

Grafton Underwood Neighbourhood Plan

Consultation Statement

March 2025

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Table of Contents

1. Introduction.....	1
Legal Requirements	1
Consultation Process.....	1
2. Neighbourhood Plan Area	3
Designation.....	3
3. Community Consultation 'Drop In' Events.....	5
Overview.....	5
Who was consulted.....	5
How were people consulted.....	5
Issues, priorities and concerns raised	6
Open Spaces.....	6
Important Views.....	6
How the Issues, Priorities and Concerns have been considered	8
4. Meeting with Boughton Estate	9
Overview.....	9
How the Issues discussed have been considered	9
5. Housing Site Consultation	10
Overview.....	10
Who was consulted.....	10
How were people consulted.....	10
Issues, Priorities and Concerns Raised.....	11
How the Issues, Priorities and Concerns have been considered	11
6. Pre-Submission Consultation on the Draft Grafton Underwood Neighbourhood Plan	12
Overview.....	12
Who was consulted.....	12
How were people consulted.....	13
Issues, Priorities and Concerns Raised.....	13
How the Issues, Priorities and Concerns have been considered	13
7. Conclusion	14
Appendix 1: Pre-submission Grafton Underwood Neighbourhood Plan – Consultees	15
Appendix 2: Pre-Submission Grafton Underwood Neighbourhood Plan – Representors.....	17

Appendix 3: Pre-submission Grafton Underwood Neighbourhood Plan – Summary of
Consultation Responses18

1. Introduction

Legal Requirements

- 1.1 This Consultation Statement has been prepared to fulfil the legal requirements of Part 5, Section 15 of the Neighbourhood Planning (General) Regulations 2012 by:
- a) Detailing the persons and bodies who were consulted about the proposed neighbourhood development plan;
 - b) Outlining how these persons and bodies were consulted;
 - c) Providing a summary of the main issues and concerns raised;
 - d) Reviewing how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

Consultation Process

- 1.2 Throughout the process of producing the Grafton Underwood Neighbourhood Plan a more in-depth consultation process has been undertaken than the minimum standards set out in the Neighbourhood Planning (General) Regulations 2012.
- 1.3 The aims of the consultation process was to:
- Ensure that the Grafton Underwood Neighbourhood Plan was fully informed by the views and priorities of local residents, businesses, and key local stakeholders;
 - Ensure that detailed consultation took place at all stages of the process, especially where key priorities needed to be set;
 - Engage with as broad a cross-section of the community as possible, using a variety of consultation and communication techniques
 - Ensure consultation results were used to inform subsequent stages of the Neighbourhood Planning process.
- 1.4 Consultation and preparation of the plan has been led by Grafton Underwood Parish Council, with professional support provided by Planit-X Town and Country Planning Services.
- 1.5 Throughout the preparation of the Neighbourhood Plan, the Grafton Underwood Parish Council website has been used to provide information and updates on the Plan's progress and is a source of material and evidence used in the Plan's preparation. Local people have also been informed through social media and leaflet drops.
- 1.6 The programme of consultations undertaken throughout the preparation of the Neighbourhood Plan, is summarised below.

Activity	Date
Community Consultation 'Drop In' Events	5 May 2002 and 6 May 2022
Meet with Boughton Estate	14 July 2022
Housing Site Consultation	February – March 2023
Pre-Submission Consultation on the Draft Plan	22 July 2024 to 2 September 2024

- 1.7 This Consultation Statement provides an overview of each of the above stages of consultation in accordance with Section 15 (2) of Part 5 of the Neighbourhood Planning (General) Regulations 2012.

2. Neighbourhood Plan Area

Designation

- 2.1 The Neighbourhood Plan Area comprises the whole of Grafton Underwood Parish. It was designated as a Neighbourhood Area on 3 June 2019, following an application made by Grafton Underwood Parish Council as the 'Qualifying Body', under Part 2, Section 5 of the Neighbourhood Planning (General) Regulations 2012.
- 2.2 In accordance with Regulations 5/5A of the Neighbourhood Planning (General) Regulations 2012 (as amended), the Grafton Underwood Neighbourhood Area was formally designated by Kettering Borough Council.¹
- 2.3 A map showing the area to be covered by the plan can be viewed below.

¹ Following local government reorganisation, North Northamptonshire Council came into being on 1 April 2021. The North Northamptonshire unitary area covers the former district and borough councils of Corby, East Northants, Kettering and Wellingborough which have been abolished.


Scale: 1:25000

Author: R. Cole

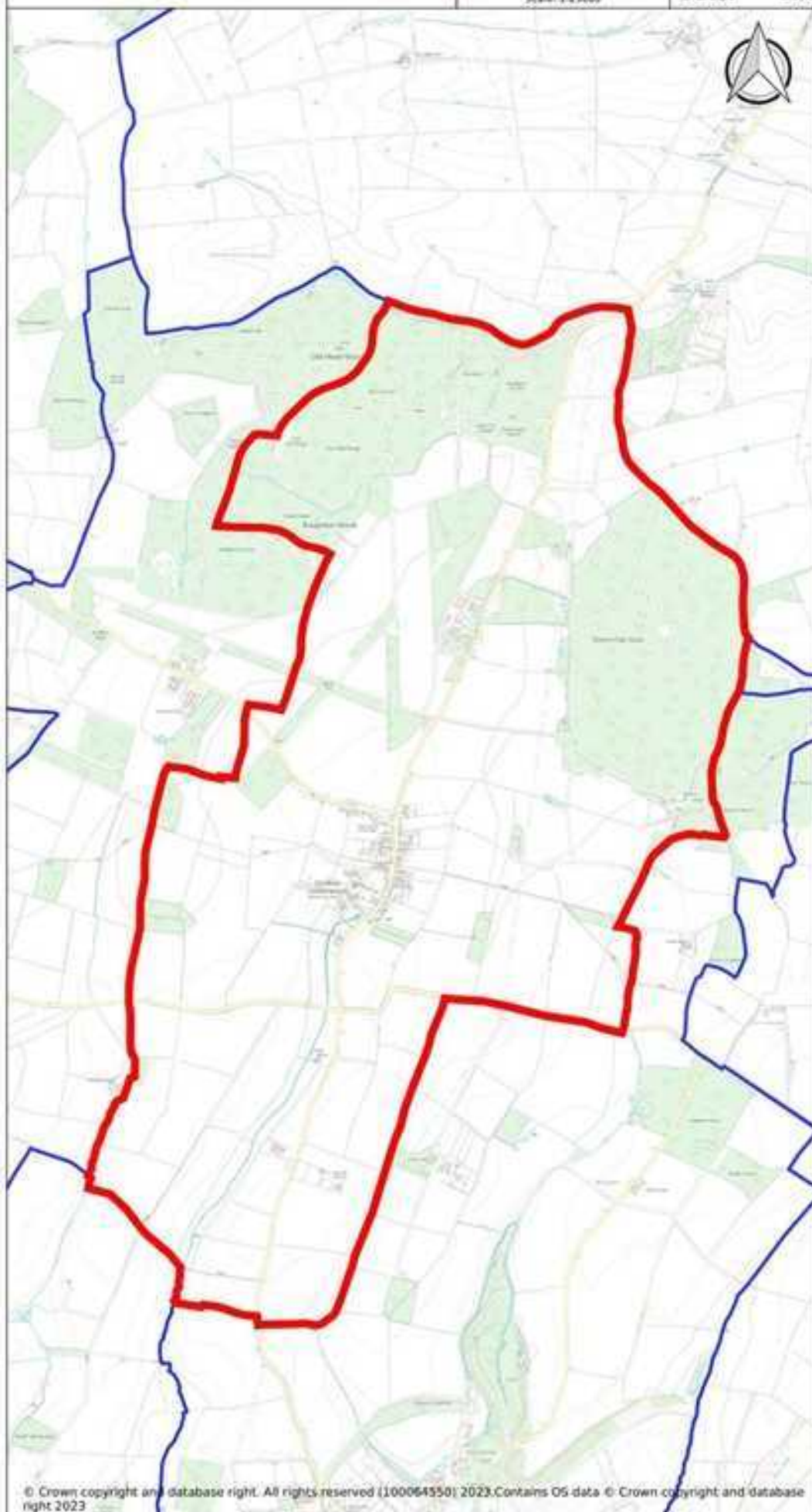
Date: 23/04/2023



Parish



Neighbourhood Plan Area



3. Community Consultation 'Drop In' Events

Dates	Thursday 5 May 2022 and Friday 6 May 2022, 4.00pm to 7.00pm
Venue	Grafton Underwood Village Hall
Format	Community 'Drop In' Event
Publicity	A leaflet advertising the event was delivered to all premises in the village of Grafton Underwood. The event was also advertised on the local events Facebook Page. Notice posted on the Parish Council noticeboard
Attendees	Approximately 41 residents attended the event over the 2 days.

Overview

- 3.1 These initial consultation events were primarily held to inform local people about the neighbourhood plan process and to explore the key issues that the neighbourhood plan needed to look at. It also provided an opportunity for residents to have a say about the future of their area.

Who was consulted.

- 3.2 The aim was to engage and consult with as many members of the local community as possible as well as local stakeholders. A leaflet publicising the event was delivered to every household in the village. The events were also advertised on the Parish Council noticeboard and the local events Facebook Page.



FIGURE 1: CONSULTATION LEAFLET

How were people consulted

- 3.3 Throughout the event a video was played providing background information on Neighbourhood Planning and its role. Members of the Parish Council were on hand to answer any queries.
- 3.4 A number of exhibition banners were displayed at the events alongside additional background information. The banners included the following information:
- The Role of the Neighbourhood Plan
 - The Local Plan and Housing in Grafton Underwood

- Design and Character
- History and Heritage
- Local Green Space
- Important Views

3.5 A series of maps were made available for attendees to identify specific features, such as housing sites, local heritage assets, important views and green spaces to be protected from development. Attendees were also encouraged to make comments on what they liked and did not like about their parish, and to identify what could be improved and what should be protected.



FIGURE 2: DROP IN EVENT

Issues, priorities and concerns raised

3.6 Approximately 41 attendees participated at these community events. A summary of the comments received is provided below.

Open Spaces

- Overall support for the protection and preservation of the identified open spaces.
- They are a community resource which contribute to the character and peacefulness of the village.
- Question the need to protect the larger areas of open space that sit outside of the village boundary.

Important Views

- Viewpoints to the church and village green should be uninterrupted
- Views into the village are considered important.
- Views are important to retain the rural character of the village and its setting.

Housing

- New build housing development not supported and would be detrimental to the character of the village.

- Support for barn conversions and conversion of agricultural building, in a sympathetic manner, to provide for new housing.
- Any affordable housing should be retained as such in perpetuity.

Design and Character

- Village has a unique and tranquil character and is highly valued.
- Character should be preserved and retained with new development sympathetic to, and in keeping, with the village's character.
- Boundary walls and open spaces and landscaping, all contribute to the character of the village.
- Preserve the separation of the village from other villages/towns in the locality.

Heritage

- Support for the protection of the village's heritage assets
- Areas of Ridge and Furrow to be preserved.
- Support for the preservation and improvement to the airfield.

Traffic

- Additional development will increase the levels of on-street parking and traffic levels through the village

Infrastructure

- Additional healthcare facilities are needed
- No windfarm development. Solar energy development maybe acceptable.

Environment

- Loss of wildlife. Seek opportunities to improve biodiversity, for example, bat boxes and swallow brick course.
- Flooding of properties is a concern
- Light, noise and traffic pollution should be kept to a minimum.
- Tranquillity of village should be protected.

How the Issues, Priorities and Concerns have been considered

- 3.7 The feedback from the events helped identify the key issues needed to be addressed by the Neighbourhood Plan.

4. Meeting with Boughton Estate

Dates	14 th July 2022
Format	Informal Meeting
Publicity	Not applicable
Responses	Not applicable

Overview

- 4.1 A meeting took place between a representative of Boughton Estate, a Parish Councillor and Planit-X Town and Country Planning Services. This provided an opportunity to discuss the Neighbourhood Plan and provide initial feedback from the public consultation, as well as to engage with the Boughton Estate, being an important landowner in the Neighbourhood Area. The Estate's aspirations were also discussed alongside any potential development sites within its ownership.

How the Issues discussed have been considered

- 4.2 Information provided and issues discussed at the meeting were used to inform the Housing Site Consultation undertaken in February – March 2023.

5. Housing Site Consultation

Date	February – March 2023
Format	Response Form
Format	Consultation Leaflet delivered to all properties in the villages. Email to Boughton Estate and North Northants Council. Publicised on the Parish Council website and the local Facebook page.
Responses	32 completed response forms.

Overview

- 5.1 One of the key issues raised at the consultation events concerned new housing in the village of Grafton Underwood. Therefore, the Parish Council undertook some further public consultation on this in order to explore this issue further.

Who was consulted

- 5.2 A Consultation Leaflet was delivered to all households in the village. This provided an overview of the potential housing allocation sites considered and identified the preferred site. The consultation was also advertised on the Parish Council web site and social media.

How were people consulted

- 5.3 The Consultation Leaflet provided a summary of the eight potential housing allocations and the preferred allocation. A detailed assessment of each site was made available on the Parish Council's website. Advice was sought from a number of key stakeholders when preparing these assessments including the local authority, highway authority, Anglian Water and the Environment Agency.

- 5.4 The leaflet sought to identify if there was support for a housing allocation in the village, and if there was, which was the preferred site. There was also opportunity to promote an alternative site. Responses were to be returned by 13th March 2023.



FIGURE 3: HOUSING CONSULTATION LEAFLET

Issues, Priorities and Concerns Raised

- 5.5 A total of 32 comments received. As a summary, 20 of the responses did not support a housing allocation in the village and only 9 responses confirmed support. A Housing Consultation Statement was prepared to provide a detailed review of the responses received.
- 5.6 In light of the level of objection received to the consultation, the Parish Council decided not to proceed with a housing allocation forming part of the Neighbourhood Plan.

How the Issues, Priorities and Concerns have been considered

- 5.7 The feedback from the consultation event helped inform the preparation of the (Pre-Submission) Draft version of the Grafton Underwood Neighbourhood Plan.

6. Pre-Submission Consultation on the Draft Grafton Underwood Neighbourhood Plan

Dates	22 July 2024 to 2 September 2024
Format	Response form
Publicity	Fliers were delivered to properties in the village. Stakeholders contacted via email. Advertised on Facebook. The consultation was posted on the Parish Council's website, along with a copy of the plan made available for download along with supporting documentation.
Responses	11 representations

Overview

- 6.1 As required under Part 5, Section 14 of the Neighbourhood Planning (General) Regulations 2012, the Parish Council undertook a pre-submission consultation on the proposed Neighbourhood Plan.
- 6.2 Within this period the Parish Council:
- Publicised the draft neighbourhood development plan to all that live, work, or do business within the Parishes.
 - Outlined where and when the draft neighbourhood development plan could be inspected.
 - Detailed how to make representations, and the date by which these should be received.
 - Consulted any statutory consultation body (referred to in Paragraph 1 of Schedule 1 of the Neighbourhood Planning (General) Regulations 2012) whose interests may be affected by the proposals within the draft neighbourhood development plan.
 - Sent a copy of the proposed neighbourhood development plan to the local planning authority.

Who was consulted

- 6.3 The Parish Council publicised the draft neighbourhood plan to all of those that live, work, or do business within the Parishes and provided a variety of mechanisms to both view the plan and to make representations.

- 6.4 A flier publicising the consultation was delivered to all premises in the village. The consultation was posted on Facebook. The draft plan and all supporting documents were made available on the parish council website.
- 6.5 The Parish Council also formally consulted the bodies identified within Paragraph 1 of Schedule 1 of the Neighbourhood Planning (General) Regulations 2012. Appendix 1 sets out the bodies and organisations that were invited to make representations.
- 6.6 Representations from 11 individuals or organisations were received within the consultation period. A list and summary of these representations is attached in Appendix 2 and 3.

How were people consulted

- 6.7 A flier publicising the Pre-Submission Draft of the Plan was delivered to all premises in the Parish. It provided a background to the Neighbourhood Plan, a summary of the Neighbourhood Plan's policies and how to make representations.
- 6.8 Statutory consultation bodies and other key stakeholders were contacted individually and invited to make representations on the draft Neighbourhood Plan.
- 6.9 Representations on the draft Plan were invited using a standard representation form, available on the website. Responses could also be provided using emails or made in writing.

Issues, Priorities and Concerns Raised

- 6.10 The representations received have been reviewed and the detailed summary of representations (Appendix 3) provides an explanation of why changes have or have not been made to the Neighbourhood Plan.
- 6.11 This consultation gave rise to changes to the Draft Neighbourhood Plan in relation to several issues. However, these changes have been minor, relating to clarification, consistency and additional information, and have not required major amendments to Plan policies or proposals.

How the Issues, Priorities and Concerns have been considered

- 6.12 All comments received were considered and used to develop and improve the Neighbourhood Plan and the changes made have been incorporated into the Submission Version of the Neighbourhood Plan.

7. Conclusion

- 7.1 The publicity, engagement and consultation undertaken to support the preparation of the Grafton Underwood Neighbourhood Plan has been open and transparent, with opportunities provided for those that live, work and do business within the Neighbourhood Area to contribute to the process, make comment, and to raise issues, priorities and concerns.
- 7.2 All statutory requirements have been met and additional consultation, engagement, and research has been completed.
- 7.3 This Consultation Statement has been produced to document the consultation and engagement process undertaken, considered to comply with Part 5, Section 15 of the Neighbourhood Planning (General) Regulations 2012

Appendix 1: Pre-submission Grafton Underwood Neighbourhood Plan – Consultees

Action Deafness
Age UK Northamptonshire
Ancient Monuments Society
Anglian Water
Canal and River Trust
Coal Authority
Councillor Lloyd Bunday
Councillor Elliot Prentice
Councillor Mark Rowley
Country Land and Business Association
CPRE (Northamptonshire)
Department for Levelling Up, Housing & Communities
East Midlands Chamber
Environment Agency
Federation of Muslim Organisations Leicestershire (FMO)
Federation of Small Businesses
Health and Safety Executive
Highways England
Historic England
Historic England
Historic England
Homes England
Midlands Rural Housing
Mobile Operators Association
National Farmers Union (East Midlands Region)
National Gas Transmission
National Grid Electricity Transmission
National Highways (Midlands)
Natural England
Nene CCG
Nene Valley Archaeological Trust
Nene Valley Community Action
Network Rail (Property)
NHS Northamptonshire Integrated Care Board (ICB)
North Northamptonshire County Council
Northamptonshire ACRE (Action with Communities in Rural England)
Northamptonshire Archaeological Society
Northamptonshire Biodiversity Records Centre
Northamptonshire Black Communities Together
Northamptonshire Police
Northamptonshire Police, Fire and Crime Commissioner
Northamptonshire Police, Northamptonshire Fire and Rescue Service

Northamptonshire Traveller Unit (NTU)
Sport England
Voluntary Impact Northamptonshire
Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire
Brigstock Parish Council
Lowick & Slipton Parish Council
Cranford Parish Council
Kettering Town Parish Council
Warkton Parish Council
Rosie Wrighting MP
Boughton Estate
Grafton Underwood Airfield

Appendix 2: Pre-Submission Grafton Underwood Neighbourhood Plan – Representors

North Northamptonshire Council

Canal Trust

Health and Safety Executive

National Highways

Environment Agency

Sport England

Historic England

Natural England

Anglian Water

National Grid

National Gas

Appendix 3: Pre-submission Grafton Underwood Neighbourhood Plan – Summary of Consultation Responses

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
North Northamptonshire Council				Please accept my sincere apologies for the delay in replying to your Regulation 14 consultation. The notification that the consultation was taking place was unfortunately misplaced from the central enquiry inbox for the Planning Policy Team. This meant I was unaware of the event until I happened upon the details on the Parish Council's website around the time the consultation was due to close. I do hope my delay in responding hasn't caused any significant inconvenience and hopefully, you will find the following comments helpful.	Noted	No change
North Northamptonshire Council				This letter comprises of the Council's informal response and should be treated as advice. At this stage the comments are intended to be constructive in nature; they are focused on the plan and its contents and do not necessarily seek to review the process undertaken to produce	Noted	No change

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				the plan up to this point or the detail of the evidence base.		
North Northamptonshire Council				Overall, I can see that the preparation of the neighbourhood plan has had regard to the National Planning Policy Framework (NPPF) and the North Northamptonshire development plan.	Noted	No Change
North Northamptonshire Council				However, some of the policies do repeat matters already covered by these policy documents and / or other policy, guidance or legislative documents, for example Policy GU12 (Housing Mix), GU13 (Rural Housing), Policy GU19 (Parking), it is difficult to see what these policies bring to the neighbourhood plan above those policies which already exist. Examiners usually pick up on repetition and recommend a modification, or more often, the deletion of the policy, as the plan should not repeat extant policy. The examples presented above are	The Neighbourhood Plan takes account of the area's local features, for example, Local Green Spaces, heritage, Grafton Underwood Airfield. The Plan's content and policies reflect those features and issues which are considered important to the local character and distinctiveness of the parish. It provides a local dimension of the relevant Local Plan policies. Further	See specific comments made under Policies GU12, G13 and GU19.

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				not exhaustive so a careful read through is recommended and where a proposed policy does not add anything locally, if it cannot be amended to provide a local context it should be removed. Further to this, ensuring that your neighbourhood plan policies provide local context is particularly relevant at this time given the current proposals to introduce national development management policies.	comments are made under the sections relating to Policy GU12, GU13 and GU19.	
North Northamptonshire Council				There are ways of recognising things special to your parish to ensure due regard is given to such features and assets in the decision making process without repeating extant policy. Drawing attention to such 'capital' through a plan narrative and maps can help decision makers understand what is important to the parish community. Identifying these in the context of national and North Northamptonshire policy is directive and helpful. A	The Plan's content and policies reflect those features and issues which are considered important to the local character and distinctiveness of the parish. It provides a context and local dimension of the relevant Local Plan policies.	No change.

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				good example of how this can be achieved is set out in the Heritage section of the Kettering Site Specific Part Two Local Plan. I would suggest this is a good approach to apply to Policy GU6 (Ecology & Biodiversity).		
North Northamptonshire Council				The Council is currently preparing the new North Northamptonshire Local Plan to replace the existing North Northamptonshire Joint Core Strategy and elements of the various part 2 Local Plans. Your plan preparation is in advance of this and as such, you will be submitting your plan in advance of the adoption of the Northamptonshire plan. Be mindful that one of the basic conditions your neighbourhood plan will be tested against at examination is having regard to national policy. The recent change in government has brought with it a review of the National Planning Policy Framework. It is important that you keep the situation under	The plan period covers the period 2022-2041 to align with the emerging North Northamptonshire Local Plan. There is no requirement to review or update a neighbourhood plan. However, policies in a neighbourhood plan may become out of date, for example if they conflict with policies in a local plan covering the neighbourhood area that is adopted after the making of the neighbourhood plan. In such cases, the more recent plan policy takes	A Basic Conditions Statement to be prepared to fulfil the requirements of the Neighbourhood Planning (General) Regulations 2012. A review of the Neighbourhood Plan to be undertaken in light of the NPPF update in December 2024.

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				review as this could have an impact on current approaches in your plan, for example, levels of anticipated growth up to the period 2041. There are likely to be changes to the national policy over the coming months which will also impact the preparation of the North Northamptonshire Local Plan. Any significant change to the spatial strategy in the North Northamptonshire Plan could necessitate a future review of the Grafton Underwood Neighbourhood Plan.	precedence. In addition, where a policy has been in force for a period of time, other material considerations may be given greater weight in planning decisions as the evidence base for the plan policy becomes less robust. Communities in areas where policies in a neighbourhood plan that is in force have become out of date may decide to update their plan, or part of it. Consultation on proposed reforms to the National Planning Policy Framework and other changes to the planning system commenced on 30 July 2024 (after consultation on the Grafton Underwood	

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
					Neighbourhood Plan Pre-Submission Draft had commenced) and closed on 24 September 2024. The proposed reforms to the National Planning Policy Framework will be kept under review and regard will be had to these changes should they be published prior to the submission of the Neighbourhood Plan in order to satisfy the Basic Conditions.	
North Northamptonshire Council				Neighbourhood plans, as with local plans, should visually illustrate how policies in the proposed plan will take effect. Good mapping can help readers to make quick sense of proposals in a plan and improve the overall look and feel of the document. The range of supplementary maps in the Grafton Underwood	Noted.	No change.

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				Neighbourhood Plan are a useful addition and help the reader identify with the intended policy approaches. It is also rewarding to see that these do include a key, a north point, a copyright and scale.		
North Northamptonshire Council				Under the Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations (2018), public sector websites published on or after 23 September 2018 must meet accessibility standards. All documents you submit to us must therefore be accessible to enable us to publish them on our website, including for consultation purposes, this is an essential requirement. Your current pre-submission plan doesn't appear to meet these standards. Further information in respect of the document accessibility guidelines can be obtained from steven.miller@northnorthants.gov.uk	Noted.	All Neighbourhood Plan documents to be submitted to North Northamptonshire Council will be checked to make sure they comply with the Website Accessibility Directive (2018).

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				The matters below provide a summary of some of the issues which need to be addressed: All titles and headings need to be properly set up as part of the structure of the document. • Images and other non-text content (including charts and tables) should have descriptive alternative text (alt text) added to them so they can be read by a screen reader.		
North Northamptonshire Council				Thank you for submitting the draft habitat and strategic environmental assessment screening reports which I will be reviewing shortly.	Noted. The Environment Agency, Natural England and Historic England have also been consulted on the draft habitat and strategic environmental screening reports.	Comments received from the statutory consultations bodies have been used to inform the final version of the HRA and SEA Screening Reports.
North Northamptonshire Council.				I look forward to receiving the revised version of the plan together with all of the required supporting documentation in due course. It would be helpful if you	Noted.	No change

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				continue to liaise closely with us over the anticipated timing of submission so that we can endeavour to resource the plan appropriately.		
North Northamptonshire Council				Finally, I would like to add that I truly appreciate the amount of work that has gone into producing your Plan. There are some really helpful, locally specific policies that have been drafted, together with a very good context to the village. Everybody involved in the development and preparation of the Plan should feel very proud. Congratulations, this is a significant milestone.	Noted.	No change.
Canal and River Trust				Thank you for consulting the Canal & River Trust on the draft Grafton Underwood Neighbourhood Plan. I can advise that the Trust does not own or operate any waterways within the Plan area, and we therefore have no comment to make on the draft Plan.	Noted.	No change

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
Environment Agency				We aim to reduce flood risk, while protecting and enhancing the water environment. Our comments on this matter are therefore made solely from these points of view. Environment Agency position. As a general comment, it is considered that the contents page should specifically refer to Policies GU1 to 19 make it clearer which of the items listed have Planning Policies associated with them and on what page they are located to help people identify and find them quicker.	There are several 'made' neighbourhood plans North Northamptonshire. Some signpost the policies in the contents page whereas others do not. The contents page and layout of the Neighbourhood Plan is logically structured and laid out. The Parish Council are of the opinion that signposting policies in a table of contents is not relevant to the Basic Conditions.	No change.
Environment Agency				From the Neighbourhood Plan, we have noted that there are no housing allocations to be made, and that any development will be infill sites. We note that you recognise that flood risk is an important consideration in guiding the location of new development in the Parish. We also see that you refer to Alledge Brook running through the centre	Noted	No change

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				of the village of Grafton Underwood and posing a potential risk to development. You also recognise that parts of the village are located within Flood Zones 2 and 3, with Flood Zone 3 areas being those areas more likely to flood.		
Environment Agency				National Planning Policy Framework (NPPF) Paragraph 180 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, Paragraph 189). Although covered in the North Northants Joint Core Strategy,	References to aquifers can be made in the Neighbourhood Plan profile (Section 2). There are no proposals for development that are likely to create a pollution risk.	Paragraph 2.1 be modified by adding a new sentence as follows; <i>The Grafton Underwood Neighbourhood Plan Area mainly lies over geology classified as secondary B (undifferentiated) aquifer, which lies over Bilsworth Limestone that is classified as a principal aquifer.</i>

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				the following could be added in a new section of the Neighbourhood Plan to add some local detail: The Grafton Underwood area mainly lies over geology classified as secondary B (undifferentiated) aquifer, which lies over Blisworth Limestone that is classified as a principal aquifer. Principal aquifers can support groundwater abstractions and baseflow to streams and rivers. The use (or potential use) of groundwater in the area makes parts of the area vulnerable to pollution from certain types of development. Best practice to ensure groundwater is protected from pollution and as a resource is contained within guidance document 'The Environment Agency's approach to groundwater protection' available at Groundwater protection position statements - GOV.UK (www.gov.uk). This publication		

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				sets out our position for a wide range of activities and developments, including: ▪ Waste management ▪ Discharge of liquid effluents ▪ Land contamination ▪ Ground source heat pumps ▪ Cemetery developments ▪ Drainage Land affected by contamination may pose risk to human health, groundwater, surface waters and the wider environment. We recommend that developers should: • Follow the risk management framework provided in Land Contamination: Risk Management, when dealing with land affected by contamination. • Refer to our Guiding principles for land contamination for the type of information that we require in order to assess risks to controlled waters from the site - the local authority can advise on		

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				risk to other receptors, such as human health • Consider using the National Quality Mark Scheme for Land Contamination Management which involves the use of competent persons to ensure that land contamination risks are appropriately managed • Refer to the contaminated land pages on gov.uk for more information		
Environment Agency				It is noted that the Plan does not refer to how foul drainage will be dealt with and there is no mention of the Water Framework Directive (WFD). For any developments that take place under the Neighbourhood Plan, a drainage plan should be drafted with input from Anglian Water, as appropriate. It is considered that the Plan should refer to this. Any future developments should look at including measures for improving and enhancing the water environment and follow the	Reference to drainage plans can be made in Section 12 (Flooding) of the Neighbourhood Plan. Anglian Water have been consulted on the Neighbourhood Plan. Neighbourhood Plans are not obliged to contain policies addressing all type of development, and plan policies cannot apply to existing development in terms of retrofitting water efficiency	Paragraph 12.7 be modified by adding a new sentence as follows; <i>Any new development proposed will require the production of a drainage plan in consultation with Anglian Water.</i>

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				sewerage hierarchy guidance for foul drainage, found here: Drainage and waste disposal: Approved Document H - GOV.UK (www.gov.uk) You may also want to refer to the Environment Agency's Catchment Data Explorer to see the current status of any WFD water bodies in the area. Found here: England Catchment Data Explorer. The Alledge Brook is part of the Middle Nene river system. Finally, it is considered that the Plan should encourage water efficiency measures in new developments and retrofitting them to existing properties in order to help alleviate any pressure on the foul drainage system.	measures. Notwithstanding, The Grafton Underwood Neighbourhood Plan Design Guide refers to sustainable building and water efficiency.	
Environment Agency				Whilst we are not requesting any of the following is included in the Plan, we would like to offer the following informative comments	Noted	No change

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				for those carrying out developments in the Neighbourhood Plan area and other interested parties regarding movement of waste off site, the use of waste on-site and resource efficiency and the circular economy: Movement of waste off-site – Duty of Care & Carriers, Brokers and Dealers Regulations The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable to any off-site movements of wastes. The code of practice applies to anyone who produces, carries, keeps, disposes of, treats, imports or has control of waste in England or Wales. The law requires anyone dealing with waste to keep it safe and make sure it is dealt with responsibly and only given to		

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				businesses authorised to take it. The code of practice can be found here:https://www.gov.uk/government/publications/waste-duty-of-care-code-of-practice If anyone needs to register as a carrier of waste, please follow the instructions here: Use of waste on-site - authorisation or permit required. If materials that are potentially waste are to be used on sites in the Neighbourhood Plan area, any developer will need to ensure they can comply with the exclusion from the Waste Framework Directive (WFD) (article 2(1) (c)) for the use of, 'uncontaminated soil and other naturally occurring material excavated in the course of construction activities, etc...' in order for the material not to be considered as waste. Meeting these criteria will mean waste		

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				permitting requirements do not apply. Where the developer cannot meet the criteria, they will be required to obtain the appropriate waste permit or exemption from us. A deposit of waste to land will either be a disposal or a recovery activity. The legal test for recovery is set out in Article 3(15) of WFD as: • any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy. • We have produced guidance on the recovery test which can be viewed at https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-		

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				recovery-plans-and-deposit-for-recovery permits#how-to-apply-for-an-environmental-permit-to-permanently-deposit waste-on-land-as-a-recovery-activity. You can find more information on the Waste Framework Directive here: https://www.gov.uk/government/publications/environmental-permitting-guidance-the-waste-framework-directive Guidance on when a material is waste, is a by-product or meets 'end of waste' status can be found here: https://www.gov.uk/guidance/check-if-your-material-is-waste You can also get an opinion from the definition of waste service https://www.gov.uk/government/publications/get-an-opinion-from-the-definition-of-waste-service More information on the use of waste in exempt activities can be		

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				found here: https://www.gov.uk/government/collections/waste-exemptions-using-waste Non-waste activities are not regulated by us (i.e. activities carried out under the CL:ARE Code of Practice), however you will need to decide if materials meet End of Waste or By-products criteria (as defined by the Waste Framework Directive).'		
Environment Agency				The circular economy is a concept designed to keep materials in use as long as possible, thus promoting resource efficient practice and deriving economic benefits. Adherence to the waste hierarchy and adoption of best practice in relation to site waste management planning will help you deliver against circular economy objectives. Observance of the waste hierarchy objectives and principles of the circular economy will depend upon the selection of	Noted	No change

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				the most sustainable option at every phase of a development project, from reduction through design and architecture, to the selection of the most efficient recovery process for the treatment and use of waste.		
Sport England				Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing	National policy makes provision for local communities to identify green areas of importance to those communities, where development will not be permitted except in very special circumstances. Some of the Local Green Spaces provide opportunity for social interaction and the creation of healthy and inclusive communities.	No change

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				new housing and employment land with community facilities is important. Therefore, it is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 102 and 103. It is also important to be aware of Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and		

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				implementation of planning policy is the evidence base on which it is founded. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications		
Sport England				Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Para 103 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood	The North Northamptonshire Greenway is a proposed strategic rural network of safe, largely traffic-free routes suitable for walking, wheeling, cycling and horse riding, connecting settlements, employment, leisure and tourism destinations across North Northamptonshire and beyond. Suggest amendments to Policy GU2 to detail support for the creation of an off-road cycle/footpath	Policy GU2: Public Rights of Way network to be amended to read;- <i>"Development should protect Public Rights of Way and wherever possible create new links to the network including footpaths and cycleways, and new permissive routes. The creation of an off-road cycle/footpath link between Grafton</i>

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport	link between Grafton Underwood and Geddington and opportunities to improve connectivity with Thrapston, as part of a new high level route crossing between Corby and Thrapston.	<i>Underwood and Geddington, along with opportunities to improve connectivity with Thrapstone, are supported as part of a new high-level crossing between Corby and Thrapston."</i>

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/		
Sport England				Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports	New development will have some impact on the existing, and the need for new infrastructure, services and amenities. There will be instances when	No change.

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place. In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing	new development will be supported by the provision of new or improved infrastructure, and developers will be expected to contribute towards the costs of providing this additional infrastructure. However, as the Neighbourhood Plan only plans for small-scale development, it does not set out policies for seeking planning obligations towards infrastructure provision.	

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				planning policies and developing or assessing individual proposals. Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved. NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities PPG Health and wellbeing section:		

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				https://www.gov.uk/guidance/health-and-wellbeing Sport England's Active Design Guidance: https://www.sportengland.org/active-design		
Health & Safety Executive				SE is not a statutory consultee for local and neighbourhood plans. If there is a nuclear installation within or nearby your local plan area, we recommend you contact the Office of Nuclear Regulation. HSE has provided Local Planning Authorities (LPAs) with access to its LUP Web App https://pa.hsl.gov.uk/ and downloadable GIS consultation zones. These tools alongside HSE's published methodology (https://www.hse.gov.uk/landuseplanning/methodology.htm) can assist you in ensuring that land allocations do not conflict with major hazard sites and pipelines, licenced explosives sites and nuclear installations.	The Health and Safety Executive (HSE) is a statutory consultee on certain developments in the vicinity of major hazard sites and major accident hazard pipelines. There are no major hazard sites and major accident hazard pipelines in Grafton Underwood Neighbourhood Area.	No change.

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				Your attention is drawn to the planning policy guidance provided by your central planning departments in England, Scotland and Wales. For England: https://www.gov.uk/guidance/hazardous-substances in particular paragraphs 65 to 69 which explain an LPAs responsibilities when taking public safety into account in planning decisions and formulating local plans.		
Anglian Water				Thank you for inviting comments on the Grafton Underwood Neighbourhood Plan Pre-submission (Reg 14) consultation. Anglian Water is the statutory water and sewerage undertaker for the neighbourhood plan area and is identified as a consultation body under the Neighbourhood Planning (General) Regulations 2012. Anglian Water wants to proactively engage with the	Noted	No change

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				neighbourhood plan process to ensure the plan delivers sustainable development for residents and visitors to the area, and in doing so protect the environment and water resources. Overall, Anglian Water is the water supply and water recycling provider for over 6 million customers. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea. Additionally, parts of the area have the highest rate of housing growth in England.		

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				Anglian Water has amended its Articles of Association to legally enshrine public interest within the constitutional make up of our business – this is our pledge to deliver wider benefits to society, beyond the provision of clean, fresh drinking water and effective treatment of used water. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop. Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources. Anglian Water has produced a specific guidance note on the preparation of NPs found using this link under our Strategic Growth and Infrastructure webpage - Strategic Growth and		

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				Infrastructure (anglianwater.co.uk). The guidance also has sign posting/ links to obtaining information on relevant assets and infrastructure in map form, where relevant. The comments provided are made, ensuring the making of the plan contributes to sustainable development and has regard to assets owned and managed by Anglian Water. It is noted that no allocations are made regarding new housing sites (paras. 9.1 – 9.5). Overall, we are supportive of the policy ambitions within the neighbourhood plan, subject to the proposed amendments.		
National Grid Electricity Transmission				National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.	Noted	No change

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently. National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET. An assessment has been carried out with respect to NGET's assets which include high voltage electricity assets and other electricity infrastructure. NGET		

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				has identified that it has no record of such assets within the Neighbourhood Plan area.		
National Gas Transmission				National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure. National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area.	Noted	No change
North Northamptonshire Council	3	1.9		Delete 'and December' in the last sentence; the December 2023 revision is the current Framework which replaced the September 2023 revision.	Agreed but this will now need to reflect the NPPF Update December 2024.	Paragraph 1.9 be amended to read <i>"This revised Framework replaces the previous National Planning Policy</i>

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
						Framework published in March 2012, revised in July 2018, updated in February 2019 and revised in July 2021, updated in September 2023 and revised in December 2023."
North Northamptonshire Council	3	1.12		For transparency and clarity, I would recommend the following change: <i>North Northamptonshire Council is currently preparing a new North Northamptonshire Local Plan to replace the existing North Northamptonshire Joint Core Strategy and elements of the four Part 2 Local Plans. The proposed timetable has been delayed for a number of reasons though the delay of the Government to deliver proposed planning reforms to the plan making system is a principal factor. The Council is working hard to maintain progress and a revised</i>	Agreed	Paragraph 1.12 be amended to read "North Northamptonshire Council is currently preparing a new North Northamptonshire Local Plan to replace the existing North Northamptonshire Joint Core Strategy and elements of the four Part 2 Local Plans. The

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				LDS will be published in Autumn 2024. The North Northamptonshire Local Plan will have an extended plan period to 2041; this Neighbourhood Plan period is from 2022 to 2041 which will align with the Local Plan.		proposed timetable has been delayed for a number of reasons though the delay of the Government to deliver proposed planning reforms to the plan making system is a principal factor. The Council is working hard to maintain progress and a revised LDS will be published in Autumn 2024. The North Northamptonshire Local Plan will have an extended plan period to 2041; this Neighbourhood Plan period is from 2022 to 2041 which will align

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
						<i>with the Local Plan."</i>
North Northamptonshire Council	4	1.16		Correction to, the consultation ran until Monday 2nd September	Agreed	Amend paragraph 1.16 to state that the consultation ran until Monday 2 September 2024. Amend paragraphs 1.16 – 1.18 to reflect the stage in the neighbourhood plan preparation process.
North Northamptonshire Council	5	1.19 –1.20		For clarification: when the Parish Council formally submits the plan proposal to North Northamptonshire Council to initiate the Regulation 16 provisions on publicising a plan proposal in accordance with the Neighbourhood Planning General Regulations 2012 it must include the plan accompanied by: a) A map or statement which identifies the area to which the	Noted.	A Consultation Statement be prepared to fulfil the requirements of the Neighbourhood Planning (General) Regulations 2012. A Basic Conditions Statement be prepared to fulfil the requirements of the

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				proposed neighbourhood plan relates b) A consultation statement - the focus of this is on the 6-week Regulation 14 consultation. It should set out what persons and bodies were consulted, explain how they were consulted, summarise the main issues raised and describe how these have been considered and, where relevant, addressed in the submission plan. However, the consultation statement should also include a summary of previous community engagement and consultation that has been undertaken during the plan preparation. c) The basic conditions statement which demonstrates how the plan meets each of the basic conditions		Neighbourhood Planning (General) Regulations 2012.
North Northamptonshire Council	11		GU1	Provides good local context, just one minor change is required for clarity and accuracy. Please amend the final sentence to read 'as listed below and shown on	Noted.	Final sentence of Policy GU1 be amended to read, "Development should safeguard

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				Map 2: Important Views and Focal Point'.		<i>and, where possible, enhance the following Important Views and Focal Point as listed below and shown on Map 2: Important Views and Focal Point and the Policies Map."</i>
North Northamptonshire Council	13	4.18		There needs to be better clarification to this paragraph. Policy NEH2 of the SSP2 does afford protection to 'borough level GI corridors'. However, the local GI corridor (Boughton Park – Titchmarsh Wood) running through GU is protected by Policy 19 in the JCS	Agreed.	Add the following after the 1 st sentence of paragraph 4.18:- <i>"Local green infrastructure corridors complement the sub-regional green infrastructure network and Policy 19 of the Joint Core Strategy supports their</i>

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
						<i>enhancement, recognising that these local corridors provide opportunities to enhance access between settlements and their surrounding countryside."</i>
North Northamptonshire Council	14	Map 3		Many planning issues cross administrative boundaries and most matters relating to green infrastructure, landscape and nature fall into that camp. The full area of Grafton Park Wood and Old Head Wood should be mapped, these open spaces do not stop at the boundary of the neighbourhood area. The same goes for the green infrastructure corridor. The reader needs context and clarity on each asset.	Noted and agreed.	Map 3 and Map 5 be updated to show the full extent of the green infrastructure corridor and local wildlife sites. Update Maps 3 and 5
North Northamptonshire Council	15		GU2	Generally speaking, site specific policies would be used to protect individual PRoW where allocations might impact on	Agreed. Update the supporting text and Policy GU2 to provide a	Replace the heading 'Public Rights of Way'

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				access. Otherwise, GU2 is repetitive from the perspective that the Highways Authority has a statutory duty to manage, maintain, improve and protect public rights of way (PRoW). This is not the role for development through neighbourhood plan policy unless there is something locally specific and the request for planning obligations meet the tests set out in para 57 of the NPPF. This policy could be more locally specific by seeking opportunities to deliver the North Northamptonshire Greenway priority route 11b which runs from Corby, through Geddington and Grafton Underwood to Thrapston (See Table 9-3: High-level Route Costings in the North Northamptonshire Greenway Strategy (2024). Not only would this have the advantage of creating a new Greenway route between Geddington and	greater local dimension to this policy.	with 'Access to the Countryside' Delete the 1st sentence of paragraph 4.19 and replace with "Grafton Underwood has a network of footpaths and bridleways both within the village and outside it, into the surrounding countryside (Map 3)" Amend the last sentence of paragraph 4.20 to read, "Further opportunities for new Rights of Way or permissive paths should be encouraged and the accessibility of

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				Grafton Underwood but it would look to enhance the existing PRoW network by taking opportunities to improve connectivity of the PRoW network between Grafton Underwood to Thrapston. If you chose to make this modification you will need to amend the narrative accordingly to explain the North Northamptonshire Greenway which is a very important framework for active travel across the area. In this endeavour perhaps you could look at how green infrastructure, the North Northamptonshire Greenway and PRoW interact. Perhaps consider drawing the section together from the perspective of active travel which offers both leisure and commuting opportunities.		<i>the existing network should be protected and enhanced."</i> After paragraph 4.20 add a new section with the heading, "North Northamptonshire Greenway" and insert the following paragraphs. <i>4.21. The North Northamptonshire Greenway is a proposed strategic rural network of safe, largely traffic-free routes suitable for walking, wheeling, cycling and horse riding, connecting settlements, employment, leisure and tourism</i>

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
						destinations across North Northamptonshire and beyond. Its key objectives are to: • Enable people to choose to walk, wheel, ride or cycle for a range of trip purposes including school, commuting, every day and leisure trips. • Deliver an accessible, inclusive active travel network in line with current design

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
						standards in terms of coherence, directness, safety, comfort and attractiveness. • Help to deliver North Northamptonshire's Green Infrastructure network including the Ise and Nene Valley Corridors, with a target of delivering at least 10% Biodiversity Net Gain. • Improve the tourism offer across

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
						North Northamptonshire, with connected market towns, nature reserves and tourism sites and circular routes. • Improve the vitality of North Northamptonshire's towns, aiding local businesses by improving access for commuters and shoppers.

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
						• Provide safe routes to schools. • Provide additional sustainable transport options for residents who don't own a car. 4.22. The Draft North Northamptonshire Greenway Strategic Masterplan has identified a proposed network of 356km and connecting settlements within North Northamptonshire and in neighbouring authorities with

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
						combined population of 600,000. The total network within North Northamptonshire is 275km comprising existing greenways, routes proposed in Local Cycling and Walking Infrastructure Plans (LCWIPs) and new routes. Excluding the LCWIP routes, the proposed network within North Northamptonshire is 212km long, demonstrating the scale of Greenway network and will cost approximately £38.1m to build.

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
						4.23. Grafton Underwood lies on a proposed new high-level route which runs from Corby, through Geddington and Grafton Underwood to Thrapston (route 11b). The Masterplan sets out a draft development contribution formula for the proposed North Northamptonshire Greenway network. Policy GU2: Public Rights of Way network to be amended to read;- "Development should protect

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
						<i>Public Rights of Way and wherever possible create new links to the network including footpaths and cycleways, and new permissive routes. The creation of an off-road cycle/footpath link between Grafton Underwood and Geddington, along with opportunities to improve connectivity with Thrapstone, are supported as part of a new high-level crossing between Cprby and Thrapston."</i>
North Northamptonshire Council	15	4.22		Correction to policy reference, this should be GU3, not GU4	Agreed.	Policy reference changed to GU3.

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
North Northamptonshire Council	16		GU3	The policy position would be strengthened if the narrative provided clearer evidence with respect to Grafton Underwood's night sky. It should be possible to do this by providing an illustration of Grafton Underwood at night using the CPRE Light Pollution and Dark Skies map and relating the narrative more specifically to the village and the impact of larger towns like Kettering and Thrapston. The policy would be more instructive to decision makers by requiring development proposals to demonstrate they meet or exceed the Institute of Lighting Professionals guidance (e.g. Guidance Note 1 for the reduction of Obtrusive Light (2021)) or other relevant standards or guidance.- this feels a little excessive.	Agreed. The policy would benefit from additional information to identify the issues experienced locally. The supporting text can make reference to relevant guidance.	Renumber paragraph 4.21 as 4.24 and insert additional sentence at the end of paragraph 4.24 to read: <i>"The figure below illustrates the higher levels of light pollution in Kettering and Thrapston and the impact beyond these towns as light spreads out into the countryside. As Grafton Underwood is some distance away from these towns, much lower levels of light pollution are currently found in its Neighbourhood Area."</i>

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
						Insert figure illustrating "Great Britain's Light Pollution and Dark Skies" for Kettering and surrounds. Renumber 4.22 to 4.25 and amend to read, " <i>The creeping urbanisation of the countryside around Kettering and Thrapston is threatening the Parish' star-studded skies overhead which are as valuable as the beautiful rolling countryside. Light pollution can also adversely impact on wildlife as well as our health and well-being.</i>"

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
						Add additional paragraph at 4.26 and amend to read, "Dark skies are a valuable resource and Neighbourhood Plan Policy GU3 will help ensure that development does not harm the quality of dark night skies by ensuring that any proposed lighting is necessary, and by reducing light spill to minimise the overall impact of light <u>Guidance Note 1 for the reduction of Obtrusive Light (2021)</u> provides detailed guidance on the control of obtrusive light and

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
						for limiting sky glow.." Amend Policy GU3 to read, "Development proposals must demonstrate that all opportunities to reduce light pollution have been taken and must ensure that the measured and observed sky quality in the surrounding area is not negatively affected. If the installation of lighting is unavoidable, necessary and appropriate for new development, light spillage and glare should be minimised, and

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
						<i>adverse impacts should be mitigated by control measures to reduce light pollution."</i>
North Northamptonshire Council	16	4.25		Specify the name, date and author of the Renewable Energy study for reader clarity and to provide the evidence and rationale for the stance the policy is taking.	Agreed	Add a footnote to reference the 'Local Carbon Energy Opportunities and Heat Mapping for Local Planning Areas across the East Midlands, July 2011 (Prepared for the East Midlands Councils by Land Use Consultants, the Centre for Sustainable Energy and SQW).'
North Northamptonshire Council	18		GU4	This policy and the supporting text is worthy of further review by the parish council for the	The role of the examiner of a neighbourhood plan is	Amend criteria a) to read "They are on previously

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				following considerations. The criteria element of the policy goes some way to providing direction for developers but it is worth examining whether (a) the whole policy is positively prepared and (b) what is repetition from guidance already set out at a national level? The new Government are much more supportive of renewables and local plans (including neighbourhood plans) and the policy approach needs to reflect this. Be mindful that Chapter 9 of the NPPF consultation at para 7 is seeking an amendment that will "direct decision makers to give significant weight to the benefits associated with renewable and low carbon energy generation, and proposals' contribution to meeting a net zero future." Para 8 seeks an amendment placing "a stronger expectation	defined and the examiner is not required to examine the tests of soundness provided for in respect of examination of Local Plan i.e. has the plan be positively prepared. The neighbourhood plan has been prepared in light of the current NPPF and also takes into account local circumstances. The application of the suggested changes with respect to agricultural land would be difficult to apply and the Parish Council are not aware of any available maps that distinguish between Grade 3a and 3b Agricultural Land.	<i>developed land and avoid woodland and agricultural land"</i> Amend final line of policy to read <i>"Wind turbines or large-scale solar farms are not supported unless the cumulative impact is shown to be insignificant."</i>

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				that authorities proactively identify sites for renewable and low carbon development when producing plans, where it is likely that in allocating a site, it would help secure development." The Council are in the process of preparing the North Northamptonshire Plan and will need to have due regard to these provisions in their plan preparation and decision making if agreed. Para 1 of the NPPF consultation states that "Onshore wind and solar are cheap, efficient and quick to build technologies that are an important part of the energy mix". On the basis of all the above, I am concerned that the policy approach may be considered too restrictive. Certainly, the final sentence in GU4 stating that 'wind	However the policy would benefit from further clarification in respect of wind turbines and large-scale solar farms and acknowledgement of the wooded character of the Parish.	

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				turbines or large scale solar farms are not supported' could not be considered as positively prepared and an Examiner may ask for that sentence to be removed. This could leave the parish vulnerable to allocations through the local plan. A better approach to the acceptance of small-scale ground-mounted solar photovoltaic farms schemes (or indeed, to any schemes) might be a criterion stating 'with exception to development on Best and Most Versatile agricultural land' (identifying as such on a map for clarity), as opposed to acceptance on 'non-agricultural land'. This will provide protection the top three grades (1 – 3a) of your agricultural land while being realistic that an allocation or a proposal may come in for Grade		

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				3b and below which could be difficult to defend. To inform your discussion you may wish to have reference to Neighbourhood planning in a climate emergency: A guide to policy writing and community engagement for low-carbon neighbourhood plans. Have due regard to Chapter 5, while bearing in mind that the NPPF has been updated twice and is currently under review again since this helpful guide was written.		
North Northamptonshire Council	19		GU5	The policy, as it stands, is repetition of Paragraphs 152 and 153 of the NPPF. Some examiners have approved this type of policy approach, others have called it into question. The focus of this policy should be the identification of the Local Green Spaces (LGS) on Map 4 and that they are to be recognised as being demonstratively special and of particular local	The policy would benefit from rewording to avoid repetition of national policy and ensure consistency with Green Belt management policy. The Parish Council wish to retain all the proposed Local Green Space designations.	Amend Policy GU5: Local Green Spaces to read, <i>The following areas identified on Map 4 and the Policies Map are designated as Local Green Space and are recognised for</i>

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				significance. A good example of policy wording to this effect can be seen in the Kettering Site Specific Part 2 Local Plan (SSP2) (2021) Policy NEH3 (Historically and Visually Important Local Green Space). I would recommend a review of the policy approach and a refinement of the wording to provide clarity and avoid repetition of the NPPF. Grafton Underwood Allotments and the St James Church Cemetery are already afforded considerable protection from development under Policy NEH4 (Open Spaces) in the SSP2. It is unnecessary to apply another level of designation over this policy approach. An examiner should recognise this and is likely to ask for them to be removed from a Local Green Space policy. As such, I would advise they be removed from the policy prior to that.	They are of particular importance to the local community and their designation as Local Green Space is justified. A comprehensive assessment has been undertaken of the Local Green Spaces and details the reasons and justification for their designation. Each Local Green Space has been evaluated in accordance with all 3 criteria details in para 106 of the NPPF. The two mentioned background papers have assisted in the assessments undertaken of the Local Green Spaces. The assessment will be provided as supporting evidence for the	<i>their local importance.</i> <i>1 Land south of Telephone Exchange</i> <i>2 Allotment site</i> <i>3 Land to the rear of the allotment site</i> <i>4 Land adjacent to the Old School House</i> <i>5 St James's Churchyard</i> <i>6 Land adjacent to the Coach House</i> <i>7 Alledge Brook</i> <i>The construction of new buildings would be inappropriate and should not be approved except in very special circumstances.</i>

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				It would be worth retaining said open spaces on Map 4 and reflect these as Local Plan policy on the key. This will help decision makers identify them as protected open spaces in the context of the Local Green Spaces when referring to the neighbourhood plan. Appendix 1 provides little more than a tick box estimate of each proposed Local Green Space with no actual quantitative and / or qualitative process to justify the selection of these spaces. In addition, it only related to criterion b) of NPPF para 106. To be designated as a Local Green Space the space must meet all three criteria in para 106, a, b and c. It is likely that an Examiner would want to see a more robust approach to how and why these sites have been selected.	submission version of the Neighbourhood Plan.	Local Green Space Assessments to be made available as supporting documents and made available on the Parish Council website.

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				To support a more robust approach reference could be made to the two background papers² prepared for the SSP2 Local Plan which proposed two Historically and Visually Important Local Green Spaces in GU. These will provide you with useful background information to help justify your assessment work: • HVI 017 named in Policy GU5 as Land adjacent to the Old School House (Site 4) and Land adjacent to the Coach House (Site 6) and • HVI 018 named as Alledge Brook (Site(s) 7) These sites weren't taken forward through the SSP2 for the reasons set out in the Inspector's Report³. It would be wholly justifiable to use the neighbourhood plan as the vehicle to take the designation forward. There are different approaches to setting out the justification. In the Braybrook		

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				Neighbourhood Plan for example, the Parish Council set out a narrative describing what was demonstratively special and of particular local significance where the. Harrington Parish Council opted for a quantitative scoring system. Both provided a clear understanding of why sites were selected.		
Anglian Water	19		GU5	Policy GU5 designates a number of areas of Local Green Spaces (LGS and states that manging development will not be supported unless there are very special circumstances which outweigh harm. It may be helpful to clarify that this is in line with the Green Belt policies defined by the NPPF, as set out in paragraphs 104 – 107 of the NPPF (current 2023 version). Anglian Water does have assets forming part of our water and water recycling network (e.g., rising mains and sewers) located within or in the vicinity of these	Noted. Policy GU5 has been amended to specify that development proposal within the LGS will only be supported in very special circumstances. Supporting text suitably acknowledges national policy with respect to Local Green Spaces.	Amend Policy GU5: Local Green Spaces to read, <i>"The following areas identified on Map 4 and the Policies Map are designated as Local Green Space and are recognised for their local importance.:</i> <i>1 Land south of Telephone Exchange</i> <i>2 Allotment site</i>

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				designated areas of local green space. There are several underground pipes which are located underground and cross the LGS areas to access the various buildings which are set back from Brigstock Road. We do not consider that the policy should prevent any operational development that may be needed to manage, maintain or repair our assets. For information, maps of Anglian Water's assets detailing the location of our water and water recycling infrastructure are available at: www.utilities.digdat.co.uk There is a minor typo on line 2 - "Polcies" should be "Policies". Although the areas of LGS are shown on Map 4 they do not appear on the Policies Map on p.78 of the document.		3 Land to the rear of the allotment site 4 Land adjacent to the Old School House 5 St James's Churchyard 6 Land adjacent to the Coach House 7 Alledge Brook <i>The construction of new buildings would be inappropriate and should not be approved except in very special circumstances.</i> Correct 'Policies' on line 2 to 'Policies'. Local Green Spaces to be

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
						added to the Policies Map.
North Northamptonshire Council	20	Map 4		It could be worth considering, in light of comments above about Grafton Underwood Allotments and the St James Church Cemetery, bringing together one 'nature' map that shows all designated open spaces, the proposed local green spaces, the local green infrastructure corridor, the North Northamptonshire Greenway route, PRow and Alledge Brook. This would be a user friendly way to present nature, green infrastructure and active travel altogether.	The purpose of Map 4 is to identify the allocation of the Local Green Spaces sought through the Neighbourhood Plan.	No change.
North Northamptonshire Council	21	6.3 – 6.4		These paragraphs provide a good description of Grafton Park Wood and Old Head Wood and their designation as local wildlife sites and their status as ancient woodland. Reference should also be made to their protection under Policy NEH4 (Open Space) in the SSP2.	Agreed.	Add sentence at the end of paragraph of para 6.4 to read " <i>Old Head Wood along with Grafton Park Wood are afforded protection under Policy NEH4 of the</i>

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
						<i>Kettering Site Specific Part 2 Local Plan.</i>
North Northamptonshire Council	24	Map 5		Many planning issues cross administrative boundaries and most matters relating to green infrastructure, landscape and nature fall into that camp. The full area of Grafton Park Wood and Old Head Wood should be mapped, these open spaces do not stop at the boundary of the neighbourhood area. The same goes for the green infrastructure corridor. The reader needs context and clarity on each asset.	Noted and agreed.	Map 3 and Map 5 be updated to show the full extent of the green infrastructure corridor and local wildlife sites.
Anglian Water	25		GU6	Anglian Water supports the policy and prioritising the delivery of biodiversity net gains within the neighbourhood planning area to support habitat recovery and enhancements within existing and new areas of green and blue infrastructure. We would also support opportunities to maximise green infrastructure connectivity including through	Noted. The Grafton Underwood Neighbourhood Plan Design Guide refers to rainwater harvesting and green roofs.	No change.

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				opportunities to minimise surface water run-off from existing urban areas through the creation of rain gardens for example. Anglian Water has made a corporate commitment to deliver a biodiversity net gain of 10% against the measured losses of habitats on all AW-owned land. As the neighbourhood plan progresses, there may also be benefit in referencing the emerging North Northamptonshire Local Nature Recovery Strategy Local Nature Recovery Strategy North Northamptonshire Council (northnorthants.gov.uk) which will identify priority actions for nature and map specific areas for improving habitats for nature recovery.		
Historic England	29			The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with	The Grafton Underwood Conservation Area Appraisal (2007) has	No change

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area. If you have not already done so, we would recommend that you speak to the planning and conservation team at your local planning authority together with the staff at the county council archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk <http://www.heritagegateway.org.uk>). It may also be useful to	been used as a source of information. Information has also been provided by the West Northamptonshire Archive and Heritage Service.	

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.		
Historic England	29			Historic England has produced advice which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at:- https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/ You may also find the advice in "Planning for the Environment at the Neighbourhood Level" useful. This has been produced by Historic England, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further	Noted	No change

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				sources of information. This can be downloaded from: < http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environmentagency.gov.uk/LIT_6524_7da381.pdf >		
Historic England	29			If you envisage including new housing allocations in your plan, we refer you to our published advice available on our website, "Housing Allocations in Local Plans" as this relates equally to neighbourhood planning. This can be found at < https://content.historicengland.org.uk/images-books/publications/historicenvironment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-localplans.pdf/ >	The Grafton Underwood Neighbourhood Plan does not propose any housing allocations.	No change
Anglian Water	40			Neighbourhood Plan Design Guide - Section 3.2.11 – Sustainable building Anglian Water is pleased to note that water efficiency is referenced. As a region identified as seriously water stressed, we	Noted.	Correct figure 36 of the Design Guide (p.30) to read "Highly water-efficient devices".

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				encourage plans to include measures to improve water efficiency of new development through water efficient fixtures and fittings, including through rainwater/storm water harvesting and reuse, and greywater recycling. Measures to improve water efficiency standards and opportunities for water reuse and recycling also reduces the volume of wastewater needed to be treated by our water recycling centres. This will help to reduce customer bills (including for other energy bills) as well as reduce carbon emissions in the supply and recycling of water. The Defra Integrated Plan for Water supports the need to improve water efficiency and the Government's Environment Improvement Plan sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in		

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress. Given the proposed national approach to water efficiency, Anglian Water encourages this approach. Figure 36 of the Design Guide (p.30) does have an error under the "Existing Homes" list. No. 6 "Highly waste efficient- devices" should be Highly water-efficient devices". Is it possible to correct this or add a note to this effect?		
Anglian Water	41		GU10	Para. 7.40, line 1 – the link to the Design Guide document is not working. Para. 7.40. line 8 - The reference should be GU10 not GU11.	Noted.	A review of all links will be undertaken to ensure they work within the Submission Version of the Neighbourhood Plan. Amend paragraph 7.40 to include the correct reference to Policy GU10.

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
North Northamptonshire Council	47		GU12	However, some of the policies do repeat matters already covered by these policy documents and / or other policy, guidance or legislative documents, for example Policy GU12 (Housing Mix) . It is difficult to see what these policies bring to the neighbourhood plan above those policies which already exist.	Policy GU12 has been prepared having regard to the housing profile of the Neighbourhood Area is detailed in the supporting text.	No change.
North Northamptonshire Council	48		GU13	However, some of the policies do repeat matters already covered by these policy documents and / or other policy, guidance or legislative documents, for example Policy GU13 (Rural Housing) . It is difficult to see what these policies bring to the neighbourhood plan above those policies which already exist.	It is important for local plans to make appropriate reference to neighbourhood plan policies and proposals and similarly for neighbourhood plans to acknowledge local plan policies that they relate to. This policy provides appropriate signposting of relevant local plan policy.	No change.
North Northamptonshire Council	58		GU19	However, some of the policies do repeat matters already covered by these policy documents and / or other policy, guidance or	The policies of the Neighbourhood Plan serve a clear purpose and avoid the	Policy GU19: Parking amended for clarity to the following

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				legislative documents, for example Policy GU19 (Parking). It is difficult to see what these policies bring to the neighbourhood plan above those policies which already exist.	unnecessary duplication of policies that are already in the development plan. Nonetheless, in accordance with Planning Practice Guidance, it is important for neighbourhood plans to acknowledge local plan policies that they relate to.	<i>"New development must be safe and should provide adequate off-street street parking provision in accordance with the Northamptonshire Parking Standards."</i>
National Highways	58			National Highways welcomes the opportunity to comment on the pre-submission draft of the Grafton Underwood Neighbourhood Plan which covers the period from 2022 to 2041. We note that the document provides a vision for the future of the area and sets out a number of key objectives and planning policies which will be used to	Noted.	No change.

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				help determine planning applications. National Highways (formally Highways England) has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In responding to development plan consultations, we have regard to DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of plans and development		

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				management considerations. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies. In relation to the Grafton Underwood Neighbourhood Plan, our principal interest is in safeguarding the operation of the SRN, the nearest route of which is the A14 which is located approximately 3km south of the plan area. The scope and scale of proposed development identified in the current North Northamptonshire Development Plan (accounted for within the Grafton Underwood Neighbourhood Plan), is modest and shall not have any significant impact on the operation of the SRN. Considering the limited level of growth proposed across the		

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				Neighbourhood Development Plan area, as well as that already delivered within the Local Plan period, we do not expect that there will be any significant impacts on the operation of the SRN. We therefore have no further comments to provide and trust the above is useful in the progression of the Grafton Underwood Neighbourhood Plan.		
Anglian Water	58			Anglian Water recognises the need to manage vehicular access/ parking arrangements within the area as set out in Policy GU19: Parking. It is suggested that the neighbourhood plan – either under this one or Policy GU10: Design or within the Design Guide - could specify that permeable surfaces (pavements and other areas of hard standing such as vehicle parking areas) are used in the design of new developments to reduce surface water run-off from the	The NP does not have to cover every topic but there is no objection in principle to add something on this issue.	Amend Policy GU19: Parking to read: <i>"New development must be safe and should provide adequate off-street street parking provision in accordance with the Northamptonshire Parking Standards. Permeable surfaces should be</i>

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				introduction of hard-standing areas.		<i>used in the design of new car parking areas to reduce water run-off."</i>
Anglian Water	60			Anglian Water is supportive of measures to address surface water run-off, including the preference for this to be managed using Sustainable Drainage Systems (SuDS) and requiring permeable surfaces for new areas of hardstanding within developments to align with the drainage hierarchy. Such measures help to avoid surface water run-off from entering our foul drainage network, and connections to a surface water sewer should only be considered where all other options are demonstrated to be impracticable. Any requirements for a surface water connection to our surface water sewer network will require the developer to fund the cost of modelling and any upgrades required to accept the flows from the development.	Noted	No change

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				Anglian Water encourages the use of nature-based solutions for SuDS wherever possible, including retrofitting SuDS to existing urban areas to enhance amenity and biodiversity within the neighbourhood plan area and contribute to green and blue infrastructure. It is the Government's intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England in 2024/ 2025. However, we welcome this policy to ensure SuDS measures are incorporated within new developments, until the Schedule is formally implemented and the necessary measures are in place.		
Environment Agency	61	12.5 & 12.6		You could further help your area to manage environmental risks and improve its resilience to climate change through	Agreed.	Insert additional paragraph after 12.5 to read:

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				Neighbourhood Planning. We welcome that paragraphs 12.5 and 12.6 of the Plan are promoting the use of Sustainable Drainage Systems. You could help your community to further manage the risk of flooding by providing landscaping to manage and store water. For example, planting trees in appropriate locations, having regard to avoiding increased flood risk to properties, helps to create green spaces which can store water and provide shade for people and wildlife. It is suggested that the Neighbourhood Plan should refer to this.		<i>"Landscaping can also help further manage the risk of flooding by encouraging water absorption, slowing water flow and creating areas to store water. For example trees in appropriate locations, having regard to avoiding increased risk to properties, helps to create green spaces which can store water as well as provide shade for people and wildlife."</i>
Environment Agency	61	12.7		We note that paragraph 12.7 of the Neighbourhood Plan says new development should take full account of flood risk in accordance with national and	Whilst not considered necessary for the Neighbourhood Plan to specify paragraphs of the NPPF, additional	Paragraph 12.2 be modified by adding the following: <i>"Strict tests are set to protect people</i>

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
				local planning policies. It is considered that you should specifically refer to the Paragraphs 165 to 175 (planning and flood risk) of the National Planning Policy Framework and Policy 5 (Water management, resources and flood risk management) of the North Northamptonshire Joint Core Strategy at this point to help guide people further on this matter.	wording can be incorporated to clarify the approach to flooding and development and make reference to Policy 5 of the Joint Core Strategy.	<i>and property from flooding which all local planning authorities are expected to follow. Where these tests are not met, national policy is clear that new development should not be allowed. These national policies are well-established, so there is no need for the Neighbourhood Plan to duplicate them."</i> Paragraph 12.7 to be renumbered as 12.8 and modified as follows: <i>"New development should take full account of flood</i>

Representor	Page	Paragraph	Policy	Representation	Comment	Recommendation
						<i>risk in accordance with national the National Planning Policy Framework and local planning policies, including Policy 5 (Water Environment, Resources and flood Risk Management) of the North Northamptonshire Joint Core Strategy."</i>
North Northamptonshire Council	78	Policies Map		The policies map on p78 is rather busy, and difficult to interpret, particularly with respect to Policies GU1 and GU9. It might be better to provide inset maps to illustrate these two policies? The Council will add the relevant neighbourhood plan policies to the Council's interactive mapping that illustrates the development plan for the area.	Noted. An additional Policies Map to be included for the Settlement of Grafton Underwood to provide clarity.	Policies Map: Settlement of Grafton Underwood, be inserted after the Policies Map on pg. 78.

