

Hargrave

Neighbourhood Development Plan

Consultation Statement

March 2021



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We do not agree with the Hargrave NDP new settlement boundary as the majority of the large infill sites have been identified on three sides of Top Farm. The Residents Survey confirmed that the green environment and general rurality of the village are deeply important to the residents and must be protected and preserved. Concentrating the proposed levels of new development in this one area will have a significant detrimental impact on the desired spacious rural nature of village..... 62

Land North of Church Street (Site 1 of the Hargrave Site Assessment)..... 62

The Settlement Boundary includes the land North of Church Street which is both visually and environmentally important. This area was designated an Important Open Space by East Northamptonshire Council, Raunds Area Plan as land “which provides an important open area within a settlement which separates distinct groups of buildings or parts of the settlement”. This land still performs an important visual role and must now be supported by Hargrave NDP, Landscape

Character and Green Space, Objective 6 which states it is essential to conserve the rural character of the parish including wildlife habitats. 62

This land is the only remaining open natural green wild space which immediately adjoins the main highway on Church Street, and the largest such area in the village. If the area is developed Church Street would become a frontage of formal gardens losing the desired openness and separation which creates the rural character and charm of the village. 62

A historic lack of management has resulted in an environmentally rich and important area. Having found Great Crested Newts on our boundary it is clear that they are thriving in their ideal habitat of scrub woodland and grassland which has been allowed to develop on the land. Such natural areas are becoming increasingly rare and existing biodiversity assets must be protected to preserve and enhance the local environment. This land is equally important, both visually and environmentally, as the sites which have been identified as Local Green Space in the Hargrave NDP and as such must be offered the same protection. 62

The lack of physical boundaries or change of ownership demarking the Settlement Boundary across the areas proposed for development allows for much larger developments beyond the initial infill proposals. Backfill is not supported by Hargrave residents or the Hargrave NDP and it is dangerous to provide the option for such schemes to evolve as they are unlikely to be refused by the Local Planning Authority..... 63

We do not agree that the allocated sites for housing have been correctly assessed to meet the criteria for designated housing development sites. Our objections are based on the following: 64

1. The Hargrave NDP Paragraph 4.1.16 states that a further 6 new homes are required from 2020 but the sites allocated for future housing development are capable of accommodating 16 new homes (Paragraph 4.3.12) permitting far greater development opportunity than required or desired by the village residents. 64

2. The Hargrave NDP Key Expectations 3.1 & 3.2 suggest that new developments should be self-sufficient in relation to storm water runoff. However, this cannot be achieved by the use of porous materials as the land is clay and infiltration schemes will not be successful..... 64

3. Both sites are situated on sloping land with the natural course of water runoff flowing towards Church Street. It will be impossible to capture all rainfall on site and as such any development will result in additional water directed towards the storm water drains within the public highway. These drains are currently blocked and have been for many months. As a result, the highway storm water now enters the sewer system and causes that to overflow. I have attached photographs of the problems that occur due to the unmanaged storm water

along Church Street near the proposed development sites, and also the resulting overflowing sewers on Brook Street..... 64

4. Land South of Church Street – Site 2..... 64

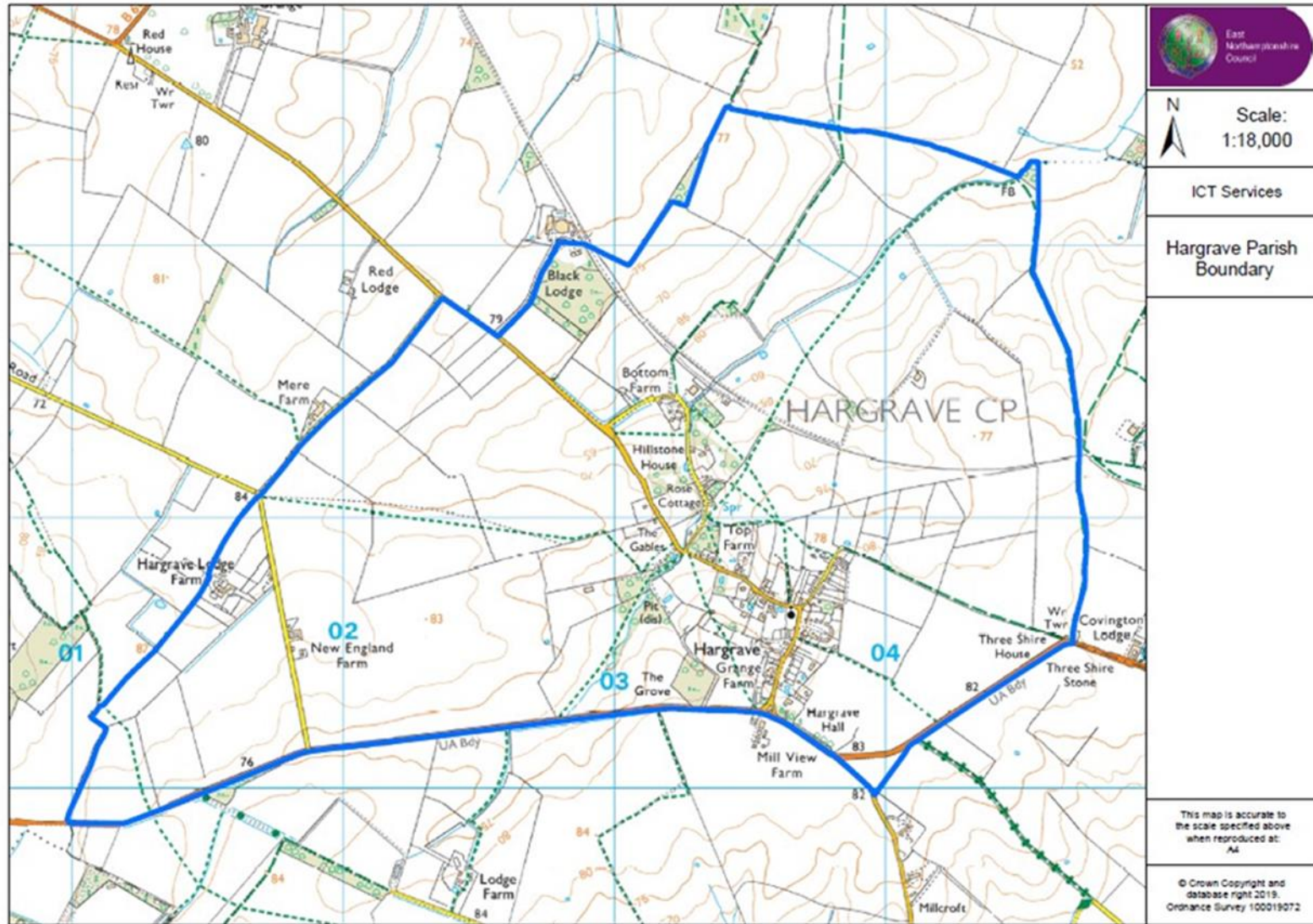
The Hargrave Site Assessment for Site 2 states that the “development will be self-sufficient in relation to stormwater run-off” and “place little pressure on existing village storm drainage”. This is not the case as already mentioned the land is clay and infiltration schemes will not be successful. Also, there is a natural spring located within the development site which runs all year. This will need containing and directing away from the site before construction can commence. The location of the spring, continual flow of water and slope of the land means this can only be done by directing the water away from the land and into the existing main system. 64

5. Land North of Church Street – Site 1 65

Concerns are raised in The Hargrave Site Assessment for Site 2 that the land to the rear of the development site is at risk of future back fill. The same risk on a potentially much larger scale applies to Site 1 but not this is not documented in the assessment. 65

6. Other potential development sites around the village have been dismissed because of associated narrow roads and lack of footpaths. The sites identified on Church Street suffer the same issues (i.e., narrow road, which is single car passing in places, and no footpaths) but at far severer scale as the highway here is subject to much faster, larger, and heavier volumes of traffic..... 65

Map 1 Hargrave Neighbourhood Area



1.0 Introduction and Background

- 1.1 This Consultation Statement has been prepared in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Paragraph 15 (2)¹ which defines a “consultation statement” as a *document which:*
- (a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;*
 - (b) explains how they were consulted;*
 - (c) summarises the main issues and concerns raised by the persons consulted; and*
 - (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.*
- 1.2 In Summer 2019, the Parish Council applied to East Northamptonshire Council for designation as a neighbourhood area. On the 6th of September 2019, East Northamptonshire Council (ENC) designated the Civil Parish of Hargrave as a Neighbourhood Area, under the Neighbourhood Planning (General) Regulations 2012 – Part 2(5).
- 1.3 The Hargrave Neighbourhood Plan Steering Group was formed to progress work on the plan and comprised both Parish Councillors and local residents.
- 1.4 This Consultation Statement lists the various stages in the consultation process and includes references to all the events and information that it comprised. It also contains feedback from the public in the form of analysis of the questionnaire, and analysis of comments received at the Regulation 14 stage.
- 1.5 Throughout the preparation of the Hargrave Neighbourhood Development Plan (HNDP) all relevant documents were available on the parish website. <http://www.parish-council.com/hargrave/index.asp?pageid=701463>

¹ <http://www.legislation.gov.uk/ukSI/2012/637/contents/made>

2.0 Draft Neighbourhood Development Plan and Informal Public Consultation

2.1 Informal Consultation

2.1.1 To kick start the preparation of the HNDP, a residents' survey (RS) was undertaken in November 2019. The survey was delivered to all households. The total population of Hargrave parish is 188 adults.

2.1.2 The Resident's Survey sought views on:

- The Parish and Settlement Boundary
- The Shape of Our Village...
- Our Local Green Space and the Environment
- The Character of our Village and the Landscape around us...
- Sustainable Infrastructure
- The Design and Architecture in our Village...
- Transport, Traffic and Road Safety
- Protecting existing (and supporting new) community and recreational facilities
- Housing Developments and their nature
- Supporting Rural Diversification and Employment

2.1.3 A copy of the RS is included at Appendix 1.

2.1.4 A total of 91 forms were returned representing the responses of 190 people of whom, 171 were over the age of 17. This represented a response rate of 91%.

2.1.5 A report was prepared containing the responses to the RS which is included at Appendix 2.

2.1.6 A feedback meeting was held with the residents, and a presentation was given in December 2019. The presentation is available on the Parish Council website at <https://s3-eu-west-1.amazonaws.com/s3.spanglefish.com/s/35145/documents/neighbourhood-plan/survey-results-slidedeck-v2.pdf>

2.1.7 The RS told the group the following:

- In broad terms, the village expects (at the most) only low growth over the next 25 years, and as later results indicate, this appears to stem from a strong desire to retain the essential nature of the small rural community, whilst protecting its countryside and environs in which to live and work.

- The form of new housing development should be “ribbon infill”, rather than backfill and cul-de-sacs.
- The green environment, the connection with local agriculture and general rurality of the village are deeply important to residents and must be protected and preserved in the Neighbourhood Plan.
- The village is short of amenities to serve the community.
- The neighbourhood plan should take care to encourage and facilitate modest scale of business and employment within the village, provided that no threat to the character or green spaces of the village occurs as a consequence.

2.1.8 From the RS and the responses to the questions, the vision, key issues, and objectives were identified

2.2 Draft Policies Consultation (September 2020)

2.2.1 Following the RS, the Steering Group worked up a number of draft policies based on the evidence provided in the survey.

2.2.2 A consultation was carried in September 2020, which again involved a presentation to residents.

2.2.3 The presentation is included at Appendix 3.

2.2.5 The policies had been drafted by the HNDP Steering Group, and the views were sought on whether the drafted policies faithfully reflect the village survey results.

2.2.6 In addition to the draft policies consultation, a “call for sites” exercise was undertaken to identify any sites for future development within the village. The deadline for submission of sites was 15th September 2020. The call for sites is included at Appendix 4

2.2.7 The draft policies consultation included the following:

- Vision
- Objectives
- A new settlement boundary
- Housing growth policy
- Pattern of development policy
- Design and architecture of houses policy
- Landscape character and green space policy
- Environment policy
- Sustainable infrastructure policy
- Village amenities policy
- Supporting Rural Diversification and Employment policy

- 2.2.8 The Draft Policy consultation document is included at Appendix 5, and response form at Appendix 6.
- 2.2.9 The final count up from feedback on the draft policies was analysed.
- 2.2.10 With 58 returns this was a healthy response from the village. Encouragingly the vast majority indicated overwhelming agreement in all the sections of the policy.
- 2.2.11 There were a lot of comments provided – all constructive, some simply endorsing, some affirming the low appetite for growth and others offering improvement suggestions and a few specifics. Green space and amenities attracted most attention.
- 2.2.12 The figures and the comments are set out in the two documents in Appendix 7
- 2.2.13 The next step entailed drafting up the plan itself.

3.0 Formal Consultation on the Hargrave Draft Neighbourhood Development Plan – 09:00 Monday 25th Jan 2021 to 17:00 Monday 8th March 2021.

- 3.1 The public consultation on the Glaphorn Draft Neighbourhood Development Plan was carried out in accordance with The Neighbourhood Planning (General) Regulations 2012 (SI No. 637) Part 5 Pre-submission consultation and publicity, paragraph 14. This states that:

Before submitting a plan proposal to the local planning authority, a qualifying body must—

- (a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry-on business in the neighbourhood area*
 - (i) details of the proposals for a neighbourhood development plan.*
 - (ii) details of where and when the proposals for a neighbourhood development plan may be inspected.*
 - (iii) details of how to make representations; and*
 - (iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised.*
- (b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and*
- (c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.*

- 3.2 The Hargrave Draft Neighbourhood Development Plan was published for 6 weeks formal Public Consultation from 09:00 Monday 25th Jan 2021 to 17:00 Monday 8th March 2021.
- 3.3 An e-mail was sent to all Consultation Bodies, including neighbouring Parish Councils, providing information about the consultation dates and the locations where the Draft Plan and accompanying documents could be viewed and downloaded.
- 3.4 A copy of the Draft Neighbourhood Plan was also sent to East Northamptonshire Council.
- 3.5 The list of consultation bodies, representation form, and screenshots of the websites are included at Appendix 8.

4.0 Consultation Responses to the Draft Neighbourhood Plan for the Regulation 14 Consultation 09:00 Monday 25th Jan 2021 to 17:00 Monday 8th March 2021.

- 4.1 Table 1 below sets out the statutory responses submitted to the Draft Neighbourhood Plan, together with information about how these responses have been considered by the Parish Council and have informed the amendments to the Submission Neighbourhood Plan. This includes the responses to the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA).
- 4.2 Table 2 sets out the responses from residents in relation to the consultation.

Table 1 – Hargrave Draft Neighbourhood Development Plan Formal Consultation Responses from Statutory consultees

Ref No.	Consultee Name	Page Para / Policy	Support Object / Comment	Comments received	Parish Council Comments	Amendments to NP
H1	Sport England	General	Comment	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation, and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p>	<p>Comments noted and accepted.</p> <p>The Parish currently does not have a playing field; however, the Parish Council is seeking to work with local landowners to identify and secure a lease on a site to provide a community playing field.</p>	<p>Amend section 4.9 Village amenities to include the following:</p> <p><i>“Health and Well-being: In producing the HNDP, the need for facilities to support the sustained health and well-being of residents is recognised as very important. Whilst the village is unlikely to ever have its own surgery or medical facilities, residents are served by those in nearby Raunds and Kimbolton. However, there is much that residents themselves can do to sustain and enjoy healthy lives. The</i></p>

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				<p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other</p>		<p><i>HNDP seeks to facilitate this.</i></p> <ul style="list-style-type: none"> • <i>The village currently enjoys healthy amenity from the network of walks along designated country footpaths and bridleways. Much has been done in recent years to improve these. The Parish Council, farm-owners, landowners, and residents should continue to work together to protect, enhance or extend these assets which are important facets of our village life.</i> • <i>The Parish Council is encouraged to continue seeking to own or lease an appropriate portion of land within or adjacent to the village settlement boundary for use as a parish playing-field suitable for safe use by both the children and adults of the neighbourhood.</i> • <i>Residents, the Church and the Parish Council are encouraged to continue working together to make available within the village hall the facilities</i>

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				<p>indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p> <p>http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you</p>		<p><i>which accommodate clubs providing activities enhancing and promoting mental and physical well-being of the residents (e.g., indoor bowls, table tennis, dancing, yoga and the like)"</i></p>

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				<p>ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p>		

Ref No.	Consultee Name	Page Para / Policy	Support Object / Comment	Comments received	Parish Council Comments	Amendments to NP
				<p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England's Active Design Guidance: https://www.sportengland.org/activedesign</p> <p><i>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p> <p>If you need any further advice, please do not hesitate to contact Sport England using the contact details below.</p>		

Ref No.	Consultee Name	Page Para / Policy	Support Object / Comment	Comments received	Parish Council Comments	Amendments to NP
H2.1	Environment agency	General	Comment	<p>Thank you for consulting us on the Strategic Environmental Assessment screening report for the Hargrave Neighbourhood Plan.</p> <p>Based on a review of environmental constraints for which we are a statutory consultee, there are no areas of fluvial flood risk or watercourses within the Plan area. Therefore, we do not consider there to be potential significant environmental effects relating to these environmental constraints or other environmental sensitivities of interest to us.</p> <p>The Lead Local Flood Authority's (Northamptonshire County Council) Surface Water Management Plan will indicate if there are any critical drainage areas from local sources of flood risk (e.g., surface water, groundwater, and sewerage) which coincide with the Plan area.</p> <p>Should you have any further questions please do not hesitate to contact me.</p>	Comments noted and accepted	No change
H2.2	Environment Agency	HNDP3	Comment	<p>Thank you for consulting us on the Draft Neighbourhood Plan for Hargrave.</p> <p>We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.</p>	<p>Comments noted and accepted.</p> <p>In recent years, the village has suffered significant increases in the frequency and degree of flooding during winter months. The storm drains have overtopped throughout the length of the</p>	<p>Amend Section 4.4 Housing Development sites to include:</p> <p><i>"In recent years, the village has suffered significant increases in the frequency and degree of flooding during winter months. The storm drains</i></p>

Ref No.	Consultee Name	Page Para / Policy	Support Object / Comment	Comments received	Parish Council Comments	Amendments to NP
				<p>Based on the environmental constraints within the area, we have no detailed comments to make in relation to your Plan at this stage. However, as the Plan promotes growth (Policy HN3) we recommend you contact your Lead Local Flood Authority (Northamptonshire County Council) who will be able to advise if there are areas at risk from surface water flood risk (including groundwater and sewerage flood risk) in your Plan area. The Surface Water Management Plan will contain recommendations and actions about how areas at risk of surface water flooding can be managed. This may be useful when developing policies or guidance for particular sites.</p> <p>As your Plan proposes development, we recommend early consultation with Anglian Water to determine whether there is (or will be prior to occupation) sufficient infrastructure capacity existing for the connection, conveyance, treatment and disposal of quantity and quality of water associated with any proposed development within environmental limits of the receiving watercourse. This may impact on the housing figures and the phasing of development.</p> <p>Please note that if there is not sufficient capacity in the infrastructure then we must be consulted again with alternative methods of disposal.</p>	<p>single through road (Church Road and Church Street) together with discharge onto the street of foul sewage causing health and traffic hazard. The County Council (responsible for the storm sewers) and Anglian Water (foul sewers) have both been notified numerous times by residents and the Parish Council.</p> <p>Because of the issues above, the Parish Council consider that this should be addressed by developers prior to submitting an application for development.</p>	<p><i>have overtopped throughout the length of the single through road (Church Road and Church Street) together with discharge onto the street of foul sewage causing health and traffic hazard. The County Council (responsible for the storm sewers) and Anglian Water (foul sewers) have both been notified numerous times by residents and the Parish Council.</i></p> <p><i>The sudden increase in flooding of foul and storm sewers has intensified and coincided with a period of rapid growth in the village housing stock, with 13 new properties (12%) constructed in the last five years alone (Para 4.4.4 refers in detail).</i></p> <p><i>Ahead of or at the times of making request for outline consent and full planning permission related to any new development, the developer must demonstrate that their proposal will not cause undue detriment or hazard</i></p>

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				Should you have any questions please do not hesitate to contact me.		<p><i>to the village as a consequence of inadequate infrastructure provision. This must demonstrate that the infrastructure necessary to service the proposed property development safely and properly has sufficient peak capacity that the proposal will not increase or contribute to flooding or similar detriment within the Parish. As a minimum this demonstration must include both:</i></p> <p><i>1. Clear statements upon which the Parish Council and Planning Authorities can place reliance from each of the relevant Authority/utility asset owner responsible for each infrastructure asset as well as from the Office of the Lead Local Flood Authority (LLFA or future equivalent body) that sufficient capacity is available to safely and reliably service the village and to accommodate the additional planned loading</i></p>

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						<p><i>from the new development.</i></p> <p><i>2. Report from an independent, nationally-recognised engineering consultancy with demonstrable relevant experience which includes an overall engineering calculation made in accordance with the prevailing professional design standards, of the incremental loading, current foul sewer system capacity, storm drain system capacity and current sewerage and storm drain loading and thereby demonstrates more than adequate capacity is available to accommodate the new development without detriment or increased risk of flooding. The Parish Council and Planning Authority must be able to place reliance on this report.</i></p> <p><i>All new property development or redevelopment which increases the scale of property within the village</i></p>

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						<i>must adhere to this minimum requirement to demonstrate infrastructure adequacy before proceeding to seek any permission to proceed.”</i>
H3	Hunts District Council	General	Support	<p>Thank you for your email notifying Huntingdonshire District Council on the Regulation 14 consultation of the Hargrave Neighbourhood Plan.</p> <p>I have reviewed the neighbourhood plan and supporting documentation and would like to send on the below comment:</p> <p>'Huntingdonshire District Council (HDC) are supportive of the production of the Hargrave Neighbourhood Plan and welcome the opportunity to comment on the draft plan. Overall, HDC are supportive of the objectives and policies set out in the draft Hargrave Neighbourhood Plan.'</p>	Comments noted and accepted	No change
H4	Development Management Northants Highways	General	Comment	<p>I have the following comments regarding the proposed sites in Hargrave:</p> <p>Please note these locations represent a further intensification of a carriageway with no footway provision and a carriageway width which is substandard, for these locations to be supported by the LHA a footpath provision would be required along Church Street.</p>	<p>Comments noted.</p> <p>It was agreed that the provision of specific footways would urbanise the village character. Traffic calming and pedestrian safety would be provided in accordance with the Design Code.</p>	<p>Additional text inserted into section 4.4 and additional criterion inserted into Policy HNPD3 as follows:</p> <p><i>“Pedestrian Safety – As the carriageway is not wide enough for two lanes, white lines could be painted at both sides to</i></p>

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				<p>Vehicle visibility splays for both sites would need to be displayed at 43 m at the proposed accesses in each direction for a road with a 30 mph speed limit.</p> <p>The nearest public transport link is more than 400 m. The LHA would seek contributions to support better transport links depending on the number of proposed dwellings for both sites.</p>	<p>Amend criterion (d) in Policy HN3 Key expectations to include visibility splays</p> <p>It is unlikely that development within Hargrave will be of a level that would attract developer contributions.</p>	<p><i>indicate where cars, pedestrians and cyclists could travel. This would ensure the continued rural nature of this street in accordance with the Hargrave Design Code.</i></p> <p><i>Amend criterion (d) in HN3 to read:</i></p> <p><i>d) Provision of a singular safe roadside access with good visibility onto Church Street is essential. "Vehicle visibility splays would need to be displayed at 43 m from the proposed accesses in each direction for a road with a 30 mph speed limit. "</i></p> <p>No change</p>
H5	East Northants Council	General	HN3 & HN4	<p>Terminology The term 'roadside infill' for housing in Policies HN3 and HN4 and throughout the text provoked a great deal of discussion. This term indicates that housing should be positioned right up to the road/footpath,</p>	<p>Comments noted It was agreed to include a definition of "roadside infill" in the Hargrave NDP/</p>	<p>Include the following definition in the Glossary and reference in paras 1.12 and 3.7 and within the policy:</p>

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			HNDP1	<p>whereas there may be circumstances which justify it being set further back, if this would not cause any design or overlooking/ loss of light issues. It was felt that, whilst we understand the reasons for this aspiration, a term such as “street facing” would be more appropriate and could be supported. Note: In the Design Guide (QP3) a diagram recommends a minimum front garden of 1.5 m which could contradict the ‘roadside’ aspiration. Housing</p> <p>POLICY HNDP1: Housing Growth “Housing growth of 0.45% per annum, would provide 6 additional dwellings over the plan period 2021-2031, and will be supported within the Hargrave village settlement boundary, as shown on the Policies Map”. The Planning Policy team’s response to this policy is that whilst this is supported in the emerging Local</p>	Amendment agreed	<p>“In the context of this HNDP the term “roadside infill” should be construed as: New housing developed:</p> <ul style="list-style-type: none"> • within the village settlement boundary • adjacent to existing village properties • where the front of each singular housing plot abuts the roadside, the back of verge or the rear of public footpath tightly adjacent to the road. <p>The dwelling itself may be situated anywhere within this roadside plot, in keeping the nature of the rest of Hargrave village, thereby affording opportunity for gardens and for off-road parking to the front or the rear of the dwelling, within its plot.”</p> <p>Amend Policy HNDP1 to remove reference to “0.45 per annum”</p>

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			HNDP3	<p>Plan Part 2, for clarity the “0.45% per annum” reference should be included in the supporting text or as a footnote, rather in than the policy text wording. Instead, the “6 additional dwellings” is the preferred reference to use in the policy wording.</p> <p>Policy HNDP3 – Housing Allocations within Hargrave village: 3.1 Land north of Church Street 3.2 Land south of Church Street Development Management Officers have commented that this policy specifically states that development would be limited to “roadside infill”. (They also feel that this term should be amended but acknowledge that the overall aim is to avoid back land development). It is suggested that the site specific policy criteria could state that the frontages of the new houses should face directly onto Church Street.</p> <p>In context with the surroundings, site 3.2 has a strong linear character and could be developed to be street-facing, in accordance with policy 8 of the JCS and we would strongly advise that the depth of site 3.2 be reduced, to at least the same depth as site 3.1. This is considered necessary to ensure that new dwellings face the street, as is a clearly stated aspiration of the Plan. Otherwise, it is felt that if site 3.2 is taken forward at its current size, this could attract proposals of an inappropriate scale. Whilst</p>	<p>Definition of roadside infill to be included. See response in ENC terminology above.</p> <p>The settlement boundary has been amended to reduce the depth of the site south of Church Street. (previously 3.2. In addition, the boundary has been drawn in tighter in other locations, in accordance with this comment.</p>	<p>Amend HNDP as above</p> <p>Figure 4 Settlement boundary map has been amended to take account of these comments</p>

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			HNDP3 & HNDP10	<p>officers would resist applications considered to be of an inappropriate scale and contrary to the NPPF and Policy 8 of the JCS, it could be argued that the allocations allow for 6 dwellings across two sites (given that terraces or larger executive homes are not favoured), both sites could be too large to resist inappropriate larger scale / low density developments. It was also felt that this policy is rather long and that it could be split into two; with one policy for each of these sites.</p> <p>Parking Policy HNDP3 requires “ample parking” and any sites in relation to HNDP10 should have ‘adequate’ parking. How will this be assessed?</p>	<p>Site 3.1 has been removed as a housing allocation for reasons identified elsewhere in the comments to the Regulation 14 consultation.</p> <p>Agreed</p>	<p>Site 3.1 has been removed as a housing allocation.</p> <p>Insert in Policy HNDP3 (e) and HNDP10 (d) and Policy HNDP4 paragraph 5 “<i>in accordance with Northamptonshire’s adopted Parking standards</i>”</p>
			HNDP4	<p>Policy HNDP4 contains a better approach, as it refers to parking being in line with highway authority standards. We would advise that all three Policies, as well as the supporting text, should use the highway authority standards - to be consistent.</p> <p>It is also noted that the draft Ringstead NP has proposed parking restrictions on certain streets (although this plan is not yet made). This approach could also be considered for Hargrave, although it would be advisable to await the outcome of the Ringstead NP, following its examination.</p> <p>Conservation The council’s Senior Conservation Officer has responded:</p>	<p>Agreed</p> <p>There was some discussion around this issue, and the conclusion was that the parking on Church Street narrowed the road and provide natural traffic calming and therefore the group did not want to adopt this approach.</p>	<p>No change</p>

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				<p>The draft neighbourhood plan places importance on preserving the rural landscape and environmental assets (among other things), however, there does not appear to be anything included within the plan relating to the historic environment. I note that there is a section in the Design Codes document that provides some background information on listed buildings, but there is no local strategy or policy for dealing with them, which I consider to be a missed opportunity.</p> <p>Advice at paragraph 185 of the NPPF states that “plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should therefore take into account:</p> <ul style="list-style-type: none"> a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation; b) the wider social, cultural, economic, and environmental benefits that conservation of the historic environment can bring; c) the desirability of new development making a positive contribution to local character and distinctiveness; and d) opportunities to draw on the contribution made by the historic environment to the character of a place.” <p>Aside from a policy dealing with designated heritage assets, such as listed buildings, I consider that it would be useful if the plan or design codes document could include a local</p> 	<p>It is considered that heritage assets are adequately covered in the NPPF and East Northants policies and a further level of policy repeating the higher level policies is not required.</p> <p>It was agreed to insert in details of the Listed Buildings in Section 2 Parish Profile in relation to heritage assets and local list assets.</p>	<p>Amendments to Section 2 to include the insertion of the details of statutory listed buildings.:</p>

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				<p>list of heritage assets for consideration in planning decisions. Work carried out by the council has previously identified the following buildings within Hargrave for inclusion on a local list:</p> <ul style="list-style-type: none"> • Top Farm & 2 Adjacent Barns, Church Street • Former School/Village Hall, Church Road • Hargrave Hall, Church Road • Telephone Box, Church Road • Bottom Farmhouse & adjacent stable range <p>The plan may also include a policy for the Old Nags Head, a grade II listed building which has been vacant for a number of years and subject to various planning applications. As a starting point I would recommend that the Neighbourhood Plan Group reviews the Historic England publication – Neighbourhood Planning and the Historic Environment (Advice Note 11) – https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/ It may also be useful to point them towards some recently adopted plans.</p> <p>Notes from other Officers on conservation matters:</p> <p>Given that the appended Design Guide: 2.3. Heritage (Historic development) describes Hargrave as a village of ancient origin, which is recorded in the Domesday book, then such heritage is worthy of a policy in the neighbourhood plan and that a local list of listed and non-designated heritage assets</p>		

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			HNDP6	<p>should form part of this policy and supporting text (as is the case in other Neighbourhood Plans; e.g., Ringstead and Raunds). East Northamptonshire Council approved a draft Local List in July 2013 (Planning Policy Committee, 22 July 2013, Item 7), which should provide a useful reference/ start point in preparing a local list. It is emphasised that Neighbourhood Plans are well placed to adopt local lists of heritage assets and it is strongly encouraged that the Hargrave Neighbourhood Plan should include a local list; especially given that the Plan emphasises the historic environment as a key aspect of the village's character. The historic significance of the village, it is felt, should not be consigned to the appended Design Guide.</p> <p>If it is decided to go forward with including a local list, it is advised that the Parish Council should undertake an additional focused Regulation 14 consultation, to allow the local list to be incorporated into the Plan.</p> <p>Greenspace HNDP6: Local Green Space refers to development only being permitted if 'consistent with national policy on greenbelt'. As there is no greenbelt land in Northamptonshire, this reference to national policy is not supported. Nearly all "made" Neighbourhood Plans in East Northamptonshire (except Rushden and Stanwick) include Local Green Space (LGS) designations; e.g., Glapthorn, Kings Cliffe</p>	Agree to amend Policy wording.	<p>Policy HNDP6 amended to read</p> <p><i>"The Green spaces identified above are protected from any new development other than in exceptional circumstances, such as provision of appropriate facilities and/or</i></p>

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			HNDP5	<p>and Warmington Neighbourhood Plans have Local Green Space (Policies 9, RC1 and W5 respectively).</p> <p>Glaphorn – LGS definition for “special circumstances”: “New build development will not be supported within the Local Green Space except for very special circumstances such as:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Provision of appropriate facilities to service a current use or function; or <input type="checkbox"/> Alterations or replacements to existing buildings or structures, provided that these do not significantly increase the size and scale of the original building”. <p>Kings Cliffe: Policy RC1: Local Green Space is particularly good in that it only allows development in exceptional circumstances, such as the provision of appropriate facilities and/or infrastructure to service a current use or function.</p> <p>Warmington: Policy W5: Local Green Spaces – refers to the green spaces designated, as shown on the corresponding map and in the supporting text and states: “Proposals for development on a Local Green Space will not be supported except in very special circumstances”.</p> <p>The reference to “Green Belt” policies is not incorrect, but it could be confusing. It is therefore suggested that you use the wording from the Glaphorn Neighbourhood Plan (above) or similar wording, rather than explicitly referencing the Green Belt.</p> 		<p><i>infrastructure to service a current use or function.”</i></p> <p>No change</p>

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				<p>Trees The council's Senior Tree and Landscape Officer has responded: Native trees: generally, in rural areas we encourage the planting of native species if possible, of local provenance. However, this should not prevent the planting of non-native trees that may be more suitable to respond to climate change, and there are some native trees, ash is a specific example, where we are presently discouraging the use of this as a species - due to disease. Current thinking is that Sycamore would be the best substitute, which although naturalised and hosting the same numbers of invertebrates, would (normally) be precluded from a native-only list.</p> <p>Maps Figures 4 (page 24), 5 (page 37) and 6 (page 39) are in need of a more up to date OS base to include the 4 houses adjacent to Rectory View (approved under references 18/01293/FUL and 19/01527/FUL). Otherwise, the way this land is shown at present (open with no housing), would indicate that it is available for development.</p> <p>Design Code Design It is noted that there is an abundance of different design types and buildings from different eras, throughout the village. The design guidance referring to design proposals</p>	<p>It was agreed to retain reference to native trees.</p> <p>The maps are produced on the latest updates of OS Master map which do not include this development yet. A footnote will be included to reflect this.</p> <p>It was agreed that the Design Code reflects the rural character of the village and should remain as it is.</p>	<p>Extra paragraph included at 1.11 as follows: "All maps included in this Hargrave Neighbourhood Plan are produced on the latest base maps provide by Ordnance Survey. In this case January 2021."</p> <p>No change</p>

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			HNDP7	<p>reflecting local character, is not specific advice and does not define aspirations. We would also question the statement in QP4 that red brick is considered the local vernacular, as there is no overriding pattern or frequency of use. Officers would advise referring to the Glapthorn Neighbourhood Plan as an example. Hargrave NP represents the best chance of setting a stricter design brief, in line with the community's aspirations.</p> <p>Environment At Policy HNDP7 it is advised that the criteria (c) and (d) wording should be amended, in order to strengthen their legal robustness; "...how these are minimised and mitigated against; and...How ground contamination will be avoided mitigated".</p>	Agreed	<p>Insert additional paragraph in Policy HNDP9 as follows:</p> <p><i>"All new development should demonstrate that environmental risks have been evaluated and appropriate measures have been taken to minimise the risk of adverse impacts both during their construction and in their operation."</i></p>
			HNDP9	<p>Community assets – protecting and enhancing village amenities At Policy HNDP9, the designation of named facilities/ services in the Plan is welcome. However, it is strongly advised that the Nag's Head Inn should be added to the list of assets, given the longstanding local aspiration to see this reopened as a community pub/ shop/ cafe.</p>	The Steering Group do not agree that the Nags Head should be included	No change

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H6	Natural England			<p>Thank you for your consultation on the above dated 25 January 2021. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>SEA and HRA Screening It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.</p> <p>Neighbourhood Plan Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the National Planning Practice Guidance. The guidance highlights three triggers that may require the production of an SEA, for instance where:</p> <ul style="list-style-type: none"> • a neighbourhood plan allocates sites for development • the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan • the neighbourhood plan may have significant environmental effects that have 	Comments noted and accepted	No change

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				<p>not already been considered and dealt with through a sustainability appraisal of the Local Plan.</p> <p>We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.</p> <p>We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.</p> <p>Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result, the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.</p> <p>Please note that Natural England reserves the right to provide further comments on the</p>		

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				<p>environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.</p>		
H7	Chelveston cum Caldecott PC			<p>Firstly, congratulations to the HNDP Steering Group for getting this far. The Chelveston-cum-Caldecott Parish Council considered your draft NDP at our February meeting and have no objections to the draft NDP, rather we support it.</p> <p>However, in light of our own experiences at the examination stage, the HNDP Steering Group may wish to give further thought to policy 6, as the Examiner is free to strike out or amend anything in the plan that he/she (alone) considers would prevent it from being "made". You won't get an opportunity to challenge the examiner's changes (unless you decided to start again with a new draft at the Reg 14 stage).</p> <p>The draft NDP allocates 4 areas as Local Green Space (LGS), with one (consisting of 4 sub-areas) totalling 4.15 ha. This very likely to be challenged as it conflicts with the emerging Local Plan Part 2, which adds an</p>	<p>Comments noted.</p> <p>The was much discussion in relation to this and other comments made by the Parish Council. It was agreed to reduce LGS 3 to the woodland identified as 3(i) and include the Brickworks suggested by the PC. The LGS assessment will need amending to reflect this and an assessment doing for the brickworks.</p>	<p>Amend Policy HN6 to reduce LGS3 to the woodland and include the Brickworks. LGS Assessment to be updated accordingly.</p>

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				<p>additional definition on the phrase “extensive tract of land” - <i>The gross area of the site does not exceed 0.5 ha or 10% of the existing main built up area of the settlement, whichever is larger.</i> The Local Plan Part 2 has gone through several consultations and is due to be submitted once the latest one finishes, so will have significant weight attached to it.</p> <p>Looking at your proposed LGS HNDP Policy 6 sites -</p> <p>5.1 Triangular space immediately to the North of the Village Hall 0.07 ha 5.2 Churchlands Garden 0.33 ha 5.3 Land at the top of Nags Head Lane 4.15 ha (total) 5.4 Land on Brook Street 1.42 ha</p> <p>Sites 5.1 and 5.2 pass the original 0.5 ha test. The main Hargrave settlement is approx. 20 ha, so site 5.4 should get through the revised ha test. But at 4.15 ha, site 5.3 is likely to attract the examiner’s attention, even by calling it 4 sub areas. Rather than risk the whole of site 5.3 being struck out, the HNDP Steering Group might want to consider re-doing the LGS assessment for each site and change policy HN6 accordingly (i.e., for 7 rather than 4 sites). That way it is easier for the examiner to consider them individually passing, rather than collectively failing.</p>		

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H8	Archaeological Advisor Planning Northants			<p>Thank you for sending me the consultation on the Hargrave Neighbourhood Development Plan.</p> <p>Overall, it is welcome to see a recognition of the historic plan form of the village and the need to protect that form, and also a recognition of the importance of historic buildings. However, I note that there is little reference to the archaeology of the village, in particular with reference to the sites allocated for housing. Given the recent archaeological works on the east side of Church Road this is a pity as those works have shown that there may be archaeological remains present in a number of locations. I would encourage a statement of the potential need for archaeological investigation in connection with development, in line with the North Northants Core Strategy policy 2(d).</p> <p>The county Historic Environment Record indicates a number of sites around the periphery of the village where finds of Iron Age and Saxon date have been identified. In conjunction with the limited archaeological work which has taken place in the village a pattern of scattered occupation is suggested, particularly in the Saxon period when the village was first beginning to take shape. Specifically in connection with the allocated housing sites, I welcome the recognition of the ridge and furrow to the north of Church Street and the move to preserve it. Both of the allocated sites would have the potential to contain archaeological remains and it is</p>	<p>Comments noted</p> <p>Agreed</p>	<p>An extra criterion is included in Policy HN3P3 as follows: <i>“i) An archaeological investigation in connection with development site should be produced and submitted, in line with the North Northants Core Strategy policy 2(d).”</i></p>

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				<p>therefore highly likely that should they come forward, some form of archaeological work will be requested, probably by use of a pre-commencement condition on any consent granted. This should also be mentioned in the assessment.</p> <p>It is also worth noting in connection with the Local Green Space assessment that site 3 field (iii) contains another area of distinct ridge and furrow which together with that to the west provides definition and character to the northern edge of the settlement.</p>		
H9	Hargrave Parish Council			<p>Parish Council requests that the steering group re-examine site known as the Brickworks with a view to designating it as local green space on the basis that there is a stream, established trees, a public right of way, wildlife and is an example of Hargrave's industrial past.</p> <p>The Parish Council draws the steering groups attention to the need for the use of unambiguous language in the policy wording to ensure that the policies achieve their intended aims.</p>	<p>Comments noted</p> <p>Agreed to include this as an LGS. LGS Assessment will require amending and the policy and map will need updating</p>	Policy HN6 updated to include The Brickworks and LGS amended to include the assessment.
H10	Stanwick Parish Council			The Parish Council commends the Hargrave Neighbourhood Plan Steering Group for a clear and concise set of documents and for the tone and nature of the Draft Plan.	Comments noted	Remove Land to the north of Church Street from Policy HN6 and update the maps.
H11	Landowner	Page 32 Para 4.4.8 Fig 5	Support comment	" I agree with the aims stated for any housing development on the plot identified as Plot 1 on the north of Church Street, and hope that it will be possible to produce housing stock in keeping with the character of	Comments noted. It has been agreed to reduce the depth of the site to the south of Church Street.	

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				<p>Hargrave. However, to accommodate the stated requirements, I feel that Plot 1 will need to be as deep as Plot 2.</p> <p>In order to achieve a single road access to the new properties with good visibility onto Church Street; for there to be adequate off-street parking; for each new property to be set in appropriate-sized gardens; for necessary drains infrastructure, etc. and allowing for the possibility that any bungalows built would need a greater footprint than houses; I believe that Plot 1 is not deep enough north to south. Therefore, in order to accommodate the stated aims and be viable, I believe that any development will require about the same depth as that indicated for Plot 2.</p> <p>To the east of Plot 1, and within the current settlement boundary, is the redundant farm building which is the former piggery built by our grandfather, J. R. Billington, in 1934 and the remains of a stone farm building to the west of the piggery. They lie within the orchard which originally formed part of the curtilage of the Farmhouse where Grandfather lived from the 1920s to the 1980s (and with Grandmother until her death in 1968). I believe that to accommodate all of the stipulations attaching to any development, the depth of Plot 1 will need to be at least level with the north of the piggery which I anticipate would form part of any proposals."</p>	<p>From the comments received from statutory bodies and residents, it has become apparent that Plot 1 (in Reg 14 version) on the north side of Church Street, and which was allocated for development (designated as site 3.1 in the draft) is on land previously designated as Important Open Space by East Northamptonshire Council within the Raunds Area Plan. That ENC document describes it as land "which provides an important open area within a settlement which separates distinct groups of buildings or parts of the settlement".</p> <p>Other feedback received under Regulation 14 also noted that this land is the only remaining open natural green wild space which immediately adjoins the main highway along the northside of Church Street, and constitutes the largest area designated as Important Open Space in the village. The Residents' Survey also demonstrated that the green environment and general</p>	

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				<p>I have not thought it necessary to respond to any other particular paragraph of the Plan which I generally agree with and any minor inaccuracies do not directly affect me.</p>	<p>rurality of the village are deeply important to the vast majority of residents and must therefore be protected and preserved under the plan.</p> <p>This intent to protect appropriately designated land and preserve the character of the village was correctly reflected in Section 4.6 Objective 6 of the HNBP which states “The existing rural and agricultural landscape character of Hargrave is exceptionally highly valued by residents and is recognised as a critical attribute of the Parish.” The declared intent within the draft plan to allocate site 3.1 for development therefore ran contrary to this strong guiding principle.</p> <p>Consequently, considering all these points the Steering Group has reconsidered its previous recommendation to allocate your land for new development. That allocation has therefore been deleted in the updated HNBP as a consequence of the Regulation 14 consultation.</p>	

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H12	Landowner			<p>You have all done so much work on this, and I thank you all for that. Broadly speaking I support most of the plan, but I am rather concerned about the part that mostly affects me. I will send a map/plan showing my farmyard as soon as I can find it! I will submit it as part of my response as soon as I can scan it in.</p> <p>Thank you for the opportunity to comment on the Draft Plan. I will comment on the part of the plan which directly affects me.</p> <p>I have only just now, at the last minute, come across the Hargrave Local Green Space Assessment, which had not been drawn to my attention at any stage. It is fortunate that I just found it on the HPC website otherwise I would have been in ignorance of the reasons for including my land as proposed Local Green Space ("LGS").</p> <p>In responding now in the light of having just found that document should not be taken as my acceptance that proper procedure has been followed. I do not accept that the proper procedure has been followed.</p> <p>The allocation of my farmyard at the top of Nag's Head Lane and two of my fields in a block allocation with two other areas to the west (marked 3(i) and (ii)) was carried out without any notification or discussion with me as landowner of my two fields. I cannot speak for the neighbouring</p>	<p>Comment noted</p> <p>There is no requirement to consult with owners of potential local green space designations separately in the process. The consultation response provided within this consultation sets out your views.</p> <p>It was agreed to remove the majority of site 3 from the LGS designation and retain the woodland identified as 3(i). LGS Assessment needs updating accordingly.</p> <p>The designation would not affect agricultural permitted development rights</p>	<p>Amend Policy HN6P6 and LGS assessment to remove sites LGS 3(ii), 3(iii) and 3(iv).</p> <p>Amend maps accordingly.</p>

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				<p>landowners who I believe recently purchased those areas and I do not know them.</p> <p>The two areas to the west of my property are of very different character to my farmyard and land. Those two areas are traversed by a footpath and there are therefore public rights over them. In contrast, my farmyard and fields are part of a bigger 21 acre smallholding which has been farmed by my family commencing with Grandfather, J. R. Billington since about the 1920s. There are no public rights over my land.</p> <p>I now turn to the specifics of having included my land in HNPD 6 Local Green Spaces:</p> <p>I object to my farmyard and 2 of my fields at the top of Nag's Head Lane being designated as Local Green Space. A farmyard is not a green space by any definition.</p> <p>I have been researching on the web about the National Policy Planning Framework with regard to LGS designation and my understanding is as follows: -</p> <ol style="list-style-type: none"> 1. Before a LGS can be proposed, I understand that the Policy requires that there should have been an initial assessment, which then should be conveyed to the landowner by direct correspondence, giving the landowner the opportunity to respond and to take professional advice. This has not happened in relation to my land at Nag's 		

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				<p>Head Lane. I was not informed or consulted prior to the issue of the HN DP and have only been consulted in a general way, as all Hargrave landowners have been, as part of the general public consultation for the draft HN DP and not specifically in relation to the proposed designation of my land as LGS before the HN DP was published. As I understand it, I should have been separately consulted in relation to the proposed LGS designation before the designation was put forward. As this has not happened, I say that due process has not been followed in relation to my land and the designation should be removed.</p> <p>2. The farmyard and the farmland are of a different character and in different ownership from the two areas to the west (marked 3(i) and 3(ii)) and different considerations apply. But the four areas have been grouped together and are treated as though in common ownership with common usage which is wrong in principle. In relation to my farmyard and land it is in private hands with no public access to the land and only a public bridleway alongside it. That is quite different to the two areas to the west which have a footpath across them and are not being actively managed as far as I am aware.</p> <p>3. LGS orders are not intended to apply to tranches of agricultural farmland outside the village envelope but are intended for the designation of small spaces within the</p>		

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				<p>village. I object on the basis that there is no public amenity to be protected by the proposed LGS designation of my farmyard and farmland and they are outside the village envelope as specified.</p> <p>4. The farmyard is at the top of Nag's Head Lane with my four fields to the east of it. There are General Permitted Development rights attached to the use of farmyards, and agricultural land. I have recently had the grain silo removed (both on safety grounds and because grain is no longer grown) but expect to be able to use the farmyard area in accordance with permitted agricultural uses. Farmyards are not to be subject to LGS orders. I object to my farmyard as having been designated an LGS. On page 13 at "Allocated for alternative use" the word "no" has been written, when clearly there is a use for the farmyard under GPDO. Similarly, under "Designation compatible with planning permission or allocation" the word "N/A" has been written, ignoring the fact that GPDO exists. So, Test 1 has failed.</p> <p>5. At test 2 it says that the designated land "does not form an extensive tract of land", but I disagree. The total area sought to be allocated is a substantial tract of land and the farmyard and two of my fields sought to be designated as LGS are part of an agricultural holding of 21 acres. Therefore, the proposal seeks to allocate a substantial part of my total smallholding as LGS.</p>		

Ref No.	Consultee Name	Page Para / Policy	Support Object / Comment	Comments received	Parish Council Comments	Amendments to NP
				<p>6. Designating the farmyard as a LGS would impact upon my ability to use the 21 acres as a smallholding and prevent the appropriate agricultural use of the land.</p> <p>7. At test 4 my farmyard and two of my fields have been described as "areas neglected for many years which are charming in their informality." This fails to understand the regimes under which the fields have been managed. For many years, the fields were governed and funded under the Common Agricultural Policy. Today, they are currently governed under Countryside Stewardship rules. The various rules applicable to farmland management change over time. The land will need to be managed accordingly in years to come.</p> <p>8. My ownership and management of the land is of relative short duration compared with the 100 years since grandfather began farming the 21 acres. There have been great changes over those 100 years, and I remember most of over 65 years of them. In years to come, it will be necessary to reflect all future agricultural requirements as they arise for all of the fields in my ownership unfettered by any LGS application.</p> <p>The above objections deal with the issues which I believe arise as a result of my research as to how these LGS designations come about. Separately, I point out some</p>		

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				<p>factual inaccuracies in describing my Nag's Head Lane land.</p> <p>(a) I did put forward the land when I saw, rather late in the day, that the Hargrave website was "calling for sites". I was only showing the land in my ownership, not intending major development but just suggesting maybe the land offered the potential to accommodate part of the modest residential growth desired for the village as a whole over the next decade or so. The impression given in the HNDP is that my proposal was rejected on the grounds, inter alia, that new accesses would need to be created. This is not so. There are two long-established vehicular accesses: - one through the gateway into the farmyard at the top of Nag's Head Lane and from there you turn east into field 1, and the other through the gateway from NA 15 directly into the second field and from there you access the other fields to the east or the west. Therefore, even if there were to be modest residential development, no new accesses are contemplated, or necessary, in relation to my land. There is no entitlement for anyone to create any new access in relation to any property bordering NA15.</p> <p>(b) The land is farmland, and the farm is being brought round. It was subject to the Common Agricultural Policy scheme in my father's lifetime, but it is now in the Stewardship Scheme which is a long-term</p>		

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				<p>scheme. Improvements have been carried out on the land in recent years. More improvements are to come consistent with the scheme. But I cannot say that there will be an applicable scheme, nor whether the land would remain within such a scheme, when the current Stewardship period ends.</p> <p>A flexible approach to farmland management will be needed.</p>		
H13	Bastion Group			<p>Thank you for the invitation to comment on the Draft Hargrave Neighbourhood Plan 2011-2031 – Regulation 14 Version ('the Draft Plan') published on 25th January 2021 for 6 weeks' consultation. These representations are submitted on behalf of our client, Mr Philip Milne, Chief Executive of the Bastion Group ('Bastion'). Bastion own land to the south of Top Farm, Church Street, Hargrave ('the site'), which is one of two proposed allocations in the Draft Plan, the subject of Draft Policy HNPD3.</p> <p>We do not seek to repeat previous representations or details of Bastion's background, expertise, and successful track record of delivering high quality, attractive and sustainable developments, particularly in this part of the country. This can be found at http://www.bastion-group.co.uk/</p> <p>We are pleased to be able to comment on the Draft Plan having previously submitted the following for consideration by the Neighbourhood Plan Steering Group:</p>	Comments noted and accepted	No change

Ref No.	Consultee Name	Page Para / Policy	Support Object / Comment	Comments received	Parish Council Comments	Amendments to NP
				<ul style="list-style-type: none"> • Expression of Interest – 15th September 2020 • Call-for-Sites – 25th September 2020 <p>This was followed by:</p> <ul style="list-style-type: none"> • “Virtual” meeting with Neighbourhood Plan Steering Group – 12th October 2020 <p>Response from Neighbourhood Plan Steering Group on Bastion’s Call-for-Sites submission – 16th November 2020</p> <p>The feedback received from the Steering Group was extremely positive and much appreciated.</p> <p>We are also very pleased to see our client’s land included as a proposed allocation in the Draft Plan.</p> <p>Neighbourhood Plan Support</p> <p>Bastion commends the positive, collaborative, and comprehensive approach taken by the Steering Group in progressing to this Regulation 14 stage of the Neighbourhood Plan-making process and looks forward to working with the Steering Group (and Parish Council) through to the submission of the Draft Plan, its examination, referendum and then being “made” part of the statutory Development Plan.</p> <p>In relation to the Policies in the Draft Plan, Bastion comments as follows:</p> <p>Policy HNDP2 – New Development within Hargrave</p>		

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				<p>Bastion supports the intentions of this Policy, which seeks to support:</p> <ul style="list-style-type: none"> a) Small scale roadside infill, in between and alongside existing built development within the settlement boundary b) Development that reinforces the character of Hargrave as a small historic village, well integrated with the surrounding countryside c) Development that protects identified green spaces and the low-density development within the settlement boundary, and d) conserves built and natural heritage assets. <p>Bastion believes that all these policy objectives can be achieved through the development of its site (Site Allocation 2) as demonstrated, albeit in indicative sketch form, in the Call-for-Sites' submission earlier in the Draft Plan-making process.</p> <p>Policy HNPD3 – Housing Allocations within Hargrave village Bastion supports the proposed allocation within the proposed settlement boundary (Figure 5 of the Draft Plan) which has been drawn up for Hargrave to identify the built-up area within which future development is considered appropriate. This is reproduced overleaf as Image 1. Bastion's land is included as Site Allocation No.2.</p>		

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				<p>This followed the Call-for-Sites exercise in September 2020 that resulted in Bastion’s [and one other] site being commended within the Plan as being suitable for development. Whilst indicative sketches for 8 no. dwellings in different configurations were shown at the “Expression of Interest” and “Call-for-Sites” stages, as expressed at the “virtual” meeting on 12th October 2020, Bastion is open and willing to engage in further discussions with the Steering Group to incorporate a scheme for 6 no. suitable dwellings on the site proposed to be allocated to the south of Church Street. This is to ensure that the objectives of the Draft Plan, the aspirations of the community and the matters raised by the Steering Group in its feedback of October 2020 are taken on board and satisfactorily addressed.</p>		
H15	Northants County Council Key Services			<p><u>Introduction</u> Thank you for your letter regarding the Regulation 14 consultation on the draft of the Hargrave Neighbourhood Development Plan 2011-2031 (the draft Plan). I am responding on behalf of Northamptonshire County Council Key Services (Education, Libraries, Broadband) and on behalf of Northamptonshire Fire and Rescue Service, in relation to the proposals and policies set out in the draft Plan. Other County Council service areas may respond separately.</p> <p>This response is based on the County Council’s adopted Planning Obligations Framework and Guidance Document</p>	Comments noted and accepted. However, it is unlikely that the level of housing development proposed will be of sufficient numbers of dwellings to generate any S106 contributions.	No change

Ref No.	Consultee Name	Page Para / Policy	Support Object / Comment	Comments received	Parish Council Comments	Amendments to NP
				<p>“Creating Sustainable Communities – Jan 2015”. This sets out the County Council’s approach to developer contributions including Section 106 planning obligations and sets out the level and type of contributions that would usually be expected to be provided by developers towards the cost of delivering infrastructure (provided by the County Council) that is necessary to make development viable and sustainable. A copy of the document is available to download from the Council’s website: www.northamptonshire.gov.uk/managinggrowth</p> <p><u>General Comments</u> It is noted that the Plan builds on the housing allocations established through the adopted North Northamptonshire Joint Core Strategy 2011-2031 which states that the scale of development in an individual village (excluding the four largest in the area) will be led by locally identified employment, housing, infrastructure, and service requirements, and be dependent upon the form, character and setting of the village and its proximity to larger settlements. This is further informed by the emerging East Northamptonshire Local Plan Part 2 which identified Hargrave as a small village, with an indicative housing need of 10-15 dwellings over the 2011- 2031 plan period.</p> <p>Since 2011, 7 new homes have been delivered in the village, with a further 8</p>		

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				<p> dwellings completed or in progress as of December 2020, taking the total new dwellings delivered to date to 15.</p> <p> The Plan seeks to address current housing need (as identified through the Resident’s survey in November 2019) by limiting development at Hargrave village “to small scale infill residential development” and “rural exceptions” affordable housing schemes whilst also ensuring that community facilities are safeguarded and, where possible, improved.</p> <p> It is noted that the draft Plan makes two additional specific allocations or additional land allocations to accommodate further housing development within the village boundary for the plan period.</p> <p> <u>Education</u> Any new housing coming forward during the draft Plan period may place additional pressure on the demand for and availability of school places across Early Years, Primary, Secondary and Sixth Form ages. As such, developer contributions (such as section 106 planning obligations and CIL if applicable) may be required to support investment in new, enhanced and/or improved infrastructure in order to effectively mitigate the impact of new development and ensure that demand for services is met to support long term sustainability. Such mitigations may include a requirement for planning obligations towards local education infrastructure in order to ensure there is sufficient capacity to</p>	<p> It is unlikely that the level of housing development proposed will be of sufficient numbers of dwellings to generate any S106 contributions.</p>	<p> No change</p>

Ref No.	Consultee Name	Page Para / Policy	Support Object / Comment	Comments received	Parish Council Comments	Amendments to NP
				<p>accommodate pupil yields arising from new housing development alongside projected population growth figures arising from any increase in birth rates and inward migration. The County Council will work with the relevant School, the Education Funding and Skills Agency, and other partners to ensure that suitable provision is available to accommodate all existing and potential future pupils in the area, and to secure section 106 planning obligations where appropriate to support this.</p> <p>It should be noted that in some cases it may be necessary for the county council to forward fund delivery of key infrastructure ahead of planned for development coming forward, for example in order to address the cumulative impact of development across a number of sites, or to respond to site specific opportunities as they arise. In these instances, and where it can be demonstrated that future development will benefit from the early delivery of related infrastructure, then developer contributions will be required to retrospectively support its delivery.</p> <p><u>Fire and Rescue</u> Northamptonshire Fire and Rescue Service (NFRS) has identified that new developments and associated infrastructure within Northamptonshire equates to an increase in population as well as traffic movements. This will inevitably lead to an increase in the spread of community risk which places additional demands on Fire and Rescue</p>	<p>It is unlikely that the level of housing development proposed will be of sufficient numbers of dwellings to generate any S106 contributions.</p>	<p>No change</p>

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				<p>Service resources to ensure safe places are maintained, consistent with national Government expectations and guidance.</p> <p>NFRS sets out its criteria for responding to incidents within its Standards of Operational Response (SOR). The standards outline how the Service will respond to different incident types which fall within its statutory responsibilities under the Fire and Rescue Services Act 2004. The projected collective growth of the county will impact on the Service's ability to maintain Standards of Operational Response. For example:</p> <ol style="list-style-type: none"> 1. Increased community risk from fire: It is important to note that fire and rescue service provision is made on the basis of mitigating risk. In this regard, national and local statistics show that residential properties pose the highest risk to life from fire related incidents. Initial target attendance times for life risk incidents have been agreed at 8 minutes from time of call to arrival at scene on 75% of occasions, and it is this target that the county needs to maintain going forward. 2. Increased community risk from road traffic collisions (RTC): Under the Fire and Rescue Services Act 2004, Northamptonshire Fire and Rescue Service have a statutory responsibility to respond to Road Traffic Collisions (RTCs). 		

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				<p>The impact of growth on NFRS is not limited to that within actual residential and commercial developments. Additional growth will create an increase in vehicles and traffic movements that will lead to an increase in risk and activity for the Service.</p> <p>Coupled with an increase in linear growth the Service will need to implement resources accordingly to ensure response standards to RTCs are maintained.</p> <p>The demands on fire and rescue resources as a result of collective growth manifest themselves in a variety of forms, dependent on the scale and nature of the proposed development, including the need for the Service to:</p> <ul style="list-style-type: none"> • introduce new types of fleet (e.g., smaller 'rapid response' initial intervention vehicles); • add new bays to existing fire stations to accommodate additional vehicles; • relocate or provide new response facilities (e.g., fire stations); • introduce new types of equipment; • reduce risk and demand through the provision of fire suppression systems (sprinklers) in appropriate developments. <p>Where there is a direct impact on infrastructure provision relating to new housing development, developer</p>		

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				<p>contributions towards Fire and Rescue service buildings and equipment will be required through s106 planning obligations. The county council will work with developers, the local planning authority and Northamptonshire Fire and Rescue to respond on site specific requirements as new planning applications come forward, and to identify opportunities for strategic infrastructure improvements to meet growing demand.</p> <p><u>Libraries</u> Where a new major development will generate additional need and library space requirement, the County Council requires contributions towards the costs of providing new, extended and/or improved library facilities to support the delivery of growth and to ensure that established national and local levels of service delivery can be maintained.</p> <p>The County Council has adopted the National Library Tariff formula produced by the Museums Libraries and Archives Council (MLA). This includes:</p> <ul style="list-style-type: none"> • A minimum standard of 30 sq. metres of new library space per 1,000 Population. • A construction and initial equipment cost on a per sq. metre basis (adjusted to reflect Northamptonshire building costs), based on BCIS building costs for public libraries. 	<p>It is unlikely that the level of housing development proposed will be of sufficient numbers of dwellings to generate any S106 contributions.</p>	<p>No change</p>

Ref No.	Consultee Name	Page Para / Policy	Support Object / Comment	Comments received	Parish Council Comments	Amendments to NP
				<p>Where there is a direct impact on infrastructure provision relating to new housing development, developer contributions towards Library facilities, services, buildings, and equipment will be required through s106 planning obligations. The county council will work with developers, the local planning authority, and the Library service to respond on site specific requirements as new planning applications come forward, and to identify opportunities for strategic infrastructure improvements to meet growing demand.</p> <p><u>Broadband</u> The vision for the county is to be at the leading edge of the global digital economy. To meet this challenge, we've set an ambitious target of 40% full fibre connectivity across the county by December 2023. To deliver on this, it is essential that new developments (both housing and commercial) are served by high quality full fibre networks. Access to the speeds, 1 gbps or faster, delivered by this technology will bring a multitude of opportunities, savings, and benefits. It also adds value to the development and is a major selling point for potential residents and occupiers.</p> <p>In order for the commercial communications market to be able to deploy to these new build areas, measures must be introduced at the earliest opportunity. This will provide the</p>	Agreed	Amend HNPD3 to include a criterion as follows:

Ref No.	Consultee Name	Page Para / Policy	Support Object / Comment	Comments received	Parish Council Comments	Amendments to NP
				<p>required specification to enable full fibre connectivity for all new developments. To help developers, some fibre based broadband network providers such as Openreach and Virgin Media have dedicated online portals which provide assessment tools and technical help. There are also a variety of other suppliers operating in the area such as: Gigaclear, CityFibre and Glide. Further details of each of these as well as others can be found at the below web address: http://www.superfastnorthamptonshire.net/how-we-are-delivering/Pages/telecoms-providers.aspx</p> <p>Early registration of development sites is key to making sure the people moving into your developments get a full fibre broadband service when they move in. More information can be found in the links below: BT Openreach: https://www.ournetwork.openreach.co.uk/property-development.aspx</p> <p>Virgin Media: http://www.virginmedia.com/lightning/network-expansion/property-developers</p> <p>It is advised that ducting works are carried out in co-operation with the installations of standard utility works. Any works carried out should be compliant with the Manual of Contract Documents for Highway Works-</p>		<p><i>"j) New development should be served by high quality full fibre networks."</i></p>

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				<p>specifically Volume 1 Specification Series 500 Drainage and Ducts, and Volume 3 Highway Construction Details Section 1 – I Series Underground Cable Ducts. These documents can be found at: http://www.standardsforhighways.co.uk/ha/standards/mchw/index.htm</p> <p>For further information on the project please visit www.superfastnorthamptonshire.net Email us at: bigidea@northamptonshire.gov.uk</p> <p>In terms of other infrastructure requirements for which the County Council has a statutory responsibility, such as Highways, S106 obligations for these would be handled directly by their respective areas within the Council. I would therefore suggest it may also be useful to liaise with these departments directly to ascertain any requirements over and above those mentioned here.</p> <p>I hope that the above information is helpful; of course, please be aware that the comments provided may be subject to change as a result of future updates to the adopted s106 Planning obligation framework, in line with any changes to County or National planning policy or legislation.</p> <p>Please don't hesitate to contact me should you have any queries or require any additional information or clarifications.</p>		

Table 2 Hargrave Draft Neighbourhood Development Plan Formal Consultation Responses from Statutory consultees

Ref. No.	Page Para Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
R1			<p>Thank you for sharing the HNDDP - an excellent document which has clearly had a lot of effort put into it.</p> <p>With having for only a few weeks, I'm not sure I feel entitled to a strong view about future housing development, although I would generally support the conclusions and policies within the plan, i.e., limited growth (I would suggest the policy should be that it should <u>not exceed</u> the requirement/target set by ENC), in-fill and within the designated area.</p> <p>However, the designation of the two sites for future housing off Church Street does concern me on two counts:</p> <p>1. The ability of the PC to limit the extent of housing on either plot which may be proposed by a developer. From the experience of my last village, an area was identified in the NDP with a clear target for house numbers. The developer then proposed a larger number which has proven difficult to argue against. I fear the same could happen here as well, especially at Housing Allocation Site 2 which looks fairly extensive. A developer would naturally want to develop all of a site at one time and maximise their investment. I'm not clear what the answer is to this risk - maybe sub-divide Site 2, or just make it smaller? I might also suggest that there should be no development of the sites until at least, say, 2025, to reflect that development tends to come in lumps rather than 1 or 2 a year.</p> <p>2. The second point is related to the concerns raised in the plan about the traffic coming from Raunds and the danger this presents in the village. I have been a bit surprised/concerned at the number of DPD vans in particular who seem to use Church St/Rd - presumably on their way to St Neots or beyond in the morning and evening. The lack of footpaths wouldn't be</p>	<p>Comments noted.</p> <p>East Northamptonshire Council in their response have requested that the percentage is taken out of the policy and therefore it will state "an additional 6 dwellings."</p> <p>The settlement boundary has been amended to reduce the depth of what was Plot 2, Plot 1 has been removed and the boundary has been drawn tighter to reflect East Northamptonshire Comments.</p>	<p>No further change</p> <p>No further change</p>

Ref. No.	Page Para Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
			<p>an issue with less fast/large traffic, but I would be concerned that anyone living in houses at Site 2 would take their lives in their hands if they wanted to walk to the church or village hall. The solution (simple but most difficult to achieve) is to reduce the amount of traffic - failing that then perhaps any development at Site 2 should come with a requirement to either create a safe footpath to the village centre, or some form of sympathetic traffic calming.</p> <p>Other than the above, I spotted a couple of typos!</p> <p>4.1.6. More up to date figures for the end of 2019, estimate the population of Hargrave at 225 people (188 adults, 37 children), living in 111 dwellings. In Hargrave, the growth of new housing since the end of 2011 has useen an increase of 7 homes through to the end of 2019. Expressed in terms of percentage growth this is growth of 6% over the period. During 2020, an additional 8 homes have been either completed or are in the final stages of construction – doubling the growth of the preceding 8 years.</p> <p>4.3.1. New housing development in Hargrave Parish shall be contained within the settlement boundary. A newly proposed settlement boundary has been drawn up for Hargrave to identify the built-up area within which future development is considered appropriate. Outside this identified settlement boundary, the Parish area is regarded as open countryside for the purposes of planning and hence development opportunities, if any, will be extremely limited and subject to approval as exceptions under the NNJCS Policy 13 (Rural Exceptions). Any exception must demonstrate how it accretes to the value of the village and why it becomes preferable to accommodating growth within the defined</p>	<p>Agreed</p>	<p>Amend accordingly.</p>

Ref. No.	Page Para Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
			village settlement boundary as has been planned, and that it will be fully supported within the capacity of the existing village infrastructure (including roads, storm drains, sewers) without strain.		
R2		support	Well, what a lot of work everyone has done, so many pages to read (and we did read them!) and we do agree with what has been suggested.	Comments noted	
R3	4.8		<p>There are 3 points I would like to raise.</p> <ol style="list-style-type: none"> 1. Increase of traffic and poor road condition. Traffic through Hargrave has increased considerably in recent years and the roads, especially Church Street, which is still very narrow in parts, is in very poor condition and has continual surface water could not sustain increased use and would need to be upgraded to support a growing community. 2. The road drainage in Church Street is not functioning with many drains blocked which, in turn, results in high volumes of surface water to run down the Street causing flooding by the white bridge and in Brook Street. This needs to be addressed. 3. The current mains drainage and sewers, especially in wet weather, is inadequate and foul water sewerage has been overflowing the main drainage into Brook Street this month (January 2021). It is obvious that the mains drainage system could not support any further development in Hargrave in its present state. <p>I am sure the Parish Council is aware of these problems and I hope they have reported these environmental issues to both the council and the East Northants Planning Department to</p>	<p>Comments noted.</p> <p>The Highway Authority have suggested that a footway is included as part of any future development. New Paragraphs have been included as 4.4.14 a to 4.4.19 to ensure that new developments deal with this issue.</p> <p>Further paragraphs have been included as 4.4.10 to 4.4.13 that ensure new developments address this issue.</p> <p>Further paragraphs have been included as 4.4.10 to 4.4.13 that ensure new developments address this issue.</p>	<p>No further change. See response to comment H4.</p> <p>No further change. See response to comment H2.</p> <p>No further change. See response to comment H2.</p>

Ref. No.	Page Para Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
			ensure that steps can be taken to resolve the issues and to keep these issues in mind when considering any future planning applications for the area.		
R4			<p>Something important I have recently thought about following something Graham said about the traffic through the village. We should start a process to make Hargrave a no through road.</p> <p>With the Chown's Mill roundabout giving better access to Bedfordshire and the proposed dualling of the A45 to Thrapston and A14 giving quicker access to Cambridgeshire; there will be no valid reason to use Hargrave as a rat run for workers or Warth Park traffic.</p>	The Parish Council considers this could cause an inconvenience to parishioners. Nonetheless, the HNBP recognises the nuisance from the increase in traffic flows through the village, and measures are included in the Design Code to address traffic flows in the village.	No change
R5			<p>I believe something bold needs to be contemplated by Hargrave residents because Raunds is expanding at an unbelievable rate and those driving south and back will make life in Hargrave extremely difficult in the foreseeable future. We need a new road just west of public footpath NA11. Starting just before the narrow bridge into Hargrave ending a hundred yards west of the present entrance on the B645. A number of expensive homes alongside this new road will be needed to help cover the cost.</p>	The HNBP recognises the increase in traffic through the village. The provision of a by-pass is outside the scope of the Neighbourhood plan.	No change
R6			<p>Having recently entered into negotiations to purchase the plot next to Wildacre (<i>corner of Church Street and Brook Street</i>), I refer to the Development plan, where the village boundary ends at my property. Development of the site might be a possibility in the future, subject to Planning Permission, with the access via the drive at Wildacre.</p> <p>Historically the site has been put forward for the erection of two dwellings and at the time, the Parish Council had no objections, based on the above arrangement of a shared drive.</p>	<p>Comments noted.</p> <p>The Steering Group have identified a settlement boundary for the village and areas within that settlement boundary for future growth for the village. The Settlement boundary has been extended from the 1996 version to encompass Wildacre,</p>	

Ref. No.	Page Para Policy No.	Support / Object / Comment	Comments received	Parish Council Comments	Amendments to NP
			I would ask that the plot be included within the village boundary, to this end.	however, it is not considered appropriate to extend the boundary further.	
R7.1	Page 24 Para 4.2.2 Policy 2	object	<p>We do not agree with the Hargrave NDP new settlement boundary as the majority of the large infill sites have been identified on three sides of Top Farm. The Residents Survey confirmed that the green environment and general rurality of the village are deeply important to the residents and must be protected and preserved. Concentrating the proposed levels of new development in this one area will have a significant detrimental impact on the desired spacious rural nature of village.</p> <p>Land North of Church Street (Site 1 of the Hargrave Site Assessment). The Settlement Boundary includes the land North of Church Street which is both visually and environmentally important. This area was designated an Important Open Space by East Northamptonshire Council, Raunds Area Plan as land “which provides an important open area within a settlement which separates distinct groups of buildings or parts of the settlement”. This land still performs an important visual role and must now be supported by Hargrave NDP, Landscape Character and Green Space, Objective 6 which states it is essential to conserve the rural character of the parish including wildlife habitats.</p> <p>This land is the only remaining open natural green wild space which immediately adjoins the main highway on Church Street, and the largest such area in the village. If the area is developed Church Street would become a frontage of formal gardens losing the desired openness and separation which creates the rural character and charm of the village.</p> <p>A historic lack of management has resulted in an</p>	<p>Comments noted.</p> <p>From the comments received from this consultee and others, it has become apparent that the land on the north side of Church Street, and which was allocated for development is on land previously designated as Important Open Space by East Northamptonshire Council within the Raunds Area Plan. That ENC document describes it as land “which provides an important open area within a settlement which separates distinct groups of buildings or parts of the settlement”. It is agreed that this land is the only remaining open. natural green wild space which immediately adjoins the main highway along the northside of</p>	<p>Site allocation 3.1 Land to the north of Church Street is removed as a housing allocation and re-instated as a Local Green Space.</p>

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			<p>environmentally rich and important area. Having found Great Crested Newts on our boundary it is clear that they are thriving in their ideal habitat of scrub woodland and grassland which has been allowed to develop on the land. Such natural areas are becoming increasingly rare and existing biodiversity assets must be protected to preserve and enhance the local environment. This land is equally important, both visually and environmentally, as the sites which have been identified as Local Green Space in the Hargrave NDP and as such must be offered the same protection.</p> <p>The lack of physical boundaries or change of ownership demarking the Settlement Boundary across the areas proposed for development allows for much larger developments beyond the initial infill proposals. Backfill is not supported by Hargrave residents or the Hargrave NDP and it is dangerous to provide the option for such schemes to evolve as they are unlikely to be refused by the Local Planning Authority.</p>	<p>Church Street, and constitutes the largest area designated as Important Open Space in the village.</p> <p>The Residents' Survey also demonstrated that the green environment and general rurality of the village are deeply important to the vast majority of residents and must therefore be protected and preserved under the plan. This too was emphasised in feedback gained through the Regulation 14 consultation. This intent to protect appropriately designated land and preserve the character of the village was correctly reflected in Section 4.6 Objective 6 of the HNPD which states "The existing rural and agricultural landscape character of Hargrave is exceptionally highly valued by residents and is recognised as a critical attribute of the Parish."</p> <p>It has been agreed to remove the site north of Church Street as a housing allocation and re-instate it as a Local Green Space.</p>	

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R7.2	Pages 27, 30 & 31 Para 4.3.12 & 4.4.7 Policy 3, 3.1 & 3.2	object	<p>We do not agree that the allocated sites for housing have been correctly assessed to meet the criteria for designated housing development sites. Our objections are based on the following:</p> <ol style="list-style-type: none"> 1. The Hargrave NDP Paragraph 4.1.16 states that a further 6 new homes are required from 2020 but the sites allocated for future housing development are capable of accommodating 16 new homes (Paragraph 4.3.12) permitting far greater development opportunity than required or desired by the village residents. 2. The Hargrave NDP Key Expectations 3.1 & 3.2 suggest that new developments should be self-sufficient in relation to storm water runoff. However, this cannot be achieved by the use of porous materials as the land is clay and infiltration schemes will not be successful. 3. Both sites are situated on sloping land with the natural course of water run-off flowing towards Church Street. It will be impossible to capture all rainfall on site and as such any development will result in additional water directed towards the storm water drains within the public highway. These drains are currently blocked and have been for many months. As a result, the highway storm water now enters the sewer system and causes that to overflow. I have attached photographs of the problems that occur due to the unmanaged storm water along Church Street near the proposed development sites, and also the resulting overflowing sewers on Brook Street. 4. Land South of Church Street – Site 2 The Hargrave Site Assessment for Site 2 states that the “development will be self-sufficient in relation to stormwater run-off” and “place little pressure on existing village storm drainage”. This is not the case as already mentioned the land is clay and infiltration schemes will not be successful. Also, there is a natural spring located within the development site which runs all year. This will need containing and directing 	<p>Comments noted.</p> <p>Agreed. Site to the north of Church Street removed and Site to the south of Church Street has been amended.</p> <p>Agreed. Paragraphs inserted in relation to surface water run-off and foul drainage.</p> <p>Agreed see responses to comments at H2 and H4.</p>	<p>No further changes</p> <p>Amendments proposed at H2 and H4.</p>

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			<p>away from the site before construction can commence. The location of the spring, continual flow of water and slope of the land means this can only be done by directing the water away from the land and into the existing main system.</p> <p>5. Land North of Church Street – Site 1 Concerns are raised in The Hargrave Site Assessment for Site 2 that the land to the rear of the development site is at risk of future back fill. The same risk on a potentially much larger scale applies to Site 1 but not this is not documented in the assessment.</p> <p>6. Other potential development sites around the village have been dismissed because of associated narrow roads and lack of footpaths. The sites identified on Church Street suffer the same issues (i.e., narrow road, which is single car passing in places, and no footpaths) but at far severer scale as the highway here is subject to much faster, larger, and heavier volumes of traffic.</p>		
R8			<p>Please accept these last minute comments on the proposed plan.</p> <p>1. The plan adopts new village boundaries which are significantly different from the Raunds plan in 2006. How do we know that the boundary will not change again?</p> <p>2? In view of the recent floods in December 2020 and the historic evidence that the storm drains and sewage drains are of 19th century quality, that we should state that no further development should be allowed until they are brought to 21st century spec.</p> <p>3. Health and safety levels of the village roads are below modern standards, and no further development should be allowed until traffic density, vehicle speed, usable road width, road surface and available pavements are brought to standard.</p> <p>4. The proposed developments on church street are described</p>	<p>Comments noted.</p> <p>The settlement boundaries identified will remain for the plan period until 2031.</p> <p>Criteria will be included in HNDP3 that states that developers must ensure that this is addressed prior to submitting a planning application. See response to Comments at H4.</p>	No further changes

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			<p>as reasonable in the plan but no plans are shown for our illumination.</p> <p>5. The plan describes a good level of internet; however, I believe that fibre to house should be considered as 21st century standard.</p>	<p>Future development of the site will be through planning applications.</p> <p>Agreed this is now included.</p>	
R9	Page 32 Para 4.4.8 Policy 3	Object comment	<p>My response is an objection to, and comment on, the decision to designate area 1, the 'land north of Church Street' as suitable for housing development.</p> <p>My objection largely rests on the fact that I think the area is a valuable green space that better meets many of the criteria identified in the section on Green Spaces (para 4.6.17) than some the areas that have been designated as such. I'm not denigrating any of the sites chosen, and I am not suggesting any shouldn't have been. However, if one is looking for a green 'wild' area that provides a natural break in the built environment or a space with a richness of wildlife (4.6.14) then clearly the field between Top Farm & the Farmhouse has more to offer than the garden at Churchlands or the small triangle of land left north of the village hall. Indeed, given recent developments and the more advanced proposed development south of Church Street, it is probably the last sizeable green space left within the village as opposed to on its outskirts. I note that, bar the two areas already mentioned, all the other designated Green Spaces are actually outside the proposed village envelope.</p> <p>The Local Green Space section talks of areas that are "important to wildlife, providing shelter and having created habitat corridors and cover that allow mammals and birds, such as deer and pheasant, to roam freely within the village and connect with the countryside beyond. Species are diverse, and include long- eared owls, barn owls, turtle doves and lesser spotted woodpeckers. Badgers, muntjac and fallow deer, foxes, bats, red kites, and peregrine falcons are all frequently observed within the village and its environs, providing delightful</p>	<p>Comments noted.</p> <p>From the comments received from this consultee and others, it has become apparent that the land on the north side of Church Street, and which was allocated for development is on land previously designated as Important Open Space by East Northamptonshire Council within the Raunds Area Plan. That ENC document describes it as land "which provides an important open area within a settlement which separates distinct groups of buildings or parts of the settlement".</p> <p>It is agreed that this land is the only remaining open. natural green wild space which immediately adjoins the main highway along the northside of Church Street, and constitutes the largest area designated as Important Open Space in the village.</p>	No further changes

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			<p>diversity of wildlife”. Of the areas within the village envelope, none meet that description as well as the land north of Church Street that has been lined up for development.</p> <p>However, even if it is included, I would suggest there is still an opportunity for the village to incorporate further safeguards around any impacts on wildlife into the plan.</p> <p>As noted in the separate Housing Site Assessment document there is an issue regarding the existing pressure on village infrastructure and drainage, and I welcome the stipulation that any development of additional property must be responsible for demonstrating independent verification of whether or not the existing infrastructure has capacity capable of meeting future need before proceeding. However, I would suggest that it would be beneficial for an additional stipulation that before any development proceeds there needs to be a similar responsibility for allowing a full and independent ecological survey of the site at an early stage.</p> <p>I am aware from living next door to the field and having regularly seen many of the species already mentioned earlier, that it is a haven for wildlife including protected species. Given the field, including the section singled out for development, appeared to have been left untouched for at least 15 years prior to the 2019 clearance work, and have been untouched since, there is a reasonable question as to what other species of flora & fauna may have settled there.</p> <p>The wider field is also the site of a large pond, one of the few significant areas of available water for wildlife that I’m aware of within the village. Though the pond itself appears to be just beyond the roadside area marked for development, its proximity will have contributed to the variety of wildlife in the designated area.</p> <p>A full ecology report will need to be made on all the vulnerable and protected species found such as newts, bats, badgers, birds, butterflies etc. Including a stipulation in the plan that this needs to be done independently, and with sufficient time ahead</p>	<p>The Residents’ Survey also demonstrated that the green environment and general rurality of the village are deeply important to the vast majority of residents and must therefore be protected and preserved under the plan. This too was emphasised in feedback gained through the Regulation 14 consultation. This intent to protect appropriately designated land and preserve the character of the village was correctly reflected in Section 4.6 Objective 6 of the HNDDP which states “The existing rural and agricultural landscape character of Hargrave is exceptionally highly valued by residents and is recognised as a critical attribute of the Parish.”</p> <p>It has been agreed to remove the site north of Church Street as a housing allocation and re-instate it as a Local Green Space.</p>	

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			<p>of submitting full development plans to allow consideration of appropriate mitigations, would go some way towards showing that the village is serious when it refers to objective 6 of the plan including 'To conserve the essential rural character of the parish, including local green spaces, wildlife habitats...' (my emphasis), It would also be beneficial if the said ecology report was required to cover the whole field, as opposed to just the roadside area, both so that any wider impacts can be assessed and so that there is already a wildlife record in place when a subsequent request is made to extend the development further away from the main road.</p>		
R10			<p>According to the village survey 49% of villagers did not want any further development whereas the plan has opted for making space available for a level on the top side of the forecast is 20. There are I believe, four sites currently with planning permission that are as yet to be developed. Given that the village response resulted in only 18% favouring an increase of up to 25 properties, the areas that are proposed/could be developed are well in excess of this. I therefore believe that the settlement boundary in Church Street (north side) between Top Farm and the bungalow (of Fritton) could be redrawn to eliminate any potential development there.</p> <p>On the question of green spaces, I believe the Brickyard area in Church Street should be included in the Green Space area to help protect the wildlife and bird habitat especially given that there is a footpath and stream in close proximity. I think to counter the inclusion of this area, the area marked 3ii could be eliminated and the northern half of 3iii could be taken out as this area is most unlikely to need protecting. Area 3.i should remain in the green space area.</p> <p>Overall, my opinion of the document is that it is very comprehensive and well-drawn up.</p>	<p>Comments noted and accepted.</p> <p>The Brickworks and the land between Top Farm and the bungalow have been included as LGS, and Site 3 has been reduced.</p>	

