# Grafton Underwood Neighbourhood Development Plan
## 2022-2041

## A report to North Northamptonshire Council on the Grafton Underwood Neighbourhood Development Plan

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## Executive Summary

1 I was appointed by North Northamptonshire Council in December 2025 to carry out the independent examination of the Grafton Underwood Neighbourhood Plan.

2 The examination was undertaken by way of written representations. I visited the neighbourhood area on 14 January 2026.

3 The Plan includes a variety of policies and seeks to bring forward positive and sustainable development in the neighbourhood area. It has a focus on safeguarding its built and natural environments, promoting sensitive employment development, and designating a package of local green spaces.

4 The Plan has been underpinned by community support and engagement. All sections of the community have been engaged in its preparation.

5 Subject to a series of recommended modifications set out in this report, I have concluded that the Grafton Underwood Neighbourhood Plan meets all the necessary legal requirements and should proceed to referendum.

6 I recommend that the referendum area should coincide with the neighbourhood area.

**Andrew Ashcroft**
**Independent Examiner**
**6 March 2026**

# 1 Introduction

1.1 This report sets out the findings of the independent examination of the Grafton Underwood Neighbourhood Development Plan 2022-2041 (the Plan).

1.2 The Plan has been submitted to North Northamptonshire Council (NNC) by Grafton Underwood Parish Council (GUPC) in its capacity as the qualifying body responsible for preparing the neighbourhood plan.

1.3 Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to allow local communities to take responsibility for guiding development in their area. This approach was subsequently embedded in the National Planning Policy Framework (NPPF). The NPPF continues to be the principal element of national planning policy. It was most recently updated in December 2024.

1.4 The role of an independent examiner is clearly defined in the legislation. I have been appointed to examine whether the submitted Plan meets the basic conditions and Convention Rights and other statutory requirements. It is not within my remit to examine or to propose an alternative plan, or a potentially more sustainable plan except where this arises because of my recommended modifications to ensure that the plan meets the basic conditions and the other relevant requirements.

1.5 A neighbourhood plan can be narrow or broad in scope. It can include whatever range of policies it sees as appropriate to its designated neighbourhood area. The Plan has been designed to be distinctive in general terms, and to be complementary to the development plan. It has a focus on safeguarding its built and natural environment, promoting sensitive employment development, and designating local green spaces.

1.6 Within the context set out above this report assesses whether the Plan is legally compliant and meets the basic conditions that apply to neighbourhood plans. It also considers the content of the Plan and, where necessary, recommends changes to its policies and supporting text.

1.7 This report also provides a recommendation as to whether the Plan should proceed to referendum. If this is the case and that referendum results in a positive outcome the Plan would then form a part of the wider development plan and be used to determine planning applications in the neighbourhood area.

## 2 The Role of the Independent Examiner

2.1 The examiner's role is to ensure that any submitted neighbourhood plan meets the relevant legislative and procedural requirements.

2.2 I was appointed by NNC, with the consent of GUPC, to conduct the examination of the Plan and to prepare this report. I am independent of both NNC and GUPC. I do not have any interest in any land that may be affected by the Plan.

2.3 I possess the appropriate qualifications and experience to undertake this role. I am a Director of Andrew Ashcroft Planning Limited. In previous roles, I have 43 years' experience in various local authorities at either Head of Planning or Service Director level and more recently as an independent examiner. I have significant experience of undertaking neighbourhood plan examinations and health checks. I am a member of the Royal Town Planning Institute and the Neighbourhood Planning Independent Examiner Referral System.

*Examination Outcomes*

2.4 In my role as the independent examiner of the Plan I am required to recommend one of the following outcomes of the examination:

(a) that the Plan as submitted should proceed to a referendum; or
(b) that the Plan should proceed to referendum as modified (based on my recommendations); or
(c) that the Plan does not proceed to referendum on the basis that it does not meet the necessary legal requirements.

2.5 The outcome of the examination is set out in Sections 7 and 8 of this report.

*Other examination matters*

2.6 In examining the Plan I am also required to check whether:

- the policies relate to the development and use of land for a designated neighbourhood plan area; and
- the Plan meets the requirements of Section 38B of the Planning and Compulsory Purchase Act 2004 (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one neighbourhood area); and
- the Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

2.7 Having addressed the matters identified in paragraph 2.6 of this report I am satisfied that each of the points have been met subject to the contents of this report.

## 3 Procedural Matters

3.1 In undertaking this examination I have considered the following documents:

- the submitted Plan.
- the Basic Conditions Statement.
- the Consultation Statement.
- the SEA/HRA screening opinions.
- the Design Guide
- the representations made to the Plan.
- GUPC's responses to the clarification note.
- the North Northamptonshire Joint Core Strategy 2011-2031
- the Kettering Site Specific Part 2 Local Plan
- the National Planning Policy Framework (December 2024).
- Planning Practice Guidance.
- relevant Ministerial Statements.

3.2 The various documents are helpfully available on NNC's website. Wherever possible, I will refer to the document concerned for the purposes of keeping this report as concise as possible.

3.3 I visited the neighbourhood area on 14 January 2026. I looked at its overall character and appearance and at those areas affected by policies in the Plan in particular. The visit is covered in more detail in Section 5 of this report.

3.4 It is a general rule that neighbourhood plan examinations should be held by written representations only. Having considered all the information before me, including the representations made to the submitted Plan, I was satisfied that the Plan could be examined without the need for a public hearing.

## 4 Consultation

*Consultation Process*

4.1 Policies in made neighbourhood plans become the basis for local planning and development control decisions. As such the regulations require neighbourhood plans to be supported and underpinned by public consultation.

4.2 In accordance with the Neighbourhood Planning (General) Regulations 2012, GUPC prepared a Consultation Statement. It is proportionate to the neighbourhood area and the contents of the Plan and reflects the specific circumstances that have generated the community's desire to prepare the Plan.

4.3 Paragraph 1.6 of the Statement sets out the various activities that were held to engage the local community during the plan-preparation process. The Statement also reproduces the various documents used to engage local people. This gives the Statement a real sense of depth and purpose.

4.4 Appendix 3 of the Statement sets out how the submitted Plan took account of consultation feedback at the pre-submission phase (July to September 2024). This is a helpful way to set out the information and helps to describe how the Plan was refined based on consultation and feedback.

*Consultation Feedback*

4.5 Consultation on the Plan was undertaken by NNC. It ended on 13 October 2025. This generated representations from the following organisations:

- National Highways
- Boughton Estates
- Natural England
- North Northamptonshire Council
- Brigstock Parish Council
- KR.eativ Architects Ltd

4.6 I have taken all the comments into account in preparing this report. Where appropriate, I refer to specific representations in my commentary on the various policies in the Plan.

## 5 The Neighbourhood Area and the Development Plan Context

*The Neighbourhood Area*

5.1 The neighbourhood area is the parish of Grafton Underwood. It was designated as a neighbourhood area on 3 June 2019 by the former Kettering Borough Council. In 2021 its population was 130 people, living in 60 households. The village has a very distinctive character based on two issues. The first is the presence of the Alledge Brook that runs north to south through the village. The second is its development as an estate village associated with the Duke of Buccleugh's Estate of Boughton.

5.2 Grafton Underwood is a linear village, open to the surrounding countryside and landscape. The main street runs through the centre and along the eastern edge of the Alledge Brook. Most development is laid out either side of the Brook, comprising long narrow plots stretching between the main street and former back lanes. At the northern end of the village the buildings are set back from the Brook alongside an area of open space.

5.3 The remainder of the neighbourhood area is attractive open countryside.

*Development Plan Context*

5.4 The development plan for the neighbourhood area is the North Northamptonshire Joint Core Strategy (JCS) 2011-2031 and the Kettering Site Specific Part 2 Local Plan.

5.5 The submitted Plan has sought to provide local value to several of the strategic policies in the Core Strategy. In general terms Policy 11 (Network of Urban and Rural Areas) identifies the type of development which will be appropriate in villages and in the countryside. In addition, the following policies have influenced the preparation of the submitted Plan:

- Policy 2 Historic Environment
- Policy 5 Water and Flood Risk Management
- Policy 7 Community Services and Facilities
- Policy 10 Provision of Infrastructure
- Policy 22 Delivering Economic Prosperity
- Policy 25 Rural Economic Development and Diversification

5.6 The Kettering Site Specific Part 2 Local Plan was adopted in December 2021. Policy RS2 designates a small number of settlements within the Rural Area as Category B villages. These villages have particularly important Conservation Areas, as well as having a particular character and charm, given that these are 'estate villages' associated with the Boughton Estate. The Plan advises

that it is therefore essential that the character and vitality of these villages is maintained. The Plan also comments that, in accordance with Policy 11 of the JCS, which allows the designation of sensitive areas where infill development will be resisted or subject to special control, these villages are designated as Category B villages. Within these villages infill development, as defined in the glossary, will be limited to developments of 1 or 2 dwellings.

5.7 Policy GRA1 of the Local Plan (Grafton Underwood Development Principles) provides specific advice for development in the village. Other relevant policies in the Local Plan include:

- Policy LOC1: Settlement Boundaries
- Policy EMP4: Live Work Units
- Policy HWC2: Protection of Community Facilities and Proposals for New Facilities
- Policy NEH2: Borough Level Green Infrastructure Network
- Policy NEH3: Historically and Visually Important Local Green Space
- Policy RS4: Development in the Open Countryside
- Policy RS5: General Development Principles in the Rural Area

5.8 The submitted Plan has been prepared within its wider adopted development plan context. In doing so it has relied on up-to-date information and research that has underpinned existing planning policy documents in North Northamptonshire. This is good practice and reflects key elements in Planning Practice Guidance on this matter. The submitted Plan seeks to add value to the development plan and to give a local dimension to the delivery of its policies. This is captured in the Basic Conditions Statement.

*Visit to the Neighbourhood Area*

5.9 I visited the neighbourhood area on 14 January 2026. I approached it from Kettering from the west. This helped me to understand its connection to the strategic road network and its setting in the wider countryside.

5.10 I looked carefully at the character and layout of the village. I paid specific attention to the proposed Local Green Spaces. I also looked at the former Airfield to the north of the village.

## 6 The Neighbourhood Plan as a whole

6.1 This section of the report deals with the submitted neighbourhood plan as a whole and the extent to which it meets the basic conditions. The Basic Conditions Statement has helped considerably in the preparation of this section of the report. It is a well-presented and informative document. It is also proportionate to the Plan itself.

6.2 As part of this process I must consider whether the submitted Plan meets the basic conditions as set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990. To comply with the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan in the area;
- not breach, and otherwise be compatible with, the assimilated obligations of EU legislation (as consolidated in the Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023; and
- not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

6.3 I assess the Plan against the basic conditions under the following headings.

*National Planning Policies and Guidance*

6.4 For the purposes of this examination the key elements of national policy relating to planning matters are set out in the National Planning Policy Framework (NPPF) issued in December 2024.

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6.5 The NPPF sets out a range of core land-use planning issues to underpin both plan-making and decision-taking. The following are particularly relevant to the Grafton Underwood Neighbourhood Plan:

- a plan-led system – in this case the relationship between the neighbourhood plan and the adopted development plan as identified in Section 5 of this report;
- delivering a sufficient supply of homes;
- building a strong, competitive economy;
- recognising the intrinsic character and beauty of the countryside and supporting thriving local communities;

- taking account of the different roles and characters of different areas;
- highlighting the importance of high-quality design and good standards of amenity for all future occupants of land and buildings; and
- conserving heritage assets in a manner appropriate to their significance.

6.6 Neighbourhood plans sit within this wider context both generally, and within the more specific presumption in favour of sustainable development. Paragraph 13 of the NPPF indicates that neighbourhoods should both develop plans that support the strategic needs set out in local plans and plan positively to support local development that is outside the strategic elements of the development plan.

6.7 In addition to the NPPF, I have also taken account of other elements of national planning policy including Planning Practice Guidance and ministerial statements.

6.8 Having considered all the evidence and representations available as part of the examination I am satisfied that the submitted Plan has had regard to national planning policies and guidance in general terms. It sets out a positive vision for the future of the neighbourhood area. It has a focus on safeguarding its built and natural environment, promoting sensitive employment development, and designating local green spaces. The Basic Conditions Statement maps the policies in the Plan against the appropriate sections of the NPPF.

6.9 At a more practical level, the NPPF indicates that plans should provide a clear framework within which decisions on planning applications can be made and that they should give a clear indication of how a decision-maker should react to a development proposal (paragraph 16d). This is reinforced in Planning Practice Guidance. Paragraph 041 Reference ID:41-041-20140306 indicates that policies in neighbourhood plans should be drafted with sufficient clarity so that a decision-maker can apply them consistently and with confidence when determining planning applications. Policies should also be concise, precise, and supported by appropriate evidence.

6.10 As submitted, the Plan does not fully accord with this range of practical issues. Many of my recommended modifications in Section 7 relate to matters of clarity and precision. They are designed to ensure that the Plan fully accords with national policy.

*Contributing to sustainable development*

6.11 There are clear overlaps between national policy and the contribution that the submitted Plan makes to achieving sustainable development. Sustainable development has three principal dimensions – economic, social, and environmental. I am satisfied that the submitted Plan has set out to achieve sustainable development in the neighbourhood area. In the economic dimension, the Plan includes policies for the conversion of rural buildings (Policy GU15), home working (Policy GU16), and for the former Airfield (Policies 17/18). In the social dimension, it includes policies on community facilities (Policy GU11), housing mix (policy GU12), and on local green spaces (Policy GU5). In the environmental dimension, the Plan positively seeks to protect its natural, built. and historic environment. It includes policies on landscape character and views (Policy GU1), ecology and biodiversity (Policy GU6), and ancient woodlands (Policy GU7). This assessment overlaps with GUPC's comments on this matter in the Basic Conditions Statement.

*General conformity with the strategic policies in the development plan*

6.12 I have already commented in detail on the development plan context in North Northamptonshire in paragraphs 5.4 to 5.8 of this report.

6.13 I consider that the submitted Plan delivers a local dimension to this strategic context. The Basic Conditions Statement helpfully relates the Plan's policies to the policies in the development plan. Subject to the recommended modifications in this report, I am satisfied that the submitted Plan is in general conformity with the strategic policies in the development Plan.

*Strategic Environmental Assessment*

6.14 The Neighbourhood Planning (General) (Amendment) Regulations 2015 require a qualifying body either to submit an environmental report prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 or a statement of reasons why an environmental report is not required.

6.15 In order to comply with this requirement, GUPC commissioned a screening report in December 2024 on the need or otherwise for a Strategic Environmental Assessment (SEA) to be prepared for the Plan. The report is thorough and well-constructed. It includes the responses from the consultation bodies. It provides the necessary analysis relating to the potential for negative effects on sensitive areas and other key environmental assets, including nearby SPAs, SSSIs, Scheduled Monuments, Historic Gardens, Conservation Area and Listed Buildings. With respect to these designations, it is considered that these are unlikely to be significant in the context of the SEA Directive. It advises that the significance of potential effects will be limited by key aims of

the Plan. The report concludes that the Grafton Underwood Neighbourhood Plan should not be subject to a full SEA.

*Habitat Regulations*

6.16 GUPC also commissioned a Habitats Regulations Assessment (HRA) of the Plan at the same time. It advises that given the distance between the neighbourhood area and the Upper Nene Valley Gravel Pits SPA, the Plan does not include policies that allocate land for development, and the likely scale of future development, a full Habitat Regulations Assessment is not required, as the plan is considered unlikely to have significant adverse effects on the Natura 2000 network of protected sites. The Assessment concludes that there are unlikely to be significant negative effects on a European Designated Site resulting from the policies detailed within the draft Grafton Underwood Neighbourhood Plan. It also advises that there are also considered to be no in-combination effects.

6.17 Having reviewed the information provided to me as part of the examination I am satisfied that a proportionate process has been undertaken in accordance with the various regulations. In the absence of any evidence to the contrary, I am entirely satisfied that the submitted Plan is compatible with this aspect of neighbourhood plan regulations.

*Human Rights*

6.18 In a similar fashion I am satisfied that the submitted Plan has had regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights (ECHR) and that it complies with the Human Rights Act. There is no evidence that has been submitted to me to suggest otherwise. In addition, there has been full and adequate opportunity for all interested parties to take part in the preparation of the Plan and to make their comments known. Based on all the evidence available to me, I conclude that the submitted Plan does not breach, nor is in any way incompatible with the ECHR.

*Summary*

6.19 On the basis of my assessment of the Plan in this section of my report I am satisfied that it meets the basic conditions subject to the incorporation of the recommended modifications contained in this report.

## 7 The Neighbourhood Plan Policies

7.1 This section of the report comments on the policies in the Plan. It makes a series of recommended modifications to ensure that the various policies have the necessary precision to meet the basic conditions.

7.2 My recommendations focus on the policies themselves given that the basic conditions relate primarily to this aspect of neighbourhood plans. In some cases, I have also recommended changes to the associated supporting text.

7.3 I am satisfied that the content and the form of the Plan is fit for purpose. It is distinctive and proportionate to the neighbourhood area. The wider community and GUPC have spent time and energy in identifying the issues and objectives that they wish to be included in the Plan.

7.4 The Plan has been designed to reflect Planning Practice Guidance (Paragraph 004 Reference ID:41-004-20190509) which indicates that neighbourhood plans must address the development and use of land.

7.5 I have addressed the policies in the order that they appear in the submitted Plan.

7.6 For clarity this section of the report comments on all the policies in the Plan.

7.7 Where modifications are recommended to policies they are highlighted in bold print. Any associated or free-standing changes to the text of the Plan are set out in italic print.

*The initial sections of the Plan (Sections 1-3)*

7.8 The Plan is well-organised and includes effective maps and photographs that give real depth and purpose to the Plan. The Plan makes an appropriate distinction between the policies and their supporting text. Its design will ensure that it will comfortably be able to take its place as part of the development plan if it is eventually made. The initial elements of the Plan set the scene for the policies. They are proportionate to the neighbourhood area and the subsequent policies.

7.9 The Introduction properly identifies the neighbourhood area (Map 1) and the Plan period (in paragraph 1.5). It sets out the Plan preparation process and explains the basic conditions. It also comments on the development plan context within which the Plan has been prepared.

7.10 Section 2 sets out a profile of the parish. It helpfully sets the scene for the Plan and informs several of the policies.

7.11 Section 3 sets out the Vision for the Plan. It captures a series of issues shown diagrammatically in paragraph 3.5.

7.12 The remainder of this section of the report addresses each policy in turn in the context set out in paragraphs 7.5 to 7.7 of this report.

Policy GU1: Landscape Character and Locally Important Views

7.13 The Plan advises that this policy allows account to be taken of the different roles and characters of areas and recognises the intrinsic character and beauty of the countryside. The policy comments that development should be located and designed in a way that is sensitive to its landscape setting. It also advises that development should safeguard and, where possible, enhance the following Important Views and Focal Point as shown on Map 2

7.14 This is a very good policy which sets the scene for the wider Plan. The justification for the identified views was obvious during the visit. I am satisfied that the policy responds positively to Sections 11 and 15 of the NPPF. In this context it meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Policy GU2: Access to the Countryside

7.15 This Plan advises that this policy takes account of the different roles and character of different areas as well as seeks to support the multiple benefits from the use of rural areas, such as recreation and wellbeing, and maximise opportunities for walking and cycling.

7.16 The policy comments that development should protect Public Rights of Way and wherever possible create new links to the network including footpaths and cycleways, and new permissive routes. It also comments that the creation of an off-road cycle/footpath link between Grafton Underwood and Geddington, along with opportunities to improve connectivity with Thrapston will be supported as part of a new high-level crossing between Corby and Thrapston.

7.17 The policy responds positively to the close relationship between the village and the surrounding countryside. It also has a non-prescriptive approach which acknowledges the creation of new links to the existing network may not always be possible. In the round this is a very good policy and I am satisfied that it responds positively to Sections 8 and 9 of the NPPF. I recommend a modification to the wording used in the second sentence of the policy to ensure that it properly relates to the development management process. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**In the second sentence replace ‘are’ with ‘will be’**

Policy GU3: Dark Night Skies

7.18 This policy seeks to ensure that development is appropriate for its location and considers the impact of light pollution.

7.19 The policy comments that 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. It continues by commenting that if the installation of lighting is unavoidable, necessary, and appropriate for new development, light spillage and glare should be minimised, and adverse impacts should be mitigated by control measures to reduce light pollution.

7.20 The policy is underpinned by appropriate evidence and its approach will assist in safeguarding the character and attractiveness of the parish. I recommend a series of modifications to the wording used so that it has the clarity required by the NPPF and will allow NNC to implement its contents through the development management process. I also recommend that the policy is applied in a proportionate way. This will avoid it having an onerous impact on minor and domestic proposals.

7.21 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**‘As appropriate to their scale and nature, development proposals should demonstrate that all relevant opportunities to reduce light pollution have been taken and should ensure that the measured and observed sky quality in the surrounding area is not negatively affected. Where the installation of lighting is unavoidable, necessary, and appropriate for the proposed development, light spillage and glare should be minimised, and any adverse impacts should be mitigated by control measures to reduce light pollution.’**

Policy GU4: Renewable Energy

7.22 The Plan advises that this policy supports the provision of renewable energy infrastructure whilst seeking to ensure adverse impact is avoided and addressed.

7.23 The policy comments that proposals for microgeneration technologies development or for the development of local carbon technologies such as retrofitting for energy efficiency will be supported where development has

been demonstrated to respect local character and residential amenity. It also comments that small-scale ground-mounted solar photovoltaic farms will be supported only where a series of criteria are met.

7.24 In general terms this is a positive policy that has regard to Section 14 of the NPPF. In this context I recommend two modifications to ensure that the policy has clarity required by the NPPF and to allow NNC to be able to apply it through the development management process:

- a revision to the wording of criterion d so that it applies in the plural as elsewhere in the policy; and
- ensuring that wind turbines or large-scale solar farms are acceptable as individual projects in addition to their potential cumulative effects

7.25 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**In criterion d of the first part of the policy replace 'It does not' with 'They do not'**

**Replace the second part of the policy with:**

**'Proposals for wind turbines or large-scale solar farms will not be supported unless they are sensitively located and their cumulative impact with similar developments is acceptable.'**

Policy GU5: Local Green Spaces

7.26 The Plan advises that the context to the policy is that national policy which allows for neighbourhood plans to identify for the protection green areas of importance to them.

7.27 The policy proposes the designation of seven local green spaces (LGSs) and then applies the matter-of-fact approach taken in paragraph 108 of the NPPF to the identified spaces. The full reasons for designation are included in Appendix 1.

7.28 I looked at the proposed LGS carefully during the visit. I saw the way in which they helped to define the character of the village and complemented its linear nature.

7.29 Based on all the evidence and my own observations, I am satisfied that the seven LGSs meet the criteria in paragraphs 106 and 107 of the NPPF. In coming to this conclusion, I have taken account of GUPC's helpful response to the clarification note on the size of LGSs 4 and 6.

7.30 The policy responds positively to local circumstances and has regard to Section 8 of the NPPF. I am satisfied that it meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Policy GU6: Ecology and Biodiversity

7.31 The Plan advises that the NPPF is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution. It also comments that the policy seeks to minimise impacts on biodiversity and seek positives in biodiversity. It also has identified and mapped components of local ecological networks and features.

7.32 In general terms the policy takes a positive approach and has regard to Section 15 NPPF.

7.33 The reference to the Local Wildlife Sites (a) sits uncomfortably in the overall structure of the policy. I recommend that it is weaved more naturally into the policy. I also recommend two other modifications to bring the clarity required by the NPPF and to allow it to be applied through the development management system:

- the inclusion of a positive element into the first part of the policy; and
- the inclusion of a proportionate element into the third part of the policy. This will acknowledge that some of the measures identified may not be appropriate for minor and domestic proposals.

7.34 Otherwise, I am satisfied that it meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**‘Development proposals should respond positively to and not harm the network of local ecological features and habitats as shown on Map 5 and the Policies Map.**

**Development proposals should maintain and enhance local wildlife sites, and other ecological corridors and landscape features (such as watercourses, hedgerows, and treelines) and deliver an overall net gain for biodiversity.**

**As appropriate to their scale, nature and location, development proposals should integrate features such as bat boxes, bird boxes, and hedgehog highways to support biodiversity.’**

Policy GU7: Ancient Woodland

7.35 This policy seeks to protect the natural environment and to bring forward mitigation where appropriate.

7.36 The policy advises that development resulting in the loss or deterioration of irreplaceable habitats such as the ancient woodland at Boughton/Old Heads Woodland and Grafton Park Wood, and individual or small group of ancient or veteran trees will not be supported. It also comments that the restoration of planted ancient woodland sites will be supported.

7.37 The policy responds positively to local circumstances and has regard to Section 15 of the NPPF. I am satisfied that it meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Policy GU8: Trees and Hedgerows

7.38 This policy supports the conservation and enhancement of the natural and local environment. It advises that development resulting in the loss of ancient trees will not be supported.

7.39 In general terms, the policy takes a positive approach to this issue and has regard to Section 15 of the NPPF. The intention of the first part of the policy is clear. Nevertheless, to ensure that it has a positive focus, I recommend that its order is reversed so that the submitted first sentence is repositioned to the end. GUPC agreed to this approach in its response to the clarification note. In doing so I also recommend the refinement of the wording used throughout the policy to bring the clarity required by the NPPF, and to allow the policy to be implemented through the development management process. The recommended modifications will also allow the restructured policy to have a more natural flow.

7.40 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**‘Development proposals should be designed to retain ancient trees, or hedgerows and trees of arboricultural and amenity value. Proposals should also consider the ongoing protection of affected trees, including appropriate root protection zones.**

**Where it has been demonstrated that trees or hedgerows cannot be retained, native species replacements should be planted in locations**

**where they would have the opportunity to grow to maturity, increase canopy cover, and contribute to the local ecosystem.**

**Development proposals that would damage or result in the loss of ancient trees, or hedgerows or trees of good arboricultural and amenity value, will not be supported.'**

Policy GU9: Local Heritage Assets

7.41 This policy supports the conservation of heritage assets. It recognises that heritage assets are an irreplaceable resource and seeks their conservation and enhancement and plans positively with respect to non-designated heritage assets. Heritage assets within the parish have been identified so they can be appropriately considered.

7.42 The policy address local heritage assets in a positive way and has regard to Section 16 of the NPPF.

7.43 I looked carefully at the proposed local heritage assets. The reasons for their identification were self-evident. I recommend that the policy element sits at the end and that the earlier part of the policy identifies the various assets. GUPC agreed to this approach in its response to the clarification note.

7.44 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Reorder the policy so that it reads:**

**'The Plan identifies the following local heritage assets:**

**[list a-c with details in a].**

**The determination of planning applications which would affect the features of local heritage interest will balance the need for the proposed development against the significance of the asset and the extent to which it will be harmed.'**

Policy GU10: Design

7.45 This policy seeks to secure high quality design. The Plan advises that design is a key aspect of sustainable development and should contribute positively to making places better for people. This policy has regard to this approach and facilitates the promotion or reinforcement of local distinctiveness. It seeks to deliver development that is of a design that reflects the local area.

7.46 The policy is carefully underpinned by the Design Guide. In the round, the policy and the Design Guide represent an excellent local response to Section 12 of the NPPF.

7.47 I correct a typographical error in the second part of the policy. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**In the second part of the policy replace 'local' with 'location,'**

Policy GU11: Retention of Services and Facilities

7.48 The policy supports the retention and development of local services and community facilities in the village and plans positively against their unnecessary loss. The policy also seeks improvement of facilities that meet day to day needs.

7.49 I saw the importance of the identified facilities during the visit. The policy makes good use of the relevant policy in the adopted Local Plan.

7.50 I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

Policy GU12: Housing Mix

7.51 The Plan seeks to facilitate a mix of housing that reflects local need and demand. Priority is given to the provision of smaller and modest sized homes.

7.52 The policy is underpinned by extensive supporting text on local housing need and prices. It acknowledges that whilst opportunities for new housing development in Grafton Underwood are restricted, Policy RS2 of the Local Plan allows for limited housing development.

7.53 In general terms the policy takes a positive approach to this matter which has regard to Sections 5 and 8 of the NPPF. Nevertheless, I recommend a series of modifications to the wording used to bring the clarity required by the NPPF and to allow NNC to apply its contents through the development management process. Otherwise, I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of the social and the environmental dimensions of sustainable development.

**Replace the policy with:**

**'Development proposals for new dwellings should demonstrate how they will meet the housing needs of older households and/or the need for smaller homes for sale or rent. The development of housing with more than three bedrooms will only be supported where it is necessary**

**to make the best use of redundant or disused rural buildings in accordance with Policy GU14 (Rural Housing).'**

Policy GU13: Rural Housing

7.54 This policy provides a parish-based dimension to national and local policies on residential development in the countryside. It identifies four types of development to which support would be limited.

7.55 The policy takes a locally-distinctive approach to this matter which has regard to Sections 5 and 8 of the NPPF.

7.56 In this context I recommend that the wording used in the opening element of the policy is modified so that it has the clarity required by the NPPF and better applies to the development management process. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

**Replace the opening element of the policy with: 'Proposals for housing in the countryside will only be supported where they relate to the following matters:'**

Policy GU14: Rural Worker Accommodation

7.57 This policy sets out the requirements to be met for new rural worker's accommodation. This policy relates to workers of existing rural enterprise and not just land-based agricultural businesses, so it can also apply to forestry and rural education.

7.58 This is a comprehensive policy which includes detailed guidance for the development management process. I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Policy GU15: Business Conversion of Rural Buildings

7.59 The Plan advises that this policy supports sustainable economic development in accordance with the NPPF and supports economic growth in rural areas whilst respecting the character of the area.

7.60 The supporting text advises that the Joint Core Strategy, along with National Planning Policy, support opportunities to sustainably develop and diversify the rural economy. It also advises that the submitted Plan recognises the importance of having a sustainable rural economy and supports the conversion of existing rural buildings to business use. However, it advises that the proposed uses must be appropriate in scale, form, impact, character, and siting to their location in the countryside. This approach forms the basis for a

criteria-based policy which supports the re-use, adaptation, or extension of rural building for business use.

7.61 I am satisfied that the criteria are locally distinctive, and that the approach taken complements national and local planning policies. As such it has regard to Sections 6 and 8 of the NPPF. I am satisfied that the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Policy GU16: Working from Home

7.62 The Plan advises that this policy supports sustainable economic development in accordance with the NPPF.

7.63 The policy supports proposals for working from home subject to three criteria. It takes a locally distinctive approach to this matter which has regard to Sections 5 and 8 of the NPPF. In this context I am satisfied that it meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

Policy GU17: Former Grafton Underwood Airfield

7.64 This policy supports sustainable rural tourism whilst protecting and enhancing the heritage value and features of the former Airfield.

7.65 The policy advises that development proposals which contribute to and support the conservation, enhancement, interpretation, and positive management of the Grafton Underwood Airfield and allow for its heritage preservation and role as a tourism destination will be supported where a series of criteria are met.

7.66 This is another good positive local policy. In general terms the three criteria are appropriate to the former Airfield and will ensure that any development respects its location in the parish. I recommend that the third criterion is recast so that it is more applicable to the development management process (rather than simply requiring that the implications of traffic are assessed).

7.67 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

**Replace the final criterion with: 'C. Proposals can be accommodated with the local highway network.'**

Policy GU18: Timber Yard, Former Grafton Underwood Airfield

7.68 This policy supports sustainable economic development in accordance with the NPPF. It plans to support economic growth in rural areas and takes a

positive approach in this respect. The supporting text provides a very helpful context both to the site and its recent history.

7.69 In general terms the policy takes a positive approach to future development in this part of the parish and has regard to Section 6 of the NPPF. The criteria are appropriate to the location of the site and are locally-distinctive.

7.70 There is a slight disjoint between the first part of the policy and the opening element of the second part of the policy. I recommend that opening element of the second part of the policy is recast accordingly. Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

**Replace the opening element of the second part of the policy with: 'Development proposals for these uses should meet the following criteria:'**

Policy GU19: Parking

7.71 This policy seeks to provide the appropriate level of car parking infrastructure to support new development and to avoid exacerbating the adverse impacts created by on-street parking.

7.72 The thrust of the policy is entirely appropriate. However, I sought advice from GUPC about the extent to which it has a specific purpose given that the broader issue is addressed in the Northamptonshire Parking Standards. In its response to the clarification note it commented that:

*'Residents living in the village are heavily reliant on the private car for their journeys, in light of the lack of public transport and the lack of village services and facilities. The 2021 census identifies car ownership in Grafton Underwood as 87.9%, compared to 76.5% across England. Levels of on-street parking was raised as a concern through the public consultation undertaken by the parish Council in May 2022. High levels of car ownership and reliance on the private car for journeys in turn creates a parking demand. Parking issues are identified in the supporting text and the policy seeks to reinforce existing parking standards in the County and not exacerbate the parking issues faced in the village. In addition, the parking standards were adopted after the North Northamptonshire Joint Core Strategy.'*

7.73 I have considered this matter very carefully. Whilst I understand the concerns raised by GUPC, the first part of the policy simply restates existing local policy. On this basis I recommend that the policy's focus shifts to the element about the use of permeable surface for new parking areas. Nevertheless, I recommend that the supporting text is expanded so that it highlights the importance of the Northamptonshire Parking Standards.

7.74 Otherwise, the policy meets the basic conditions. It will contribute to the local delivery of each of the three dimensions of sustainable development.

**Replace the policy with: 'Wherever practicable, permeable surfaces should be used in the design of new car parking areas to reduce water run-off.**

*At the end of paragraph 11.3 add: 'The Parish Council recognises the importance of these Standards, and will expect development proposals to provide the necessary parking spaces.'*

Monitoring and Review

7.75 Section 13 of the Plan addresses the way in the Plan will be monitored and reviewed. This is best practice

Other Matters – General

7.76 This report has recommended a series of modifications both to the policies and to the supporting text in the submitted Plan. Where consequential changes to the text are required directly because of my recommended modification to the policy concerned, I have highlighted them in this report. However other changes to the general text and maps may be required elsewhere in the Plan because of the recommended modifications to the policies. It will be appropriate for NNC and GUPC to have the flexibility to make any necessary consequential changes to the general text. I recommend accordingly.

*Modification of general text (where necessary) to achieve consistency with the modified policies.*

## 8 Summary and Conclusions

### *Summary*

8.1 The Plan sets out a range of policies to guide and direct development proposals in the period up to 2041. It is distinctive in addressing a specific set of issues that have been identified and refined by the wider community. It has a focus on safeguarding its built and natural environment, promoting sensitive employment development, and designating local green spaces

8.2 Following the independent examination of the Plan, I have concluded that the submitted Grafton Underwood Neighbourhood Development Plan meets the basic conditions for the preparation of a neighbourhood plan subject to a series of recommended modifications.

*Conclusion*

8.3 Based on the findings in this report I recommend to North Northamptonshire Council that, subject to the incorporation of the modifications set out in this report, the Grafton Underwood Neighbourhood Development Plan should proceed to referendum.

*Referendum Area*

8.4 I am required to consider whether the referendum area should be extended beyond the Plan area. In my view, the neighbourhood area is entirely appropriate for this purpose and no evidence has been submitted to suggest that this is not the case. I therefore recommend that the Plan should proceed to referendum based on the neighbourhood area as approved by the former Kettering Borough Council on 3 June 2019.

. 8.5 I am grateful to everyone who has helped in any way to ensure that this examination has run in a smooth and efficient manner.

**Andrew Ashcroft**
**Independent Examiner**
**6 March 2026**