
**Ecton Neighbourhood
Plan
2016-2031**

*Consultation
Statement*

Ecton Neighbourhood Plan
Steering Group. 2019.

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1. Introduction

- 1.1 In 2012 Ecton Parish Council made the decision to prepare a neighbourhood plan to provide the local community with an opportunity to influence the future quality of development in the Parish. Subsequently, it set up a Steering Group composed of members of the Parish Council and the local community to progress work on the Ecton Neighbourhood Plan (the ENP) to cover a 15 year period (2016-2031). Throughout the process there has been an open invitation for members of the local community to join the Steering Group and a number of requests for volunteers have been issued through the Parish magazine (The Ecton View). As a result, a number of parishioners have come forward and actively participated in Steering Group meetings.
- 1.2 In September 2019 the Parish Council resolved to submit the ENP to the Borough Council of Wellingborough for examination. The Neighbourhood Planning (General) Regulations 2012 require several documents to be submitted alongside the ENP, including a consultation statement.
- 1.3 This Consultation Statement (the Statement) has therefore been prepared to meet the legal requirement in [Regulation 15 of the Neighbourhood Planning \(General\) Regulations 2012](#) (the Regulations). The Regulations indicate that a consultation statement means a document which:
- contains details of the persons and bodies consulted about the Plan;
 - explains how they were consulted;
 - summarises the main issues and concerns raised by the persons consulted; and
 - describes how these issues and concerns have been considered and, where relevant, addressed in the Plan.
- 1.4 In accordance with National Planning Practice Guidance (NPPG) ([ID: 41-047-20140306](#)) the Steering Group has sought to ensure that the wider community has:
- been kept fully informed of what is being proposed;
 - been able to make their views known throughout the process;
 - had opportunities to be actively involved in shaping the emerging neighbourhood plan; and
 - been made aware of how their views have informed the draft neighbourhood plan.

2. Early Community Engagement

Who was consulted and how were they consulted?

- 2.1 The purpose of the consultation was to engage with a broad range of people from the local community and other stakeholders early in the process in order to develop a clear understanding of the issues that the ENP should seek to address.

The following list provides a brief summary of the key milestones prior to the publication of the Pre-Submission Draft ENP in 2019.

Ecton Neighbourhood Plan 2013 Questionnaire

- 2.2 In 2013 a questionnaire was sent to every household in the parish as well as local businesses and organisations. In total, approximately 250 questionnaires were issued and 64 responses were received (~25%). The responses highlighted a desire to:
- limit housing development to infill within the village;
 - protect the character of the village, including the historic character;
 - protect important areas of green space; and
 - Protect community assets.
- Concerns were raised about speeding, 'rat running' through the village and the knock on effects of limited parking, especially at drop off time at the school, church services and other events.
- Most respondents did not think that Ecton was a suitable location for a renewable energy project such as a wind farm or a biomass fuel plant.
- The findings were reported to the Parish Council in September 2013 and published in the Parish magazine and on-line in February 2014.

Ecton Neighbourhood Plan Community Event 2014

- 2.3 An invitation to attend two community events was published in the Parish magazine. The first event, held in the village hall on the evening of 9th May 2014, included a presentation of the results from the 2013 questionnaire and a question and answer session. The second event, held on the morning of 10th May 2014, was similar in nature to the first event but also included a presentation by an officer from the Borough Council of Wellingborough on neighbourhood plans, what a neighbourhood plan must achieve and what it can and cannot achieve. The presentation of the results from the 2013 questionnaire is available on the Ecton Village website at: <http://www.ectonvillage.co.uk/neighbourhood-plan/>. In July 2014, a report on the community event was published in the Parish magazine together with a request for help preparing the ENP.

Defining the Neighbourhood Area

- 2.4 The Parish Council applied in October 2014 for the whole of the Parish of Ecton to be designated as the Neighbourhood Area. The Borough Council undertook consultation, as required by section 6 of the Regulations. No objections were received and a formal decision notice¹ designating the Neighbourhood Area was issued in December 2014 and publicised in accordance with section 7 of the Regulations. Subsequently, during 2015 and 2016 the Steering Group met on a number of occasions to progress work on the ENP and develop the evidence base.

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http://www.wellingborough.gov.uk/info/200143/neighbourhood_planning/1259/ecton_neighbourhood_plan_information

Ecton Conservation Area Character Appraisal

- 2.5 Ecton Conservation Area was originally designated in 1970, though a character appraisal was not undertaken at that time. It was determined by the Steering Group that a review of the Conservation Area, including the preparation of a character appraisal, could form an important element of the evidence base of the Plan. It would provide an opportunity to develop a clearer understanding of the special interest of the Conservation Area; it would provide an opportunity to build consensus on the character that it is desirable to preserve or enhance; and it would play an important role in supporting and influencing policies in the Plan. In 2016 the Borough Council agreed to a request made by the Parish Council to undertake a review and prepare a character appraisal of the Conservation Area. Consultation on the draft appraisal was undertaken between January and March 2018 and the document, which included an extension to the Conservation Area, was adopted by the Borough Council in July 2018.

Housing Needs Survey

- 2.6 A further important element of the evidence base that has involved consultation with the local community was the undertaking of a housing needs survey. The survey form was compiled by the Borough Council and, with the help of the Parish Council, copies were delivered to households in Ecton Parish during September 2017 together with pre-paid envelopes. Respondents were given until the 1st November 2017 to return their survey form. In total, 232 forms were delivered and the overall response rate was 34%. The responses were analysed by officers of the Borough Council and the findings were published in January 2018.

Emerging Draft Ecton Neighbourhood Plan

Introduction

- 2.7 In 2016 the Steering Group determined to undertake consultation on the emerging policies that were being developed following the feedback from the initial consultation. It was considered important to provide the community with an opportunity to see the way that their responses were shaping the ENP, but also for the 'direction of travel' to be effectively tested.

Who was consulted and how were they consulted?

- 2.8 Consultation took place between 3rd October 2016 and 30th November 2016 on an Emerging Draft ENP. This included a proposed vision and objectives and a total of 13 draft policies based around 7 themes – housing, community facilities and local green space, the historic environment, landscape character and the natural environment, highways and superfast broadband.
- 2.9 A copy of the Emerging Draft ENP was delivered to households in the Neighbourhood Area along with a questionnaire; both documents were also published on the website. The Emerging Draft ENP and the Emerging Draft ENP Questionnaire are available on the [Ecton Village website](#). In addition the persons,

organisations and bodies listed in the following table were informed in writing of the consultation and directed to the website to access the ENP.

Emerging Draft Plan 2016. List of Consultees	
Known land owners	
Ecton Estate Trust (c/o Fisher German LLP)	Wilby Tree Surgeons Ltd
J and M Keggin	A and D Stones
Anglian Water Property	The World's End
D and M Dicks	
Utilities	
Anglian Water Services Ltd	Amec Foster Wheeler (obo National Grid)
Western Power	The Mobile Operators Association
National Grid Plant Protection	
Local Government	
Councillor Bone, Harrowden and Sywell Ward, Borough Council of Wellingborough	Policy and Regeneration Manager, Borough Council of Wellingborough
Councillor Hallam, Harrowden and Sywell Ward, Borough Council of Wellingborough	Planning Policy Manager, Northamptonshire County Council
Councillor Bell, Earls Barton Electoral Division, Northamptonshire County Council	Community Liaison Officer, Northamptonshire Highways
Billing Parish Council	South Northamptonshire District Council
Cogenhoe and Whiston Parish Council	Daventry District Council
Earls Barton Parish Council	Northampton Borough Council
Mears Ashby Parish Council	North Northamptonshire Joint Planning Unit
Sywell Parish Council	Northamptonshire County Council
Overstone Parish Council	
Environmental Bodies	
Natural England	Northamptonshire Wildlife Trust
Environment Agency	Natural Development Officer, Nene Valley Nature Improvement Area
Heritage England	
Housing	
Homes and Communities Agency	Housing Manager, Borough Council of Wellingborough
Wellingborough Homes	

Other	
Worldwide Church of God	Ecton Pilates Class
St Mary Magdalene Church, Ecton	Ecton Bowls Club
Police Community Support Officer	Ecton Youth Club
Ecton Village Primary School	Ecton village art class
Allotment Association	

- 2.10 The consultation provided an opportunity for the local community and other stakeholders to comment on the proposed vision, objectives and policies and to raise any additional land use related issues that ought to be addressed in the ENP. A drop-in event was held on a Saturday (October 15th) at the Village Hall to enable the local community to find out more about the ENP. The event included a presentation followed by an opportunity to speak informally to members of the Parish Council, the Steering Group and a planning consultant.

What were the main issues and concerns raised by the persons consulted and how, where relevant, have these been addressed in the Plan?

- 2.11 A total of 43 completed questionnaires were returned - a response rate of approximately 17%. In addition, replies were received from the following:

Utilities	
Anglian Water	National Grid
Local Government	
Borough Council of Wellingborough	North Northamptonshire Joint Planning Unit
Northampton Borough Council	Northamptonshire County Council
	South Northamptonshire Council
Environmental bodies	
Environment Agency	Heritage England
Natural England	
Developer	
Pegasus Group (obo Miller Homes Ltd)	

- 2.12 A detailed summary of the comments that were received and the responses of the Parish Council and Steering Group are included in Appendix 1 of this Statement. The changes agreed by the Parish Council were incorporated into the Pre-Submission Plan.

3. The Pre-Submission Draft (Regulation 14) Plan

Who was consulted and how were they consulted?

- 3.1 Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 indicates that before submitting the ENP to the local planning authority, the Parish Council 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—
- details of the Plan;

- details of where and when the Plan may be inspected;
 - details of how to make representations; and
 - the date by which representations must be received, being not less than 6 weeks from the date on which the Pre-submission Plan is first publicised;
- (b) consult any consultation body referred to in paragraph 1 of Schedule 1 of the Regulations whose interests the Parish Council considers may be affected by the Plan; and
- (c) send a copy of the Plan to the local planning authority.

3.2 Consultation on the Pre-Submission Draft ENP was undertaken between 15th April 2019 and 31st May 2019. The ENP was published on the 'Ecton Village' website with a list of hyperlinks to other documents that form the evidence base and a leaflet with a brief summary of the ENP and details of how to make representations. The leaflet was also delivered to households in the Parish in advance of the start of the consultation period and articles informing the local community of the consultation were published in the village magazine (The Ecton View) in April and May 2019. Copies of the ENP were also made available at 2 locations within the village. Alternatively, residents without access to the internet could contact the Parish Clerk to request a copy of the Plan. The leaflet and website also included details of a 'drop-in' session held in the village hall at 6pm on 21st May 2019.

3.3 In addition the persons, organisations and bodies listed in the following table were informed in writing of the consultation and directed to the website to access the Plan.

Pre-Submission Draft Plan 2019. List of Consultees	
Known land owners	
Ecton Estate Trust (c/o Fisher German LLP)	Wilby Tree Surgeons Ltd
J and M Keggin	A and D Stones
Anglian Water Property	The World's End
D and M Dicks	
Utilities	
Anglian Water Services Ltd	National Grid
Western Power	The Mobile Operators Association
Local Government	
Councillor Bone, Harrowden and Sywell Ward, Borough Council of Wellingborough	Policy and Regeneration Manager, Borough Council of Wellingborough
Councillor Hallam, Harrowden and Sywell Ward, Borough Council of Wellingborough	Planning Policy Manager, Northamptonshire County Council
Councillor Bell, Earls Barton Electoral Division, Northamptonshire County Council	Community Liaison Officer, Northamptonshire Highways

Billing Parish Council	South Northamptonshire District Council
Cogenhoe and Whiston Parish Council	Daventry District Council
Earls Barton Parish Council	Northampton Borough Council
Mears Ashby Parish Council	North Northamptonshire Joint Planning Unit
Sywell Parish Council	County Archaeological Advisor Northamptonshire County Council
Overstone Parish Council	West Northants Joint Planning Unit
Environmental Bodies	
Natural England	Northamptonshire Wildlife Trust
Environment Agency	Natural Development Officer, Nene Valley Nature Improvement Area
Heritage England	
Faith	
Worldwide Church of God	St Mary Magdalene Church, Ecton
Housing	
Homes England	Greatwell Homes
Police	
Police Community Support Officer	
Schools and pre-school	
Ecton Village Primary School	
Sports Groups	
Ecton Pilates Class	Ecton Bowls Club
Arts & History Groups	
Ecton village art class	
Other Groups	
Allotment Association	

What were the main issues and concerns raised by the persons consulted and how, where relevant, have these been addressed in the Plan?

3.4 Appendix 2 to this report provides a schedule of the representations made at the Regulation 14 consultation stage and the responses of the Parish Council and Steering Group. In total, 10 responses were received including:

- support from the North Northamptonshire Joint Planning and Delivery Unit indicating that the ENP is now consistent with the North Northamptonshire Joint Core Strategy;
- support from the Borough Council of Wellingborough. It provided several detailed comments which essentially relate to the usability of Policy 1 (Residential amenity), Policy 3 (Rural exceptions), Policy 12 (Car Parking) and Policy 13 (Fibre to the premises). Amendments have been made in response to these comments.
- Representations made on behalf of a developer requesting the deletion of the 'area sensitive to coalescence' shown on the Policies Map and Policy 9 (Maintaining the separate identity of Ecton village) and expressing concerns

about the safeguarding of views around the village in Policy 10 (Important public views and vistas). However, for the reasons outlined in Appendix 2 (the schedule of representations and responses), no changes have been made to the ENP in response.

- A proposal from a land owner for the allocation of a housing site. The site has not been included in the ENP for the reasons outlined in Appendix 2 (the schedule of representations and responses)
- A representation from a local resident expressing the need for the ENP to include an overarching concern for our environment. For the reasons outlined in the Parish Council/Steering Group response (see Appendix 2) it is considered that the policies of the ENP, in combination with the policies of the adopted Local Plan, provide an appropriate set of environmental policies.

4. Conclusion

- 5.1 This Statement outlines the publicity, engagement and consultation undertaken to support the preparation of the ENP. There have been a number of opportunities for the local community and other stakeholders to engage in the process, make comment and to raise issues and concerns. The Parish Council and Steering Group have fully considered the responses that have been received and have explained in supporting documents how these have shaped the ENP, where appropriate. The Statement further demonstrates how the Pre-Submission consultation and publicity requirements set out in Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 have been met.

Appendix 1. ENP Emerging Draft (2016). Schedule of Representations and Responses

Public consultation took place on an Emerging Draft of the Ecton Neighbourhood Plan in 2016. Approximately 250 copies of the Plan were distributed to residents of the Parish together with a questionnaire. The Plan was also made available on the website and a consultation event was held at Ecton Village Hall. A total of 43 completed questionnaires were returned; this equates to a response rate of approximately 17%. In addition, other bodies and organisations were consulted and a number of these provided a response.

The following table summarises the results of the questionnaire and the more detailed comments made by residents and other consultees. It also includes the response of the Steering Group following consideration of the comments and outlines a number of changes made to the Plan as a result.

Other amendments were made to the Plan to reflect changes in the planning context, for example the adoption of a Conservation Area Appraisal by the Borough Council, and as a result of further consideration of the policies and text of the Emerging Draft Plan

Abbreviations used in this schedule:

ENP – The Ecton Neighbourhood Plan

JCS – North Northamptonshire Joint Core Strategy – the strategic Local Plan for the area. The Neighbourhood Plan must be in general conformity with the strategic policies of the JCS.

JPU – North Northamptonshire Joint Planning Unit – the body responsible for preparing the JCS.

SHMA – Strategic Housing Market Assessment – provides an assessment of the housing market of an area and housing need.

NPPF – National Planning Policy Framework – a document which sets out Government planning policy.

NPPG – National Planning Policy Guidance – guidance provided by the Government to support the policies in the NPPF.

SPD – Supplementary Planning Document – a document that provides guidance on one or more planning policies.

SWOT – an assessment undertaken to identify strengths, weaknesses, opportunities and threats.

	Summary of representations	Recommended response
The Vision and objectives		
Responses to residents' questionnaire	~98% of respondents agreed with the vision. All respondents agreed with the objectives relating to the historic environment, community facilities, open space, important views and features of landscape importance, the separate identity of Ecton village, biodiversity, the landscape character and setting of Ecton, the highway network and communications technology. 93% agreed with the need to ensure that housing meets the needs of the local community and ~84% agreed that development should be limited to small scale infill development and 'rural exceptions' housing.	The vision and objectives are widely supported by the local community and no changes have been suggested by respondents. Representations made regarding the scale, location and type of housing and in respect of open space are responded to in the relevant policy section.
Vision and objectives recommendations		
1. No change arising directly from the representations		
Policy 1 – small scale infill development		
Responses to residents' questionnaire	<p>>88% agree with the criteria listed in the policy. A further 7% would support the policy subject to amendments to the criteria. The following comments were received:</p> <p>Ecton has been sufficiently 'infilled' and further development should be resisted.</p> <p>Most recent developments do not comply with the criteria in Policy 1. 'Over-development' (criteria 2) needs to be defined. A SWOT analysis comparing infill and a new area for development should be undertaken.</p>	The ENP must be in general conformity with the JCS. Policy 11 of that document enables small scale infill development subject to several criteria. A blanket restriction on infill development would therefore conflict with the JCS and a comparison of the merits of infill development against a new area for development is therefore unnecessary.

	<p>The policy route is essentially flawed. Infill development increases housing density and pleasant gaps between houses disappear. The village boundary should be carefully redrawn with consideration given to where new housing could be accommodated. A clear plan would put the plan in the driving seat rather than providing no options and being continually challenged by developers applying for permission on inappropriate infill sites. A clear plan and use of a good design guide would help to secure well planned and carefully designed housing.</p>	<p>Whilst JCS Policy 11 also enables additional sites to be allocated for housing as part of a neighbourhood plan, earlier consultation (2013) on the ENP identified little support for allocating sites on the edge of the village.</p>
	<p>A plot ratio should be introduced to ensure that large dwellings have large gardens in keeping with the village character. The plot ratio should be based on The Cot or the new houses in The Courtyard but not the new houses in West St.</p>	<p>It is agreed that it is important to ensure that proposals do not result in the over-development of the site. However, development should respond to the positive characteristics of the site and surrounding development rather than being based on an arbitrary and inflexible plot ratio. The density of existing development in Ecton varies significantly. For example, the area between High St and West St exhibits a significantly higher density than the development on the east side of the High St.</p>
	<p>Does 'street scene' (criteria 4) include existing on-street parking?</p>	<p>The policy relates to new development and is not therefore concerned with the impact of existing on-street parking on the street scene.</p>
	<p>Infill development must have parking facilities.</p>	<p>JCS Policy 8 requires provision for parking, servicing and manoeuvring in accordance with adopted standards.</p>
<p>Borough Council of Wellingborough</p>	<p>Criteria 2 (over-development of a site and respecting the scale/form of existing development), 4 (car parking) and 6 (vehicular access) are covered by JCS policies whilst criterion 3 is covered by Policy 7 of the ENP.</p>	<p>It is agreed that more specific reference should be made to JCS Policy 11 in the supporting text. Reference should also be made to the Village Boundary, as defined in the Plan for the Borough of Wellingborough.</p>
	<p>Refer to JCS Policy 11 in the supporting text and the North Northamptonshire Place Shaping SPD, which is currently being prepared.</p>	<p>It is accepted that certain criteria are covered by policies in the JCS. However, in response to the comments made by the JPU it is proposed to replace the policy with one more focused on protecting residential amenity.</p>

North Northamptonshire Joint Planning Unit (JPU)	<p>JCS Policy 11 already limits new development to small scale infill development unless the site is allocated or is a rural exceptions site. However, criteria 4 (car parking), 5 (refuse and recycling) and 6 (vehicular access) could form the basis of a distinctive ENP policy.</p>	
<p>Policy 1 Recommendations</p> <ol style="list-style-type: none"> 1. Include a more specific reference to JCS Policy 11 in the supporting text. 2. Replace the policy with one targeted at ensuring that proposals for new residential development take account of the need to protect the amenities of neighbouring properties. 		
<p>Policy 2 – Dwelling size</p>		
<p>Responses to residents’ questionnaire</p>	<p>>83% agree with the policy. A further 7% are supportive subject to amendments. The following comments were received:</p>	<p>At a Borough-wide level the main housing requirement, both in terms of open market and affordable housing, is for single bedroom dwellings followed by three bedroom properties². The SHMA update further states that ‘In view of restrictions imposed on eligibility for Housing Benefit, it is likely that affordable housing will be limited to the minimum requirement but, in the market sector, there is likely to be a preference by consumers and providers for an additional bedroom which, in terms of the greater flexibility achieved should be encouraged’. The conclusion is supported by the findings of the New Policy Institute³ which indicate that older people want at least two reasonable sized bedrooms and that many (especially couples) prefer to have three bedrooms. Evidence from the 2017 Ecton</p>
	<p>There is no justification for further houses with 3 or more bedrooms.</p>	
	<p>There is no need to specify dwelling size. Dwellings will not meet an existing need within the village as they will be available on the open market.</p>	
	<p>Recent developments have more than 2 bedrooms and this will not change unless public money is used.</p>	
	<p>The reference to 2 or fewer bedrooms is impractical, would be open to challenge and would make the building of small dwellings uneconomic. Dwellings should have at least 2</p>	

² North Northamptonshire Joint Planning Unit: Strategic Housing Market Assessment Update (SHMA) (2015) - <http://www.nnjpu.org.uk/docs/20141023-NNJPU-SHMA%20Update-Housing%20Reqs%20Tech%20Report%20-%20FINAL.pdf>

³ New Policy Institute: Market Assessment of Housing Options for Older People (2012) – http://www.npi.org.uk/files/5213/7485/1289/Market_Assessment_of_Housing_Options_for_Older_People.pdf

	<p>bedrooms to accommodate families with children, elderly people with carers etc. Maisonettes would fit well in a village as they can be designed to look like a larger house and are economical in terms of land use. Elderly or disabled people could be accommodated on the ground floor with a single person or young couple on the first floor.</p>	<p>Housing Needs Survey also supports the view that the current need in Ecton is for dwellings with 3 or fewer bedrooms. However, it is agreed that housing needs may change over the course of the Neighbourhood Plan period. Policy 2 and the related text should therefore be amended to place greater emphasis on the provision of dwellings with 3 bedrooms (in addition to 1 and 2 bedroom homes), particularly where the housing is to be made available on the open market, and to recognise that needs may change during the Neighbourhood Plan period.</p>
	<p>Consideration needs to be given to other needs of an ageing population e.g. ramps.</p>	
<p>Borough Council of Wellingborough</p>	<p>Whilst the aim is supported by evidence from the SHMA and local housing needs survey, local needs may change over the lifetime of the ENP. However, whilst a family may only ‘need’ a 2 bed property, a 3 bed property can provide an office space, a spare room for visitors etc. – provided they can afford it. Whilst it is appropriate to restrict the size of affordable housing to meet local need, there is therefore less of a case for market dwellings on infill plots. There are also concerns that the policy may not be defensible at appeal - you should amplify the material considerations which would justify homes of 3 or more bedrooms in the text.</p>	<p>Whilst it is agreed that residents would have to compete with prospective purchasers for market housing, the policy intention is to focus on the size of dwellings best suited to meet the requirements of the local community. New dwellings must be designed to national accessibility category 1 (visitable dwellings) standards as described in the Building Regulations. However, JCS Policy 30 requires new dwellings to meet category 2 (accessible and adaptable dwellings) of the national accessibility standards as a minimum. In addition, the policy indicates that a proportion of homes should be designed to category 3 (wheelchair accessible housing). Whilst the provision of maisonettes may be appropriate, the policy should not preclude other options which protect or enhance the positive elements of the character of the area.</p>

Policy 2 Recommendations

Amend Policy 2 and the related text to:

- 1. place greater emphasis on the provision of dwellings with 3 bedrooms (in addition to 1 and 2 bedroom homes), particularly where the proposal is for market housing; and**
- 2. indicate that needs may change during the Neighbourhood Plan period.**

Policy 3 – Rural exception sites		
Responses to residents' questionnaire	<p>>79% agree with the policy. 14% do not agree with the policy whilst the remaining 7% are supportive subject to changes being made. The following comments were received:</p>	<p><i>Impact on the countryside/village character</i> - JCS Policy 13 indicates (at criterion d) that rural exceptions housing must be appropriate to the surroundings and minimise impacts on the environment.</p>
	<p>Development could have an adverse impact on the countryside and character of the village. There is insufficient need in Ecton for affordable housing. Affordable housing would be better located on the outskirts of towns due to the need to commute to work. Unless public money is used, there is no likelihood of affordable housing being brought forward. The supply of affordable housing should not be left to established housing associations which have an inefficient management structure. As a consequence, the external materials, landscape and external design of the housing is often compromised. Consequently, other avenues of delivery (e.g. local charities) should be explored. Schemes should be of mixed tenure as housing associations will exclude people who want to downsize or are newly divorced and young people trying to buy their first home. The nomination rights should not be granted to the Borough Council as its priorities will be completely at odds with those of the local community. housing authority, is best placed to enforce this requirement and it will therefore normally be appropriate to grant it the nomination</p>	<p><i>Need for affordable housing</i> - The most recent housing needs survey indicates that there is a need, although very limited, for affordable housing in Ecton⁴.</p> <p><i>Affordable housing would be better located on the outskirts of towns</i> - Towns should be the primary focus for affordable housing. However, a growing number of people work from home both in urban and rural areas. Providing a few affordable homes can help to provide homes for people with a connection to the village including those who provide services to the local community.</p> <p><i>Public money</i> - In most cases, some public money is needed to subsidise affordable housing and there are limits on the funds available. Acquiring land through the exception site policy for a lower than market price is therefore important in ensuring that a development is viable. Housing associations may also use their own reserves or secure private loans. In some instances an element of market housing is necessary to ensure the viability of the scheme.</p> <p><i>The provider</i> - The emerging ENP policy does not require the affordable housing to be provided by an established housing</p>

⁴ Borough Council of Wellingborough. Ecton Housing Need Survey. 2018. http://www.wellingborough.gov.uk/downloads/file/7993/ecton_housing_needs_survey

		<p>association nor does it preclude the use of other avenues of delivery such as a Community Land Trust.</p> <p>Mixed use tenure - JCS Policy 13 indicates that schemes should be solely for affordable housing unless an element of market housing is necessary to make the scheme viable. The market housing should be tailored to meeting specific locally identified needs. The emerging ENP policy complements the JCS by encouraging the sale of the open market housing to residents of Ecton.</p> <p><i>Nomination rights</i> - The emerging ENP policy indicates that planning obligations will be used to ensure that people with a local connection are given priority. The Borough Council, in its capacity as the rights However, it is agreed that the position may change and alternative solutions should not be ruled out.</p>
Borough Council of Wellingborough	<p>Criteria 1-4 replicate Policy 13 of the JCS and should be deleted. The policy should focus on the mechanisms for ensuring local connections. The Borough Council's housing allocations policy was amended in September 2016 and, as a consequence, 5.2.14 needs updating. However, as the housing allocations policy is continually under review it is recommended that the paragraph should end at 'The term 'local connection' would be defined in the allocations policy of the Borough Council' to ensure that the paragraph remains up-to-date.</p> <p>In addition, it is currently uncertain whether the Government's proposals to extend the Right to Buy will impact on rural exception sites.</p>	<p>It is agreed that criteria 1-4 replicate elements of JCS Policy 13 and should be deleted.</p> <p>The updated housing allocations policy amends the definition of 'local connection'. In summary, this now includes: A person who has been a resident for 3 out of the last 5 years; A person employed in the Parish for a minimum of 16 hours per week; Immediate family members (a parent, sibling or child) resident in the Borough of Wellingborough who have lived in the area for a minimum of 5 years; Members of the Armed Forces, including former personnel, though subject to a number of criteria; and Other special circumstances as decided by the Senior Housing Officer.</p>
North Northamptonshire Joint Planning Unit	<p>The policy replicates Policy 13 of the JCS and is unnecessary.</p>	<p>It is agreed that the supporting text to ENP Policy 3 should be amended to reflect the possibility that the definition of 'local</p>

		connection' may change over time. However, the text also requires amendment to emphasise that part of the allocations policy intended to ensure that people with a local connection to Ecton would be given priority over applicants from outside the Parish in the event that a rural exceptions housing site is developed in Ecton.
Northamptonshire County Council – Archaeological Advisor	Planning permission should not be granted if it impacts on upstanding medieval earthworks such as ridge and furrow.	JCS Policy 2 and emerging ENP Policy 8 provides an appropriate level of protection for heritage assets. It is not therefore necessary to amend the policy to include criteria relating to sites of archaeological significance.
Policy 3 Recommendations <ol style="list-style-type: none"> 1. Delete criteria 1 to 4. 2. Update the supporting text with reference to the Borough Council's housing policy and indicate that, while it would normally be appropriate to grant the nomination rights to the Borough Council or its successor, alternative solutions may be appropriate. 		
Policy 4 – The protection of community facilities		
Responses to residents' questionnaire	~98% agree with the policy whilst the remaining 2% would support it if changes were made. The following comments were received:	
	There is no recognition of the planning permission for community facilities at the rear of the 3 Horseshoes. Asset of Community Value (ACV) status does not provide real protection, only delay. The village has few facilities. The primary facility is the village hall which is already in village ownership.	The planning permission to the rear of the pub has lapsed. Designation of buildings or land as an ACV provides a Parish Council and community groups with an opportunity to bid for the asset (see para 5.3.6 – 5.3.7 of the Emerging Draft ENP). The village hall is owned by Ecton Estates.
Borough Council of Wellingborough	It would be useful to refer to JCS Policy 7 in the text.	Agreed. It would be helpful to explain how Policy 4 of the ENP supports and supplements JCS Policy 7 (see below).

North Northamptonshire Joint Planning Unit	The policy replicates Policy 7/paragraph 3.82 of the JCS and is unnecessary.	JCS Policy 7 safeguards facilities subject to several criteria. However, Policy 4 of the ENP provides greater clarity than JCS Policy 7 regarding the preferred location of a replacement facility (criterion 1) and the level of evidence required to demonstrate that there is no prospect of a continued community use (criterion 2).
Northamptonshire County Council – Archaeological Advisor	Proposals may require archaeological assessment which could involve archaeological fieldwork. Development should avoid impacting on the historic landscape i.e. medieval ridge and furrow.	Noted. JCS Policy 3 indicates that development should retain and, where possible, enhance features of landscape importance.
<p>Policy 4 Recommendations</p> <ol style="list-style-type: none"> 1. Include an explanation of how Policy 4 of the ENP supports and supplements JCS Policy 7. 2. Remove the sentence ‘In addition, and specifically in relation to the listing of a public house as an ACV, the right to change the use of a building without planning permission is removed’. This is to take account of a recent change in legislation⁵ which removes permitted development rights allowing the conversion of a pub to a shop, office or restaurant/café without the need to obtain planning permission. In addition, the legislation introduces a new permitted development right for pubs to be used as a drinking establishment with expanded food provision. 		
Policy 5 – The protection of community facilities		
Responses to residents’ questionnaire	~98% agree with the policy whilst the remaining 2% would support it if changes were made. The following comments were received:	It is agreed that the issues raised in criteria 1 and 2 of draft ENP Policy 5 are addressed in JCS Policy 8 and that these particular criteria are therefore unnecessary.
	Criteria 1-3 must be strictly enforced as there is insufficient parking at present.	However, criterion a) of JCS Policy 7 provides for new facilities ‘to meet the needs arising from the development’ i.e. the policy appears to be concerned with provision made necessary as a result of a new development which is of sufficient scale to
Borough Council of Wellingborough	JCS Policy 7 supports the provision of community facilities whilst JCS Policy 8 focuses on amenity issues. Consequently, the proposed policy in the ENP is unnecessary.	

⁵ Town and Country Planning (General Permitted Development) (England) (Amendment) (No 2) Order 2017

<p>North Northamptonshire Joint Planning Unit</p>	<p>JCS Policy 7 provides support for the provision of new community facilities. Consequently, the proposed policy in the ENP is unnecessary.</p>	<p>generate either a need for new facilities or a financial contribution towards their provision. The policy will not be applicable to Ecton where development is essentially limited to infill development of insufficient scale to create a need for new facilities. In contrast to JCS Policy 7, the purpose of proposed ENP Policy 5 is to enable new facilities to be provided where required to meet a need arising from the population of Ecton as a whole e.g. a village shop or a sports field.</p> <p>In addition, whilst para 3.78 of the JCS stipulates that new provision should be of an appropriate scale to meet the needs of the local community, this requirement is not included in JCS Policy 7. The ENP therefore supports the JCS by making it clear within criterion 3 of Policy 5 that new facilities and services must be appropriately located and of a scale focused on meeting the needs of the local community rather than the wider area.</p>
<p>Northamptonshire County Council – Archaeological Advisor</p>	<p>Proposals should not detrimentally impact on the historic environment, especially landscape.</p>	<p>JCS Policies 2 and 3 provide for the protection of the historic environment and landscape character.</p>
<p>Policy 5 Recommendations 1. Delete criteria 1 and 2 of the policy.</p>		
<p>Policy 6 – Local Green Space</p>		
<p>Responses to residents’ questionnaire</p>	<p>All respondents agreed that the allotments, church grounds and children’s play area should be protected. Over 95% wish to protect the grounds of the World’s End and ~98% thought that the open space to the rear of the church hall should be protected. A respondent suggested that as the grounds of The World’s End are not used by the community they should not be protected for use by the community.</p>	<p>To be designated as Local Green Space (LGS), land must meet criteria specified in Government planning policy (the NPPF) and supporting guidance (the NPPG). The Government requires land to be in reasonably close proximity to the community. Proposals must not relate to an extensive tract of land and blanket designation of open countryside adjacent to settlements will not be appropriate. Areas designated as LGS may also be nominated</p>

~74% of respondents wish to see other areas designated as Local Green Space. The following areas were referred to by respondents:

1. The land in front of Ecton Hall – this could be used as a pocket park;
2. The former walled garden to Ecton Hall;
3. The ancient orchard (lichens and tree species) opposite 20 Church View (facing 22a and 23 Church View) - the area is of value for its wildlife and is suitable for a pocket park;
4. The Wilderness;
5. The old village cricket ground;
6. Grass verges on Parsons Close, at the end of West St and the wide verge on the A4500 facing The Worlds End;
7. The parking area at the rear of the Three Horseshoes; and
8. The farmland at the bottom of West St and at the end of Barton Fields

for listing by the local authority as an Asset of Community Value. Listing gives community interest groups an opportunity to bid if the owner wants to dispose of the land.

The NPPF requires spaces to be special in terms of beauty, historic significance, recreational value, tranquillity, wildlife, or for other reasons. However, where land is already protected by designation, consideration should be given to whether any additional local benefit would be gained by designation as LGS.

The World's End – Land can be designated as LGS even if there is no public access. In this instance the land is not being protected for use by the community but because the trees on the site form an important visual amenity (see para 5.3.12 of the Emerging Draft ENP). However, the land is now within an enlarged Conservation Area and the trees are therefore now afforded a degree of protection. Consequently, it is no longer necessary to designate the site as LGS in the Neighbourhood Plan.

Land within the historic curtilage of Ecton Hall (Land in front of Ecton Hall, the former walled garden to Ecton Hall, the ancient orchard (opposite 20 Church View) and The Wilderness) – The sites are in reasonably close proximity to the community, although not accessible to the public. The sites are outside the Village Boundary, as defined in the recently adopted (February 2019) Plan for the Borough of Wellingborough, and are therefore in the open countryside where policies of restraint will be applied. In addition, they are now within the extended Conservation Area where restrictions on development apply and where most trees are given some protection.

Pocket park – The Parish Council is not aware of evidence of need for a pocket park in Ecton. The public rights of way system provides opportunities for physical exercise and to walk the dog

		<p>in the countryside whilst the play area provides a recreational area for children in close proximity to the local community. Notwithstanding this, the land immediately south of Ecton Hall forms part of its grounds and is for the private use of residents.</p> <p><i>The old village cricket ground</i> – the land is no longer of importance for its recreational value. It therefore forms part of the wider open countryside.</p> <p><i>The parking area at the rear of the Three Horseshoes</i> – the land does not consist of an area of green space and does not meet the criteria for designation as LGS.</p> <p><i>The grass verges on Parsons Close, at the end of West St and the wide verge on the A4500 facing The Worlds End</i> – Whilst of amenity value, the verges consist of highway land and it is therefore unlikely that additional benefit would be gained by designating the land as LGS.</p> <p><i>Farmland at the bottom of West St and at the end of Barton Fields</i> –Whilst in close proximity to the community, these areas are extensive tracts of land. Accordingly, they do not meet the Government criteria for designation as LGS.</p>
Borough Council of Wellingborough	The policy is supported.	The support is welcomed
Northamptonshire County Council – Planning Services	The inclusion of the 5 areas of Local Green Space are supported. Northamptonshire County Council is currently looking into ways to help communities create and use allotments.	
<p>Policy 6 Recommendations</p> <p>1. Amend the Policy, the supporting text and the policies map to exclude the land within the grounds of the World’s End.</p>		

Policy 7 – The Conservation Area		
Responses to residents’ questionnaire	<p>~91% agree with the policy and a further 7% would support it if changes were made.</p> <p>The following comments were received:</p> <p>No consideration was given to traditional materials and architectural design when the Sunnyside flats were built. We should not worry excessively about new development when young, local people need housing;</p> <p>Windows should be of wood rather than UPVC;</p> <p>New satellite dishes should be in less visible locations or even in roof spaces;</p> <p>Could fences, which are not a significant part of the village-scape, be sited as being against policy?</p> <p>Should the listings policy be refreshed as more properties are being renovated?</p> <p>There should be a clearance (e.g. 2 metres) between foot routes/roads to protect existing ‘open’ areas.</p> <p>Where possible, buildings rather than parked cars should be the view from publically accessible spaces.</p>	<p>The historic environment of Ecton is strongly valued by the local community with most questionnaire responses indicating support for the Policy.</p> <p>Permission is not always required for replacement windows, satellite dishes or fencing within a Conservation Area. However, where permission is required, the policy enables the proposal to be assessed against the relevant criteria and the Conservation Area Appraisal. Similarly, the need to protect ‘open’ areas would be assessed against the relevant criteria and other policies of the Development Plan.</p> <p>Criterion 4 of Policy 1 requires car parking that will not have an adverse impact on the street scene.</p>
Borough Council of Wellingborough	The policy adds local detail to Policy 2 of the JCS and is supported.	The support is welcomed
Policy 7 Recommendation		
<ol style="list-style-type: none"> The Policy and supporting text should be updated to refer to the Ecton Conservation Area Appraisal, adopted by the Borough Council in 2018, and to include reference to the setting/views of the Church and other heritage assets (see Policy 10). 		
Policy 8 – Non-designated heritage assets		

Responses to residents' questionnaire	The policy is fully supported by those residents who responded to the questionnaire.	
Borough Council of Wellingborough	The policy is supported. In respect of criterion 3, however, the Borough Council's preference would be for the use of conditions.	The Borough Council's preference should be referred to in the background text.
Northamptonshire County Council – Archaeological Advisor	<p>Para 5.4.8 (non-designated heritage assets) – the Historic Environment Record contains additional records which are considered in the planning process.</p> <p>Para 5.4.9 – the County Council is also involved in identifying non-designated heritage assets.</p> <p>The policy appears to duplicate part of NPPF section 12. It might be more beneficial if it referred to specific non-designated assets of local value. This covers not only below ground remains, Prehistoric and Roman remains and upstanding medieval earthworks such as ridge and furrow but also unlisted but locally interesting buildings which add to the character of the village.</p>	<p>Reference to the Historic Environment Record and to the role of the County Council in identifying non-designated heritage assets should be included in the background text.</p> <p>Supporting Action 2 indicates that the Parish Council is willing to work with the local authorities to produce a list of non-designated heritage assets.</p>
<p>Policy 8 Recommendations</p> <ol style="list-style-type: none"> 1. Refer to the Borough Council's preference for the use of planning conditions 2. Include reference in the background text to the Historic Environment Record and to the role of the County Council in identifying non-designated heritage assets. 		
<p>Policy 9 – The separate identity of Ecton</p>		
Responses to residents' questionnaire	<p>93% of respondents agree with the policy whilst the remaining 7% are supportive subject to changes being made. The following comments were received:</p> <p>It is important to maintain a green wedge which also works for Ecton Brook;</p> <p>The words 'generally open and undeveloped' should be replaced with 'open fields';</p>	<p>A policy within a neighbourhood plan must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic conditions. The strategic policies for the ENP area are essentially contained within the North Northamptonshire JCS.</p>

	<p>The opening statement should not be qualified as any development would diminish the separation; The policy should also apply to the gap between Earls Barton and Ecton; and The policy should include the vistas to the north, south and east to enhance Policy 10.</p>	<p>It is explained in the JCS (para 1.14) that it is unnecessary to make any provision for the needs of adjoining areas (including Northampton) before 2029. The inspector who held the examination into the North Northamptonshire JCS further indicated that options to meet the county's long term needs should, in due course, be a matter for a review of the North Northamptonshire JCS or West Northamptonshire JCS. Policies 3 and 11 of the JCS require proposals to be assessed against the need to protect the landscape setting of settlements, their individual and distinct character and their separate identity. However, it is acknowledged that the supporting text in the JCS indicates that the identification of areas of particular sensitivity to coalescence that should be protected strategically using measures such as strategic gaps are a matter for the Local Plan rather than a neighbourhood plan. Much of the ENP area forms part of the Ecton and Earls Barton Slopes landscape character area defined in the Northamptonshire Landscape Character Assessment (LCA) (see http://www.rnrpenvironmentalcharacter.org.uk/). The JCS (at para 3.24) indicates that the LCA will be used to ensure that the diverse character of North Northamptonshire's landscape is respected, retained and, where possible, enhanced. In respect of the landscape strategy for the Rolling Ironstone Valley Slopes, including the Ecton and Earls Barton Slopes, the LCA states that 'In view of the proximity of the many urban areas within and surrounding this landscape, it is likely to be particularly vulnerable to development pressure and change. It is important, therefore, that where development is considered, its integration with the local landform is carefully considered, as well as its wider setting and relationship with existing built areas.</p>
Borough Council of Wellingborough	<p>Whilst concerns about the growth of Northampton are understood, the JCS inspector considered that such proposals were a matter for the review of the JCS in due course. The JCS includes policies to prevent coalescence (Policy 11 and Policy 3) whilst para 5.7 indicates that the identification of areas of particular sensitivity to coalescence are a matter for the Local Plan rather than a neighbourhood plan. However, if the community wishes to include something in the ENP it could refer to the JCS policies in the background text and to the area as being 'sensitive to coalescence'. This would provide a local interpretation to a strategic policy rather than seeking to introduce a strategic landscape designation.</p>	
North Northamptonshire Joint Planning Unit	<p>Designation of a 'green gap' is a strategic matter for consideration in a local plan rather than a neighbourhood plan as indicated in paragraph 5.7 of the JCS. The NPPF/NPPG indicate that Local Green Space designation should only be used where the area concerned is not an extensive tract of land. Consequently, the blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to achieve what would amount to a new area of Green Belt by another name.</p>	

<p>South Northamptonshire Council</p>	<p>Whilst the principle of appropriately managing any potential expansion of Northampton to take account of the character and separate identity of settlements is generally supported, the designation of a green wedge is a matter for the Wellingborough Local Plan and not a neighbourhood plan. Northampton BC has recently stated that it only has 3.1 years supply of housing land (i.e.an undersupply of ~5000 dwellings) with limited land available to meet this need. As part of the ‘duty to cooperate’ the local planning authorities adjacent to Northampton will need to jointly address this issue at a strategic scale. Adoption of the ‘Green Gap’ could pre-empt locations and impact on the ability to meet the required provision in the most sustainable locations. The ‘Green Gap’ should be removed as this is a strategic matter to be assessed and reviewed as part of the strategic development plans for the area.</p>	<p>‘Landscape guidelines’ in the LCA further emphasise the need to avoid visual, actual or perceptual coalescence of neighbouring settlements and approve only new development that performs this objective.</p> <p>Furthermore, the 2009 West Northamptonshire Emergent JCS Sustainability Appraisal Report (Appendix C: Emergent Strategy Options Appraisal Matrices) http://www.westnorthamptonshirejpu.org/connect.ti/website/viaw?objectId=2757296 refers to the area between Ecton and Northampton as having high landscape and visual sensitivity. Around the village of Ecton and to the east the sensitivity is medium and it is low closer to the A45. The report concludes that development to the east of Northampton could result in the merger of Ecton into the Northampton urban area, resulting in a loss of its distinctiveness.</p> <p>Having regard to the policy context and the various responses it is concluded that the policy and supporting text should be amended to enable development that accords with the strategic policies of the Local Plan whilst ensuring that proposals are managed to ensure that they take account of the need to retain the separate identity and distinct character of Ecton village.</p>
<p>Pegasus Group (on behalf of Miller Homes Ltd)</p>	<p>It is clear from the NPPF/NPPG that neighbourhood plans must conform to national policies and up-to-date strategic policies set out in an adopted local plan. They must take a positive approach to facilitate new development and should not be used as a constraint to restrict growth going forward in the plans strategy.</p> <p>The designation of an area of restraint in the ENP will restrict the ability of the Borough Council to plan strategically for growth and work through its ‘duty to cooperate’ with neighbouring authorities to consider how any future unmet needs are best accommodated.</p> <p>In addition, the Green Gap is not supported by any robust analysis of the landscape context to justify the extent of the area proposed for designation.</p>	

Northampton BC	<p>Consideration of any need to establish a Green Gap policy around Northampton is a strategic issue that should be assessed and reviewed as part of the strategic development plans for the area.</p> <p>The current 5 year assessment indicates that Northampton has 3.1 years of deliverable housing land for the period 2016-2021. The Part 2 Local Plan for Northampton will seek to identify sites to meet the requirements of the West Northamptonshire JCS to 2029. Any proposed strategic designations for the fringe of Northampton should be assessed, defined and reviewed in this context.</p> <p>Neither the North Northamptonshire JCS nor the Emerging Draft Plan for Wellingborough propose any policies or designations for strategic Green Gaps for the period up to 2029. However, both plans recognise that spatial options may need to be assessed and reviewed (see para 1.14 of the JCS and para 1.0.22 of the Emerging Draft Plan for Wellingborough). There is no rationale for the lack of conformity between these 2 documents and the ENP. There also does not appear to be a clearly evidenced justification for the extent of the area proposed to be designated as a Green gap.</p>	
Anglian Water	<p>The ENP should explain in what circumstances development would be acceptable within the Green Gap. This should include reference to utility infrastructure provided by Anglian Water.</p>	
Environment Agency	<p>The policy would help stop Northampton spreading further to the east. The Billing Brook has been heavily modified and disturbed due to human intervention during the 20th century.</p>	
Policy 9 Recommendations		

1. Amend the supporting text to read as follows:

‘The village of Ecton is located approximately 0.5 miles to the east of Northampton and much of the intervening countryside is rural and undeveloped in character. There is pressure from the development industry to extend beyond the Ecton Brook, which currently forms a firm, eastern boundary to Northampton. Whilst the inspector who held the examination into the North Northamptonshire JCS concluded that development beyond the Ecton Brook is not necessary, he recognised that proposals may need to be considered in the long term to help meet the county’s needs. However, he stated that this would be a matter for a review of either the North Northamptonshire JCS or West Northamptonshire JCS to address in due course. Further explanation in the North Northamptonshire JCS indicates that it is not necessary for North Northamptonshire to identify land for housing or other development specifically related to meeting the needs of Northampton before 2029. However, ‘for the period post 2029 options outside of the West Northamptonshire boundary area may need to be tested alongside others for meeting Northampton’s longer term development needs’.

The land between Ecton village and Northampton forms part of the Ecton and Earls Barton Slopes landscape character area as defined in the Northamptonshire Environmental Character Assessment⁶. The JCS (at para 3.24) indicates that the Character Assessment should be used to ensure that the diversity of the North Northamptonshire landscape is respected, retained and, where possible, enhanced. Policies 3 and 11 of the JCS highlight the need for the landscape setting of settlements, their individual and distinct character and their separate identity to be protected whilst the overwhelming majority of local residents who responded following publication of the Emerging Draft Neighbourhood Plan (October 2016) recognise the important role that the countryside has to play in protecting the village setting and preventing coalescence with Northampton. The Character Assessment further highlights the vulnerability of the Rolling Ironstone Valley Slopes, including the Ecton and Earls Barton Slopes, to development pressure and concludes that, when considering proposals for development, it will be important to give careful consideration to the integration of development with the local landform as well as to the wider setting and to the relationship with existing built areas.

In recognition of the desire to protect the character of Ecton village an area ‘sensitive to coalescence with Northampton’ has been identified on the Policies Map. The purpose of this designation is not to preclude development that accords with the strategic policies of a Local Plan but to highlight the need for the landscape impacts arising from the scale, location and design of development to be carefully considered to ensure that the landscape setting of Ecton village, its individual and distinct character and its separate identity are protected.

2. Amend the Policy to read as follows:

Policy 9 – Maintaining the separate identity and setting of Ecton village.

Within the area designated on the Policies Map as ‘sensitive to coalescence,’ proposals for development will not be permitted if, individually or cumulatively, they will harm the landscape setting and distinct identity of the village of Ecton or undermine the visual or physical separation of Ecton village from Northampton.

⁶ River Nene Regional Park. Northamptonshire Environmental Character Assessment. nrpenvironmentalcharacter.org.uk

Policy 10 – Important views and vistas

Responses to residents' questionnaire

All respondents agreed that the views from the west of the village towards the church tower; along High St; and along Church Way should be protected.

Most respondents (~98%) also considered that the views of Ecton Hall and Barton Fields to the east of the village and views from the public footpath network to the west should be protected.

The majority (~65%) did not consider there to be other views that are particularly important. However, further views referred to by individual respondents included:

- The View of Ecton on entering the village from Ecton Lane. The trees provide a green exit/entrance to the village.
- The view across the Nene valley towards Cogenhoe.
- The view of the village from the A45 and Little Houghton-Cogenhoe Road.
- The vistas around Sywell Country Park.
- The Church Tower from Church View.
- The mature trees and ancient orchard at the top of Church View.
- The view from Sywell Lane.
- The views from The Courtyard and Church View looking westward across the old walled garden towards the landscaped woodland of the Hall.
- From High St along Parsons Close and to Laurel's Park.
- Views into Ecton Brook pocket park.
 1. The estate boundary approaching from Sywell and Earls Barton.
 2. Views through Franklin's close, West Street and Barton Fields to the landscape beyond.

The high level of support for the Policy is noted.

However, it is, impossible to identify every view within the Neighbourhood Plan Area and determine its importance. The purpose of the Policy is therefore to provide a framework against which planning applications can be determined. The focus is essentially on key views within and around the village, as explained at paragraph 5.57 of the Emerging Draft. This is because most development is expected to take place here rather than in the wider countryside where there is greater restraint. Notwithstanding this, it is recognised in criterion 2 of the Policy that views from the public rights of way and public roads can be important when determining a planning application. Essentially this criterion covers a number of the views referred to by respondents both within the village and the wider countryside.

Within the Conservation Area important viewpoints are shown on the map that forms part of the Conservation Area Appraisal and are listed in Policy 10. To reinforce their importance, reference should be included in the supporting text. In addition, neither Policy 10 nor Policy 7 (Conservation Area) specifically refer to important views of heritage assets other than the Church. The Policy should be amended to include such a reference.

	<ul style="list-style-type: none"> - The area around the cenotaph when viewed from High Street. - Either side of Ecton Hall gates. - Where footpaths lead off West Street, including the views of protected monument areas. - 	
Borough Council of Wellingborough	The policy adds local detail to Policy 2 and 3 of the JCS and is supported.	Noted.
Policy 10 Recommendations		
<ol style="list-style-type: none"> 1. Refer to the viewpoints identified in the Conservation Area Appraisal and include a criterion which seeks to safeguard important views of heritage assets. 		
Policy 11 – Natural features and landscape works.		
Responses to residents' questionnaire	<p>~ 98% of respondents agree with the proposed policy whilst one person was supportive subject to changes. Comments raised in respect of the policy were as follows:</p> <p>Consideration should be given to creating a landscape feature that can be this generation's legacy. The former cricket pitch could be a possible option.</p> <p>Where development will result in an unavoidable loss of habitat or green space, proposals must provide</p> <ul style="list-style-type: none"> - Compensation through the inclusion of a net gain in biodiversity; - Offsetting by contributing to local habitats; - The creation of wildlife corridors to prevent fragmentation; and - Measures to protect species rich and local habitats of importance. 	<p>The planting of trees to provide a landscape feature would not require planning permission and would not therefore be a matter for the Neighbourhood Plan.</p> <p>Policy 4 of the JCS indicates that a net gain in biodiversity will be sought. The policy lists measures to protect existing biodiversity assets and enhance ecological networks; to support the protection and recovery of priority habitats and species; and to avoid or mitigate against adverse impacts on the Upper Nene Valley Gravel Pits Special Protection Area. Further guidance is set out in Supplementary Planning Documents listed in the Emerging Draft ENP (para 5.5.15). It is not necessary to repeat Policy 4 of the JCS in the Neighbourhood Plan.</p>

Borough Council of Wellingborough	The policy is unnecessary as these issues are already covered by Policy 8 of the JCS.	Policy 3 of the JCS is essentially strategic in nature. It includes key principles to secure the retention and enhancement of important landscape features and provide appropriate landscape mitigation. Policy 8 of the JCS incorporates key 'place shaping' principles including the need to incorporate measures to enhance biodiversity and for tree planting to enhance the public realm. Policy 11 of the ENP is intended to complement the policies of the JCS. Development in Ecton is expected to be minor in scale and the policy therefore focuses on those issues related to natural features and landscaping which are likely to be most relevant when considering planning applications such as those of a single dwelling or a house extension. It focuses, for example, on the protection of trees and their replacement where their loss is deemed to be acceptable. It also emphasises the need for landscape works to soften the impact of development. Additional background text should be included to explain how the policy complements the policies in the JCS.
North Northamptonshire Joint Planning Unit	Provision for the retention and enhancement of the natural landscape is made within Policy 3 of the JCS and the policy is not therefore necessary.	
Northamptonshire County Council	The aims and purpose of the policy are supported. However, it is unclear how the phrase 'natural features of nature conservation and/or amenity value' differs from the term 'biodiversity features' used in the Biodiversity SPD. The difference should be clarified in the supporting text. Otherwise, for the sake of consistency, I would suggest that the term 'biodiversity features' is sufficient.	The Biodiversity SPD indicates that the term 'biodiversity features' essentially relates to the conservation of species and their habitats. However, the ENP policy is also concerned with landscape character.
Environment Agency	We are encouraged that the associated text refers to water features. This would allow for river interventions such as restoration or enhancement, should the opportunity arise.	Noted.
Policy 11 Recommendations		
1. Include background text to explain how the policy complements the policies in the JCS.		
Policy 12 – Car parking		

Responses to residents' questionnaire

~ 88% of respondents agree with the proposed policy whilst the remainder are supportive subject to changes. Comments received included the following:

Parking - Sufficient provision should be made for visitors, including delivery vehicles and tradesmen; thought should be given to the likely increase in vehicles at existing premises as well as the need for parking permits and communal parking areas; most garages are not used for car parking these days and unless supported by adequate enforcement this policy is worthless.

Modal shift – Travel plans can assist in delivering sustainable transport and reducing vehicular clutter on the streets. It is important to indicate how travel plans will be delivered and monitored. Modal shift initiatives (e.g. accessible public transport information, working from home and car sharing) should be encouraged.

Electric vehicles - Consideration should be given to installing equipment that would encourage electric car use in the village. Contact should be made with 'Chargemaster' about such provision.

Road safety and highway improvements Proposals should be developed to ensure an easy flow of traffic down High St (e.g. no parking areas); through traffic should be discouraged whilst footpaths should be cleared of parked cars and parking bays should be provided; occasional road closures would send a message to through traffic to indicate that this is a village and not a 'rat-run'; the Highway Code indicates that you should not park within 10 metres of a junction - can this be implemented?; Paragraphs 5.6.2 and 5.6.4 do not

General - The emphasis in a land use plan should be on ensuring that new developments mitigate their impact on the highway network. So, for example, policies might be used to secure adequate off-street parking; safe, vehicular access; or traffic calming measures made necessary by the development.

However, transport policy at a local level is primarily a matter for the County Council (the highway authority) with law enforcement being the responsibility of the Police. Policies not specific to new development (e.g. public transport improvements to serve the village, car sharing or measures to improve road safety) cannot normally be achieved through land use planning and, consequently, cannot be included in a neighbourhood plan policy. These wider community aspirations, however, may be referred to in the neighbourhood plan where the community proposes to focus its efforts on their delivery. Such supporting actions and projects do not carry any legal weight and must be clearly distinguished from planning policy in the neighbourhood plan.

Parking – Parking standards can only be applied to new development requiring planning permission. It is agreed that many garages are not used for the parking of vehicles. However, where planning permission is granted subject to the type of condition outlined in Policy 12, the condition will ensure that, where appropriate, the garage will be available for future occupiers of the property to use for the parking of vehicles.

Modal shift - Development in Ecton is unlikely to be of sufficient scale to require the preparation of a Travel Plan. Measures to encourage greater use of public transport and car sharing are not normally matters for inclusion in a neighbourhood plan policy.

	<p>mention school children or the frail and elderly who have difficulty in crossing the road network, including the A4500, for public transport; traffic measures must be in keeping with the visual environment of the village.</p>	<p>However, see 'general' comments (above) regarding wider community aspirations.</p> <p><i>Electric vehicles</i> - The NPPF states that developments should be 'be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations'. It is therefore appropriate to include policy wording requiring new dwellings and garages to be provided with an electric vehicle charging point, where practical. However, in respect of existing development, the planning system is unable to require the provision of infrastructure.</p> <p><i>Road safety and highway improvements</i> intended to address existing issues are essentially matters for the Highway Authority and Police as indicated in the 'general' comments (above). However, the Emerging Draft ENP indicates (at page 26) the policy of the Parish Council to support suitable measures to improve highway safety. Reference is made in para 5.6.1 of the Emerging Draft ENP regarding parking in the vicinity of the school and the problems encountered by pedestrians crossing the A4500.</p>
<p>Borough Council of Wellingborough</p>	<p>The policy complements and adds local detail to JCS Policy 8. However, it may prove difficult to refuse applications without strong evidence of problems in the local vicinity. The NPPF indicates that development should only be prevented where the residual cumulative impacts are severe.</p>	<p>Noted.</p>
<p>Policy 12 Recommendations</p> <ol style="list-style-type: none"> 1. Insert criterion and supporting text to require electric vehicle charging points to be included as part of new residential development. 		

Policy 13 – Fibre to the premises		
Responses to residents' questionnaire	~93% of respondents agree with the proposed policy whilst the remaining 7% are supportive subject to changes. Comments included the need to make fibre to the premises available to existing properties as well as new developments.	The need for high speed broadband is of vital importance to support working from home and reducing the need to travel etc. However, the planning system is unable to require the provision of infrastructure that will enable fibre optic broadband to be delivered to existing homes.
Borough Council of Wellingborough	The proposed policy complements and adds local detail to JCS Policies 10 and 25. However, it should be reworded as follows: 'Planning permission for new dwellings or commercial development will be subject to a condition requiring the provision of ducting that can support the provision of fibre to the individual premises unless it can be demonstrated that such provision would not be practical or viable'.	The suggested amendment clarifies the intention to apply the condition to new dwellings rather than to all residential development, including house extensions. The policy should therefore be amended as suggested by the Borough Council.
North Northamptonshire Joint Planning Unit	JCS Policies 10 and 25 provide support for fibre broadband, with a particular emphasis on rural areas. The proposed ENP policy is therefore unnecessary.	JCS Policy 25 provides support for enhanced broadband provision to facilitate economic development in rural areas. JCS Policy 10 indicates that on-site infrastructure should be provided to enable 'Next Generation Access' (NGA) to the premises. NGA includes not only fibre to the premises but also fibre to the cabinet. Policy 13 of the ENP adds local detail to the JCS policies by requiring infrastructure specifically to enable the delivery of fibre to the premises. It further explains that this requirement will be achieved through the use of a planning condition.
Policy 13 Recommendations		
<ol style="list-style-type: none"> Amend the wording of the Policy to read as follows: ' Planning permission for new dwellings or commercial development will be subject to a condition requiring the provision of ducting that can support the provision of fibre to the individual premises unless it can be demonstrated that such provision would not be practical or viable'. 		

Other comments:

<p>The Environment Agency</p>	<p>Water quality – Any future development must not cause a deterioration in the water quality of the River Nene and its tributaries (Sywell Brook and the Nene-Brampton Branch to Ise). Ecton is served by the sewage treatment works at Great Billing. Whilst flows are currently (2013) below the maximum specified in the Environment Permit, developers will need to consult AW to establish whether there is capacity to accept additional foul water or the need for upgrades.</p>	<p>JCS Policy 5 indicates that development will only be granted where adequate and appropriate water supply and wastewater infrastructure is available or will be made available prior to occupation.</p>
	<p>Flood risk - As the ENP is not seeking to allocate sites in areas at risk of flooding or provide further policy above and beyond the North Northamptonshire JCS and NPPF, we have no comment to make.</p>	<p>Noted</p>
	<p>Water resources – Future developments must not cause impacts on water features i.e. springs, wells, boreholes, ponds and reservoirs. New and upgraded developments should apply water efficiency and water saving methods to minimise potential impacts on water resources within the area.</p>	<p>Residential development should incorporate water efficiency measures in accordance with JCS Policy 9. In addition, JCS Policy 5 indicates that development is unlikely to be permitted where proposals would lead to deterioration in the ability of a water body or underlying groundwater to meet good status standards as defined in the Anglian River basin Management Plan.</p>
	<p>Ground water – There are areas of the Parish classified as ‘Secondary A Aquifers’. Such areas are often capable of supporting water supplies at a local scale (rather than a strategic scale) and can provide an important source of flow to some rivers. Whilst the Parish lies outside any groundwater Source Protection Zones (these zones highlight the risk of contamination from activities that might cause pollution) there is a single domestic abstraction at Plantation Farm and two deregulated abstractions at Sywell and West Lodge. In addition, the former gravel pit lakes in the south of the Parish contain historic landfill where inert waste was</p>	

	deposited in the past. Piling and certain other works can also result in the contamination of groundwater Further advice on protecting groundwater is available from the EA.	
Anglian Water	The North Northamptonshire JCS already includes a policy (Policy 5) relating to water supply, water quality and wastewater infrastructure. It is not therefore necessary to include a similar policy in the ENP.	Agreed
National Grid	National Grid owns and operates the high voltage electricity transmission system and the gas transmission system. With respect to the ENP, there are no implications for National Grid's intermediate/high pressure gas apparatus. However, there may be low pressure or medium pressure pipes within development sites. Information in relation to electricity assets is available on-line. The distribution operator is Western Power Distribution.	Noted. Western Power Distribution was consulted on the emerging draft ENP, although no response was received.
Heritage England	At this point we don't consider there is a need to be involved - the conservation officer at the Borough Council is best placed to assist. You should also contact Northamptonshire CC who look after the Historic Environment Record and give advice on archaeological matters.	The Borough Council and County Council have been consulted on the ENP and both have provided comment.
Natural England	Part of the ENP area is within 3kms of the Upper Nene Gravel Pits Special Protection Area (SPA). Housing development within the zone would have an adverse effect on its integrity unless measures are in place as outlined in the mitigation strategy. However, as no specific housing allocations have been identified in the ENP and the policies for infill development and rural exception sites state that development must be within or adjoining the village (which is ~ 3.5km from the SPA) these developments will not be subject to a financial contribution in line with the mitigation strategy.	Noted.

Appendix 2. ENP Pre-Submission Schedule of Representations and Responses

Public consultation took place on the Pre-Submission Draft Ecton Neighbourhood Plan (ENP) between April 15th and May 31st 2019. A leaflet, providing a brief summary of the Plan and details of how to comment, was delivered to households in the Parish. The ENP was also made available on the Ecton Village website and a drop-in session was held at the Village Hall on Tuesday 21st May, prior to the Annual Meeting of the Parish and the Annual Parish Council Meeting (AGM). Other key stakeholders were informed of the consultation by email.

A total of 10 responses were received and these are summarised in this schedule. The responses have been carefully considered by the Parish Council and Steering Group and their response to the comments received during the consultation period are also outlined in this schedule along with resultant changes to be made to the ENP before it is submitted to the Borough Council of Wellingborough for Examination.

Abbreviations used in this schedule:

BCW – Borough Council of Wellingborough

ENP –The Ecton Neighbourhood Plan

HRA – Habitat Regulations Assessment -

JCS – North Northamptonshire Joint Core Strategy – the strategic Local Plan for the area also sometimes referred to as the Local Plan Part 1.

JPDU – North Northamptonshire Joint Planning and Delivery Unit – the body responsible for preparing the JCS.

NPPF – National Planning Policy Framework – which sets out Government planning policy.

PBW – The Plan for the Borough of Wellingborough

SEA – Strategic Environmental Assessment

	Summary of comments	Ecton Parish Council response
North Northamptonshire Joint Planning & Delivery Unit (NNJPDU)	Satisfied that the ENP has taken our comments on the earlier consultation (November 2016) into account and is now consistent with the JCS. More specifically the strategic issue of the previously proposed 'Green Gap' has now been more appropriately addressed through Policy 9 (Maintaining the separate identity of Ecton village) of the ENP by means of locally interpreting Policies 3 and 11 of the	The conclusion that the ENP is now consistent with the adopted JCS is welcomed.

	JCS to test any potential future proposals, rather than there being a complete blanket restriction.	
Borough Council of Wellingborough (BCW)	Policy 1 - Residential amenity: Concerns remain in respect of criterion 3 and how this might be implemented. It is not clear what is meant by 'significant disturbance'. Given the scale of development likely to come forward in Ecton it is unlikely that vehicular accesses will result in significant disturbance. Amenity considerations are also covered by JCS Policy 8 as referred to in the accompanying text. Should you wish to keep a reference to disturbance from vehicular access perhaps you could consider adding additional background text to explain what would not be acceptable.	It is agreed that the provision of a vehicular access to serve residential development is unlikely to result in significant disturbance to neighbouring occupiers. As advised by BCW, JCS Policy 8 provides for the consideration of residential amenity where development could give rise to unacceptable impacts on neighbouring properties or the wider area by reason of noise, vibration, smell, light or other pollution, loss of light or overlooking. <i>Criterion 3 of the policy will be deleted along with that part of paragraph 5.2.6 relating to the provision of vehicular access.</i>
	Policy 2 - Dwelling size: The aim of this policy is supported as it seeks to ensure new dwellings meet identified need as much as possible. It is recognised that the policy has been amended to reflect previous comments. The policy would be appropriate when dealing with a rural exception site or a small group of dwellings on an infill site, however it must be recognised that it would be difficult if not impossible to apply the policy on a single dwelling infill site.	Noted.
	Policy 3 - Rural exceptions: This policy has been amended to reflect previous comments and the approach to securing nomination agreements with a local connection is supported. Para 5.2.15 refers to the Borough Council's current housing allocations policy. It should be noted that this may change when the proposed Unitary Authority is in place. Policy H6 of the PBW now also enables single plot exceptions sites for self-build. This needs to be recognised in the plan.	Paragraph 5.2.14 will be amended as follows: Policy 13 (Rural Exceptions) of the JCS and Policy H6 (Single Plot Exception Sites for Self-build) of the PBW focus on the scale, location and type of dwellings that should be provided on rural exception sites and on ensuring that the homes remain available and affordable in perpetuity to meet local needs. The Neighbourhood Plan complements these policies, focusing primarily on ensuring that people with a strong local connection to Ecton are given priority access to the affordable housing in perpetuity. The following will be inserted at the end of paragraph 5.2.15: <i>'For the purposes of Policy 3 (Rural exception sites) of the ENP the definition of 'local connection' shall be as defined in the 2018</i>

	<i>Housing Allocation Policy of the Borough Council.'</i>
Policy 4 - The protection of community facilities: This policy complements Policy 7 of the JCS and provides greater detail on the level of evidence required.	The support is welcomed
Policy 5 - The provision of new community facilities: This policy is supported, it complements Policy 7 of the JCS.	The support is welcomed
Policy 6 - Local Green Space: This policy is supported, it reflects national policy.	The support is welcomed
Policy 7 - The Conservation Area: This policy is supported. It adds useful local detail to Policy 2 of the JCS and supports the conservation area appraisal.	The support is welcomed
Policy 8 - Non-designated heritage assets: This policy is supported, it reflects the NPPF, JCS and the conservation area appraisal.	The support is welcomed
Policy 9 - Maintaining the separate identity of Ecton village: This policy is considered to provide an appropriate local interpretation of Policies 3 and 11 of the JCS.	The support is welcomed
Policy 10 - Important public views and vistas: This policy is supported. It adds useful local detail to Policies 2 and 3 of the JCS.	The support is welcomed
Policy 11 – Natural features and landscape works: This policy complements Policies 3 and 8 of the JCS. The additional background text is considered helpful in defining the role of the policy.	The support is welcomed
Policy 12 – Car Parking: Criterion 1 is supported. It complements Policy 8 of the JCS. Criterion 2 is rather a blanket restriction. If adequate parking is available it may not be justifiable to require	The support for criteria 1 and 3 is welcomed.

	<p>such a condition. You should consider adding ‘in areas with limited off-street parking’. Criterion 3 is supported, this reflects advice in the NPPF to enable charging of plug-in and other ultra-low emission vehicles.</p>	<p>In respect of criterion 2 the words ‘Where appropriate’ will be added at the start of the sentence and the following text will be included in the policy justification:</p> <p><i>‘In determining compliance with parking standards, the highway authority issued some clarification to the Borough Council in 2017 regarding garage provision and other matters. The clarification indicates that a double garage can be counted as one parking space while a single garage can also be included as one parking space if external storage, such as a shed, is to be provided. Where it is necessary to count a proposed garage as a parking space in order to ensure compliance with adopted parking standards it will be appropriate to include a condition to prevent its future conversion for use as an extension to the dwelling without planning permission’.</i></p>
	<p>Policy 13 – Fibre to the premises: This policy complements and adds local detail to JCS Policies 10 and 25. It does however need rewording, as the meaning is not clear. It is suggested that it is amended to the wording suggested in the Schedule of representations and responses (April 2019) i.e. ‘Planning permission for new dwellings or commercial development will be subject to a condition requiring the provision of ducting that can support the provision of fibre to the individual premises unless it can be demonstrated that such provision would not be practical or viable.’</p>	<p>Agreed. The policy will be reworded as follows:</p> <p><i>‘Planning permission for new dwellings or commercial development will be subject to a condition requiring the provision of ducting that can support the provision of fibre to the individual premises unless it can be demonstrated that such provision would not be practical or viable.’</i></p>
<p>Fisher German on behalf of the Trustees of the Ecton Estate</p>	<p>The JCS limits residential development in the village to small scale infill and rural exception sites, unless otherwise promoted through a neighbourhood plan. The ENP creates an opportunity to steer development to the most appropriate locations within the village where there are a very limited number of infill sites.</p>	<p>The site is shown in Figure 1 (page 46) and forms the former walled garden within the Ecton Hall estate.</p> <p>The adopted Local Plan does not allocate sites for housing in Ecton but limits development to small scale infill development on suitable sites within villages (JCS Policy 11) together with rural exceptions housing as outlined in JCS Policy 13 and PBW Policy H6.</p>

The site in Figure 1 (see page 46) represents the most suitable location to accommodate growth identified by the current Housing Needs Survey and any subsequently prepared survey over the plan period.

This site is well related to the built form of the village with a clear, defined boundary to the east, comprising woodland, and the A4500 to the north. It is also located outside the Conservation Area and a suitable access could be taken from Church View. The site is of sufficient size to accommodate current and future needs whilst ensuring the protection of neighbouring amenities and retention of any important trees where it will help to reduce pressure on the development of other less suitable sites in the village.

This site could be identified as a preferred location for growth to ensure that the ENP can deliver existing and future housing needs. This would reinforce policies which seek to restrict development and protect important views, landscape features, heritage assets, valued open spaces and the village identity.

This approach would support the requirement for plans to be 'positively prepared, in a way that is aspirational but deliverable' (paragraph 16 of the NPPF). The ENP would promote appropriate development whilst restricting that which would be harmful to elements within the village that are valued.

To interpret whether sites are located within the village or on adjoining land, a village boundary for Ecton has been defined in [Appendix D \(Policies Maps\)](#) of the adopted Plan for the Borough of Wellingborough. The Policies Map indicates that the site shown in Figure 1 is not within the village boundary but is adjacent to it.

In 2017, as part of work required to produce the PBW, the Borough Council published a [Village Boundaries Background Paper](#). In response to a representation requesting the inclusion of the walled garden within the village boundary, the Borough Council concluded that the site is extensive garden land whose development would harm the form and character of the village (see page 12 of the Background Paper).

JCS Policy 11 indicates that development above these requirements will be resisted unless agreed through the ENP. However, as noted at paragraph 5.2.3 of the ENP, earlier consultation has indicated that such provision would not be supported by the local community and the ENP does not therefore allocate land for housing. In addition, the most recent housing needs survey (2017), referred to in paragraph 3.19 of the ENP, suggests that there is very limited local need in Ecton at the present time.

Contrary to the statement made by Fisher German, the site is within the Conservation Area, as shown in Figure 5 of the ENP. [The Ecton Conservation Area Appraisal](#) (at para 6.7 and 6.8) refers to the need to include the old walled garden, including the boundary walls (this is the site proposed by the Ecton Estate) within the Conservation Area as it positively contributes to the character of Ecton and the Ecton estate.

		<p>It is therefore unclear how Fisher German has reached the conclusion that the development would ‘protect important views, landscape features, heritage assets, valued open spaces and the village identity’ as the proposal would surely have a negative impact on the positive contribution that the site makes to the Conservation Area.</p> <p>No evidence has been submitted to support the opinion that development of the site would protect important heritage assets and landscape features or how it would meet the requirements of Policy 13 of the JCS or why it represents ‘the most suitable location to accommodate growth’.</p> <p>It is not therefore proposed to allocate the site for housing in the ENP.</p>
<p>Natural England</p>	<p>Unable to provide a response. However, the lack of comment does not imply that there are no impacts on the natural environment. Natural England has signposted information sources that may be used in developing the plan, and to highlight some of the potential environmental risks and opportunities that neighbourhood plans may present. In particular we would draw your attention to the SSSI Impact Risk Zones which may be of use in understanding potential impacts from the Plan on nearby designated sites.</p> <p>Natural England has not assessed the ENP for impacts on protected species but has published <u>Standing Advice</u> which you can use to assess impacts on protected species or you may wish to consult your own ecologist for advice. Natural England and the Forestry Commission have also published standing advice on <u>ancient woodland and veteran trees</u> which you can use to assess any impacts on ancient woodland.</p>	<p>A Pre-Submission (Regulation 14) Draft SEA/HRA screening report was forwarded to Natural England by BCW in May 2019. The report noted that the ENP must be in general conformity with the strategic policies of the Local Plan (which has been the subject of Sustainability Appraisal); that it does not propose more development than is set out within the Local Plan; and that it does not allocate sites for development. The screening report concluded that implementation of the ENP is unlikely to result in any significant effects on either the environment or the Nene Valley Gravel Pits Special Protection Area. In response, Natural England advised that it had no comment to make on the screening report.</p> <p>In addition, several policies applicable to the Neighbourhood Plan area provide for the protection of natural features and protected species. These include JCS Policy 4 (Biodiversity and Geodiversity), JCS Policy 3 (Landscape character) and ENP Policy 11 (Natural features and landscape works).</p>

<p>Wood obo National Grid</p>	<p>National Grid operates the electricity transmission network across the UK. It also owns and operates the high-pressure gas transmission system. National Grid has no record of such transmission apparatus within the Neighbourhood Plan area.</p> <p>National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called 'Cadent Gas'. The electricity distribution operator in the area is Western Power Distribution.</p> <p>Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk</p>	<p>The comments are noted.</p>
<p>Anglian Water</p>	<p>The NNJCS includes a policy relating to water supply, water quality and wastewater infrastructure (Policy 5).Therefore it is not necessary to include a similar policy in the ENP.</p> <p>Policy 9 (Maintaining the separate identify of Ecton Village) should explain in what circumstances development within the designated area would be acceptable. It would be helpful to include reference to utility infrastructure provided by AW as being essential infrastructure in this context.</p>	<p>The comments are noted.</p> <p>Policy 9 is intended to prevent development which would harm the landscape setting and distinct identity of the village or undermine the visual or physical separation of the village and Northampton. However, where planning permission is required for development, including utility infrastructure, proposals should be assessed against all relevant policies in the adopted Local Plan and, once made, the ENP. Relevant policies will be determined by the nature, scale and location of the proposed development. It is not therefore appropriate to refer specifically to utility infrastructure in Policy 9 of the ENP.</p>
<p>Historic England (HE)</p>	<p>There is no need for HE to be involved at present; the conservation officer at BCW can help you to consider how the strategy might address the area's heritage assets.</p> <p>NCC, which looks after the Historic Environment Record and give advice on archaeological matters, should be able to provide details of designated heritage assets, locally-important buildings, archaeological remains and landscapes. It may also be useful to</p>	<p>BCW has provided comments on the ENP (see above). It has also undertaken a Conservation Area Appraisal which resulted in the extension of the Conservation Area. NCC has also been consulted on the ENP and provided comment at the earlier Draft ENP stage. Historic England was also consulted on the Pre-Submission (Regulation 14) Draft SEA/HRA screening report (see above response in respect of</p>

	<p>involve local voluntary groups such as the local Civic Society or local history groups</p> <p>Further guidance from HE on how heritage can be incorporated has been produced can be found at:- http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood</p>	<p>comments made by Natural England) and advised BCW that it had no comments to make.</p>
<p>Pegasus Group obo Miller Homes</p>	<p>Policy 5 (Provision of new community facilities) should recognise that new residential development provides opportunities to secure new community facilities for existing and future residents. Development east of Northampton would incorporate facilities that would be easily accessible for Ecton residents.</p> <p>Policy 9 (Maintaining the separate identity of Ecton village). It is noted that, in respect of the Emerging Draft ENP, the NNJPU, South Northamptonshire Council and Northampton Borough Council advised that the designation of a ‘green gap’ would be a strategic issue to be addressed through local plans. BCW also confirmed that the identification of areas of separation was a matter for local plans but suggested that the ENP could refer to an ‘area of separation’. The amended approach in Policy 9 and para 5.58 is welcomed. However, the Policies Map continues to show an extensive area as being sensitive to coalescence. Local residents will expect the area to remain open, notwithstanding the comments in the text that the policy is not intended to preclude development.</p> <p>Policy 9 and the designation on the Policies Map should be deleted and para 5.58 should be replaced with the following: ‘The Parish Council will expect the local planning authority, in considering any proposals for development in the area, to carefully consider the landscape impacts of development to ensure that the landscape setting of Ecton village, its individual and distinct character and its separate identity are protected’. Alternatively, this requirement could be expressed as policy.</p> <p>There is the opportunity in association to the west of the village to clearly define an area of separation for safeguarding. This would</p>	<p>Policies in the ENP are based on the scale of growth envisaged in the adopted Local Plan. Land to the east of Northampton is not allocated for development and it is not therefore appropriate to include reference to such facilities in the ENP.</p> <p>Neither South Northamptonshire Council nor Northampton Borough Council responded to consultation on the Pre-Submission ENP. While Pegasus Group has welcomed the amended approach it has suggested an alternative form of wording and deletion of the area described as ‘sensitive to coalescence’ on the Policies Map. However, the NNJPU (see above) has confirmed that it is satisfied that the ENP is now consistent with the JCS. Similarly, BCW has concluded that Policy 9 provides an appropriate local interpretation of policies in the JCS.</p> <p>It is explained in the policy background text that Policy 9 is not intended to preclude development but serves to highlight the need to protect the landscape setting and separate identity of Ecton and its individual and distinct character.</p> <p>The illustrative draft masterplan provided by Pegasus (see page 47) serves to highlight the considerable concern that the Parish Council and local community have regarding possible eastward expansion of Northampton and the need to include Policy 9 in the ENP; it shows a large area of development, both north and south of the A4500, which abuts up to the village at its closest point and results in physical and visual coalescence with the village of Ecton.</p>

	offer stronger safeguarding than seeking to protect an overly extensive area as is currently proposed in the ENP. The attached illustrative Draft Masterplan (see page 47) shows how development could take place with an area of land retained to provide a robust area of separation.	It is not proposed to amend the ENP in response to the representation.
	Policy 10 (Important views/vistas). The approach represents a blanket restriction on development around the village and is not supported by a clear assessment of key viewpoints that would merit safeguarding.	<p>The ENP must be in general conformity with the strategic policies of the Local Plan which allow for minor infill development within a defined Ecton Village Boundary and for rural exception sites. Within the countryside the Local Plan strategy aims to strictly manage development in order to safeguard the character and beauty of the countryside and maintain separate settlements; it does not provide for development of the scale proposed by Miller Homes. However, it is envisaged that limited development of the scale proposed can be accommodated while safeguarding the views outlined in Policy 10 of the ENP.</p> <p>The policy draws on the Conservation Area Appraisal and Environmental Character Assessment and the strong views expressed by local residents, most notably in responding to the questionnaire issued at the Emerging Draft stage (2016).</p> <p>It is not proposed to amend the ENP in response to the representation.</p>
	Policy 11 (Natural features/landscape works). Any development to the west of the village would safeguard hedgerows and incorporate new areas of landscaping within a retained area of green space.	Noted
	Policy 12 (Car parking and electric vehicle charging). Development to the west of the village could provide the opportunity to secure electric vehicle charging points.	Noted.
Local resident	There is no mention of protection of the environment. The ENP should aim to show an overarching concern for our environment	Contrary to the representation, the ENP includes a range of policies to protect the historic and natural environment and protect

	<p>running through it. <u>The Wootton Wawen Neighbourhood Plan</u> provides an example of best practice. This includes a section on the protection of the environment. As a result, the Parish successfully changed the policies of the Council, improved and rejuvenated allotment facilities, reduced speeds through parts of the village by 20 mph and had some of the most energy efficient housing in the country built.</p>	<p>residential amenity. The Wootton Wawen Plan includes a specific section relating to the ‘neighbourhood environment’. However, planning applications should be determined in accordance with the Development Plan. In the case of Ecton this currently includes the adopted JCS and PBW but it will also include the ENP once it is ‘made’ (adopted). In combination, these documents address a number of similar areas as the neighbourhood environment policies of the Wootton Wawern Plan. Examples include:</p> <p>Renewable energy - see JCS Policy 26 (Renewable and local carbon energy).</p> <p>Green and blue infrastructure – see JCS Policy 19 (Delivery of green infrastructure, JCS Policy 20 (The Nene and Ise valleys) and ENP Policy 11 (Natural features and landscape works).</p> <p>Flooding and surface water drainage – see JCS Policy 5 (Water resources, environment and flood risk management).</p> <p>Protection of the best and most versatile agricultural land – there are several references in the JCS to the need to safeguard such land including, for example, paragraph 3.32.</p> <p>The protection of valued landscapes, skylines and important views – see JCS Policy 3 (Landscape character), ENP Policy 9 (Maintaining the separate identity of Ecton village) and ENP Policy 10 (important views and vistas).</p> <p>Preservation of designated heritage assets – see JCS Policy 2 (Historic environment) and ENP Policy 7 (The Conservation Area).</p> <p>Promoting high quality built design – see JCS Policy 8 (North Northamptonshire place shaping principles and JCS Policy 9 (Sustainable buildings and allowable solutions).</p> <p>Nature conservation - see JCS Policy 4 (Biodiversity and Geodiversity).</p> <p>It is not therefore proposed to amend the ENP in response to the representation.</p>
<p>Sywell Parish Council</p>	<p>No objections</p>	<p>Noted.</p>



Figure 1 Land proposed for housing allocation by Fisher German on behalf of the Trustees of the Ecton Estate



Figure 2 Illustrative Draft Masterplan for Development East of Northampton (see representation by Pegasus Group obo Miller Homes)

