included in the Neighbourhood Plan if this southern area has the necessary attributes for such designation. They also note that paragraph 7.6 makes reference to issues raised at the public event that “there was strong feeling against further gravel extraction on the flood meadows beyond the Mill”. As the neighbourhood plan is excluded from covering minerals and waste matters, it is

considered this text should be excluded. Finally, they note potential housing site 1 (on Map 4) is in a sand and gravel safeguarding area and any planning applications made on this site will need to have regard to Policy 28 of the Northamptonshire Minerals and Waste Local Plan (2017). They consider the Neighbourhood Plan could reference this.

Northamptonshire County Council as Highway Authority notes paragraph 9.1 of the Plan refers to the A605 as a 'major strategic highway'. They point out that strategic roads are managed by Highways England whereas the A605 is part of the principal road network that is managed by the County Council. They therefore wish for this to be corrected in the Plan.

In addition, the Development Management Team of the County Council makes various general points about the need to secure adequate education, fire and rescue, library and broadband infrastructure in connection with developments. Related to this, they ask that Policy W3 (Site allocation for future housing development) makes reference to the need to secure planning obligations towards primary education infrastructure if necessary. Furthermore, in relation to Policy W4 (criteria for selection of housing site locations outside the village boundary), they note it includes a requirement to consider additional infrastructure requirements to support large housing sites including the potential for the relocation of the primary school. They consider that in the event that such a measure is required, this must be in consultation with the County Council and, where appropriate, any such action is supported via a Section 106 Agreement. They also consider Policy W4 should also seek to secure Section 106 contributions to support the provision of additional capacity at the existing school in the event that relocation is not considered appropriate.

Anlian Water note that reference is made to the County Council's Local Standards in the Plan and ask that reference is made to their Surface Water Management Policy and Sustainable Drainage Systems (SuDS) adoption handbook. They also note changes have been made to the design code in response to comments made by the County Council as Lead Local Flood Authority and support the requirement for applicants to include the provision of SuDS so as not to increase flood risk and to reduce flood risk where possible. Finally, they consider SuDS would help reduce the risk of surface water and sewer flooding.

Representations from other parties

Three representations were received.

The first is on behalf of the owner of the site at 3 Spinney Close.

In summary, this is concerned about two aspects of the Plan in relation to this property.

The first relates Policy W2 and, in particular, to the designation of much of the garden of this property outside the settlement boundary for the village. A boundary in this position is currently shown in the Council's Rural North, Oundle and Thrapston Plan. However, they argue the situation has changed since then. They consider the property to be integral to the built up area of the village as a result of a combination of the permitted development rights it has (various extensions and buildings in the grounds have been accepted under Council reference 19/00468/LDP) and a number of planning applications that have been made relating to the grounds which they consider are likely to be approved in the near future (19/00598/FUL for the conversion and extension of a barn to create a dwelling plus 19/00957/FUL for a new dwelling on the Church street frontage). As a result, they consider

this Policy (as it relates to this property) contravenes basic condition 2 as it does not contribute to sustainable development and basic condition 3 as it is considered this is not in general conformity with the strategic policies set out in the development plan.

In addition, it objects to the designation, in Policy W7, to much of the garden of this property as an area of Local Green Space. Again, they note this designation has been carried forward from the Rural North, Oundle and Thrapston Plan and they consider there is insufficient evidence to justify this and, once more, circumstances have changed. It is therefore considered this contravenes basic condition 1 as it fails to have regard to national planning policy and guidance from the Secretary of State about how such areas should be designated.

The second representation is from Gladman Developments. In summary, this expresses 3 concerns as follows:

- There is concern that Policy W2 states the existing settlement boundary will be retained and all development outside this boundary will be resisted with the exception of rural exception sites and additional housing requirements imposed through overarching national or Local Planning Authority Policy changes. It is considered this approach precludes otherwise sustainable development coming forward in such locations and this does not accord with the positive approach to growth required by the National Planning Policy Framework. Therefore, they consider the Plan to be contrary to basic Condition (a) as it is not in line with national policy. Related to this, it is considered Policy W4, which lists the types of development which will be acceptable outside the settlement boundary, should be opened up to all forms of development. In addition, there is concern that this Policy refers to small scale sites being preferred and it is considered this should be changed to sites being proportionate in scale to Warmington.
- There is concern about Policies W7 and W8 which seek to designate Local Green Space and Important Local Open Space. It is considered there is insufficient evidence to support these designations. This is considered contrary to the National Planning Policy Framework and therefore also contrary to basic Condition (a).
- Finally, there are concerns about Policy W9 which seeks to protect important views. It is considered that opinions on landscape are highly subjective and there is insufficient evidence to support why these views are considered special in the Plan. Accordingly, the Policy, in the current form, is likely to lead to inconsistencies in the decision-making process.

The third representation is from a mineral extraction and land restoration company. In summary, this is concerned that the Plan does not recognise an area allocated for mineral extraction in the County Council's Mineral and Waste Local Plan (adopted July 2017). They point out a Neighbourhood Plan should be in conformity with strategic Policies such as this and are concerned that it makes reference to specific areas within the proposed mineral extraction site which are of importance to the local community without accepting the allocated area that is safeguarded for mineral extraction. These include the eastern sector of the site which is stated to be 'important open space'. They add that, following mineral extraction, the site will be restored to flood meadows and consider the end product will increase the biodiversity within the locality.