

Spratton Neighbourhood Plan

Pre-submission consultation representations

Within the representations certain allegations have been made against Parish Council which have as a result of legal advice been redacted.

No	Name	Pg	Section	Representation
	M. Heaton	27	7.8 line 4	Parishioners spelt incorrectly
		27	7.8	Revised text to show demonstrate why Jubilee Wood is special, as below The land for Jubilee Wood, adjacent to a public footpath, was made available by a landowner to create a community facility of the only accessible wood in the parish. It was planted by parishioners in 2012 for the enjoyment of future generations and also to provide biodiversity benefits. Jubilee Wood is maintained by 'Natural Spratton', a group affiliated to Spratton Parish Council, and is enjoyed on a daily basis by parishioners
		50	12.1	Delete Post Office
1	B. Foster	5	Proposals map	That her property has been 'cut in half' and should all be included per Land Registry holding
2	C. Richardson			<i>Just ticked 'support'</i>
3	J. Hinds			<i>Just ticked 'support'</i>
4	M. Benn	5	2.1	As Spratton village has been in the form of a "cluster" since the 9 th C, what right have we to consider significant expansion outside the existing cluster? It would be tragic if, in the 21 st C we should allow this heritage and principle to be violated after 1200 years. Long Buckby we ain't, and should not be permitted to expand in that manner.
		7	2.13	The variations of age structure between Spratton and the Daventry District as recorded are not statistically significant.
		15	5.7	Limit to 10 including "Affordable" must be unchallengeable and stressed as such. Absolutely not more.
		16	5.9	Agree in principle but how can "in perpetuity" be enforced? Will a Local Lettings Policy be put in place by Daventry District Council, and when?
		23	6.9	No mention of potential expansion of the units on Holdenby Road below Broomhill, nor of the Broomhill development which will involve substantial employment little or none from Spratton and certainly much increased traffic. A policy should be included in the plan to preclude any expansion of the latter (or similar schemes) beyond that for which existing planning permission has been granted.
		46	10.9	New pavements should be resisted as a further encroachment of urbanisation of the village. This policy is misguided and should be deleted. How many injuries in Spratton have occurred because of lack of pavements? Indeed in many places these are being purposely removed to ensure lower traffic speeds. Holland, Exhibition Road, Dorchester etc. A good case could be made for removing them on Brixworth Road to reduce speeds in the

				narrow section between School Road and the Memorial Garden
		47	10.11	Difficult to rely on sufficient funds from this source if restricted to contributions from developments in the village. Alternative sources essential.
		49	RE1 Objective 2	Should include reference to Views.
		50	12.3	It lacks a “village hall commensurate with the size of and demand from residents” (It already has a village hall as in earlier para, & many would say that this is quite adequate for the PC!)
5	D. Cooke	3	1.6	JSC report should have been available mid-2014 and any implications incorporated into this document.
		13	4.3	This appears to make all areas adjoining the settlement boundary available for development without qualification except a limit of ten dwellings per development in 4.4.
		13	4.4	There is no excuse for encouraging Spratton Hall School to expand their operation or to give them a special mention. They are the source of traffic congestion in the village and seem able to get DDC’s agreement to whatever they want to do without assistance from the Parish Council
		13	4.4	The comment about pupil numbers at the school is meaningless as the number of pupils is not stated. Even if it was it would be unenforceable and ignored. Previously, when there were less than 390 pupils, the School gave an undertaking, as part of a planning application, not to increase numbers and hence traffic. I believe the current roll is 460.
		13	4.4	Also the School hire their facilities to other schools and they arrive on large coaches that are unsuitable for the roads. Any new building on this site involves introducing more traffic into an already difficult situation.
		13	4.4	With this in the Plan there is no way the Parish Council will be able to object to any planning application the school may make in the future.
		13	4.4	The School have always refused to acknowledge their responsibility for the traffic problems they cause in the village or cooperate in any way to mitigate the difficulty. There is no sign this will change.
		15	5.7	This restricts new development to the settlement area in conflict with 4.3. JCS plan should be available and numbers known. Also why state that Social Housing may be outside the Settlement Boundary when 4.3 and 5.7 clearly allow all developments to be outside the boundary?
		15	5.7	This restricts the size of developments to 10 dwellings but not the number of developments. Why?
		26	Green spaces	Surely the wood on Rolly Banks should be listed. It is in private ownership in the same way as Jubilee Wood. Also East View Cemetery could be included.
		40	8.17	“Lighting in the Countryside: Towards Good Practice” is not well known and is out of print. If Contractors and Developers are to find it, it needs to be clarified that it was published in 1997 by Department of Communities and Local Government and can be found online. It will cross reference with-out-of date standards as BS EN 13201-2 is now 2003.

		45	Traffic	The traffic congestion caused in the streets around Spratton Hall School was clearly identified in a village questionnaire in connection with the Plan as a major concern to residents and an improvement in the situation was a priority. It has been completely ignored. This issue needs to be clearly stated in the Plan (Objective 6). In the same way as development is to be limited to reduce parking on verges a policy is needed to prevent any development that will exasperate the situation that already exists.
		50	12.1	The Post Office was closed a number of years ago
		50	12.3 12.4	This is a surprise. It is not so long ago that the Parish Council decided the Village did not need a Parish Hall and spent the money that was available at that time on repairs to the existing wooden structure built in 1927!
		52	13.5	It is unfortunate that both the original proposed developments were rejected as both had potential, with thoughtful design, to incorporate measures to slow traffic coming into the village.
6	J. Gaywood			[This section redacted on legal advice]
				[This section redacted on legal advice]
				[This section redacted on legal advice]
				[This section redacted on legal advice]
				[This section redacted on legal advice]
				[This section redacted on legal advice]
				72.14 PLANNING EXECUTIVE COMMITTEE Chair: Councillor Fiona Keable 2/. How can it be that S.P.C. get to choose an independent adjudicator. In my opinion if a body has a say in who is going to inspect them, then the inspection is far from independent, is it not? It might be the right of the Council to do this under the rules, this I can't argue, as I don't know. However, I certainly can state that I will not have confidence that the report is going to be independent. On that basis, I declare the use of that term to the general public, as an attempt to mislead them in the same way that I feel they have been misled throughout this process, by being repetitively told that Navigus Planning are an independent body. They can't be as they are paid by the Parish Council. This is a contradiction in terms! I request that you send me documentation stating the rules regarding the appointment of the adjudicator without delay, as I want to see the word independent in it's text for myself.
				[This section redacted on legal advice]
				[This section redacted on legal advice]
				[This section redacted on legal advice]
7	R. Humphries (ex Spratton Resident)			I am writing to you to express my concerns regarding the Spratton Neighbourhood Plan process. Along with the impact this may have on the private planning application made for 37 houses off Brixworth road. Growing up I was a parishioner at Spratton for 20 years leaving the village around 5 years ago and would relish the opportunity to move back in to the village. Due to this I have been following the developments of the neighbourhood plan.
				In my opinion, it is clear to see from the consistent bias and leading questionnaires and bulletins that the plan is not robust. For the vast majority of the process parishioners were consulting on two sites that were selected based

				<p>on the information learnt from previous consultations regarding what the parishioners wanted to achieve from the plan.</p> <p>To my understanding all parties had agreed to a written protocol. This protocol, composed by the parish council and their advisors was then broken by the parish council before completion. It is my understanding that the protocol stated that if consultation regarding the two sites was to close to determine the outcome a site specific vote would follow.</p> <p>It is my educated opinion from following this process closely that this site specific vote was avoided due to the likelihood of it bringing about the result that the parish council have so clearly attempted to steer the village away from. This being the allocation of site two for development.</p> <p>The people of Spratton have identified in previous consultation that they would like to see around 35 new houses. The parish council is now leading parishioners towards "organic growth". Spratton have now consulted on this with no information regarding a technical study to determine whether it is possible to incorporate the growth required in this style.</p> <p>The way I see it, Spratton parish council have spent a lot of money and achieved absolutely nothing.</p>
				They have conducted numerous consultations, that have all bar one had positive responses to larger schemes.
				<p>We have now seen a sudden injection of impetuous in my opinion to block a private application. This is surely not the mandate set out be creating a neighbourhood plan? The way understand it, you are supposed to consult with the parishioners to determine a clear and robust plan. When considering the whole process and results from a variety of consultations, you are not in a position to make a recommendation to the village as the results from the latest leading questionnaire are no more definitive than previous results.</p> <p>In the committee report I noticed the latest consultation results had been published within the document, I was of the understanding that the neighbourhood plan and private application were two separate matters? If this is incorrect, will you be considering that the private application received a far larger amount of letters of support than letters of objection within the neighbourhood plan?</p>
				Across this process the need for affordable housing in Spratton has been one of the main aspects for consideration. In my opinion, this should not be thrown to the wayside based on the results of one consultation from a leading questionnaire.
				I would like to see more consultation done with informative non bias bulletins that allow people to make their own minds up, along with questionnaires that do not lead parishioners but seek their opinion in order to lead you to a plan that will bring about what people truly want.
8	Mr and Mrs Woods	36	8.9	It says that the view to Brixworth and its spire are particularly important but the map at 8.1 does not show an arrow pointing directly to the east with specific comment
				The scope and content of the plan has been very well executed and it gives a reasonable and comprehensive review of the development needs of the village.
9	B. Frenchman	13	4.3	But subject to DDC planning policies
		13	4.4	As only developments over 5 (currently) have affordable housing element perhaps we should have a policy of

				numbers of affordables
		13	4.4	Actually put a number to pupil limit
		15/1 6	5.8 HS1	To require developments of 5 or more units to provide affordable units
		23	Sec. 6	Other employment areas e.g. Hawthorn Park to be mentioned
		50	12.1	Hall school added to Community facilities
		52	13	Policies to be added on rural transport and any aspirations on this
10	R. Woodgate	15	5.7	Finally , regarding the maximum 10 houses that will be allowed in any one development should there be an additional note regarding the infrastructure to support any such development ie that the existing road that the proposed development would spur off from can support the additional entry/exit point. That additional road traffic will not impair the rights of existing residents. that any additional street lighting required will not impose on existing residents.
		17	5.14	Could there be an additional bullet point ... "Loss of natural stone walls that have formed a natural and continuous boundary ".
		18	5.20	Suggested additional point . "Where a new build is replacing an existing building, the footprint should remain the same or smaller , and the maximum height of the new build should remain the same or less, as the building to be replaced ".
		35	Objective 3	Proposed additional sentence. ".....including existing trees and foliage where they have previously formed a natural feature of the street scene "
		48		Could this section (HP2) merit inclusion of Northamptonshire Highways Manual For Streets requirements eg. "Developments should meet minimum highways visibility requirements at any proposed access points ie visibility splays of 25 metres in either direction . "Entrance and exit points of any proposed driveway must meet Northamptonshire Design Guidance for New Developments ie must be at least 4 metres from any existing entrance/exit".
		48	1st para	Could there be a general point made in the opening paragraph on Page 48 relating to the Councils desire to improve footpath safety for children and parents walking to /from school. eg "The council wishes to encourage parents in the village to walk their children to school to avoid road congestion in the village. Any developments that include car access that could potentially cause visibility issues for footpath traffic will be strongly resisted."
11	E. Jarvis	11	Vision 3.1	"Demography – an ageing population and low proportions of young people, particularly young families". I feel that the primary school and its needs should be mentioned in this section concerning 'Vision'. It is a vital parish facility to keep the village alive and vibrant (phrase used on page 8). We need to do all that we can to increase the numbers of young families in the village.
		12	3.3	"Provide new community facilities to address identified needs of the community". I feel strongly that present community facilities like the village school should be supported as well as providing new ones. (See my detailed comments on 12.5 on page 50)

		13	Boundary 4.4	It is unnecessary to mention the independent school and protect its needs, when no mention has been made of the village's own school.
		14	Policy SB1	Objective 4: "Developments should meet the needs of the local community." This Neighbourhood Plan completely ignores the needs of the primary school. The large housing estate known as Site 2 offered extra parking spaces, drainage of school field and a small piece of extra land as well as houses for young families. All this has been ignored and disappeared in the draft neighbourhood plan
		15	Housing 5.5	This does not reflect village views adequately. NO VOTE was allowed or taken on which of the two larger sites of houses was preferred. Assumptions were made by the Parish Council that the village was 50% in favour of one and 50% in favour of the other
		15	5.7	"The community has clearly indicated..." NO VOTE was taken on the large housing sites, only on the second proposition. A clever piece of political manoeuvring
		15	5.8	" the provision of affordable housing as part of any proposed housing development is a critical issue..." Aghreed. Affordable housing is important to increase the number of young families. Will this be possible with small housing developments.
		46	Highways 10.8 10.9	Pedestrian movement: There should be mention made of primary school children in this section. It is vital that safe routes to school are considered when new houses are being built.
		46	Highways 10.8 10.9	There is considerable concern about the safety of children walking from any new houses near to Smith street to the primary school. There is not pavement, a dangerous sharp corner and the entrance to the independent school to be crossed at a time when many cars are on the road.
		47	10.10	I find it surprising that footpaths have a whole paragraph, yet the safety of children walking in the street is ignored
		50	12.1	This is the only mention made of the village school in the whole plan – in a list of facilities
		50	12.3	"What the village lacks at present is a village hall" This is inaccurate, not to mention offensive to those who worked long and hard to update the WI hall to a village hall in Sept 2006 and also to Mrs Sheila Bradshaw who provided a very large amount of money. "The current meeting facility used by the Parish Council" – the large board outside the hall states quite clearly, VILLAGE HALL, not 'meeting facility'. Other organisation use it as well as the Parish Council. This seems to have been written by someone who does not know the village. Agreed that the kitchen needs updating and refurbishing.
		50	12.4	"There is considered to be a need for a dedicated village hall to serve the community of Spratton". Where has this idea suddenly come from? It has not been proposed at any of the village consultations that have been held.
		50	12.5	In 2005-6 much work was done by a committee of villagers chaired by Adrian Baker, to provide a new village hall on the Recreation Field – even as far as hiring an architect and approving plans. We finally found we could not access any grant money because <u>we could not establish a need</u> in the village. There were two main reasons

				given – 1) Societies and clubs wanted to keep using their own halls e.g. W.I., Scouts, Social Club, 2) The Recreation ground was too far for people to walk, older people and young mothers with prams said that they would not use it. The playgroup preferred to stay near the primary school. The present site in the centre of the village was much preferred. If clubs wanted a larger venue, they used the primary school hall, the King’s head or Spratton Hall School hall. We now also have the Church with its new kitchen and toilet facilities. This is increasingly used for functions and meetings.
				Finally, I am sorry that village children, their safety needs and their school gets no mention or support in the plan, while a new village hall suddenly becomes a necessity and gets plenty of space given to it
12	Governors Church of England Primary School	11	Vision 3.1	“Demography – an ageing population and low proportions of young people, particularly young families”. I feel that the primary school and its needs should be mentioned in this section concerning ‘Vision’. It is a vital parish facility to keep the village alive and vibrant (phrase used on page 8). We need to do all that we can to increase the numbers of young families in the village.
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		47	10.10	I find it surprising that footpaths have a whole paragraph, yet the safety of children walking in the street is ignored
		50	12.1	This is the only mention made of the village school in the whole plan – in a list of facilities
				Finally, I am sorry that village children, their safety needs and their school gets no mention or support in the plan, while a new village hall suddenly becomes a necessity and gets plenty of space given to it. This must be an oversight, surely?
13	D. Bennett	15/1 6	5.5 + HS1`	No guarantee of deliverability – could easily be no development or any number of joined-up ones. Much better to have one scheme only
		22/2 5	Section 6	No mention of Broomhill and its expansion. Why not?
		22/2 5	6.8 and 6.9	Why is Matts land singled out for mention here?
		30 to 35	S.7, LG3, 7.16	Verge 4 in Smith Street should not be protected. The land may be needed in future to generate passing place for traffic.
		51	S.12 and CF1	Provision of new Village Hall – where does this come from? Not mentioned before and it was previously turned down as not sustainable or affordable!
14	S. Gammage			I did not read the plan. I do feel that it could have be condensed. I do not support the Plan
15	A. Frisby	12	3.3	Obj. 7 should surely also refer to supporting and enhancing existing facilities.
		13	4.4	If the Settlement Boundary is to include land for the expansion for Spratton Hall School, then it is even more important for it to provide for the development and enhancement of the village Primary School, which is a far greater asset to the village and makes a far greater contribution to village life.
		15	5.4	Ref. To the community’s increasingly aging population should also refer to the primary school’s essential role in addressing this need.
		15	5.7	The community only indicated that developments should not exceed 10 units AFTER the community was denied the opportunity to vote on alternative developments. This para is misleading and inaccurate
		15	5.8	This is inaccurate – proposals to provide affordable housing have been put aside and the village have been denied a vote on their preferences
		29	7.14	The availability of allotments is an asset to the village in general and not just those who currently maintain/use them
		47	10.2	Why is there no ref. to the location of the primary school and the safety of the pupils? It is unbelievable that this aspect of village life is omitted completely from this section.
		48		A direct route to Brampton Valley Way (leading to Brixworth) must be given priority. This is where

				serious accidents occur and the provision of a footpath was recommended by the Coroner, which should carry significant weight. This is something many villagers would like and benefit from.
		50	12.1	Unless I am mistaken, this is the first mention in this document of the village's primary asset – the flourishing primary school. I cannot imagine another village which would not put this top of their list of concerns and priorities. We have no Post Office!
		50	12.3	We have a village hall – it is listed above. It is not defunct like the Post Office. The use of the term “Meeting Facility” is disingenuous. There are lots of “meeting facilities” in the village. They are all appreciated, used and have their own individual identities.
16	N. Boutle			As a governor of Spratton church of England Primary School I fully support the submission made by Enid Jarvis on behalf of the school
		46	10.7	The policy statement only makes reference to car parking, an increasing problem in parts of the village is the parking of lorries (including HGVs), large ‘sprinter’ vans and other vehicles too big to fit on off road parking spaces. The owners of these vehicles park them anywhere, often away from their own properties causing distress to other residents. The plan should make explicit reference to restrict the parking of lorries and other large vehicles on roads and verges within the village
		46	10.8	The reason why many of the pedestrian routes within the village are unsafe relates to the nature of the traffic using the roads, specifically HGVs using Brixworth Road as an east west short cut. This road is unsuitable for HGVs. Not only is it too narrow by Sauls and the church wall, there is a narrow bridge further down over the brook, a steep winding section into Brixworth and then traffic calming. The village plan should include an explicit statement restricting HGVs and large lorries using the village, except for delivery. Such a restriction is already in place down Teeton Lane
				I would be happy to support the plan subject to substantial modification particularly in regard to the primary school (as per the governors’ response)
17	Colin Hayter (owns Nursery in The Walk)	11	3.2	We support the vision for Spratton, in particular the need to adapt and change, to provide housing and sustain local enterprise. We believe that this can be done whilst respecting the historic village and its landscape setting.
		13	4.3	The Draft Neighbourhood Plan (DNP) recognises that the old Local Plan ‘existing confines’ policy was a straightjacket to change that is no longer relevant to present day issues, nor does it conform with the National Planning Policy Framework. We support the more flexible approach proposed in this section of the DNP
		13	4.4	We welcome the DNP recognition that development can be acceptable adjacent to the built up area of the village. However, we are concerned that the introduction of a ‘settlement boundary’ drawn tightly around the village may be used to apply the old straightjacket policy by the back door. Other sections of the DNP rightly recognise that development of certain spaces within the built up area would be less desirable than development immediately adjacent
		13	4.5	We believe that greater clarity and consistency with Policy SB1 and paras 4.1 and 4.3 would be given by

				amending the opening sentence to read: <i>“Away from the village settlement boundary and property or land immediately adjacent, in the open countryside...”</i>
		14	Policy SB1	We support the principle that development should be focussed within or immediately adjacent to the village settlement boundary. We suggest that the second sentence would be strengthened by substituting <i>“within or immediately adjacent to”</i> in place of <i>“separate from”</i> . [It is presumed that this refers to the first sentence of the second paragraph]
		15	5.3	The last sentence of this paragraph is at odds with Policy SB1, paras. 3.2, 4.3, 4.4 and 5.8. we believe that the last sentence should correctly read, <i>“The Settlement Boundary, as defined in Policy SB1, allows for development within and immediately adjacent to the Village Settlement Boundary”</i> .
		15	5.7	We support the DNP in its recognition that small scale development immediately adjacent to the village settlement boundary can address present day needs and help to deliver the Vision of the DNP
		16	Policy HS1	We support this Policy. We note the approach decided upon is to enable sites to come forward during the plan period rather than relying upon a ‘straw poll’ at one point in time
		22	Policy CM1	We support this policy but consider that it would be stronger in purpose if its scope included property or land immediately adjacent to the village settlement boundary, subject to the historic village and landscape setting considerations set out earlier in the DNP
		38	Policy LD1	We support this policy and its purpose
		40	Policy LD3	We support this policy subject to the deletion of the words <i>“as directed by Policy HSI”</i> . Amended in this way the policy would be robust in consideration of all development, not just housing
18	Norma & Allan Simons	1	Map	I see that there is no protected view from the Primary School to Brixworth so building here would not conflict with the VDS views
		10	2.20	The PC opposed a planning application of a perfectly suitable site off the Brixworth Road, a development with affordable housing. This document contradicts many of the decisions that the PC have recently made.
		10	2.22	Where is the deprivation and how will you address it?
		11	3.1 Demography	In recent months the PC have opposed several planning applications for the village; this does not help the situation
		13	4.3	Another contradiction as the draft states that there should be a boundary but as this, in some cases, can be ignored, it means nothing
		13	4.4	DDC seems to agree to all Spratton Hall School’s plans so I don’t see why the Parish Council should give any encouragement. We should be looking at the needs that are sadly lacking in this draft
		15	5.3	Does this mean that affordable/social housing is the only housing to be built on rural exception sites?
		15	5.7	This does not restrict the number of developments so how do you propose to provide the affordable housing said to be needed
		16	5.12 Policy HS1 and 4 th bullet	How do you propose to do this?

		23	6.8	Also there are many ugly containers on Matts land, they certainly do not enhance the landscape and conflict with the view on the Page 1 map. Perhaps Mr Matts could be encouraged to plant trees to hide the eyesore
		26	7.2	The wood on Roly Banks should be included. It is on private land as is Jubilee Wood. The trees on Roly Banks are nicely established.
		30	7.16 (4)	Part of this has recently been chopped down by residents, was this appropriate and how will you stop it happening again?
		40	8.16	Councillor Heaton obviously did not adhere to this in his recommendation for site 1 document, he did not feel that the light pollution on the high ground a problem
		41	8.18	Another reason why the wood on Roly Banks should be protected
		45	Traffic	Parishioners have stated that the traffic to Spratton Hall School is a major problem; at least Site 2 (opposed by the PC) would have taken some of the traffic away from the Primary school, at least doing something to alleviate the problem.
		45	Traffic	A policy is needed to prevent any development that will cause more traffic in that area
		47	10.10	At the beginning of the NP project a route to the Brampton Valley Way was offered by a landowner if building was permitted on his land nearby. Does this mean that traffic would gain access to the sire from Yew Tree Lane (a council maintained road) as access to The Walk (a Heritage rope walk site) from the village is highly dangerous, crossing the Holdenby Road
		47	10.10	A point missed by the Project manager who was recommending Site 1 which would take away our easy access to the countryside; a footpath used by more parishioners than any other footpath in the village
		50	12.1	Post Office. One wonders if the document was proof read at all.
				Is this questionnaire a 'seen to be doing' exercise? It should have been updated before the NP process. It is unfair to expect much of a response from parishioners
				Hairdresser and Beauty Salon have been excluded from the facilities
			Village Primary School	There is so little mention of our Primary school in the document. At the very beginning of the NP, boosting the numbers of children using the primary school was one of the priorities. This has since been forgotten.
		50	12.3	It was decided not long ago that we did not need a village hall. What's changed?
		52	13.5	How does the Parish Council receive contributions from a development?
19	R Fowkes			<p>You state 'In seeking to establish an appropriate scale of growth, the community has clearly indicated that developments should not exceed 10 units.'</p> <p>This is not true, even on the evidence of those who responded to your questionnaire. Of the 289 net ballots, only 148 'would not support...significantly more than 10 homes'. This is in no way a strong majority. On top of this the fact that nearly 705 of the villagers were not motivated to respond to your questionnaire indicated, by definition, that they had no issue about a development of whatever size; be it 10 houses or 35 houses. So, in fact the community has 'clearly indicated' that it will support a development of 35 houses.</p> <p>Interestingly, in the same section, it then goes on to say that 'It will also ensure that developments will be able to address the identified affordable housing needs of the parish'. My question is How? Because you are now trying</p>

				to exclude the very kind of development which was presented as the one and only way of ensuring affordable housing. I think, therefore, that we as villagers and indeed any potential interested developers, have been seriously misled here. As such Section 5 as it stands cannot be considered as valid in the context of the neighbourhood Planning Procedure.
20	S and M Matthews	1	Views	Protected views. This shows the only outlook not protected as being the area below the village school where planning was recently refused
		11	3.1	The wish to retain high quality landscape and the views. Create highway and Pedestrian safety. The only place not protected that meets these requirements is the site below the school. It already has a viable footpath. The road could be prioritised to make it safe. The sewers would easily be provided without great upheaval.
		13	1.3	This seems to allow building of new houses outside the boundary for up to ten houses. Why have several building sites when one will do? How do we get the much needed affordable houses if only a few houses are built on each site?
		13	4.4	Spratton Hall future needs. Spratton Hall is next to land available for building on the Brixworth Road. This area has already been spoiled by building at the school. Further building in this area would keep all new development in one place. It would not spoil any views. If it is acceptable for Spratton Hall to build in this area, why not for new housing? It would not encroach onto the open countryside. Flood light of Spratton Hall School sports ground already cause light pollution so again why not keep it all together.
		19	5.29	States new houses to be in keeping with surrounding houses. Why build stone faced small houses in High street? The surrounding houses are brick or pebbledash, the pressing need in Spratton is for small affordable housing not expensive ones.
		26		Roly Banks is a much loved green area of the village why isn't it included when Jubilee Wood also on private ground is included
		31		Photographs of verges 1 and 2 wrong way round
		37		Figure 8 again refers to the site below the primary school as not being a protected view.
		41	8.18	Points out that there are few woodland areas in Spratton; again we ask why isn't Roly Banks protected? It is an area greatly enjoyed by the youngsters in the village on their way to the recreation ground
		46 48	HP1 Objective 8	Objective 6 stresses the importance of addressing traffic, parking and pedestrian issues in the village
		47	10.1	Proposed footpath to Brampton Valley Way. This is offered on the condition that the farmer is allowed to build one house at the end of The Walk and to remove an existing footpath from the Walk into the field. Is it still one house? Would access be from The Walk, which is an unmade road with main services under it, and no footpath? Or yew Tree Lane which has a council maintained Road and a footpath? Agricultural traffic to the fields drive along The Walk to reach the fields which doesn't help the surface of The Walk. Will that stay the same or will farm traffic use Yew tree Lane in future? Whichever road is to be used the access to church Road and Holdenby Road is not good. The access from Yew tree Lane to Brixworth Road is not good. Building has been refused before on this site for these reasons.

		50		<p>It is disappointing that there has been no mention of the primary school until this section.</p> <p>On previous consultations with the village it has been shown that the school is an important part of the village. It is a thriving school, well supported by the villagers both young and old. New housing must include affordable housing to encourage new families to the village. This will keep a heart to village life. Care must be taken so that new housing will have safe footpaths to the school.</p>
				<p>The mention of the Post Office, which has been closed for many years makes us wonder if the person compiling this plan knows anything about the village and its needs.</p>
				<p>We know a lot of people who have had difficulty in accessing this plan and many, including ourselves, who have found it confusing.</p>
				<p>The fact that this plan has been proof read and the mistake the post office and the photographs of the verges being with the wrong captions not having been picked up makes us questions the rest of the document. How much more of the document isn't correct and how much interested (Sic) in the project did the people concerned have?</p> <p>The Plan seems very misleading and contradictory we cannot agree it.</p>
21	<p>D Cooke G Rodgers P Greenwood G Gaywood M Gaywood S Newham S Alfred J Gaywood R Abbott S Hussey A Wykes N Kenway A Taylor Jodi Gaywood M Lawrence R Bucknole D Mould T Mould G Jones A Cattell Illegible</p>			<p>Please take this as notice that I am not satisfied with the Pre submission Draft of Spratton's neighbourhood Plan 2014-2029 (October 2014) as currently shown on Spratton Parish council's website.</p> <p>I consider that there are many problems with the latest document under consultation. As a examples, one major and critical omission from the draft is that a plan of this type should definitely include or even prioritise our village's primary school. This should be one of the most important considerations in the text.</p> <p>However, the only mention of the Primary School in the current document is found under section 12.1 Community facilities which is a simple list of the existing amenities in the village at April 2014. Other than that , there is total lack of information, future plans or support for our village school within the latest draft.</p> <p>On that basis, I expect the Parish Council to suspend the present plan until such time that further consultation with the parishioners has taken place. This would more accurately assess the points that the residents of Spratton would prefer to see within their plan, than the process to date has.</p> <p>I avidly support the growing feeling that before drafting another replacement plan, the Parish Council should send out their own list of suggested headers for possible inclusion in the new plan for parishioners to vote on. This should include a section for parishioners to put forward their own headers for possible inclusion.</p> <p>Only then can the Parish Council be in a position to judge what issues are important to the village. Subsequently, each of the voted in headers should be individually consulted on with the village. This will reveal the public's true and democratic opinion for inclusion in the final draft. This is the only way that a robust neighbourhood Plan, reflecting the wishes of the majority of the parishioners, can be produced by the Parish Council for the future of our community.</p>

22	A. Leeson	14	SB1	Endorses objectives 1, 2, 3. 1) Protection of Agriculture – we live in a small island and we are not self sufficient now. 2) Landscape – buildings obscure views 8 Minimum impact of environment
		17	HS1	Endorses objectives 1, 4, 8 1 Protect agricultural land, once built on then it will be lost forever 4. Needs of local community – only 8. Minimum impact on village
		20	HS2	Infill where appropriate ei No house or any building on Rolly Banks this is intrusive and outside the agreed area No houses or any buildings on Roly Banks and outside the agreed area
		30	LG2	Provision of adequate allotments
		38	LD1	Robust protection of landscape and views: future generations will not thank you if these are destroyed
		40	LD3	As above. No plans to be bulldozed through
		41	LD4	Spratton Hall school already have their flood lights on well after school time
		48	HP2	New footpaths into farmland restrict the types of animals that can graze, putting extra cost on farmers. A new footpath in the wide verge between Spratton and Brixworth would be very beneficial.
				I would like to complain about the way that the consultation document was produced. It was far too long, and with the restricted access, either via a computer or at the Library, not everybody is computer literate, or the time to get to grips with what is being decided, and if the wrong decisions are made, could be disastrous
23	S.May			No info in Plan re Primary school future
24	C. Bull			Primary school not mentioned at all. Having worked at the school there needs to be a safe access
25	N. Kenway			How can we have a plan which doesn't include the future of the school
26	M. Morris			No proposal for Primary school or the traffic alleviation which is the village's future
27	V. Stewart			No thought for village children or the school. We need to keep the Rec and Roly Banks to cemetery
28	A Stewart			No thought for village children or the school. We need to keep the Rec and Roly Banks to cemetery. Keep the village safe from traffic
29	K Bunt			Has not taken into account the community wishes
30	C Morris			(Sic) (The Proposed development on Brixworth Rd) the village as at its capacity for schools and road traffic
31	W Denny			My first concern is that not being able to view and divulge the information put forward by the draft plan as I do not have time during my working day to get to the church to read the document. I do not drive so the library in Brixworth is not an option
32	A Taylor			I fail to see how views expressed within consultation have been fairly incorporated in the Neighbourhood Plan. Most of the sections within plan have never been voted on or put to consultation
33	Jodi Gaywood			I feel that further consultation is required, the village has not agreed this plan.
34	M Lawrence			I don't believe the plan in any way reflects the feelings of myself and many other villagers

35	M Gaywood			I feel further consultation with the village is required as the majority of sections within the document have never been consulted with the parishioners.
				We do not have a post office in Spratton. This shows inaccuracy and lack of care within the current draft
36	S Newham			I feel proper consultation with the village has not been done therefore I reject the whole Plan
37	M McPhee			Narrow minded view of the future of my village! And the future of the place in which we live. The youth of Spratton should be catered for not just the rich outsiders.
38	G Gaywood			Firstly I would like to point out that there are two different draft plans available for viewing on your website, draft plan and presubmission draft plan. The consultation response form leads parishioners towards towards the draft plan as it does not mention 'presubmission' at all. Therefore I suspect that it is highly likely that parishioners have been consulting on the wrong document. Especially as I still do not know for sure which one is correct. After taking advice on this matter, I can confidently state that due to this discrepancy, if proper practice is followed this consultation has to be declared void.
				At the chance that proper practice is not followed, I would like to give my account. It is my opinion that the Parish Council are not currently in a position to produce a draft plan let alone be consulting on it. This opinion is endorsed when considering that the drafts contents do not reflect the views of parishioners established across this process. Instead, it reflects the results of one leading questionnaire.
				Through consultation we have ascertained that 86.52% of the 141 parishioners that answered the question deemed the Primary School very important to our community. Since this consultation there's been no mandate to remove or not consider the Primary School within the Neighbourhood Plan. Further to that, on the Neighbourhood Plan seminar posted on the Parish Council website you state how it is rewarding to think about the school. It is my opinion that this draft has intentionally avoided highlighting the Primary School due to its direct connection with our site and the inevitability that to highlight the school, and how best to secure its longevity and performance, would in turn highlight the merits of our site.
				In my opinion, it would be particularly harmful to document the importance us parishioners put on delivering a safe route to school for our children as this would effect a future and perhaps immanent application for houses on Mr. Kelly's land.
				It is also my opinion that the smaller "unidentified sites" are not so unidentified. [Next sentence redacted on legal advice]
				This plan is fundamentally flawed in one of its primary goals from the outset, declared by Cllr Frenchman, to protect the village. It has left us open to the prospect of numerous planning applications over a period of time for ten houses market houses, creating a large site that does not provide the community benefits we have consulted upon. As a Parish Council it is your role to ensure parishioners are making informed responses to consultations. Why are you not informing them of the potential repercussions of this plan?
				As you will be aware, the emerging Core Strategy requires rural sites of 5+ dwellings to provide affordable housing. However, on 28 th November 2014 the government released new guidance which states that " <i>affordable</i>

				<p><i>housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development” on sites of 10 units or less, which have a combined gross floorspace of no more than 1000sqm. See link: http://planningguidance.planningportal.gov.uk/revisions/23b/012/</i></p> <p>This guidance makes the Core Strategy affordable housing policy out of date, and in applying the new guidance the Parish Council will not be able to secure affordable housing through smaller scale housing of less than 10 dwellings as proposed within the draft plan. This means that, based on the definition of Sustainable Development set out within the National Planning Policy Framework (specifically the definition of the ‘social role’ at paragraph 7), the Plan would fail to “contribute to the achievement of sustainable development” (Schedule 4B, Paragraph 8(2)(d) of the Town and Country Planning Act 1990).</p> <p>In light of this information, and the importance placed on transparency along with making decisions based on the best available information, it would only be appropriate to hold further consultation. Consultation to seek the opinions of parishioners based on this new information. Do they still want smaller, organic growth in light that it is highly unlikely to bring about the affordable housing aspect we have identified a need for?</p>
39	English Heritage	11	3.1	<p>Heritage</p> <p>We welcome the inclusion of this Objective. However, the wording should be modified to broaden the scope of the objective and help deliver benefits for Spratton Parish.</p> <p>‘Protect and enhance the landscape and heritage of Spratton’</p>
		16	HS1	<p>The requirement to respect and enhance the historic environment should be strengthened by referring to protect and enhance the historic environment. We support the requirement to maintain Spratton village’s strong and established sense of place.</p>
		38	LD1	<p>We note the Map shown in Figure 8.1 showing protected views into and out of Spratton Village. Many of the views, both into and out of the village, are views towards designated and non-designated heritage assets. English Heritage guidance is available on both the setting of heritage assets and views.</p> <p>‘The setting of heritage assets’</p> <p>This document sets out guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes</p> <p>https://www.english-heritage.org.uk/professional/advice/advice-by-topic/setting-and-views/</p> <p>‘Seeing the history in the view’</p> <p>This document presents a method for understanding and assessing heritage significance within views. The method can be applied to any view that is significant in terms of its heritage values as in the case of the views identified in Figure 8.1.</p> <p>https://www.english-heritage.org.uk/professional/advice/advice-by-topic/setting-and-views/seeing-the-history-in-the-view/</p>
		43	HD1	<p>Paragraph 9.1 should be broadened to encompass the wider heritage of Spratton Parish and reworded as follows.</p> <p>‘Spratton has a rich historic environment, with a number of designated and non-designated heritage assets within</p>

				the parish boundaries. The village has a clear architectural heritage within the centre and its Heritage Trail includes a number of listed buildings.’
		43	9.3	Paragraph 9.3 should be reworded as follows: ‘...new development observes and includes in its design the use of materials that are in keeping with the character of the village.’ This will more closely align the supporting text with Policy HD1 which requires new extensions to be built using matching style and materials used in the main building; in the more modern buildings in the village, this will not always be local materials.
			Appendix 1	Heritage There are nine designated heritage assets in the village; all listed buildings, including the Grade I listed Church of St Andrew. It would be helpful if this section listed these designated heritage assets, mapped them and provided photographs. The reference to the numerous other buildings of historic and local interest and quality is welcomed. Paragraph 15 would benefit from an introductory sentence explaining that Spratton has a rich historic environment, with both designated and non-designated heritage assets
40	G Rodgers	15	5.7	We were in favour of smaller developments of up to 10 dwellings; however, an upper limit must be set for the number of dwellings must be established before we can approve any draft plan. And the development on the old leather factory should be included in the proposals
		26	Green spaces	The Roly Banks is an important recreational area for the community and a main route to the cemetery. I think that the Roly Banks should be included in the other listed protected spaces. (Area A, B and C)
		37		The map shown in Figure 8.1 differs from that issued by Daventry District Council on 15 May 2013. Both maps indicate the important walls in the village. However, in the version submitted with the draft Plan three walls have been removed from this category <ul style="list-style-type: none"> 1. The lower end of Smith Street abutting the listed building Home Farm. 2. A section of wall to the right hand side of the entrance to Spratton Hall School (as you enter the School from Manor Road/Smith Street). 3. And finally a large stretch of wall on church Road. I would be interested in a response to why these stretches of important wall have been changed in the Draft Plan
		50	12.1	Post Office
41	P. Letten			[This section redacted on legal advice]
42	E Pryor	7	2.10 2.11	Useful to know how many primary and pre-school children age group 30-44 has fallen – more mix of housing could be reason. My two sons, aged 33 and 36, have left Spratton, one for more affordable housing and the other because of the need for social housing. They are both in different villages, they would have preferred Spratton, they were born here.
		11	3.1 3.3	No mention of primary school
		15	5.5	Spratton Hall School given opportunities to develop. No mention of opportunities for Primary School which had

			5.7	been addressed in recent site 2 proposal. Site 2 would have given these parking spaces to primary school
				Latest infill on Manor Road looks good but is well above average wage affordability
		19	5.27 10.5	No mention of school safety issues. No mention of on-going Spratton Hall School traffic
		26	7.3	Pocket Park. Many residents ignore this. If previous site agreed it would be more inclusive within the village boundary
		50	12.3 12.4	'the current meeting facility' is the village hall – need to look back at recent changes from previous W.I. hall and generous donation to enable this
		50	12.4	Additional leisure facilities and parking would be very welcome
				I appreciate the Plan would have been expensive to distribute to each household but also know that many residents have not looked at it because it is available mainly online. This has not been a problem for me but it has been for other residents without computers or those who prefer a paper copy
43	G Bennett			Thought that the plan was thorough – slightly inaccurate e.g. implying that parking on the verge is common in School Road and it isn't. If you look carefully there is only one car on the grass but yes parking is very important. Just hope any housing it called affordable is not like the 'affordable' housing in Creaton which several years ago started at £250,000. I really don't know – conflicting advice – need an overall view not a biased one.
44	Val Coleby for S Holt	14	SB1	We agree with Policy SB1 that development should be within the settlement boundary or adjoining it.
		16	HS1	We agree that individual developments should include up to 10 dwellings either within or adjoining the village. We suggest that the second bullet point should be amended to read: <i>"It shall provide a mix of unit sizes taking in to account the site circumstances and context"</i> This amendment will provide a mix of unit sizes on site but allows a scheme to be designed in relation to site circumstances and surrounding properties. Housing needs change overtime and may be very different when the site is assessed and when it is eventually built. It may then be responding to a set of housing needs that no longer exist. As regards affordable housing requirements and the thresholds applied the policy should make reference to National Guidance issued through the National Planning Practice Guidance.
		20	HS2	With regard to the first bullet point of this Policy which refers to the uniformity of the street scene, in our view there are areas within the village that do not have a uniformity and are characterised by the individuality of properties that make up the street view. I suggest the words ' <i>reinforce the uniformity of the street by</i> ' should be deleted.
		48	HP2	We support the Parish Council's objectives to improve the footpath links to the countryside.
45	County Highways	35	LG3	Many of the green spaces included in this policy refer to verges that may be highway land, therefore they cannot be protect green areas as they may be needed to provide space for services, visibility splays or access. Hence policy LG3 in its present format should be removed from the plan.
		46	HP1	The general emphasis of this policy aligns with Northamptonshire Highways concerns about developments

				providing sufficient parking, however the policy is too specific with regards to making all the car parking spaces off- road. Northamptonshire Highways would rather that the policy was widened to these spaces being provided as a mix of off- road and on highway parking, so giving more flexibility to the parking provision within the local community.
		48	HP2	Northamptonshire Highways is supportive of a policy that promotes further opportunities for walking. However, the policy as written is misleading and limited due to its specific nature. The policy title could be change to “improved provision for walking”, and the policy then be directed at creating further walking links/ connecting missing links.
				<p><u>General Comments</u> Other Neighbourhood Plans that I have been involved with in the county, are aligned with Core Strategies as Local Plans such as Daventry’s are too dated for this process. If this document was further aligned with the West Northamptonshire Core Spatial Strategy (WNCSS) it would be a progress plan instead of the rather prescriptive document that has been produced. Aligning with the WNCSS would require the village to identify directions for growth and that process would be informative for the local community and potential developers.</p> <p>Parking is a problem in most settlement, and it may be that that village needs to give wider consideration to the issues, by perhaps considering space for a village car park or looking at how specific parking problems might be dealt with. The results of these investigations could then be used to inform the Neighbourhood Plan.</p> <p>The plan seems to be missing any reference to cycling or public transport both subjects that are usually given positive consideration in Neighbourhood Plans.</p>
46	Daventry DC	3	1.6	This section requires updating to reflect the change in status of the West Northamptonshire Joint Core Strategy
		3	1.7	This section will need to be updated when the Joint Core Strategy is adopted. This should take place before the Neighbourhood plan is submitted to Daventry District Council
		14	SB1	<p>The policy as currently written incorrectly describes Open Countryside and is currently in conflict with policy HS24 as it describes adjacent land as not being Open Countryside, which it is. In addition it also leaves too much scope for interpretation of what is ‘separate’. Furthermore there are concerns about the term ‘appropriate for the countryside’ and this needs to be qualified with reference to sustainable development.</p> <p>As presently written the concerns related to this policy have implications for the implementation of other policies, for example CM2.</p> <p>The policy should therefore be changed, suggested wording along the lines of; “Development outside the village boundary is classified as being in Open Countryside and development will only be acceptable where it is adjacent to the village boundary or it is a use which is sustainable development which is appropriate in the countryside”</p> <p>This policy should refer to the proposals map set out on page 1.</p>
		16	HS1	<p>The 3rd bullet point needs amending to refer to the Core Strategy policy H2.</p> <p>The 4th bullet point includes reference to a local lettings policy which is not required. Therefore this part of the</p>

				sentence should be deleted and the policy should commence with “the affordable..”
		20	HS2	Final bullet point. The term on these streets should be deleted.
		22	CM1	The policy is currently inconsistent as it refers to development within the settlement boundary however the settlement boundary allows for some development adjacent to it.
		25	CM2	It would be helpful, in the supporting text, to define what ‘minor’ means. Concerned that this policy isn’t deliverable at present as a minor extension to an existing employment area that is outside the curtilage will be classified as Open Countryside. Suggested change to the wording of the final bullet point to “It must not be detrimental to the character of the wider open countryside or views across it”
		26 27	Local Green Spaces	Whilst the descriptions of the 4 proposed areas are helpful further detail is required for each area against the bullet points of paragraph 77 to demonstrate how the space meets each of the criteria. It will also be important to consider paragraph 78 of the NPPF that local policy for managing developments within a Local Green Space should be consistent with policy for Green Belts and the implications of this for the Local Green Spaces within Spratton.
		39	8.14	The supporting text makes reference to the allocation of sites. No sites are allocated in the plan and therefore this wording needs to be altered.
		40	LD3	As currently written this policy is not in accordance with policy EN1 of the Local Plan, Special Landscape Area and therefore is not at present in general conformity with this strategic policy. This particularly applies to the first 2 bullet points which do not allow for an assessment of the impact on the character of the Special Landscape Area. Therefore criteria needs to be included to allow for this.
		43	HD1	There are internal inconsistencies with this policy, for example new development should not be repetitive (bullet point 3) but should harmonise with neighbouring properties (bullet point 1). This should be rectified. In addition the policy is considered to be inconsistent with policy HS1, in particular through seeking for buildings not to be repetitive (bullet point 3) however policy HS1 refers to respecting the built environment (bullet point 5) and maintaining Spratton’s strong and established sense of place (bullet point 6). Again the wording of the policy needs to be changed to reflect a consistent approach.
47	Mulberry Developments	3	1.6 + 1.7	Updating of the text is required to reflect the latest position in respect of the emerging West Northamptonshire Joint Core Strategy.
		11	3.1	The Vision and Objectives chapter of the Pre-submission Draft Plan confirms that “ <i>the Neighbourhood Plan seeks to address, as far as is possible, the challenges that face the community of Spratton Parish</i> ” and identifies demography (specifically the “ <i>low proportions of young people, particularly young families</i> ”), housing (needing to “ <i>ensure that new housing addresses the needs of the community...</i> ”), highway/pedestrian safety and traffic congestion (including... “ <i>the limited road space created by the historic layout</i> ”) and community facilities (...“ <i>the need to provide facilities that are wanted by residents, in order to retain Spratton as a vibrant community</i> ”) as matters to be addressed by the Plan. It will be set out later in these representations why the Pre-Submission Draft Plan is not considered to achieve this vision and objectives.

		11	Vision for Spratton	<p>The vision should specifically identify the desire to provide both new affordable and open market housing, as opposed to making reference to housing in general terms.</p> <p>A major driver for the designation of the Neighbourhood Plan Area was the opportunity to deliver affordable housing. This should be a fundamental element of the vision and should be set out within the objectives of the Neighbourhood Plan at paragraph 3.3.</p>
		13	4.3	<p>Mulberry support a <i>“more flexible approach to development adjacent to the built-up area of the village in order that it can properly accommodate the levels of growth likely to come forward through the updated planning policy framework provided by Daventry District Council”</i></p>
		13	4.4	<p>Specific reference is made to the private education premises, ‘Spratton Hall School’. This includes the identification of land around the existing buildings <i>“to address its future needs, provided these are to serve pupil numbers in line with those as at the end of the 2013/2014 academic year”</i>. While Mulberry have no interest in the land associated with the Hall School, it seems perverse that a Plan that covers the period through until 2029 is seeking to constrain development at Spratton Hall School to its needs at 2013/2014, as opposed to allowing flexibility to meet needs for the entirety of the Plan period.</p> <p>Furthermore, no reference is made to Spratton Primary School at this point. This is despite the Primary School being a community facility that is at the centre of the village, at the heart of village life, and is located on a relatively compact site in need of the opportunity for growth and/or reorganisation. In the context of the scope for development allowed for at Spratton Hall School, it is considered appropriate to allow for expansion of Spratton Primary School also.</p>
		15	5.1	<p>The paragraph notes that the Parish had 1,150 people within 498 dwellings at the time of the 2011 census, and experienced a 6% growth (28 dwellings) in the number of dwellings between the 2001 census and the 2011 census.</p> <p>This percentage growth represents relatively modest growth for the village over a ten year period.</p>
		15	5.2	<p>The word ‘settlement’ should be plural.</p>
		15	5.2 + 5.3	<p>Cross reference is made to the housing requirements set out within the emerging Joint Core Strategy.</p> <p>Given the advanced stage of the Core Strategy, and the comparable Plan Period (the Joint Core Strategy covers the period to 2029), it is considered appropriate that the housing numbers to be accommodated in the rural areas are presented here, along with clarification about what this equates to in terms of percentage increase in the total number of dwellings in the rural areas. This will help the community to understand the broad scale of development that the rural areas are expected to accommodate, and the level of development that could be expected to be delivered at Spratton.</p> <p>In this respect, Policy S3 confirms that Daventry Rural Areas will be required to deliver about 2,360 dwellings during the Plan Period 2011 – 2029.</p>
		15	5.3	<p>The final sentence at Paragraph 5.3 states that <i>“The Village Settlement Boundary, as defined in Policy SB1, allows for new development within the settlement area and for affordable housing on rural exception sites immediately adjacent to it”</i>. In fact Policy SB1 does not restrict new development to sites within the ‘settlement</p>

				area', nor does it indicate that the only residential development outside the Settlement Boundary shall be limited to affordable housing on rural exception sites immediately adjacent to the boundary (that is in fact the position set out within the Daventry Local Plan Saved Policy HS22 which the Neighbourhood Plan acknowledges at Paragraph 4.3 is not sufficiently flexible). Draft Policy SB1 merely states that " <i>development shall be focused within or adjacent to the village settlement boundary of Spratton</i> " (Pegasus emphasis). Paragraph 5.3 therefore needs a correction to accurately reflect Policy SB1.
		15	5.4	It is stated that " <i>the Neighbourhood Plan seeks to plan positively for growth. Delivering a wide choice of high quality homes is essential to support sustainable, mixed and inclusive communities. In Spratton this will help to ensure the ongoing viability of local services and prosperity of the Parish, particularly in light of the community's increasingly ageing population</i> ". This text should also make express reference to the appropriateness of delivering affordable housing as part of any large scale residential growth at the village.
		15	5.5	Reference is made to the need for growth to be incremental. If it is determined that incremental growth is important to control the rate of housing delivery, this could be achieved through a number of approaches (i.e. phased delivery of one larger site, or several separate sites coming forward).
		15	5.6	The concern regarding the affordability of dwellings at Spratton is shared by Mulberry. In terms of data evidencing demand for affordable housing within Spratton, and more generally across the District, the Draft Neighbourhood Plan identifies that the latest housing needs survey for the area that has been released was in 2012. However, there are other indicators of housing need that are also appropriate to include within the Neighbourhood Plan to evidence the need for affordable housing. Daventry District Council's Housing Options team has confirmed that, as of November 2014, there were 886 live applications for affordable housing provision. Of these current applicants on the register there are 35 applicants who are living in Spratton and the adjoining villages (including Creaton, Hollowell, Church Brampton, Chapel Brampton, Holdenby and Brixworth). Furthermore, 56 people on the register had expressly identified Spratton as a preferred location.
		15	5.7+5.8	The Plan proposes to allow " <i>small scale developments immediately adjacent to the settlement boundary</i> " and states that " <i>the community has clearly indicated that developments should not exceed ten units</i> ". It goes on to claim that this will enable growth " <i>at a scale that is in keeping with the current size of the village and the range of services it provides to its community</i> " and that such schemes " <i>will also ensure that developments will be able to address the identified affordable housing needs of the parish</i> ". The position adopted does not take into account the most recent expression of Government guidance regarding affordable housing. On 28th November the Government amended the National Planning Practice Guidance (NPPG) to include new paragraphs (ID 23b-012-20141128). This new national threshold gives an exemption from affordable housing and tariff-style contributions on developments of 10 units or fewer which have a combined gross floorspace of no more than 1000 square metres. The new guidance applies to all areas except "designated rural areas" as described under section 157(1) of the Housing Act 1985, and these include National

				<p>Parks and Areas of Outstanding National Beauty, as well as any additional rural areas designated by order of the Secretary of State. As things stand Spratton would not fall to be considered under the “designated rural areas” criteria and so a scheme of 10 dwellings would not attract any affordable housing contribution. As a consequence, the Neighbourhood Plan’s approach to housing will fail to deliver affordable housing in conjunction with open market residential developments.</p> <p>The second main reason given for the Parish Council’s application to designate a neighbourhood area was the lack of affordable housing stock, and indeed Paragraph 5.8 of the Pre-Submission Draft Plan confirms that <i>“the provision of affordable housing as part of any proposed housing development is a critical issue and therefore developments that deliver affordable housing – either through a market-led scheme or through a rural exception site – will be viewed favourably”</i> (Pegasus emphasis). In this context, the premise on which the community voted to opt for ‘smaller’ sites (i.e. that ‘smaller’ schemes can still deliver the critically important affordable housing provision) is no longer applicable.</p> <p>The Neighbourhood Plan would therefore fail to deliver any affordable housing for the next 15 years (unless it were to come forward through exception sites) and, in the context that one of the two main reasons for seeking designation as a neighbourhood area was affordable housing delivery, this would be in clear conflict with the National Planning Policy Framework and the emphasis on meeting housing needs, supporting strategic needs, and planning positively (paragraph 16 of the NNPF).</p>
		16	5.12	<p>Support is given for the recognition that there is a need for housing (open market as well as affordable) to be delivered that caters for a range of property sizes and types, as evidenced by the West Northamptonshire Strategic Housing Market Assessment.</p>
		16	HS1	<p>Draft Policy HS1 supports the grant of permission for residential development <i>“within or immediately adjacent to the village settlement boundary”</i> subject to a number of criteria. This includes the limit of the scale of development to schemes of <i>“up to 10 dwellings”</i>. There is no evidential basis for restricting development to such a threshold and there are concerns that such schemes will be incapable of creating significant new infrastructure for the village.</p> <p>The draft Policy, for the reasons outlined above in respect of paragraphs 5.6, 5.7 & 5.8, will fail to deliver a genuine contribution to affordable housing provision at Spratton unless it is through rural exception sites. This is despite there being an identified “critical” need for affordable dwellings set out within the Neighbourhood Plan.</p> <p>As a consequence, having regard to the definition of Sustainable Development set out within the National Planning Policy Framework, specifically the definition of the ‘social role’ at paragraph 7, the Plan would fail to <i>“contribute to the achievement of sustainable development”</i> (Schedule 4B, Paragraph 8(2)(d) of the Town and Country Planning Act 1990).</p> <p>Furthermore, there is no evidence base to confirm that there are sufficient ‘smaller sites’ available and deliverable at Spratton to deliver the necessary housing provision. As the Draft Policy is very specific regarding locations that will be considered appropriate for residential development, yet does not seek to identify any sites, it is appropriate to assess the relevant land holdings that are available and the implications of their release.</p>

		<p>Paragraph 184 of the NPPF makes clear that a Neighbourhood Plan “<i>should not promote less development than set out in the Local Plan or undermine its strategic policies</i>”. This is a Parish which had 1,150 people within 498 dwellings at the time of the 2011 census, and proposes a housing policy that provides no certainty about the level or direction of growth. On the assumption that four sites of up to 10 units come forward over the Plan period to 2029, this would deliver a maximum of 40 new houses for the next 15 years, representing an increase of only 8% of the housing stock.</p> <p>The Parish Council submitted their application to designate a neighbourhood area in July 2012 on the basis of two main reasons: the first of which is the decline in local services. The level of residential development proposed over the 15 year Plan Period appears incapable of resolving this problem. By example, Spratton Primary School has a capacity of 120 pupils, but the numbers on the role are approximately only half of that figure. In light of the ageing population identified at Chapter 2 of the Pre-Submission Draft Plan, the delivery of additional family in the village would clearly assist in sustaining the school.</p> <p>In light of the lack of affordable housing that will be delivered by Draft Policy HS1, and the lack of any certainty regarding the availability and deliverability of the land that the policy directs residential development towards, there is a need to reconsider the approach to housing delivery at Spratton.</p> <p>Mulberry maintain that there are significant benefits arising from delivery of a larger residential scheme than that allowed by the 10 dwelling or less approach currently presented. In addition to affordable housing provision, the economies of scale potentially make further community benefits a viable proposition. Mulberry therefore proposes that Draft Policy HS1 is amended to allow for larger scale development (at a level to be consulted upon with the community), so that confidence can be had in the benefits that will be delivered.</p> <p>In this context, the Parish has spent the last few years exploring the ability to deliver housing on one larger site, with an appropriate on-site affordable housing contribution, together with other community benefits. This had been narrowed down to two candidate sites. Neither of these sites has been discounted to date; the Parish Council merely sought to consider an alternative proposal in light of decisions made on other emerging Neighbourhood Plans.</p> <p>Mulberry were responsible for the promotion of one of these sites, known as land off Brixworth Road (commonly referred to in the previous Neighbourhood Plan consultations as Site 2). Outline proposals have been prepared for this site which included ‘up to 37 dwellings, together with school amenity space, drop off/pick up area and 6 parking spaces for the primary school, access, public open space and associated infrastructure’. This scheme evidenced the community benefits that can be secured through a larger development, with the delivery of open market housing, affordable housing, additional play ground space for Spratton Primary School, 6 parking spaces and a drop-off/pick-up zone for the for the Primary School.</p> <p>These proposals are supported by technical evidence which confirmed that the site was deliverable. This information is submitted as an addendum to these representations for ease of reference, and comprises the following:</p> <p>Site Location Plan</p>
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		39	8.12-8.15	<p>Policy LD3 (on page 40) makes clear that residential development in accordance with Policy HS1 is an appropriate exception to the policy of restraint that the Pre-Deposit Draft Neighbourhood Plan seeks to apply to sites that are outside the Settlement Boundary but within the Special Landscape Area. The associated supporting text does not make this point. This is a critical matter and should be clarified within the supporting text at paragraphs 8.12 – 8.15.</p>
		48	HP2	<p>Support is given to the thrust of the policy which states that <i>“proposals to provide new or improved pavement access within Spratton village will be strongly supported”</i>.</p>
				<p><u>Other matters - Strategic Environmental Assessment (SEA)</u> In the context of the Pre-Deposit Draft Neighbourhood Plan a copy of the documents relating to the SEA process were requested. Although we have not had sufficient time to review the documents in detail, it was considered to make brief comments. First, it is apparent that the SEA process has been limited to a screening exercise. A concern regarding the screening exercise is that it has been undertaken at the end of the process, rather than being undertaken at the start. Secondly, there are a number of legal challenges to emerging Neighbourhood Plans which have relevance to various SEA points. We reserve the right to reference these matters as the legal position gains greater certainty.</p>
				<p><u>Other matters – Sustainability Appraisal (SA)</u> While there is no legal requirement for a Neighbourhood Plan to be accompanied by an SA, there is a need to demonstrate how the Plan will contribute to achieving sustainable development and an SA is an obvious way of achieving this. In the case of the draft Spratton Neighbourhood Plan, it is understood that an SA has not been completed and no evidence has been presented which provides confidence that the contribution to achieving sustainable development has been demonstrated. There are a number of legal challenges to emerging Neighbourhood Plans which have relevance to various SA points. We reserve the right to reference these matters as the legal position gains greater certainty.</p>
48	Baillie			<p>There is a greater prominence of Spratton Hall School than Spratton Primary School. This has been done without justification therefore could be considered biased in favour of the Hall School and against the Primary School. I do not support the Neighbourhood Plan as it is.</p>

		1	Map	The Recreation Ground "open space" shading has not been correctly done. As I understand it. The allotment adjacent to the Club area is privately owned land.
		1	Map	The village envelope line along Smith Street seems to have changed since the 2003 drawing. Where is the justification for this?
		10	2.22	I could see nothing in the Neighbourhood Plan which addresses pockets of deprivation
		12	3.1	Limited transport will mean that local facilities will need to be safeguarded against closure, particularly the Primary School. This should be addressed through the Neighbourhood Plan.
		13	Objective 4	Spratton is already, to a large extent a dormitory village, with many households accessing private schools, shopping elsewhere and using leisure facilities outside the district. There is also a huge range within the "built form" throughout the village. For these residents it is quite likely they would not have an accurate appreciation of the importance of local facilities for residents who rely on these. The Primary School is essential for the future vibrancy of the village and with 88% in support of the Primary School (from October 2012 consultation) I would have thought this essential community facility would have more than a passing mention in the Neighbourhood Plan. Ensuring the future sustainability of the Primary School is crucial if the village is to be a thriving community in 2029
		14	4.4	Spratton Hall School should not be allowed any more open land for development than the Primary School. As it stands the Neighbourhood Plan advantages Spratton Hall School and at the same disadvantages Spratton Primary School. Surely the Primary School should be afforded the same "flexibility"-
		15	5.4	The future viability of the Primary School will be risked if it is not featured prominently in the Neighbourhood Plan.
		15	SB1	Objective Four is not met if the primary school is unable to develop in the way it needs to between now and 2029.
		19	Photographs	The photographs used do not reflect the issue identified in 5.13. The photographs of the verge show multiple cars for one household. More than the average 2 cars per household. Using these photos as examples indicate a requirement that each new property would need around five off road parking spaces
		26	7.6	Ownership of Rec needs to be explicitly stated.
		26	7.6	Ownership of the Allotments needs to be explicitly stated.
				Duplicate Photos Photos should not be duplicated. If necessary to use a photo in two parts of the report refer to the location of where the photo can be found.
		47	10.10	Any plans for pedestrian routes should also be considered as bridleways to assist in the reduction of horses needing to use the public highway, particularly busy roads. This will improve the safety of all roads in Spratton if there are more options for riding routes.
		50	12.1	Also hairdresser and beauty salon.
		50	12.3	The village DOES have a village hall. It doesn't have a village hall which is able to be used as a multi-function facility, eg: indoor sports, smaller meeting rooms, etc.

49	J Gaywood			I can't support the whole of the draft because of the process that has been used to consult on it. There is no closing time for the submission. The form asks you to submit on the Spratton Neighbourhood Draft Plan, however there are two draft plans on your website (draft and pre-submission draft). I understand that page and section numbers are required but the two drafts differ in numbering which would lead you to believe that the content is different, in any case the numbering will be wrong. You cannot comment on things not included in the Plan as, if they are not included, then they don't have a page number, you have already informed me by e-mail that if they are not numbers they won't be included
				In the draft, p.37 or 38 dependant on what link you go from, under Figure 8.21 map the important walls leading up Smith street from Home Farm and to the right of the Hall School entrance have had the red line removed. That indicates protection for that wall in the VDS document that Figure 8.1 was lifted from. [Remainder of comments redacted on legal advice]
				I request that you publish the numbers of forms submitted and the number of yes and No. This consultation should be considered null and void and a re-consultation happen
50	A Holland	6	2.8	There are 2 adjoined cob properties (est. 1800's) situated on the junction of Smith Street and High Street (27 and 28 Smith Street) which add to the historic picture of the village. These are currently missing from the map.
		18	5.22	Whilst mentioning vehicle parking on new developments, attention should be drawn to existing vehicle access when considering new sites. For example the current traffic conditions on Smith Street would need to be heavily considered for new development plans on the North side of the village .Smith Street already will have additional traffic from the new development on Manor Road/High Street in addition to the School traffic. Effectively the road is one lane wide due to residents parking up from the High Street, making the existing speed/visibility situation dangerous, especially with 2 crossing points for children.
		36	8.4	"General lack of trees" - fails to mention the trees on the public footpath between Smith Street and the Cemetry
		37	8.10	View B - also extends from further down the footpath (not just from the top field as currently annotated)
		40	8.16	Due to topography of the village, should a statement about minimising light pollution from developments on higher ground be considered; and lower ground development would be beneficial to satisfy this point
		50	12.1	No post office in the village, although listed in the community facilities. No mention of hairdressers or beauty salon.
		50	12.4	Village hall already in existance on School Road, yet mentioned that a need for a dedicated village hall is required?
		xvii		No mention of the listed 'Home Farm' building and adjoining wall (bottom of Smith Street)? This view from Smith Street down to the farm can also be considered an important 'village' view, especially alongside the rolling banks and open views to the North from the footpath which should be considered alongside the other examples.

				Why is this not included in the plan?
				I have many other comments which I feel need to 'protect' the village which may not fall into a specific section, for example, focus on the future of the school (the school I only found mentioned once in the whole document); the focus on reducing traffic within the existing village roads to increase safety to residents and our children is lacking. Let's make sure this opportunity is not missed and the parishioners are able to have a say in this process as 'their' plan. I look forward to seeing the output of all the comments received in response to the plan to date.

79 blank but signed forms indicating No support for Plan