

**Table 1. Great Houghton Regulation 14 Consultation -Comments from WNUA and suggested response**

Reference	Comment	Suggested Response
1	<p><b>Section 1: Background</b></p> <p>1. For clarity, the Northampton Local Plan Part 2 was submitted to the Secretary of State on 4 February 2021 and is not at the pre-submission stage as stated in paragraph 1.2.</p>	Amend as suggested and update if necessary.
2	<p><b>Section 2: Great Houghton Neighbourhood Development Plan Key Issues, Vision and Objectives</b></p> <p>2. Paragraph numbering is incorrect from 2.2 onwards.</p> <p>3. At paragraph 2.2 it would be useful to provide a brief summary of how many people were consulted and commented on the Design Statement as well as any other facts that may be relevant to the Plan. It would also be useful to provide details on the status of the Design Statement.</p>	Correct paragraph numbering and add in details of Design Statement consultation and status.
3	<p><b>Section 4: Planning Policy Context</b></p> <p>4. Paragraph 4.9 discusses the proposed LPP2 allocation at The Green, Great Houghton (LAA1098) and states the allocation would be for 800 homes. The Neighbourhood Plan should state that this is an indicative figure.</p>	Add allocation figure at The Green is indicative.
4	<p><b>GHNDP1</b></p> <p>5. Policy GHNDP1 - a) The policy refers to a 'green buffer' but Policy 41 of the submitted Northampton LPP2 identifies this area as an area of ecological enhancement and it would be useful if the neighbourhood plan used consistent terminology.</p> <p>6. At Paragraph 5.7 there is reference to Great Houghton Conservation Area and a number of heritage assets on the National Heritage List, including listed buildings. For clarity the National Heritage List contains the Statutory List of listed buildings.</p>	<p>Group to discuss issue of Green Buffer area of ecological enhancement.</p> <p>Amend 5.7 as suggested.</p>
5	<p><b>GHNDP2</b></p> <p>7. Policy GHNDP2 – Planning proposals should refer to the Great Houghton Conservation Area Appraisal ahead of scheme development. Additionally, any new development will be expected to make a positive contribution to the setting of heritage assets. Comments on specific bullet points are below:</p> <ul style="list-style-type: none"> <li>• Policy GHNDP2 - b) Conservation Area designation does not prevent replacement of windows</li> </ul>	Add in reference to Conservation Area Appraisal.

	<p>and doors (listed buildings would require consent) unless supported by an Article 4 Direction.</p> <ul style="list-style-type: none"> <li>• Policy GHNDP2 - d) Avoid terminology such as ‘where possible’ as it allows applicants to say it is not possible.</li> <li>• Policy GHNDP2 - e) Loss of trees is identified as an issue in the Conservation Area Appraisal. There should be a mechanism to allow mature trees to be removed if they conflict with the character of appraisal of the conservation areas (a line of conifer hedging for example) or if they represent a hazard. Use of the terminology ‘new trees’ would be preferable to ‘young trees’; for example, a young oak tree could be 300 years old.</li> <li>• Policy GHNDP2 – f) Important walls are identified in the Conservation Area Appraisal.</li> <li>• Policy GHNDP2 – g) Locally important buildings are detailed in the Conservation Area appraisal and will be considered by the independent selection panel as part of the local list project.</li> </ul> <p>8. Paragraph 5.15 should read the former School and the Rectory.</p>	<p>b) This is correct in terms of permitted development, but the policy covers development requiring planning permission, where it may be possible to seek such retention from applicants.</p> <p>d) amend as necessary</p> <p>e) Amend as suggested.</p> <p>f) Comment noted, no change.</p> <p>g) Comment noted, add in reference to local list project.</p> <p>Amend.</p>
6	<p><b>GHNDP3</b></p> <p>9. Objective 2 of the Plan seeks to ensure biodiversity net gain (BNG), however BNG is only referenced briefly in Policy GHNDP3 (c). It would be useful for plan to be explicit in the requirement for major development to provide a net gain in biodiversity so that it is aligned with Policy 29 of the submitted Northampton Local Plan Part 2.</p> <p>10. Policy GHNDP3 – u) – If consent is granted for the felling of a tree there is generally a requirement to replace where appropriate. It is also queried where new trees would be expected to be planted as some building plots on proposed development may not be able to accommodate 3 trees as required by the policy.</p>	<p>Add in further policy detail on biodiversity net gain.</p> <p>u) amend final sentence to remove reference to 3 trees.</p>

	<p>11. The Plan seeks to encourage tree planting (and new planting and landscaping as set out in Policy GHNDP6 (d)), however, the requirement to plant native trees and species is restrictive, especially when considering climate change. The Parish Council is directed to Planning Practice Guidance for the Natural Environment<sup>1</sup> for guidance on trees and species which stipulates <i>trees of the right species and age profile</i> are essential. Further guidance can be found in the newly published England Trees Action Plan (2021 – 2024)<sup>2</sup>.</p> <p>12. Policy GHNDP3 (u) conflicts slightly with Policy GHNDP6 (c). Policy GHNDP3 (u) requires an increase when replacing trees but Policy GHNDP6 (c) requires mature trees to be replaced elsewhere on the site or within the neighbourhood plan area. Consistency with Policy GHNDP6 (c) is preferred.</p> <p>Policy GHNDP3 (u) states that: To ensure good design is achieved development should be designed to take account of, and will be assessed against, the following criteria, where relevant... u) it ensures there is no loss of, or damage to, existing trees or woodland. Where trees or woodland cannot be retained, they are to be replaced at a ratio of at least 2:1 native trees. Three new native trees will be planted for each new dwelling.</p> <p>Policy GHNDP6 (c) states that: new development should conserve or enhance the local landscape by: ... c) retaining or enhancing ponds, streams, mature trees, woodland, ancient and mature hedgerows, or where removal is unavoidable, providing by way of off-setting replacement habitat elsewhere on the site or within the neighbourhood plan area.</p>	<p>Amend as suggested.</p> <p>The policies deal different issues – check and remove any inconsistency (if any).</p>
<p><b>7</b></p>	<p><b>GHNDP4</b></p> <p>13. Policy GHNDP4 / 5 proposes local green space at Brackmills Employment Estate Buffer Zone. Part of this proposed local green space has already been built on and the remaining is allocated within the Submitted Northampton LPP2 as safeguarded employment land. As such the policy is in conflict with the evidence that supports the LPP2 which requires employment land to be safeguarded to ensure the economic prosperity of Northampton<sup>3</sup>. Furthermore, it has not been shown that the site now meets the criterion set out in paragraph 100 of the National Planning Policy Framework of being demonstrably special. The proposed local green space at Brackmills Employment Estate Buffer Zone should be</p>	<p>Group to discuss deletion of GHNDP4/5.</p>

	<p>removed from the plan and from Figure 5.</p> <p>14. Neighbourhood Plan Policy GHNDP4 proposes that Local Green Space designation be accorded to an area of land referred to as GHNDP4/6 – The Green Ecological Buffer Zone. The same parcel of land is illustratively indicated in Figure 20 of the emerging Northampton Local Plan Part 2 as an area for ecological enhancement. As set out in Policy 41 of the emerging Local Plan, this parcel of land forms part of the proposed allocation LAA1098 (The Green, Great Houghton). The parcel in question is an area of search for ecological enhancement within which a buffer is to be created. In common with other Northampton Local Plan Part 2 allocations, the proposed allocation LAA1098 will be considered as part of the Examination in Public of the Local Plan. For this reason, the designation of the whole of the area of search as Local Green Space is not appropriate at this stage. Furthermore, it has not been shown that this site meets the criterion set out in paragraph 100 of the National Planning Policy Framework of being demonstrably special.</p> <p>15. There are two ‘Table 1’s within the Plan. The second Table 1 (Local Green Space Assessment) assesses each proposed local green space. The proposed local green space (Proposed LAA1098 development – Ecological Buffer Zone) should be labelled consistently (i.e. The Green, Ecological Enhancement).</p>	<p>Group to discuss.</p> <p>Amend table numbering. See reference 4 in this table re: The Green.</p>
<p><b>8</b></p>	<p><b>GHNDP5</b></p> <p>16. Policy GHNDP5 states that: Development that would result in the loss of other open spaces within the Village Confines will only be supported when: a) Equivalent or better provision is provided elsewhere within a suitable location within the same Village Confines Boundary. The Plan needs to define the ‘Village Confines’ boundary.</p>	<p>Remove reference to village confines and replace with built up areas of the village.</p>
<p><b>9</b></p>	<p><b>GHNDP6</b></p> <p>17. Policy GHNDP6 (d) requires new planting and landscaping to use native species. It is suggested that the following wording change to the policy would allow for flexibility including climate change.</p> <p>Where new planting and landscaping is proposed it should use native and other suitable species and be designed in such a way so as to ensure that it is suitable when considered in the wider local landscape, and where appropriate provides stepping stones or links to existing woodland and hedgerows;</p>	<p>Amend as suggested.</p>

	<p>18. Policy GHNDP6 (h) seeks to conserve and enhance the integrity and fabric of historic buildings and their settings, particularly where new uses are proposed through the use of appropriate styles and sustainable locally distinctive materials. It should be noted that some alterations will not require consent in the Conservation Area i.e. replacing windows.</p> <p>19. Policy GHNDP9 (b) mentions the A428 Bedford Trunk Road however, the road is not a Trunk Road.</p>	<p>Comment noted, no change.</p> <p>Amend.</p>
<b>10</b>	<p><b>Section 6: How to comment on this document</b></p> <p>20. Paragraph 6.2 – The Great Houghton Neighbourhood Development Plan will be submitted to West Northamptonshire Council.</p> <p>21. Paragraph 6.4 – Once made, the Great Houghton Neighbourhood Plan would be used to help determine planning decisions alongside National Planning Policies, the West Northamptonshire Joint Core Strategy and Northampton Local Plan Saved Policies or Local Plan Part 2 policies (once adopted).</p>	<p>Amend section 6 as necessary.</p>
<b>11</b>	<p><b>Glossary</b></p> <p>22. The Economic Development definition needs to be updated to reflect the changes to the Use Classes Order.</p> <p>23. Listed Building – a listed building is one which is included on the statutory list of ‘buildings of special architectural or historic interest’.</p>	<p>Amend Glossary.</p>