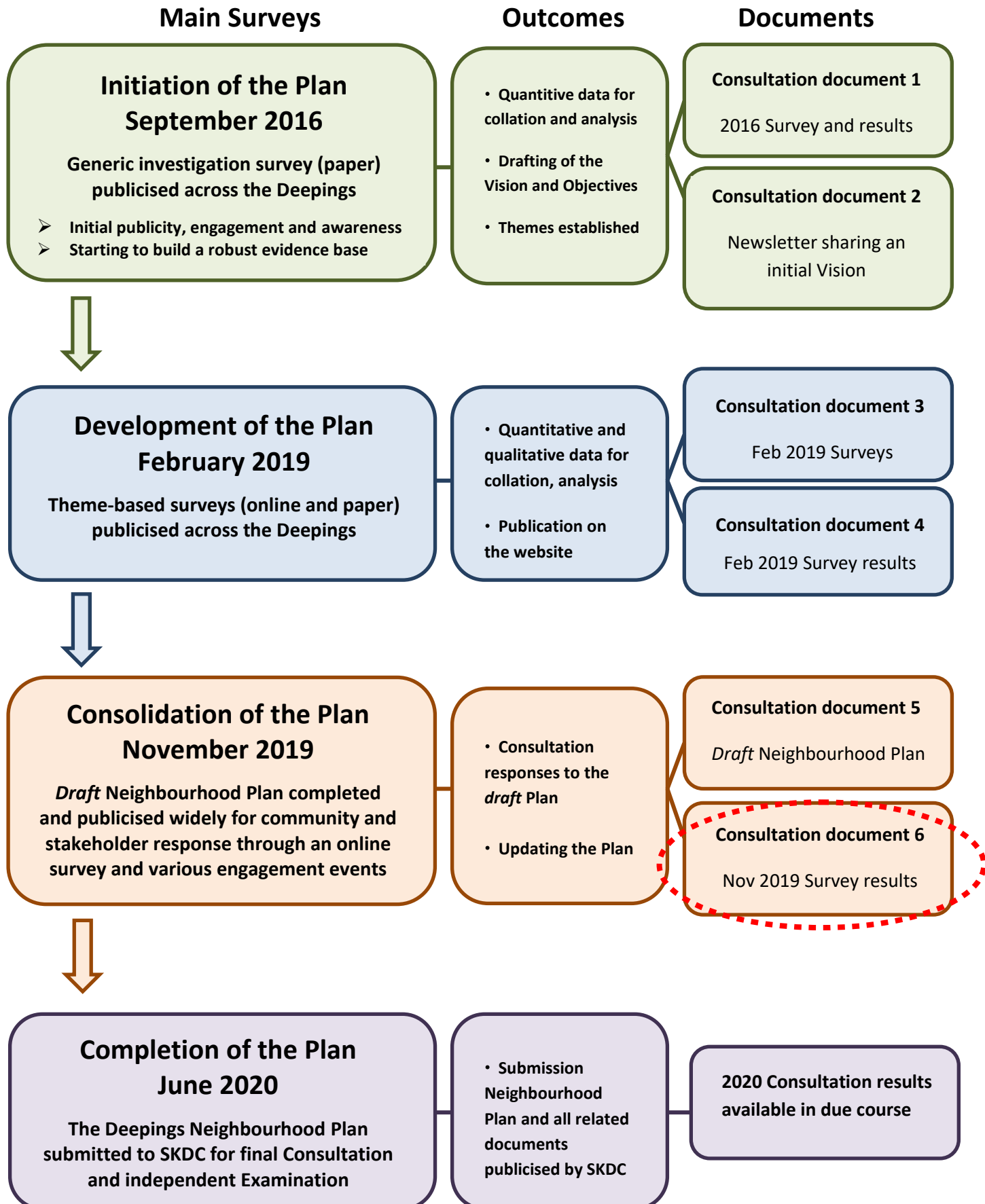


Consultation Document 6

Draft Neighbourhood Plan Consultation Response, 2019

The main table here, but not appendices, also appears in the Submission Document: 'Consultation Statement'.

The Deepings Neighbourhood Plan (Submission Draft) Consultation Framework



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The following is derived from Table 2: Responses to the Regulation 14 Public Consultation period. Note appendices to this document.

- Appendix 1 – Lincolnshire County Council Response
- Appendix 2 – The Deepings Group response to Lincolnshire County Councils Response
- Appendix 3 – South Kesteven District Council Response
- Appendix 4 - The Deepings Group response to South Kesteven District Councils Response

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
ST032 Resident	Sustainable Transport	Finally your idea for a Green Walk through the Deepings is a good one, especially if it provides safe, traffic free passage for cyclists. The lack of such provision in the Deepings needs addressing.		No additional action required by the group
ST031 Resident	Sustainable Transport	Plan should include the reopening of Littleworth Station to give an alternative mode of sustainable clean, green transport in line with lowering emissions and reducing carbon footprint on behalf of the Parish Council	Email Comment	Reopening DSJ station may not meet sustainability criteria; passengers would have to drive there and park. It could adversely affect the existing Delaine Deeping-Peterborough bus service.
ST030 Resident	Sustainable Transport	The reopening of Deeping St James railway station to provide easier access to the rail network for commuters and leisure travelers.	Email Comment	Reopening DSJ station may not meet sustainability criteria; passengers would have to drive there and park. It could adversely affect the existing Delaine Deeping-Peterborough bus service.
ST029 Resident	Sustainable Transport	I support DNP 15	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
ST028 Resident	Sustainable Transport	Very necessary, especially for DSJ and any new developments in order to reduce private car use	Email Comment	No additional action required by the group
ST027 Resident	Sustainable Transport	The current infrastructure will not cope with the planned expansion of the Deepings and less and less people will be able to walk and cycle realistically there fore roads will become congested. The suggestion that proposed development for Mill Field will have no adverse affect on Millfield Road is farcical, it is at best a single track leading at the Stamford Road end onto 2 blind bends, the proposal for some 260 homes will potentially give rise to a minimum of 260 more cars assuming only one car per household which is probably more likely to be 2 per household. Public transport does not serve this area and so people will get into cars to go about their daily business.	Email Comment	No additional action required by the group
ST026 Resident	Sustainable Transport	The bus service is excellent and we reduce our car usage considerably, cycle racks would be useful in town centre.	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
ST025 Resident	Sustainable Transport	Cycle routes and potholes ought to be prioritised for safety sake as well as environmental good and health. I consider the Village Green application off Mill Field Road should have been approved for the benefit of Market Deeping Residents. The proposed housing on this site is not ideal because of the likely traffic problems . Another aspect is the traffic noise problems for future residents from the bypass. Mill Field Road Village Green would be an ideal additional green space for the community and if more trees were added to this site it would cut the bypass noise for existing residents in the Tattershall Road area.	Email Comment	No additional action required by the group
ST024 Resident	Sustainable Transport	I am concerned that if the proposed houses are built off Mill Field Road this will considerably increase the traffic on the Towngate crossroads as well as increasing the traffic turning onto the Stamford Road, not a particularly safe junction.	Email Comment	No additional action required by the group
ST023 Resident	Sustainable Transport	Fully support these policies.	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
ST022 Resident	Sustainable Transport	We support DNP15 for the environmental and health benefits.	Email Comment	No additional action required by the group
ST021 Resident	Sustainable Transport	we need sustainable transport for older residents and young adults to access leisure and shopping facilities and to stop people using cars so much.	Email Comment	No additional action required by the group
ST020 Resident	Sustainable Transport	Agree	Email Comment	No additional action required by the group
ST019 Resident	Sustainable Transport	Public transport that meets the needs of the town is very important in reducing emissions from cars and motorbikes	Email Comment	No additional action required by the group
ST018 Resident	Sustainable Transport	More safe cycle lanes required that don't suddenly end.	Email Comment	No additional action required by the group
ST017 Resident	Sustainable Transport	Not much chance of that when we are constantly losing bus services and can't even go to Stamford at the weekend on the bus because no-one will do anything about the nightmare that is Tallington crossing	Email Comment	Delaines say that Saturday buses are not viable except on the core Bourne - Peterborough route. CallConnect minibus may be able to cater for some journeys on Saturdays. No additional action required by the group
ST016 Resident	Sustainable Transport	There appears to be no connection made between the overuse of parking spaces, i.e. at the Community Centre and roadside parking and the lack of public transport. These spaces	Email Comment	This is not a matter for the Neighbourhood Plan. No additional action required by the group.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		are being used by people leaving cars all day, presumably having driven from outlying areas with no direct public transport, in order to catch the bus. Parking for participants attending events at the Community Centre and the Craft Shop needs consideration. The carpark is sometimes full and attendees at regular events at the Library are unable to park. The parking on Douglas Road presents a hazard to people driving to the car park.		
ST015 Resident	Sustainable Transport	The Deepings is at the mercy of both Lincolnshire and Cambridgeshire County Councils, especially regarding bus subsidies. Whilst Delaine provide a good commercial bus service this could be lost if it is not used sufficiently. Over the decades I have lived in the area I has seen the last bus get earlier and earlier, as people resort to using their cars. We have already lost the weekend services to Stamford and Spalding. Both the local Councils need to encourage the use of	Email Comment	<p>A "Deepings Bus Guide" leaflet is being produced for distribution by the Town and Parish councils, to help promote awareness and use of the buses.</p> <p>Later evening buses in DSJ will be raised at the next "Buses" forum.</p> <p>Town and Parish councils are actively progressing provision of more bus shelters.</p> <p>Bus Clearways are being implemented at bus stops regularly obstructed by parked vehicles, e.g. Horsegate (Benedict Court).</p>

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		Public Transport, so that it can be developed and improved. This can include more bus shelters, and bus clearways, as well as promoting public transport. Consideration should be given to re-opening the Railway Station in Deeping St James, as there is clearly a need for this as follows: Increasing population Less car miles, and less emissions leads to a greener environment Stamford, Peterborough and Spalding stations are in locations where future development is limited Easier access to London for commuters		Reopening DSJ station may not meet sustainability criteria; passengers would have to drive there and park. It could adversely affect the existing Delaine Deeping-Peterborough bus service.
ST014 Resident	Sustainable Transport	Public transport to the Deepings remains problematic, particularly to some areas of Deeping St James, which have no service at all. As the centre point between four surrounding towns, one would expect that service routes would be far more accessible and numerous,	Email Comment	Deepings already has good bus services to the 4 surrounding towns during daytime, Mons-Fris. At other times, demand is low and services cannot be operated profitably. Call Connect demand-responsive minibus can provide service at these times. Hopper Bus route (as proposed by Tim) would serve DSJ Eastgate area.
ST013 Resident	Sustainable Transport	Agreeable	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
ST012 Resident	Sustainable Transport	There needs to be significant increase in public transport at affordable cost.	Email Comment	No additional action required by the group
ST011 Resident	Sustainable Transport	Nice idea	Email Comment	No additional action required by the group
ST010 Resident	Sustainable Transport	Agreeable	Email Comment	No additional action required by the group
ST009 Resident	Sustainable Transport	There should be a bus service down Tattershall Drive	Email Comment	Hopper Bus route (as proposed by Tim) would serve Tattershall Drive
ST008 Resident	Sustainable Transport	Local bus routes are vital and need maintaining	Email Comment	No additional action required by the group
ST007 Resident	Sustainable Transport	I like the idea of counting Garages as storage areas not parking spaces	Email Comment	No additional action required by the group
ST006 Resident	Sustainable Transport	I support DNP 15	Email Comment	No additional action required by the group
ST005 Resident	Sustainable Transport	Improve bus routes for Deeping St James and the new housing Linchfield Road	Email Feedback	Too "general" for a specific response, but is picked up in other comments
ST004 Resident	Sustainable Transport	However it is dressed up the Deepings are dormitory villages for outside employment areas. Anyone who requires to go outside the Deepings for work, or other purposes, mostly travels south, west or north. The Gateways Map 13 identifies 3 outlets/inlets which are on the western side of the town. For some reason the outlet/inlet over	Email Feedback	A new Link Road onto the bypass is to be included in the Plan, Group have amended the policy wording to address this opportunity.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		the river in DSJ has been omitted despite it's extensive use. All of these have to be approached through the developed area via relatively narrow congested roads. The town needs an additional gateway on to the bypass to help overcome this, and to provide an outlet/inlet for those living in DSJ. The obvious route is to improve Linchfield Road and extend it northwards up to the bypass. Using the planning process, new developers building in that area could be required to contribute this.		
ST003 Resident	Sustainable Transport	Don't see how this will happen	Email Feedback	No additional action required by the group
ST002 Resident	Sustainable Transport	A small hop-on and hop-off bus just going round the Deepings would be a boon for many.	Email Feedback	Hopper Bus to be included in Improvement (Aspirational) Projects.
ST001 Resident	Sustainable Transport	Need expressed for additional evening buses in DSJ, all existing evening routes currently only run through MD	Face to Face event DSJ	No additional action required by the group. On Agenda for next "Buses" mtg
PSLE026 Resident	A Prosperous and Sustainable Local Economy	In the local amenities, only two churches have been considered. There is the Open Door Church, Baptist Church, Roman Catholic	Email Comment	No additional action required – These facilities have been added to the list of amenities.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		Church and Methodist church. The latter providing a regular space for blood donations. Additionally the amenities at the Exeter close and Jan Wake clubhouses and facilities at the Deepings caravan park have been omitted. Sporting amenities including the cricket club, bowling green, tennis club, rugby club, hockey club and football club have been omitted. The allotments in Deeping St James have been omitted from the amenities.		
PSLE025 Resident	A Prosperous and Sustainable Local Economy	The Market Deeping Town Council boundary should continue up Halfleet to the Towngate East / West crossroads to protect the ancient frontages of houses. The local amenities - Deeping St James Scout Hut, The Cross School, The Institute are not local amenities in common ownership rather in the ownership of a charity.	Email Comment	A revision to better define the town centre has been included within the economy section. These amenities have been removed from the list of amenities.
PSLE024 Resident	A Prosperous and Sustainable Local Economy	A lot of information here. A good review. Some tables could be clearer.	Email Comment	Further clarification on the tables and charts have now been included within the plan.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
PSLE023 Resident	A Prosperous and Sustainable Local Economy	Obvious	Email Comment	No additional action required by the group
PSLE022 Resident	A Prosperous and Sustainable Local Economy	complicated need to read many times	Email Comment	No additional action required by the group
PSLE021 Resident	A Prosperous and Sustainable Local Economy	Generally I'm happy with the proposed policies.	Email Comment	No additional action required by the group
PSLE020 Resident	A Prosperous and Sustainable Local Economy	we need to support our local economy as much as we can by keeping the local shops & businesses,	Email Comment	No additional action required by the group
PSLE019 Resident	A Prosperous and Sustainable Local Economy	It is difficult to encourage people to support the local economy as many people work away from the town so any initiative is welcomed	Email Comment	No additional action required by the group
PSLE018 Resident	A Prosperous and Sustainable Local Economy	We need to be mindful of the heritage of the town and not gratuitously build sites of potential employment that conflict with the important historical aspects	Email Comment	No additional action required by the group
PSLE017 Resident	A Prosperous and Sustainable Local Economy	The only way you are going to provide more space for business is to just build on absolutely every single bit of land in the Deepings! We have no green space of any size except Mill	Email Comment	No additional action required by the group.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		Field and it has come down to residents to fight tooth and nail to try and keep it.		
PSLE016 Resident	A Prosperous and Sustainable Local Economy	The need to encourage the establishment of shops selling everyday foods within Market Deeping centre should be a priority.	Email Comment	Agree and feel that was well covered within my original chapter but has not been included as a policy - hopefully we can do something with an Improvement/Aspirational project. Survey data supports this. Would like to make sure all the survey data is included in a reference section.
PSLE015 Resident	A Prosperous and Sustainable Local Economy	The Deepings needs a Railway Station as the benefits outweigh the costs. 1. House prices will increase. 2. The better communications will make the Deepings become more attractive to employers. This will lead to more and better paid jobs. 3. Cleaner environment as less car journeys. 4. It will attract more visitors to the area, boosting the local economy, and benefiting everyone. 5. Better communications to London, the Cities of the Midlands and airports will lead to a better standard of living for residents 6. It will help local farmers with better transport to market for	Email Comment	I agree with the sentiment, but it is outside of the scope of the plan.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		<p>their produce. 7. It will be s big boost to the Station Road area of DSJ. 8. The catchment area for the Railway Station is large, covering the Deepings and surrounding villages, out to Bourne and beyond. 9. It will help the Deepings maintain their separate and unique character. It does not need a full size platform at the outset, which will reduce building costs. This could be achieved by becoming a "Community Railway Station". A partnership between Lincolnshire County Council, SKDC, Deeping St James Parish Council and Market Deeping Town Council, and the public A business case could be prepared between the four Councils, with costings. Followed by obtaining agreement with the rail companies and the government. Then funding can be sourced. The station does not need to be manned, again reducing building costs. As a "Community Railway Station" it will be looked after by a Friends group, who would look</p>		

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		after landscaping gardening etc. There is ample land on Station Road for a car park as well which could produce enough revenue to cover running costs		
PSLE014 Resident	A Prosperous and Sustainable Local Economy	As the Deepings continue to grow it is important that the local offer continues to grow to meet the needs of the people living and working here. A bigger and better retail mix is needed	Email Comment	Agree and survey data supports this. Survey data is included in a reference section.
PSLE013 Resident	A Prosperous and Sustainable Local Economy	In full agreement	Email Comment	No additional action required by the group
PSLE012 Resident	A Prosperous and Sustainable Local Economy	Again, whilst space has been allocated for businesses and employment it is unlikely to be sufficient to sustain the occupants of the additional houses that are planned.	Email Comment	The SKDC Local Plan and the Neighbourhood Plan both support appropriate economic development within the Deepings. Not just on identified sites, but also within the community such as the town centre.
PSLE011 Resident	A Prosperous and Sustainable Local Economy	It should be taken as and where each development on merit	Email Comment	No additional action required by the group
PSLE010 Resident	A Prosperous and Sustainable Local Economy	Agreeable	Email Comment	No additional action required by the group
PSLE009 Resident	A Prosperous and Sustainable Local Economy	These sound very reasonable to me	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
PSLE008 Resident	A Prosperous and Sustainable Local Economy	This heading is very confusing, as the relevant section starts on page 40 and is entitled 10 A Prosperous and Sustainable Local Economy with the para numbering starting at 10.1 and the policy's set out on page 60 onwards numbered as DNP4,5,6 and 7	Email Comment	Heading above the policies "A prosperous and Sustainable Local Economy" has been included within the plan.
PSLE007 Resident	A Prosperous and Sustainable Local Economy	Development of Northfields industrial estate to bring in further employment is important	Email Comment	No additional action required by the group
PSLE006 Resident	A Prosperous and Sustainable Local Economy	In 10.14 I presume the majority of people employed outside the area are employed in Peterborough and maybe London. Thought it strange that other Lincolnshire towns are mentioned but Peterborough isn't 10.6 Saturday Market.	Email Comment	Changed wording to last sentence as follows: A significant number of Deepings residents are employed outside of the area with large numbers commuting to Peterborough and then a proportion of those, then onward via train to London. Additionally, the nearby towns of Spalding, Stamford and Bourne provide some smaller levels of employment for local residents. From our survey, with 198 responding to the specific question: 55 were employed locally in the Deepings whilst 143 were employed outside of the Deepings.
PSLE005 Resident	A Prosperous and Sustainable Local Economy	A lot of information, A good review some tables could be clearer	Email Comment	Agreed. Further clarity has been added to the tables and charts within the Plan.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
PSLE004 Resident	A Prosperous and Sustainable Local Economy	Section 10, Map 4 and 5 proposed extension to MD Town Centre boundary - the square to the right of the map is that part of the extension proposed?	Paper copy feedback	The proposed Town Centre boundary map has now been revised to remove other designations from the plan.
PSLE003 Resident	A Prosperous and Sustainable Local Economy	Again, statements are idealistic. Chart after 10.15 does not state source or date. The numbers in the coloured bar above the pie chart do not = 6973 residents.	Email Feedback	The statement quotes the census but the graph used is from our public survey. Propose to change wording to: According to the 2011 Census, there were 6973 residents, in The Deepings, aged 16 to 74 in employment. Our public survey undertaken in 2019 had 406 respondents of which 197 were working.
PSLE002 Resident	A Prosperous and Sustainable Local Economy	Map 4 and 5, Town Centre Boundary is difficult to compare as map scales are different	Face to Face event DSJ	Group discussed and agreed that this should be added into the plan.
PSLE001 Resident	A Prosperous and Sustainable Local Economy	Table 5 (pg48) needs to include reference to Open Door Church and Methodist Church, also content of table needs to be ordered as appears random	Face to Face event DSJ	Group discussed and agreed that this should be added into the plan.
POGS7 Resident	Protected Green Spaces and Open Spaces	Access to green spaces is such a key feature of the need to enhance modern living. Mental health issues are on the increase by such a huge amount and the calm tranquillity of meaningful open spaces is recognised as such an important help in dealing with them. The Green Walk is	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		<p>another way to help and is simply an essential feature of living in the Deepings environment. It will be used by so many people of all ages, providing simple local access to exercise. SKLP OS1 Policy protects among others 'natural green spaces'. The town and parish councils must be robust in challenging any housing development projects from LCC and SKDC which don't comply. Once again local knowledge is vital in stopping centrally based, uniformed plans. The Neighbourhood Plan will give them the tools to prevent such planning applications. The recognition of the need to protect existing tree lines and hedgerows is a welcome aspect of the plan, especially where those are the habitat of our wildlife such as bats and owls and rare species of birds, and other animals for that matter. All too often these are sacrificed to allow building of all kinds, when it isn't necessary.</p>		

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
POGS076 Lincolnshire County Council	Protected Green Spaces and Open Spaces	Lack of justification for proposal of Green Lane status for Millfield	Email	Following the public consultation feedback and the support from the community to include this area as a Local Green Space, the Neighbourhood Plan group have provided more, detailed, justification for why Millfield green spaces meets the necessary requirements as identified within the NPPF. This can be found in a supporting document on the Deepings first website. See Appendix 2 of Consultation Statement.
POGS075 Lincolnshire County Council	Protected Green Spaces and Open Spaces	Proposed LGS Mill Field fails to meet the criteria with regard to being an extensive tract of land	Email	Following the public consultation feedback and the support from the community to include this area as a Local Green Space, the Neighbourhood Plan group have provided more, detailed, justification for why Millfield green spaces meets the necessary requirements as identified within the NPPF. This can be found in a supporting document on the Deepings first website. See Appendix 2 of Consultation Statement.
POGS074 Resident	Protected Green Spaces and Open Spaces	It is encouraging to see your wish to preserve the green spaces in the Deepings, especially as so many appear to be under threat from development. We have already		No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		seen officials from SKDC trying and failing to justify the development for housing off the area between Millfield Lane and the A15. I hope that you continue to vigorously oppose such ill considered schemes.		
POGS073 Resident	Protected Green Spaces and Open Spaces	Agree green spaces very important	Email Comment	No additional action required by the group
POGS072 Resident	Protected Green Spaces and Open Spaces	The appropriate sites have been identified	Email Comment	No additional action required by the group
POGS071 Resident	Protected Green Spaces and Open Spaces	Keen to see protected green spaces	Email Comment	No additional action required by the group
POGS070 Resident	Protected Green Spaces and Open Spaces	This section I believe is vital for residents of Deeping we must absolutely protect our truly open green space, LCC and SKDC are flying in the face of the guidance document they produced making firm recommendations with regard to the provision of open green space for the general health and well being of the community. Mill Field is an excellent example of this, it is also a haven for wildlife including bats, owls, hedgehogs	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		and deer many endangered species. The tree area is lined with expansive areas of established trees, in a time when we are being encouraged to plant more trees to attempt to mitigate the carbon dioxide we are pumping into the air why on earth would we even be considering destroying this area.		
POGS069 Resident	Protected Green Spaces and Open Spaces	As mentioned in 8.6 about not impinging into local countryside & in 8.10 & 8.13 refers to the rural & highly attractive, historic landscape, please leave Mill fields as they are, with their natural beauty & the fact that they good for our Wellbeing-body, mind & soul. Once gone they cannot be replaced & their value is incalculable for local residents.	Email Comment	No additional action required by the group
POGS068 Resident	Protected Green Spaces and Open Spaces	Protected green and open spaces should be maintained, in particular Millfield which provides an essential open space for the benefit of the community of the Deepings	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
POGS067 Resident	Protected Green Spaces and Open Spaces	The Mill fields are a beautiful natural green space where we walk regularly without having to use a car	Email Comment	No additional action required by the group
POGS066 Resident	Protected Green Spaces and Open Spaces	The designation & retention of all green spaces is the principal reason why the Deepings is such a good place to live and defines the Deepings as the place to raise a family in a really good and safe environment.	Email Comment	No additional action required by the group
POGS065 Resident	Protected Green Spaces and Open Spaces	It is really important that the natural landscape around Deeping is maintained rather than creating new green spaces that need to become established. Millfield is one area with an abundance of nature - both established trees and wildlife and I feel it is imperative that this area is preserved.	Email Comment	No additional action required by the group
POGS064 Resident	Protected Green Spaces and Open Spaces	Green spaces in the Deepings are what make the Deepings. It is a country Town and should be kept as such, keeping it's green spaces as is. There are many reasons for doing so. .. health; mental, emotional and physical. It has been proven. Living in overly built up areas in stressful.	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		By building on our green areas means more cars therefore more pollution. Mill Fields in Deeping should be kept free of any building as most of the people in Deeping use it. It's a healthy space, a haven for wild life, a beautiful space, a breathing space, a space that we want to keep and cherish and embrace for all its qualities. It is the only space of its kind in Deeping therefore a place important in The Deepings' heritage		
POGS063 Resident	Protected Green Spaces and Open Spaces	Green spaces in the Deepings are what make the Deepings. It is a country Town and should be kept as such, keeping it's green spaces as is. There are many reasons for doing so. .. health; mental, emotional and physical. It has been proven. Living in overly built up areas in stressful. By building on our green areas means more cars therefore more pollution. Mill Fields in Deeping should be kept free of any building as most of the people in Deeping use it. It's a healthy space, a haven for wild life, a	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		beautiful space, a breathing space, a space that we want to keep and cherish and embrace for all its qualities. It is the only space of its kind in Deeping therefore a place important in The Deepings' heritage		
POGS062 Resident	Protected Green Spaces and Open Spaces	I consider the village green application off Mill Field Road should have been approved for the benefit of Market Deeping Residents. The proposed housing on this site is not ideal because of the likely traffic problems. Another aspect is the traffic noise problems for future residents from the bypass. Mill Field Road village Green would be an ideal additional green space for the community and if more trees were added to this site it would cut the bypass noise for existing residents in Tattershall Road area	Email Comment	No additional action required by the group
POGS061 Resident	Protected Green Spaces and Open Spaces	When you see the green spaces in context it is clear just how restricted access to open space is - the only really 'wild' space is Mill Field, it is the only space where I can let my dogs run	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		loose without fear of them going into the road. It is such a treasured place that deserves to be preserved for the generations to come.		
POGS060 Resident	Protected Green Spaces and Open Spaces	We need to have open spaces like mill field as its for the environment, the community	Email Comment	No additional action required by the group
POGS059 Resident	Protected Green Spaces and Open Spaces	Mill Field should be protected for the people of Deeping so that it can continue to be used as Recreation space, as it has been for many decades. It should not be built in.	Email Comment	No additional action required by the group
POGS058 Resident	Protected Green Spaces and Open Spaces	A number of people have put a huge effort into trying to save Mill Field for the use as a green space , this must happen as most of the designated green spaces are in essence very small in size . Millfield must be protected	Email Comment	No additional action required by the group
POGS057 Resident	Protected Green Spaces and Open Spaces	I do not want the Mill Field green space to be developed with housing since it will bring unwanted extra traffic and noise pollution to a quiet part of the village.	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
POGS056 Resident	Protected Green Spaces and Open Spaces	We need to protect Mill Field and keep this an open green space for everyone to use!	Email Comment	No additional action required by the group
POGS055 Resident	Protected Green Spaces and Open Spaces	I think our views are well known, there will not be many green spaces soon.	Email Comment	No additional action required by the group
POGS054 Resident	Protected Green Spaces and Open Spaces	LGS18 Mill Field Must not be developed as it provides a unique space within the community for recreational purposes such as walking, dog walking and a peaceful area within easy reach of the main residential area of Market Deeping. It is "jewel in the Crown".	Email Comment	No additional action required by the group
POGS053 Resident	Protected Green Spaces and Open Spaces	I believe that it is extremely important that we get the right balance between building the additional homes that our society needs and protecting the green open spaces that have been enjoyed and valued by locals for many years. To this end I urge those that will ultimately decide on the development plans for the Mill Field site to think very carefully; these green open spaces are much valued by many in the community and	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		would be sorely missed. Is it absolutely essential that these spaces be lost for housing? Have all other suitable alternatives been fully considered? Once this important part of our local heritage is lost it cannot be reclaimed.		
POGS052 Resident	Protected Green Spaces and Open Spaces	this is elementary , Millfield must be saved as the only remaining Green space left in Deeping especially moving towards anti pollution safe our planet, the area could be developed into a small forest allowing walk areas, this could be achieved with local farmers and garden centres also involving local primary schools with planting, all on a voluntary basis, 'simple'	Email Comment	No additional action required by the group
POGS051 Resident	Protected Green Spaces and Open Spaces	Green spaces are precious and should be preserved and protected	Email Comment	No additional action required by the group
POGS050 Resident	Protected Green Spaces and Open Spaces	Mill Field is a special green space within the area and deserves to be protected for future generations.	Email Comment	No additional action required by the group
POGS049 Resident	Protected Green Spaces and Open Spaces	I am pleased to see that Mill Field and the lane have been recognised as special green	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		spaces within the plan. They are used by many people and need to be saved for the future		
POGS048 Resident	Protected Green Spaces and Open Spaces	Very important that all existing green and open spaces including Millfield are maintained for the benefit of the population, especially with the further proposed housing developments on Towngate and Linchfield Road	Email Comment	No additional action required by the group
POGS047 Resident	Protected Green Spaces and Open Spaces	Please keep The Deeping Showground Site open for Dog walking and sport. I have used this field since I was a boy and I believe that it would be better as an official open space. Many residents have little time or money to travel miles to other places it brings so much pleasure to walk there quickly from home with the dog its a massive asset to the me and the whole area around here. The trees are beautiful and off set fumes and noise from the bypass.	Email Comment	No additional action required by the group
POGS046 Resident	Protected Green Spaces and Open Spaces	Mill Field is a lovely green space. The area makes for a lovely walk on a Sunday afternoon.	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
POGS045 Resident	Protected Green Spaces and Open Spaces	See comments for Green Clean Safe Environment	Email Comment	No additional action required by the group
POGS044 Resident	Protected Green Spaces and Open Spaces	Millfield is a wonderful area and is used every day it's in a lovely country lane full of beautiful birds and wildlife. It is a very needed space as there is nothing like it anywhere else in Deeping.	Email Comment	No additional action required by the group
POGS043 Resident	Protected Green Spaces and Open Spaces	Millfield, market Deeping is a very important green area. It supports diverse wildlife and is a valuable recreational area. It is important for this to be retained as such. Similarly, Millfield Road is an attractive lane surrounded by ancient hedgerows and mature trees. This lane should be kept as a Green Lane.	Email Comment	No additional action required by the group
POGS042 Resident	Protected Green Spaces and Open Spaces	All communities need a balance of green spaces along with new development. To this end I support the local wish to keep the Mill Field as a green open space. We use the space for dog walking and enjoyed the Deepings show when it was held there. It is a place for wildlife as well as humans as is a valuable	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		area of green space, which should be kept.		
POGS041 Resident	Protected Green Spaces and Open Spaces	we need protected open spaces and green spaces for peoples health and well being and for the younger generation to get out and play and explore and see the wild life & the wild life needs protecting for the future of our planet.	Email Comment	No additional action required by the group
POGS040 Resident	Protected Green Spaces and Open Spaces	We must keep our green spaces to ensure a healthy lifestyle and well being, areas such as Mill field are well used and must be kept	Email Comment	No additional action required by the group
POGS039 Resident	Protected Green Spaces and Open Spaces	Whilst I agree that new homes must be built, its also important to keep a pleasant environment for everyone to enjoy. The green spaces included in the plan are vital to achieve this, including Mill field which appears to be under threat.	Email Comment	No additional action required by the group
POGS038 Resident	Protected Green Spaces and Open Spaces	Agree	Email Comment	No additional action required by the group
POGS037 Resident	Protected Green Spaces and Open Spaces	It's important that we maintain our local open spaces to allow residents to "escape" for a moment and take exercise, walk	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		their dogs etc. Larger spaces such as the fields off Mill field could become natural areas for wildlife and nature walks for kids with the right tree planting etc.		
POGS036 Resident	Protected Green Spaces and Open Spaces	The Mill Field is a very Important green space and it should be awarded Village Green status; it has been used by the people of the town for many, many years and it should NOT be built upon	Email Comment	No additional action required by the group
POGS035 Resident	Protected Green Spaces and Open Spaces	It is so very important for towns to have green spaces so many towns are being swallowed up by housing estates with little places to go for a walk in the fields this is why Mill field is so important you can get away from buildings and traffic and feel like your in the country go for a nice walk or jog please let Mill field stay as a green space for all in Deeping to enjoy	Email Comment	No additional action required by the group
POGS034 Resident	Protected Green Spaces and Open Spaces	I use Millfield road and the green space next to it to walk with my children and spend time relaxing there. It would a huge loss if it was altered. Also, there is lots of wildlife that lives in the trees. I can often hear owls at night.	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
POGS033 Resident	Protected Green Spaces and Open Spaces	Fantastic - I'm glad you included Mill Field - We walk round Mill Field two or three times a day and meet and make lots of new friends there.	Email Comment	No additional action required by the group
POGS032 Resident	Protected Green Spaces and Open Spaces	So pleased Mill Field is included! The Inspector at the recent Public Inquiry concerning Mill Field acknowledged that it was and has been used for recreational activities by a significant number of local residents for decades and that it was extremely valuable in environmental and social terms for the well- being of local people.	Email Comment	No additional action required by the group
POGS031 Resident	Protected Green Spaces and Open Spaces	Fantastic list of Local Green Spaces...all important most especially MILL FIELD because it's used by SO many local residents and it's our own mini country park.	Email Comment	No additional action required by the group
POGS030 Resident	Protected Green Spaces and Open Spaces	Would like to keep mill field public open space	Email Comment	No additional action required by the group
POGS029 Resident	Protected Green Spaces and Open Spaces	Mill Field MUST be protected from development NOW and FOREVER. It is, frankly, disgusting that the owner of the	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		land (Lincs CC) were allowed to decide on the public enquiry. They must be forced to designate it a protected area and village green.		
POGS028 Resident	Protected Green Spaces and Open Spaces	All the green spaces are important, and need to be protected. The Mill Field is under threat from LCC who want to build houses on it. If the people of the Deepings loses this space others will come under threat. It is therefore important that Mill Field is saved for future generations to enjoy	Email Comment	No additional action required by the group
POGS027 Resident	Protected Green Spaces and Open Spaces	When houses are built close together, as many are on the new developments, it is imperative that people can find space somewhere within their community, This currently is really not the case, as apart from the green walks, there is only limited space provided by parks and gardens. What the Deepings really needs is a very large park, with walk ways, trees and possibly a lake, somewhere where people can find peace,	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		quiet and a pleasant area to walk.		
POGS026 Resident	Protected Green Spaces and Open Spaces	The historic Mill Field natural open space should be preserved at all cost if you are serious about the green issues; The Millfield Road - the last remaining Lane in Market Deeping, if not preserved would be contrary to the policy of delivering a distinctive local character stated in this plan! Rhetoric is not enough!	Email Comment	No additional action required by the group
POGS025 Resident	Protected Green Spaces and Open Spaces	Would you please keep Mill Field as a public open space. It's a place where people meet and talk. When I'm feeling lonely, I know that there will usually be some other dog walker to chat to.	Email Comment	No additional action required by the group
POGS024 Resident	Protected Green Spaces and Open Spaces	I would hope that Mill Field is retained as a Local Green Space. It would be tragic for this space to be lost to development. It is currently well used and is of historic interest as the site of the Deeping Show in years gone by.	Email Comment	No additional action required by the group
POGS023 Resident	Protected Green Spaces and Open Spaces	Please keep Mill Field as a protected green space. It's used and enjoyed by many people,	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		both young and old. It would be a great loss if it could not be designated as a protected area and it was used to provide an area of housing or further the spread of construction in the Deeping area.		
POGS022 Resident	Protected Green Spaces and Open Spaces	Green and open spaces are essential to preserve the character of the town and there designation in the NP should be sacrosanct and protected from change in future plans and development.	Email Comment	No additional action required by the group
POGS021 Resident	Protected Green Spaces and Open Spaces	Mill Field should be protected and kept as a green open space	Email Comment	No additional action required by the group
POGS020 Resident	Protected Green Spaces and Open Spaces	Mill Field should remain as it is - a free and open space to everyone	Email Comment	No additional action required by the group
POGS019 Resident	Protected Green Spaces and Open Spaces	All current green spaces that are used for recreation should be given protected status	Email Comment	No additional action required by the group
POGS018 Resident	Protected Green Spaces and Open Spaces	It was nice to see that Mill Fields are proposed to become Protected Green space. There is so little green space nearby (which is also proven by the popularity of the fields). And indeed Millfield Road. It would	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		be a tragedy for the community to lose this space due to the far reaching benefits of improvement to health, well being and mindfulness.		
POGS017 Resident	Protected Green Spaces and Open Spaces	Of massive importance is Mill Field that I feel strongly must be conserved. This was the former site of the Deepings Show and is used by the public and in high numbers. The benefits of green undeveloped spaces are well written on regards to mental health and wellbeing in promoting other outdoors, exercise and the local wildlife population.	Email Comment	No additional action required by the group
POGS016 Resident	Protected Green Spaces and Open Spaces	This is more important than ever before, particularly for our children and grandchildren. With reference preserving historic distinctive local character and many proven benefits to the local community for over a century, Mill Field open green space needs to be protected and its role enhanced for the 21st Century. Further more, Green Lanes identified on Map 17 particularly Millfield Road is the	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		finest example of a country lane and the last one remaining in Market Deeping, should be preserved, any interference would be against the spirit of green agenda expressed in this document.		
POGS015 Resident	Protected Green Spaces and Open Spaces	Our family have utilised and enjoyed Mill Field for many years. A valued and extremely important local green space.	Email Comment	No additional action required by the group
POGS014 Resident	Protected Green Spaces and Open Spaces	Mill Field and Millfield Road should be protected as one of the last open green spaces in the Deepings. There are far better suited areas in the Deepings for the development of necessary housing. Also the character of Millfield Road, as a beautiful country lane would be destroyed if Mill Field were to be developed.	Email Comment	No additional action required by the group
POGS013 Resident	Protected Green Spaces and Open Spaces	Mill Field is used by the whole community. Very important for mental health to have these open spaces to walk, exercise and enjoy. Also providing many habitats to animals	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
POGS012 Resident	Protected Green Spaces and Open Spaces	Mill Field is a fantastic green space which I have used for 12 years. It's a great place to safely walk your dog and meet and socialise with other dog walkers. Whether you walk round there on your own or with others it's a fantastic space to get away from the daily grind of everyday life. Deepings will be a worse place to live without it.	Email Comment	No additional action required by the group
POGS011 Resident	Protected Green Spaces and Open Spaces	Delighted to see such a good selection of Local Green Spaces...e specially thrilled that Mill Field is a local Green Space as it is used by a significant number of local people for recreational activities and has been for over 20 years.	Email Comment	No additional action required by the group
POGS010 Resident	Protected Green Spaces and Open Spaces	This is incredibly important as I have been part of the Save Mill Field campaign. I believe that the Deeping Showground is part of the towns unique heritage and wish to see this preserved for the community. The fields as mentioned in the document are spacious and provide a wonderful green entrance to the	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		Towns Conservation area and elegant Georgian Buildings.		
POGS009 Resident	Protected Green Spaces and Open Spaces	Para 11.38 p70 notes that the Mill Field open space is a unique environment being visually contained with mature hedgerows for the most part, and noise bunds with mature landscaping. Long northerly views towards Langtoft Church and its spire provide a distant focal point. It is mostly used for grazing and recreation a topic that has been the subject of a Village Green Inquiry) However the Inquiry has recently resulted in the application for Village Green status being narrowly rejected, which is very worrying given that (i) SKDC's Local Plan (para 3.47) states that in this event "the status of the site could be reviewed through the preparation of the Deepings Neighbourhood Plan or by the first review of its Local Plan, subject to its availability and suitability as well as consideration of any additional housing requirements. (ii)	Email Comment	The "special circumstances" relate to the necessary development or improvement of a particular green space i.e. The need for additional or new play equipment, lighting, changing rooms. Any development must have a direct benefit to the said open space and not lead to its loss.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		although not mentioned in either the NP nor SKDC's LP, last year LCC submitted a planning application for up to 260 dwellings on the Mill Fields (S18/2146) and (iii) para 2 page 105 states that 'Development on these (Local Green) sites will only be supported in very special circumstances. But it does not specify what these special circumstances are. It would be helpful to know them.		
POGS008 Resident	Protected Green Spaces and Open Spaces	I am pleased to see that Mill Field has been designated as a protected green space and that Mill Field Road has been designated a green lane. This is the last true open space available for people to walk and exercise and is home to a huge array of plants and wildlife. The lane is the only country lane left in the Deepings and has some lovely big trees which are home to many bird species and need to remain in the future.	Email Comment	No additional action required by the group
POGS006 Resident	Protected Green Spaces and Open Spaces	Unbelievable that Mill field is being included as an important green space when there is a dire	Email Comment	Following the public consultation feedback and the support from the community to include this area as a

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		need for housing in the Deepings, South Lincolnshire and the Country as a whole. This is an ideal location for further housing and the purported uses of this area are far far outweighed by the need to provide somewhere to live for young people, families and existing residents of the Deepings who are unable to afford homes here and are forced to move away. It will also end up being a burden on the Local Council Tax Payers - something very important to resident of Market Deeping who already pay the highest Council Tax in South Kesteven due to the very high town council levy		Local Green Space, the Neighbourhood Plan group have provided more, detailed, justification for why Millfield green spaces meets the necessary requirements as identified within the NPPF. This can be found in a supporting document on the Deepings first website.
POGS005 Resident	Protected Green Spaces and Open Spaces	Looks comprehensive and I like the idea of an Area of Separation	Email Comment	No additional action required by the group
POGS004 Resident	Protected Green Spaces and Open Spaces	No mention of Dixon's Road green, is this an oversight	Paper copy feedback	No additional action required - Group discussed not appropriate to add.
POGS003 Resident	Protected Green Spaces and Open Spaces	If Mill field is to be a 'Village Green' it needs to be enhanced-I am wary of walking there because of dog fouling. It could	Email Feedback	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		be a beautiful park with trees planted etc.		
POGS002 Resident	Protected Green Spaces and Open Spaces	A good idea but no mention of the area of Deeping St James to the east of the village	Email Feedback	No additional action required by the group
POGS001 Resident	Protected Green Spaces and Open Spaces	Local Green Spaces and Important Local Open Spaces - a degree of confusion	Face to Face event DSJ	Make it clearer - perhaps add a description into the section of the Plan
PIC022 Resident	Public Involvement and Consultation	A lot of consultation	Email Comment	No additional action required by the group
PIC021 Resident	Public Involvement and Consultation	Excellent and very welcome idea as current residents should be involved	Email Comment	No additional action required by the group
PIC020 Resident	Public Involvement and Consultation	There has been extensive public consultation and a wide spread of opinions and aspirations are included in the document	Email Comment	No additional action required by the group
PIC019 Resident	Public Involvement and Consultation	Been involved with saving Mill Field	Email Comment	No additional action required by the group
PIC018 Resident	Public Involvement and Consultation	complicated need to read many times	Email Comment	No additional action required by the group
PIC017 Resident	Public Involvement and Consultation	totally agree	Email Comment	No additional action required by the group
PIC016 Resident	public Involvement and Consultation	This is so important for residents to be involved as Deeping is becoming far too built up, I feel	Email Comment	No additional action by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		like up to this point of consultation, we have had no say in the process.		
PIC015 Resident	Public Involvement and Consultation	We welcome objectives 7-10.	Email Comment	No additional action by the group
PIC014 Resident	Public Involvement and Consultation	Public consultation & involvement is fine but it should be listened to as well.	Email Comment	No additional action required by the group
PIC013 Resident	Public Involvement and Consultation	Agree	Email Comment	No additional action required by the group
PIC012 Resident	Public Involvement and Consultation	Good	Email Comment	No additional action required by the group
PIC011 Resident	Public Involvement and Consultation	It would make a change if local people's views were actually taken account of	Email Comment	No additional action required by the group
PIC010 Resident	Public Involvement and Consultation	The Committee have sought to involve local residents.	Email Comment	No additional action required by the group
PIC009 Resident	Public Involvement and Consultation	You did well with various types of Involvement and Consultation. It is not always easy getting public opinion.	Email Comment	No additional action required by the group
PIC008 Resident	Public Involvement and Consultation	This provided a great opportunity to find out the answers to the questions I had	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
PIC007 Resident	public Involvement and Consultation	I hope the public voice will be heard	Email Comment	No additional action required by the group
PIC006 Resident	Public Involvement and Consultation	Whilst it appears that there is sufficient regard for the thoughts of the public it really depends how influential this is.	Email Comment	No additional action required by the group
PIC005 Resident	Public Involvement and Consultation	As long as the public voice is taken into consideration and not just heard and then ignored	Email Comment	No additional action required by the group
PIC004 Resident	Public Involvement and Consultation	I sincerely hope that residents aspirations are respected	Email Comment	No additional action required by the group
PIC003 Resident	Public Involvement and Consultation	Thankfully this is a community event with hope that we can protect our towns character in this process	Email Comment	No additional action required by the group
PIC002 Resident	Public Involvement and Consultation	I just hope the public responses are taken into account and that SKDC/LCC don't override the local residents wishes.	Email Comment	No additional action required by the group
PIC001 Resident	Public Involvement and Consultation	The local consultation process seems to have been very inclusive and thorough and ambitious in its outcomes	Email Comment	No additional action required by the group
PA003 Anglian Water	Policy Amendment	Policy DNP4 - Employment Opportunities Addition of the following point: Sustainable Urban Drainage (SUDS) incorporation of a surface water	Email Comment	Wording amendment will be picked up as part of draft 2 amends/corrections

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		drainage scheme for the site based on sustainable drainage principles and which delivers biodiversity benefits.		
PA002 Anglian Water	Policy Amendment	Policy DNP2 - Additional Residential Development in the Deepings Additional Residential Development Addition of the following point: Sustainable Urban Drainage (SUDS) incorporation of a surface water drainage scheme for the site based on sustainable drainage principles and which delivers biodiversity benefits.	Email Comment	Wording amendment has been picked up as part of draft 2 amends/corrections
PA001 Anglian Water	Policy Amendment	Policy DNP1 The allocation of residential sites Addition of the following point: Sustainable Urban Drainage (SUDS) incorporation of a surface water drainage scheme for the site based on sustainable drainage principles and which delivers biodiversity benefits.	Email Comment	Wording amendment has been picked up as part of draft 2 amends/corrections
IC022 Resident	Introduction and Context	Points on presentation - In main report policies are printed white on light green which is readable but I question the value. Black on white is known to be pretty successful. Unfortunately the	Email Comment	The policy boxes are presented in colour format, so they are distinguish between the non-policy parts of the plan. It is important that the policies are recognisable and presentable to the people using the document.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		summarised policies doc has transcribed the colours to black on dark green and that depending on the quality of your screen and age of eyeballs is approaching illegibility. Maps prior to those in appendix A are placed within the policy sections to which they belong but are not indexed. Perhaps they would be easier to find when one is reading the policies summary if they were brought together as the first Appendix. I'm thinking about content but, meanwhile, I remember being quite surprised to see Frognall but not other Deepings mentioned in the intro.		
IC021 Resident	Introduction and Context	Clear and to the point	Email Comment	No additional action required by the group
IC020 Resident	Introduction and Context	Comprehensive and well thought out plan	Email Comment	No additional action required by the group
IC019 Resident	Introduction and Context	Reasonably well scripted	Email Comment	No additional action required by the group
IC018 Resident	Introduction and Context	complicated need to read many times	Email Comment	No additional action required by the group
IC017 Resident	Introduction and Context	positive	Email Comment	No additional action required by the group
IC016 Resident	Introduction and Context	Seems comprehensive!	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
IC015 Resident	Introduction and Context	It is important for local residents to set these agendas and Neighbourhood plans are one way of doing this.	Email Comment	No additional action required by the group
IC014 Resident	Introduction and Context	Agree	Email Comment	No additional action required by the group
IC013 Resident	introduction and Context	Interesting	Email Comment	No additional action required by the group
IC012 Resident	Introduction and Context	Well thought through.	Email Comment	No additional action required by the group
IC011 Resident	Introduction and Context	The history section was very interesting	Email Comment	No additional action required by the group
IC010 Resident	Introduction and Context	I learned a great deal about the history of our community	Email Comment	No additional action required by the group
IC009 Resident	Introduction and Context	I'm in agreement with the main objectives of the plan	Email Comment	No additional action required by the group
IC008 Resident	Introduction and Context	Comprehensive and helpful	Email Comment	No additional action required by the group
IC007 Resident	Introduction and Context	I hope that the actual green spaces do actually appear when the new building is done. This is usually the first thing that is knocked off to save money as is the tree planting etc.	Email Comment	No additional action required by the group
IC006 Resident	Introduction and Context	Certainly agree with the main objectives. The section on history of Deepings was particularly interesting.	Email Comment	No additional action required by the group
IC005 Resident	Introduction and Context	Well done everyone	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
IC004 Resident	Introduction and Context	Respect is given to the History of the Deepings	Email Comment	No additional action required by the group
IC003 Resident	Introduction and Context	Well written and represents the Deepings and it's history	Email Comment	No additional action required by the group
IC002 Resident	Introduction and Context	The concept of local community involvement in influencing planning can only be described as essential if not vital. All too often planning which is totally led from LCC or SKDC results in ill informed decisions about policy and planning. The NPPF has very good intentions and should be result in better decisions, but it needs to be constantly monitored as resulting planning does not always fulfil those intentions. Local monitoring can help to make sure that does not happen.	Email Comment	The Neighbourhood Plan includes a monitoring section, and this will be the responsibility of the group or council that takes it forward. There will also be opportunities, once the plan is made, to review and update it so it can be valued as an "up-to-date" plan and policy document for the Deepings.
IC001 Resident	Introduction and Context	At 4.2 it states 'The Deepings' is the collective name for Market Deeping, Deeping St James, West Deeping and Deeping St Nicholas. The Neighbourhood Plan does not cover all of the Deepings.	Email Feedback	This has been revised.
GH051 Gladman	A Good Home for Everyone	Policy DNP10 - Area of Separation - request for further evidence to support	Email	Group have reviewed and have adjusted the map as it appeared to be misleading as to the size of area proposed

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
GH050 Gladman	A Good Home for Everyone	Policy DNP3 agree in principle but suggest additional wording to cover inevitable changes to housing mix requirements	Email	No additional action required
GH049 Gladman	A Good Home for Everyone	Gladman are opposed to the designation of a development boundary as they believe it conflicts with national policy	Email	Group have reviewed and agreed to remove the proposed Development Limit.
GH048 Gladman	A Good Home for Everyone	Policy DNP1 Sites DEP1-H1/H2/H3 should not be referred to as allocations as they have already been identified as part of the Local Plan	Email	Agreed. Reference to these sites being allocated in the Local Plan has now been included to make this clearer to the reader.
GH047 Resident	A Good Home for Everyone	The restrictive nature of policies DNP1 and DNP 13 threaten to severely prejudice the delivery of sustainable development.	Email	Disagree. The sites are already allocations, the detail provided within these policies provides more, locally distinctive elements that complement the policies within the SKDC Local Plan.
GH046 South Kesteven District Council	A Good Home for Everyone	DNP8 - 3 site characteristics - add in - development proposals should follow a clear design process, with a site and contextual analysis being undertaken first (proportionate to the scale and sensitivity of the development) This should be followed by a design concept plan, illustrating what the response to the context is and	Email Comment	Elements of this have been included within the revised policy. The policy is broken into chapters on the relevance of good design. See Appendix 4 of Consultation Statement.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		then the final design should evolve from this.		
GH045 Resident	A Good Home for Everyone	I understand that a new Leisure Centre is planned for the Deepings. I found no mention of this in your document, yet clearly its location will have significant impact on the surrounding area.		This is not within the scope of the Neighbourhood Plan. No additional action required by the group
GH043 Resident	A Good Home for Everyone	The plan also speaks of the area North of the Towngate crossroads, as being ideal for low density housing. But in fact scheduled for industry (11.45) Before its designation as an area for development, part of this land was used to grow wheat. Had it remained so, it would have continued to provide a sense of transition between the Deepings and the rural environment. it is disappointing to see that such potential planning errors were not the subject of a more robust challenge in your document. You acknowledge that planning mistakes have been made in the past surely potential errors should be pointed out more forcibly. The local community must be much more aware of the		No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		impact of such ill considered measures than officials from the County Council.		
GH042 Resident	A Good Home for Everyone	The document speaks of Development Limitations for the Deepings. From my reading of the document I can see no mention of the proposed Service Station which, I understand is to be constructed on the A15 roundabout on the northern side of Market deeping, going towards Langtoft. This seems to be outside your development limits, on a greenfield site. It would also set a precedent for the commercial development on the very narrow area between the Deepings and Langtoft. In addition it seems in direct contradiction to your strategy to 'avoid impinging on the local countryside' (8.6) Since there are areas designated for commercial development within the Deepings, it is hard to see how this can be justified, except in terms of maximising the profits of the companies involved.		Development Limit removed

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
GH041 Lincolnshire County Council	A Good Home for Everyone	Section 13.11 Residential development proposals will be expected to demonstrate accordance with local parking standards- There are no parking standards within the nationally or within the local plan. We have guidance documents but the site should be assessed on its own merits.	Email Comment	More guidance and clarity have now been included related to parking standards within the revised plan. See Appendix 2 of Consultation Statement.
GH040 Lincolnshire County Council	A Good Home for Everyone	Proposed Policies document section o) Tandem parking should not be relied upon- parking orientation will depend on the land available and the density of development. This statement would have no bearing on the acceptability of an application. Garages will not be classed as a parking space- Double or oversized garages may be classed as a parking space, there are no standards nationally, or within the local plan that confirm this is unacceptable. Should be provision for electric charging points- Should be reworded to 'encouraged' on new developments, again there is no	Email Comment	More guidance and clarity have now been included related to parking standards within the revised plan. See Appendix 2 of Consultation Statement.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		policy to state they should be provided.		
GH039 Resident	A good Home for Everyone	The development limit in the West should be Millfield Road not the bypass. The indicative 73 houses on DEP1-H1 is too dense.	Email Comment	Development Limit removed
GH038 Resident	A Good Home for Everyone	Excellent ideas. The best bit of the plan	Email Comment	No additional action required by the group
GH037 Resident	A Good Home for Everyone	Plans seem quite crowded- houses close together. Look like they will result in a lot of additional traffic on routes to town centre.	Hand Written	No additional action required by the group
GH036 Resident	A Good Home for Everyone	Obvious	Email Comment	No additional action required by the group
GH035 Resident	A Good Home for Everyone	I understand the need for an increase in starter homes, rental properties and social housing	Email Comment	No additional action required by the group
GH034 Resident	A Good Home for Everyone	The excessive cost of poor rental accommodation and the complete lack of security for the those forced to adopt this method for finding a home is intolerable in a civilised community. Starter homes are a nonsense for people on local wages who can barely survive on rented property costs. They certainly are not in a position to	Email Comment	The Plan supports the inclusion of an appropriate housing mix for the local community. This includes specific types of accommodation that is currently needed in the community such as starter homes, affordable housing and housing for older people. The housing allocations in the Deepings are of a scale that can successfully include a greater mix of housing types.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		save for a deposit on a starter home. Social housing should be the only reason to build new homes in the Deepings as that currently does not meet the needs of the community. For many local people born and raised in the Deepings it is unlikely they will ever be able to buy a home of their own. All new builds which suit the contractors who build them in pursuit of their profits are bought by people moving into Deeping. This growth in house building does not benefit the local residents in any way. The divide between the have and have nots is not exclusive to large cities. The planners need to prevent the problem now rather than build it in to future planning drives and potential social problems in years to come.		
GH033 Resident	A Good Home for Everyone	Ideals are good but sadly when builders have price constrictions then corners are cut and green spaces are forgotten about	Email Comment	No additional action required by the group
GH032 Resident	A Good Home for Everyone	complicated need to read many times	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
GH031 Resident	A Good Home for Everyone	I am concerned that the existing infrastructure will not support the proposed development with no proposal in the plan to redress the balance.	Email Comment	No additional action required by the group
GH030 Resident	A Good Home for Everyone	These are very positive ideas	Email Comment	No additional action required by the group
GH029 Resident	A Good Home for Everyone	I appreciate the need for homes but hopefully they won't eat up all the green spaces and will provide options for all.	Email Comment	No additional action required by the group
GH028 Environment Agency	A Good Home for Everyone	The Flood Map for Planning shows small areas of the Plan area are in Flood Zones 2 (medium probability) and 3 (high probability). DNP1: We are pleased to note that all of the allocated sites are in Flood Zone 1 (low probability). DNP2 & 5: Consider adding that any new (residential or commercial) development must not increase flood risk and should be developed in line with the South Kesteven Strategic Flood Risk Assessment. It should also be noted that a formal flood defence is located along a large section of the River Welland. This defence protects properties and	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		businesses in the Deepings from potential flooding from the River Welland and as such, any developments need to ensure that this defence is protected.		
GH027 Resident	A Good Home for Everyone	As long as it's in keeping with the environment and doesn't impact on the already stretched resources or take away much needed green spaces & does actually provide homes for older people and affordable housing for younger people as suggested.	Email Comment	No additional action required by the group
GH026 Resident	A Good Home for Everyone	It is important to keep our young people in the Deepings and to have affordable housing and facilities for them.	Email Comment	No additional action required by the group
GH025 Resident	A Good Home for Everyone	Agree	Email Comment	No additional action required by the group
GH024 Resident	A Good Home for Everyone	The Deepings has more housing than the infrastructure can support	Email Comment	No additional action required by the group
GH023 Environment Agency	A Good Home for Everyone	Too many large detached houses being built instead of terraced or starter homes	Email Comment	The Plan supports the inclusion of an appropriate housing mix for the local community. This includes specific types of accommodation that is currently needed in the community such as starter homes, affordable housing and housing for older people. The housing allocations

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
				in the Deepings are of a scale that can successfully include a greater mix of housing types.
GH022 Resident	A Good Home for Everyone	We need more bungalows in Deepings	Email Comment	The Plan supports the inclusion of an appropriate housing mix for the local community. This includes specific types of accommodation that is currently needed in the community such as starter homes, affordable housing and housing for older people. The housing allocations in the Deepings are of a scale that can successfully include a greater mix of housing types.
GH021 Resident	A Good Home for Everyone	It's very important to provide ample parking spaces to avoid on street parking.	Email Comment	More guidance and clarity have now been included related to parking standards within the revised plan.
GH020 Resident	A Good Home for Everyone	We don't get good houses now. They are little boxes with either no parking or garages that won't fit a car in - there are paltry amounts of green space within estates	Email Comment	More guidance and clarity have now been included related to parking standards within the revised plan.
GH019 Resident	A Good Home for Everyone	The lack of planning for rented accommodation owned by the Local Authority is concerning. I would like to see Freehold purchase being highlighted as requirement for developers and Leasehold contracts refused, bearing in mind the difficulties	Email Comment	The Plan supports the inclusion of an appropriate housing mix for the local community. This includes specific types of accommodation that is currently needed in the community such as starter homes, affordable housing and housing for older people. The housing allocations in the Deepings are of a scale that can

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		this is now creating for many purchasers and the questionable riches this is providing landlords. There is little mention of homes for disabled people. There is mention of the growing needs of older people but insufficient consideration of the needs of families with disabled children and younger adults.		successfully include a greater mix of housing types.
GH018 Resident	A Good Home for Everyone	There was no mention of "Designing out Crime", which is important for the Deepings, especially with the cuts to Policing. Future developers should be challenged to ensure they incorporate anti crime measures into their designs.	Email Comment	It is important that new spaces are developed to be inclusive and safe. Reference to providing a safe environment have been included in Policy DNP8.
GH017 Resident	A Good Home for Everyone	Providing well built homes which are affordable must be a priority	Email Comment	No additional action required by the group
GH016 Resident	a good Home for Everyone	Admirable	Email Comment	No additional action required by the group
GH015 Resident	A Good Home for Everyone	It's an admirable concept but it is probably not achievable	Email Comment	No additional action required by the group
GH014 Resident	A Good Home for Everyone	I have concerns about the development of DEP3-H3. I could see no mention in the neighbourhood Plan for how the increase in traffic along Park Road and Welland Way will be	Email Comment	This assessment will be carried out as part of a future planning application and discussions with the Local Authority.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		managed. These are on the most direct route from this development to Peterborough and will likely bear the brunt of the rush hour traffic. These narrow roads are not suitable for any more traffic during rush hour especially with cars parked. Provisions should be included in the plan to ensure that traffic uses the major routes and ideally access to the Deepings Bypass should be improved along Towngate East.		
GH013 Resident	A Good Home for Everyone	Good Idea	Email Comment	No additional action required by the group
GH012 Resident	A Good Home for Everyone	Generally Agree	Email Comment	No additional action required by the group
GH011 Resident	A Good Home for Everyone	Youngsters needs one bedroom starter homes to get on the property ladder. These can be made cheaper by building them back to back.	Email Comment	The Plan supports the inclusion of an appropriate housing mix for the local community. This includes specific types of accommodation that is currently needed in the community such as starter homes, affordable housing and housing for older people. The housing allocations in the Deepings are of a scale that can successfully include a greater mix of housing types.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
GH010 Resident	A Good Home for Everyone	It is important to use the plan to ensure our area is not over run with housing development	Email Comment	No additional action required by the group
GH009 Resident	A Good Home for Everyone	As residents of Millfield Road we are re very pleased to see that on pg33, Policy DNP2 states in para 1 that Proposals for residential development , including the conversion of existing buildings over and above that of the allocated sites on Map 3 will only be supported if the development is located within the existing development limit of the Deepings and in para 2 that Land outside the development limit including and individual or small grouped of buildings will be treated as open countryside.	Email Comment	No additional action required by the group
GH008 Resident	A Good Home for Everyone	It's important to provide a mixture of housing for all ages and affordable housing	Email Comment	No additional action required by the group
GH007 Resident	A Good Home for Everyone	Although a mix of housing is mentioned in Section 1 and DNP3 1&6 include similar comments there is currently a shortage of bungalows in areas close to local services. Perhaps there should be a policy to	Email Comment	A reference to single storey accommodation has now been included within policy DNP3.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		encourage developments in these areas to include bungalows. If older residents require a bungalow then it would release multi-floor housing in other areas. The section on housing for the elderly is good. Ref DNP1 m the location is rather vague "West of Linchfield Road" however on the plan this is all shown as being allocated to new housing. I believe a park should be landscaped with shrubs, trees and paths so it can be used year round. (not just a grass area like Jubilee Park).		
GH006 Resident	A Good Home for Everyone	Excellent ideas best bit of the plan	Email Comment	No additional action required by the group
GH005 Resident	A Good Home for Everyone	To help alleviate on street parking they have made a stipulation that any applications for single or small multiple developments should include for as many off street parking spaces as the property has bedrooms.	Email Comment	More guidance and clarity have now been included related to parking standards within the revised plan
GH004 Resident	A Good Home for Everyone	All sounds ideal, can't argue against any of it, but is it deliverable. At Policy 2a 'streets as places', I think providing	Email Feedback	More guidance and clarity have now been included related to parking standards within the revised plan

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		sufficient off street parking is essential - on street parking can prevent the streets being used for play, cycling and walking.		
GH003 Resident	A Good Home for Everyone	A great idea but not sure if it will actually happen	Email Feedback	No additional action required by the group
GH002 Resident	A Good Home for Everyone	More bungalows needed close to bus routes and essential services. This may encourage older people to release family sized homes.	Email Feedback	A reference to single storey accommodation has now been included within policy DNP3.
GH001 Resident	A Good Home for Everyone	The Plan does not appear to reference the provision of single storey accommodation (bungalows) specifically and designed in a courtyard type development to encourage social interaction	Face to Face event DSJ	A reference to single storey accommodation has now been included within policy DNP3.
General	General	Comments received from SKDC attached with responses agreed	Email	See Appendix 4 of Consultation Statement.
GEN042 United Charities	General	Three buildings are listed as local amenities which are not publicly owned Deeping St James Scout Hut, The Cross School, The Institute Building they are in fact owned by United Charities who request they are removed as to list them would directly conflict with the Trustees charitable responsibilities	Hard copy response posted	No additional action required - Group discussed and agreed to remove

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
GEN041 South Kesteven District Council	General	8. pedestrian and cycle movement - add in cycle	Email Comment	Agreed And included.
GEN040 Resident	General	I appreciate the fact that you make clear the limitations of the plan. The reproduction of the maps in your document is so poor that they are of little use. The community should be grateful to those who have spent time and effort in the plans compilation.		Some plans have been revised. No additional action required by the group
GEN039 Resident	General	The gravel workings to the west of Market Deeping should be landscaped after, and linked to provide a country park, walking and cycling area with trim trail and habit areas. This would provide a green lung and recreational area, and alleviate the blight caused by workings left in a derelict and un-rural state. The rural character of the area should be realised it should not resemble Corby after the steelworks closure.	Hand Written	No additional action required by the group
GEN038 Resident	General	Why are LCC and SKDC even considering a housing	Email Comment	No additional action required by the group

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		development outside of the agreed areas in the Local Plan, these allocations I am assured provide the quota needed for the area so why other than for purely financial reasons do we need to consider building on Mill Field a wholly unsuitable site for a myriad of reasons LCC seem hell bent on ignoring.		
GEN037 Resident	General	Millfield should be protected as a green space for current and future generations	Email Comment	Millfield has been included as a proposed designated Local Green Space within the Plan.
GEN036 Resident	General	A great neighbourhood plan but given that The Deepings are on the periphery of Lincolnshire is the LCC and SKDC just going to ride roughshod over it, particularly in respect to development planning and the protection of open green spaces, as their behaviour with regard to Millfield has been less than honourable to date.	Email Comment	No additional action required by the group
GEN035 Resident	General	Save Millfield for future generations to use	Email Comment	No additional action required by the group
GEN034 Resident	General	Very good and well prepared Plan	Email Comment	No additional action required by the group
GEN033 Resident	General	I don't have a computer my daughter is helping me fill this in.	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		<p>I used the Deeping Showground many times with my husband. We moved to the Deepings in 1993 and support maintaining the agricultural character of Market Deeping and Deeping St James. So many houses are being built near me in Hereward Way, small plots land are being infilled. A historic bungalow sites has been sold, the bungalow cut in half so that the gardens get planning permission and road access for 4 houses on Broadgate lane. There seems no respect any more for the character of the district. It was this character that drew my husband and I to move here in 1993 from London. We understand that these Showground fields have a long history in the area and ask that the site be conserved as open space for the use of all residents. To promote health and well being and encouraging children to play and be safely outdoors.</p>		
GEN032 Resident	General	I would like to see the historic site of the Deeping Showground	Email Comment	This is not within the scope of a Neighbourhood Plan. The Local

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		as a conservation area and open space saved for public enjoyment in continuity for future use by all children and adults and disabled people in the area.		Authority is the responsible body for implementing and reviewing Conservation Area designations. No additional action required by the group
GEN031 Resident	General	I would like to see the Deeping Showground conserved for the local residents to use permanently as an open space and conservation area. Neighbouring Peterborough has very progressive policy on the environment. I would like to see safeguards in place that match the quality of their policy. Such as the Forest for Peterborough project established in 2010, so that a network of green spaces and wildlife corridors are consistent and present alongside built up areas,	Email Comment	No additional action required by the group
GEN030 Resident	General	Deeping is a lovely place to live, hopefully it won't get too big & loose it's character & charm.	Email Comment	No additional action required by the group
GEN029 Resident	General	basically as the community is growing we need a the police station manned full time and we will need another doctors surgery to supplement he	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		already over stretched practice we have at present.		
GEN028 Resident	General	The two protected Green Lanes are a fantastic idea but why protect them from "Unsympathetic Development" ? They need to be protected from ALL development and remain as they are today - part of the Deepings rural heritage.	Email Comment	It would be considered unreasonable to restrict all development here. Any development in the green lanes should have regard and respect their rural and open character.
GEN027 Resident	General	Well done everyone!	Email Comment	No additional action required by the group
GEN026 Resident	General	Children are the future. Was any consultation carried out specifically with children and young people? Were the needs of disabled specifically sought?	Email Comment	No additional action required by the group
GEN025 Resident	General	The Plan has taken an in depth look at the Deepings and has delivered an opportunity to ensure that the future of the communities is monitored and protected.	Email Comment	No additional action required by the group
GEN024 Resident	General	Given the previous incidents of local flooding in parts of Market Deeping during heavy rains (Meadow Road and Robin Close flooded over footpath level, and parts of Godsey Lane and High Street awash, water lapping at	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		my front door). I would suggest that 'Managing water and drainage in a suitable manner' (Policy DNP2) is inadequate for the amount of future development being pursued. This problem has got steadily worse over the last 30 years as developments have progressively used up the drainage land between Godsey Lane and Linchfield Road, to the extent that the current drainage systems can no longer cope. Improvements to existing drainage systems in the heart of Market Deeping (new drains? Pumping station?) should be included in the local plan before homes start flooding and house insurance become unavailable and unaffordable.		
GEN023 Resident	General	Developments should not be allowed to have on street parking they are dangerous to pedestrians, the disabled and children. Too many developments cram in houses with no thought to parking.	Email Comment	More guidance and clarity have now been included related to parking standards within the revised plan

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
GEN022 Resident	General	Despite NPPF, the planning authorities have not given priority to the green and environmental issues. Perhaps with the recent international and national concerns SKDC could be sympathetic with the NP's Green vision for the future.	Email Comment	No additional action required by the group
GEN021 Resident	General	You state that parking is an issue as houses are being built with spaces for one or two cars only whereas in reality most homes have a minimum of two cars. There should be a robust policy to counter this problem i.e. extra parking spaces must be built on estates for residents and visitors...suggesting more spaces for bikes will not resolve this issue	Email Comment	More guidance and clarity have now been included related to parking standards within the revised plan
GEN020 Resident	General	Thank you for your respectful consideration	Email Comment	No additional action required by the group
GEN019 Resident	General	Overall a good balanced report but I believe it is a little light on amenities sports clubs etc. Also I think the section on approach from North via Towngate needs revision as the boarded up hotel has gone and it reads a little negative.	Email Comment	Further information on the amenities have now been included within the plan – including a revised list.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
GEN018 Resident	General	Very informative and comprehensive	Email Comment	No additional action required by the group
GEN017 Resident	General	Commenting on the draft plan was not made easier by not being able to save sections and return to them later. Could this be addressed?	Email Comment	No additional action required by the group
GEN016 Resident	General	I have concerns about the ability of amenities to cope with the existing population let alone an increase. I am referring specifically to the health provision which comes under greater demand with an aging population. How is this plan being linked in to the plans for health services in the future? In addition I think the transport and accessibility issue needs some more focus, especially in DSJ end of the area.	Email Comment	Further information on the amenities have now been included within the plan – including a revised list.
GEN015 Resident	General	Unbelievable that is expected 162 pages plus a further 18 pages of policy's will be read, digested and understood by the residents of the Deepings. This is way too long for a document where support will be requested from the public by way of a referendum. Just an educated	Email Comment	The Neighbourhood Plan, once made, will become a legal document, so this has to follow a process and include relevant information and justification to support the proposed policies. The plan will be subject to an independent examination. Therefore the level of detail and content is considered necessary.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		hunch but I think turnout will be very low. Surely it is not beyond the comprehension of those charged with producing this that the document size will be off putting to say the least. Surely it is not beyond the capacity of those involved to at least have produced a separate summary document with links to the main document for those who wish to gain more in depth details.		
GEN014 Resident	General	I think you have done an excellent job and am impressed. Just hope SKDC etc. don't remove too many items.	Email Comment	No additional action required by the group
GEN013 Resident	General	Intro ok but couldn't find anything titled context - addition of face to face events to public consultation needed	Email Comment	There is a section about the public consultation undertaken as part of the preparation of the Neighbourhood Plan.
GEN012 Resident	General	Clear and to the point, lots of consultation	Email Comment	No additional action required by the group
GEN011 Resident	General	Incorrect use of apostrophe's 3.5, 3.6 and 9.2. 4.6 we now have a market every Saturday this is mentioned later in the document. 9.4 Arguably main reason of increase in population is because of increase in housing, so should be listed first.	Paper copy feedback	This has been revised in the Plan.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
GEN010 Resident	General	Nowhere in this paper do I see the problem of Healthcare addressed. The current waiting list is now in excess of 4 weeks. This has grown from 1 week in a relatively short number of years. I had an upset stomach recently, my partner booked me in for an appointment and luckily picked up a cancellation for that day. I was referred for tests. I was diagnosed with oesophageal cancer. By the time I was operated on - I had only one lymph node contaminated. Had I waited 4 weeks I would probably be dead now. You are advocating the building of another 800 odd homes, possibly adding another 2000 patients to the role on the Health Centre. Where is the resource coming from to cope with the current shortfall plus the added burden of the proposed new homes?	Email Feedback	The group discussed and agreed that the individual should be contacted and permission sought to send his feedback directly to the health centre manager.
GEN009 Resident	General	My main concern is the Village Green in Mill field. I feel this area should be retained as a Green area for recreational	Email Feedback	No additional action required -

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		areas only. It should be developed as a Park for families and walkers with keep fit equipment part of the hard landscaping.		
GEN008 Canal and Rivers Trust	General	Trust confirmed they have no waterways within the Deepings Neighbourhood Plan are so therefore have no comments	Email Canal & River Trust	No additional action required by the group
GEN007 Resident	General	Thank you to all concerned for such a comprehensive plan	Email Feedback	No additional action required by the group
GEN006 Virgin Media	General	Virgin Cable will only comment if there are areas within the plan that have Virgin Cable present	Email Feedback	Group confirmed no areas covered have Virgin Cable
GEN005 Forestry Commission	General	Forestry Commission will only comment if the area covered by the plan has designated ancient Woodland	Email Feedback	No additional action required by the group
GEN004 Resident	General	Many comments from people who didn't want housing, or saw a mismatch with infrastructure	Face to Face event DSJ	No action, outside of our brief
GEN003 Resident	General	People with disabilities - no clear reference. Wanted more priority given to blue badge holders	Face to Face event DSJ	This will require engagement with LCC Highways
GEN002 Resident	General	Welcomed the plan as having Green Infrastructure (open spaces, green walk etc.) but needed more emphasis on renewable energy and green imperatives. Suggested we	Face to Face event DSJ	Consider noting that a degree of expertise will be needed outside the teams competences (Ask Ashley Baxter) Add to Improvement Project List for future consideration review this at next update to the plan

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		approach the Centre for Alternative Technology, who can give feedback.		
GEN001 Resident	General	Commuters park in Church Street Mkt Deeping all day to avoid parking charges taking up space for shoppers and residents. Can something be done to resolve this?	Face to Face event DSJ	Group discussed and agreed that this fell outside of the scope of the Neighbourhood Plan
GC034 United Charities	A Green Clean and Safe Environment	Objection raised to listing Riverside Park DSJ as a LGS by owner	Hard copy response posted	No additional action required - Group discussed and as Land listed as OS by SKDC additional protection is not required
GC033 Resident	A Green Clean and Safe Environment	No comment to make	Email Comment	No additional action required by the group
GC032 Resident	A Green Clean and Safe Environment	DNP13 we support the protection of these areas, some of which are less intensively managed than those listed in Important Open Spaces	Email Comment	No additional action required by the group
GC031 Resident	A Green Clean and Safe Environment	This is more important than ever and should be prioritised	Email Comment	No additional action required by the group
GC030 Resident	A Green Clean and Safe Environment	DNP12 there are a large number of small pockets of open space, these mostly look to be mown/intensively managed areas with little biodiversity value. There could be a change	Email Comment	An interesting contribution, to be considered under development projects for future improvements to the Deepings.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		in the way some appropriately chosen sites are managed to encourage more bio diversity-rich meadow areas. This would have the additional benefit of requiring less maintenance and realise a saving for the local authority. Feel strongly that the existing green infrastructure, local green spaces and important open spaces should be preserved and retained, with absolutely no more development supported.		
GC028 Resident	A Green Clean and Safe Environment	Ambitious and very preferable	Email Comment	No additional action required by the group
GC027 Resident	A Green Clean and Safe Environment	Proposed development will impact on this with more vehicles and homes generating green house and grasses and the gradual over development swallowing up the few open green areas we have.	Email Comment	No additional action required by the group
GC026 Resident	A Green Clean and Safe Environment	retain Millfield as green environment	Email Comment	No additional action required by the group
GC025 Resident	A Green Clean and Safe Environment	Feel strongly that the existing green infrastructure, local green spaces and important open	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		spaces should preserved and retained, with absolutely no more development supported.		
GC024 Resident	A Green Clean and Safe Environment	It would be a shame to loose Mill Field to housing. A green buffer is required to off set all the other proposed development.	Email Comment	No additional action required by the group
GC023 Resident	A Green Clean and Safe Environment	DNP11 & 14: We are pleased to note that the Neighbourhood Plan aims to enhance the green infrastructure and the watercourse corridor biodiversity. This will contribute to achieving Water Framework Directive aims of improving the ecological status of the waterbody. Please note however that any plans for the proposed infrastructure will need to ensure there is no loss of floodplain and that flood risk is not increased as a result. Any proposed works affecting statutory main rivers or within the indicative floodplain or within the byelaw distance requires the prior written approval of the Environment Agency under the relevant statutory legislation and current land drainage byelaws. Please contact the Environment	Email Comment	Ongoing consultation with the Environment Agency will continue through the process of the Neighbourhood Plan and for any improvement projects identified that may pose an impact to flood risk.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		<p>Agency Partnerships and Strategic Overview team if further information is required or visit the Flood Risk Activity Permit section of the GOV.UK website https://www.gov.uk/guidance/flood-risk-activities-environmental-permits. In addition, any development plans should be carried out in accordance with the NPPF and South Kesteven SFRA as there may be certain development types which may not be appropriate. The River Welland corridor currently has limited biodiversity value as much has been developed and is in private ownership as residential gardens on the north side of the Welland, the south side appears to be out of scope for this consultation. Any opportunity to protect areas and managed riparian areas for the benefit of biodiversity such as Welland Gardens, Riverside Park and Riverside Park DSJ would provide valuable havens for the local wildlife. Please note</p>		

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		that there is a designated conservation area (site of special scientific interest) located just outside of the area boundary of the neighbourhood plan. DNP12: There are a large number of small 'pockets' of open space; these mostly look to be mown/intensively managed areas with little biodiversity value. There could be a change in the way some appropriately chosen sites are managed to encourage more biodiversity-rich meadow areas. This would have the additional benefit of requiring less maintenance and realise a saving for the local authority. DNP13: We support the protection of these areas, some of which are less intensively managed than those listed in 'Important Open Spaces'		
GC022 Resident	A Green Clean and Safe Environment	Mill field, market Deeping is a very important green area. It supports diverse wildlife and is a valuable recreational area. It is important for this to be retained as such. Similarly, Millfield Road is an attractive lane surrounded	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		by ancient hedgerows and mature trees. This lane should be kept as a Green Lane.		
GC021 Resident	A Green Clean and Safe Environment	A green clean and safe environment is paramount to this community & future generations	Email Comment	No additional action required by the group
GC020 Resident	A Green Clean and Safe Environment	We must keep our green spaces to ensure a healthy lifestyle and well being, areas such as Mill field are well used and must be kept	Email Comment	No additional action required by the group
GC019 Resident	A Green Clean and Safe Environment	Agree	Email Comment	No additional action required by the group
GC018 Resident	A Green Clean and Safe Environment	Green spaces are so important and nothing should be done to adversely impact upon them, in particular, nothing should be built upon the Mill Field	Email Comment	No additional action required by the group
GC017 Resident	A Green Clean and Safe Environment	More Dog bins required at all green spaces	Email Comment	No additional action required - Outside the scope of the NP - issue to be addressed by Town/Parish Council
GC016 Resident	A Green Clean and Safe Environment	Good luck with that!	Email Comment	No additional action required by the group
GC015 Resident	A Green Clean and Safe Environment	Addressing the lack of public transport is key. Street lighting is a concern. Footpaths should be well lit. Streets need to have	Email Comment	Need to engage with LCC on this matter.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		good lighting if the aim is to encourage people to walk.		
GC014 Resident	A Green Clean and Safe Environment	The Deepings for about 300 years was a Canal Town. Whilst the Canal to Stamford has now gone, parts could be restored for the benefit of the whole community. Reconstructing Low Lock, and possibly Briggins Lock would open up the Welland to boat traffic to Crowland, Spalding and Springfield. This will bring more visitors to the area, and boost the local economy. It will also create more use for the river, which would then be better maintained.	Email Comment	Proposal for brief discussion. Outside the review of the NP but potential consideration for inclusion as a major Development/Aspirational Project.
GC013 Resident	A Green Clean and Safe Environment	It is important to build a healthy community where people can choose to walk or cycle safely, not just for leisure but also to schools and work and to access the services they need. Safe cycle and walking routes are essential so the residents can leave their car at home when wanting to go to a pub or restaurant. Everyone including the business community will	Email Comment	The body of this comment has been reflected within the revised Plan.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		benefit from lots of safe access routes.		
GC012 Resident	A Green Clean and Safe Environment	Must be preserved	Email Comment	No additional action required by the group
GC011 Resident	A Green Clean and Safe Environment	Unless sufficient employment is provided locally it will be impossible to stop people travelling by car. There would need to significant increases in public transport at affordable cost.	Email Comment	Add comment to Economy Section (justifying allocation of employment capacity)
GC010 Resident	A Green Clean and Safe Environment	we all deserve that	Email Comment	No additional action required by the group
GC009 Resident	A Green Clean and Safe Environment	I am very favourable to general aspirations. To gain full perceived benefits, it is vital that all modalities are integrated and will require a long term commitment.	Email Comment	No additional action required by the group
GC008 Resident	A Green Clean and Safe Environment	I like the ideas written	Email Comment	No additional action required by the group
GC007 Resident	A Green Clean and Safe Environment	As residents of Millfield Road we are pleased to see that on pages 156 - 158 of Appendix C the NP highlights the special nature of the Mill Fields area LGS18 shown on the map at page 143	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		as being the last area of accessible countryside within Market Deeping...situated very close to the community that it serves... and which is Highly valued by the Town Council and local residents for the amenities it provides for walking, meeting people, enjoying wildlife and for children to run freely with safety. In addition, it observes that the proposed route for the Green Walk will also pass directly through Mill Field.		
GC006 Resident	A Green Clean and Safe Environment	It's vital to protect our current green spaces and also to provide more in nay future developments. The Green Walk is a great idea to promote the Deepings as a great place to live - providing a safe and planned walk for residents to follow aiding well being and promoting better health. The Deepings has many great habitats for wildlife such as Mill field and these should be protected for future generations.	Email Comment	No additional action required by the group
GC005 Resident	A Green Clean and Safe Environment	What seems essential in this section is the need to think clearly about each area, its	Email Comment	Following the public consultation feedback and the support from the community to include this area as a

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		connection to others and how the planning should do all it can to promote the movement of people between in a "non carbon" way. Modern thinking is at last, certainly at central government level, trying to discourage the use of the motor car. So new planning should seek to put housing , schools , retail and as much industry as possible in close proximity to each other, thus promoting the use of walking and cycling to and from each place. Clearly access for those people with disabilities will also need to be at the forefront of planning policy. New development on the fringe of the area should be the last resort as this will always involve the use of the motor car at certain times of day causing greater choking of existing roads to the area's facilities, especially its schools at opening and closing times.		Local Green Space, the Neighbourhood Plan group have provided more, detailed, justification for why Millfield green spaces meets the necessary requirements as identified within the NPPF. This can be found in a supporting document on the Deepings first website.
GC004 Resident	A Green Clean and Safe Environment	I support DNP9 10 711 good ideas	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
GC003 Resident	A Green Clean and Safe Environment	Green walk is excellent proposal, and I hope it will link (off road) to Langtoft to the West of the bypass to link with Stowe Road.	Email Feedback	Review of Deepings Green Walk detail and routes to outlying villages. This will continue beyond the Neighbourhood Plan process.
GC002 Resident	A Green Clean and Safe Environment	Whilst more and more houses are built this will be a massive challenge	Email Feedback	No additional action required by the group
GC001 Resident	A Green Clean and Safe Environment	Deeping St James needs a family friendly park, with paths, seating and shrubbery as well as play spaces. The proposed green walk around the whole area is also a great idea. The planned footbridge next to the railway bridge is much needed too.	Email Feedback	Existing parks and spaces can be improved, but this will largely come outside the Neighbourhood Plan process.
DLC036 Resident	A Distinctive Local Character	All developments within DSJ and MD Conservation Area should positively contribute to the conservation and management of the conservation area having taken account of the respective conservation area appraisal and management plans(CAAMP) and the archaeological record as summarised in the Extensive Urban Survey. Proposals will be expected to sustain and enhance the heritage assets including putting buildings to viable new	Email	The Neighbourhood Plan supports the Conservation Area designation and seeks to further protect our historic environment from any negative impacts of development. DNP8 and DNP9 specifically include references to the historic environment and good design.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		use consistent with their conservation. New development will be expected to make a positive contribution to the local character and distinctiveness of the conservation areas namely: Simple building forms, use of sympathetic material etc		
DLC035 South Kesteven District Council	A Distinctive Local Character	11.98 - gateways maybe add some detail if relevant, defining the special character of each gateway... a different design response may be needed at each gateway for example. Photographs to support this could help too. Check this policy covers the key areas(design principles) as mentioned in the neighbourhood plan design guidance recently published	Email Comment	Further information about each gateway has been included within the Plan. The Extensive Urban Survey also includes features about the entrances to the Deepings.
DLC034 South Kesteven District Council	A Distinctive Local Character	4 and 5 - any specific local characteristics that local people value in this are? Any public engagement results could feed through into this policy.	Email Comment	No additional action required by the group
DLC033 Resident	A Distinctive Local Character	LCC knows Deepings First are aware of and interested in the work of the Extensive Urban Survey and it would be good to provide feedback that we would	Email Comment	The extensive Urban survey is now referenced within the plan and forms a comprehensive appendix to supports policies DNP1, DNP8 and DNP9.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		like to see linkages between the characterisation mapping and the Neighbourhood Plan being stated.		
DLC032 Resident	A Distinctive Local Character	With the development on the previous concrete works, Frognall has been joined into Deeping St James. The gap in the development limit for Frognall (area of separation) to enable the remainder of Frognall to stay isolated from Deeping St James could yield additional housing land.	Email Comment	The Area of separation has been included to prevent the further merging of the two settlements and to preserve the rural character of the area. It is not a green belt, but it has been designed to manage further development in this area.
DLC031 Resident	A Distinctive Local Character	New housing should provide more parking spaces, as areas are being spoiled by cars sometimes parking partly on the pavement when roads are too narrow.	Email Comment	More guidance and clarity have now been included related to parking standards within the revised plan
DLC030 Resident	A Distinctive Local Character	Very welcome but not always achievable	Email Comment	No additional action required by the group
DLC029 Resident	A Distinctive Local Character	I believe the plan recognises the major characteristics which makes the Deepings what it is	Email Comment	No additional action required by the group
DLC028 Resident	A Distinctive Local Character	The character of the town is important to me and I am glad to see the plan addresses this	Email Comment	No additional action required by the group
DLC027 Resident	A Distinctive Local Character	I believe the distinctive local character of the Deepings is	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		being severely impacted as LCC and SKDC continue to use the area to meet the Government quotas for house building ignoring the merit of these plans. We are at the very edge of the council district area and I believe they think they can take full advantage of this.		
DLC026 Resident	A Distinctive Local Character	complicated need to read many times	Email Comment	No additional action required by the group
DLC025 Resident	A Distinctive Local Character	In agreement with the policies.	Email Comment	No additional action required by the group
DLC024 Resident	A Distinctive Local Character	I love the beauty in the Deepings. It is a privilege to live here	Email Comment	No additional action required by the group
DLC023 Resident	A Distinctive Local Character	It is important that Market Deeping doesn't end up a packed to the gills dormitory town for Peterborough.	Email Comment	No additional action required by the group
DLC022 Resident	A Distinctive Local Character	DNP8: We understand the wish to retain a distinctive local character and welcome the acceptance of innovative buildings subject to high standards. Please consider adding reference to maximising energy efficient design in point 5.	Email Comment	A reference has been included in DNP9.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
DLC021 Resident	A Distinctive Local Character	yes the local character of the Deepings needs protecting it's seeped in history	Email Comment	No additional action required by the group
DLC020 Resident	A Distinctive Local Character	With the continued expansion of the Deepings local character is being lost to only the centre of town new development should also reflect its character	Email Comment	No additional action required by the group
DLC019 Resident	A Distinctive Local Character	Agree	Email Comment	No additional action required by the group
DLC018 Resident	A Distinctive Local Character	The historical buildings and appearance of the town are of paramount importance	Email Comment	No additional action required by the group
DLC017 Resident	A Distinctive Local Character	Deepings Heritage is so important. We are blessed with a beautiful town.	Email Comment	No additional action required by the group
DLC016 Resident	A Distinctive Local Character	Again it has been down to a private individual to force through the Green Walk.	Email Comment	No additional action required by the group
DLC015 Resident	A Distinctive Local Character	I am not sure why Frognall should be allowed to remain isolated through a 'Green Belt' when so many people need homes. I acknowledge it is very attractive, however, there are homeless people and families living in one bedded rooms. There are some exceptional developments in the country that are of a very high standard that if	Email Comment	The Area of separation has been included to prevent the further merging of the two settlements and to preserve the rural character of the area. It is not a green belt, but it has been designed to manage further development in this area.

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		replicated would maintain the perceived need for exclusivity yet provide homes for those in need. Planning for the future offers an opportunity for the local councils to push for excellence in this area of development.		
DLC014 Resident	A Distinctive Local Character	The history of the Deepings obviously has an impact on its development. Whilst it is recognised that the new housing areas will not be within the current conservation areas it is really important that the historic sites remain protected.	Email Comment	No additional action required by the group
DLC013 Resident	A Distinctive Local Character	Must be preserved	Email Comment	No additional action required by the group
DLC012 Resident	A Distinctive Local Character	With the scale of development within the NP I don't see how the character of the area can be maintained. It has changed significantly in the 35years I have lived here, and not for the better.	Email Comment	No additional action required by the group
DLC011 Resident	A Distinctive Local Character	So it should	Email Comment	No additional action required by the group
DLC010 Resident	A Distinctive Local Character	Every effort should be made to preserve our distinctive local character	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
DLC009 Resident	A Distinctive Local Character	It's great to see some houses being built in traditional yellow brick. We need more of these	Email Comment	No additional action required by the group
DLC008 Resident	A Distinctive Local Character	This area is very important as I live near the conservation area of Market Deeping and St Guthlac Church is such a beautiful focal point. This should remain visible to the town.	Email Comment	No additional action required by the group
DLC007 Resident	A Distinctive Local Character	Your heading here again is confusing, as the relevant section is headed on page 64 as 11 Distinctive Local Character with the paras numbered from 11.1 and the policy's starting on page 87 with DNP 8	Email Comment	Heading have been revised in the Plan.
DLC006 Resident	A Distinctive Local Character	New buildings and extensions especially in the centre should be reviewed by planners to ensure they do fit in with the local character and don't destroy the special character of the Deepings	Email Comment	No additional action required by the group
DLC005 Resident	A Distinctive Local Character	Maintaining local character which is excellent in the Deepings area and makes it the desirable place it is to live in is vital and seems to have been respected by this draft plan. Respecting and enhancing the	Email Comment	No additional action required by the group

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		local character should be an outcome		
DLC004 Resident	A Distinctive Local Character	Comprehensive	Email Comment	No additional action required by the group
DLC003 Resident	A Distinctive Local Character	Hard to follow, needs conclusions and proposed actions i.e. more punchy	Email Comment	No additional action required by the group
DLC002 Resident	A Distinctive Local Character	Good policy, hope they can be delivered by developers when they also provide affordable housing elements.	Email Feedback	No additional action required by the group
DLC001 Resident	A Distinctive Local Character	by cars sometimes parking partly on the pavement when roads are too narrow	Email Feedback	More guidance and clarity have now been included related to parking standards within the revised plan
AP001 Resident	Development Project	Suggestion for an additional footbridge at Riverside Park to provide an additional walking route	Face to Face event DSJ	Group discussed and felt this should be added to the Improvement/Aspirational projects
GC40 Lincolnshire County Council	Protected Green Spaces and Open Spaces	This is a well thought through plan with a sufficient level of emphasis on access to green spaces and the wider countryside. LCC is aware of the Green Walk proposal and will assist the Town Council where practical to do so.	Email Comment	More guidance and clarity have now been included related to parking standards within the revised plan
		The problem of parking is referred to on P31, and in general terms throughout the document. If the proposed		

Ref	Topic Area	Comment	Type of Comment	Changes to the Plan
		<p>developments bring an extra two thousand people into the Deepings, it will significantly increase the pressure on the local infrastructure. Already, we see, in areas of modern development, such as Tattershall drive, the inadequacy of the parking arrangements, which cause the road to be lined with cars at times. There are other areas of similar concern of which all residents will be aware. It also seems that significant numbers of people use the bus service to go into Peterborough, either for work, or for other activities, and in view of the inadequate parking available, simply park their cars on the streets. The whole problem of traffic management needs to be addresssed, and a strategy devised to better accommodate the number of vehicles expected. A park and ride, for example, could be of benefit.</p>		

Appendices 1-4

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Appendix 2 The Deepings Neighbourhood Plan Group response to Lincolnshire County Council's Comments	page 203
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Appendix 4 The Deepings Neighbourhood Plan Group response to South Kesteven District Council's comments	page 229

Appendix 1

Lincolnshire County Council's Objection

November 2019

LCC Corporate Property Team

Representations to the Draft Deepings First Neighbourhood Plan

Land off Millfield Road

On behalf of Lincolnshire County Council,
Corporate Property Team

Contents

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Appendices

Appendix 1: Planning application reference S18/2146: Indicative site layout

Appendix 2: Cheltenham Local Plan 2011-Inspector's Post Hearing Advice (April 2019)

Appendix 3: Tatenhill Neighbourhood Plan (Examiner's Report dated November 2015)

Appendix 4: Oakley and Deane Neighbourhood Plan (Examiner's Report dated December 2015)

1. Introduction

- 1.1. This Report has been prepared by Savills on behalf of the Lincolnshire County Council's Corporate Property Team (LCC CPT) in response to the pre-submission draft version of The Deepings Neighbourhood Plan (Regulation 14) and in particular, its proposed Local Green Space ('LGS') designation of land within LCC's ownership.

Lincolnshire County Council, Corporate Property Team

- 1.2. Lincolnshire County owns land around the county which has been used either by the Council or rented out for farming. The Council is considering the sale of these pockets of land to raise income and, in some cases, encourage residential development to help meet the need for more housing. The ownership includes the following site:

- 11.6ha of land at Millfield Road, Market Deeping

The Pre-Submission Draft 'Deepings First' Neighbourhood Plan

- 1.3. The draft Deepings First Neighbourhood Plan ('the draft NP'), prepared jointly by Market Deeping Town Council and Deeping St James Parish Council is currently subject to a six week consultation period until 2nd December 2019.

Summary of the Representations

- 1.4. The draft NP proposes the designation of the aforementioned site as Local Green Space (LGS) through its proposed Policy DNP13. LCC CPT wholly objects to the proposed LGS designation of land off Millfield Road (LGS18) for the reasons which this Report explains in detail. It is also important to note that the Councils did not formally notify LCC of their intention to designate land within LCC's control as LGS. This designation was only brought to LCC's attention following publication of the current draft version of The Deepings NP to which this Report relates.
- 1.5. This Report concludes that Policy DNP13 of the draft NP, and its proposed LGS designation of the above site fails to meet the policy tests set out in national guidance for the designation of LGS' and must therefore be removed from the draft NP before it is subject to further stages of the plan-making process. This Report also explains how several other policies, being proposed by the draft NP are not sufficiently justified nor in accordance with planning policy (and would therefore be unable to meet the necessary 'Basic Conditions' tests).
- 1.6. This Report also addresses the proposed introduction of a settlement boundary in Policy DNP2, which is not in accordance with the policy approach of the emerging South Kesteven Development Plan (SKDC DP) and is also considered to prevent the emerging NP from meeting any 'Basic Conditions' test.

- 1.7. Finally, this Report also challenges the proposed designation of Millfield Road as a 'Green Walk' through policy DNP11 which is not considered to be adequately justified or evidenced within the draft NP.

2. Land off Millfield Road, Market Deeping

- 2.1. The land to the west of Millfield Road is designated as LGS18 Mill Field through policy DNP13 of the Pre-Submission Draft of the NP. LCC CPT's representations to policy DNP13 are set out in section X of this report.
- 2.2. LCC own the 11.6 hectare (28.73 acres) Site in its entirety which comprises two roughly rectangular fields and it is currently in agricultural use, and let to an agricultural tenant. The topography of the site is predominately flat.
- 2.3. The site is located to the west of Market Deeping and is enclosed by the A15 which extends along the entire western boundary. It is bordered by extensive mature trees and hedging along its eastern, southern and western boundaries. The northern boundary of the site has limited containment, with two agricultural fields beyond. An earth bund runs the length of the eastern boundary separating the site from the A15. The two fields are separated by one another by a brook that connects to a ditch which runs the length of the western boundary between the site and Millfield Road.
- 2.4. A Public Right of Way (PROW) runs east to west across the centre of the site.
- 2.5. The site is not subject to any statutory designations. It is not located within the Green Belt, an Area of Outstanding Natural Beauty, a Site of Scientific Interest or a Special Conservation area, nor is it located within the vicinity of any Listed Buildings or Scheduled Ancient Monuments.
- 2.6. The site is located within Flood Zone 1 in accordance with the Environment Agency's Flood Map for Planning and, therefore, has a low probability of flooding.
- 2.7. The Agricultural Land Classification England identifies the land as Grade 3.

3. Planning Policy Context

- 3.1. The Localism Act (2011) makes provision for Neighbourhood Planning, empowering local communities to develop a shared vision for their neighbourhood and deliver the sustainable development they need through planning policies relating to the development and use of land.

Basic Conditions

- 3.2. For a Neighbourhood Plan to proceed to a referendum, the Localism Act requires the appointed Examiner to consider whether it meets the 'basic conditions' set out at Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended) and summarised in Paragraph ID41-065-20140306 of the national Planning Practice Guidance (PPG).

- 3.3. The basic conditions are:

“(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).

(b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.

(c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.

(d) The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.

(e) The making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

(f) The making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.

(g) Prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).”

National Planning Policy and Guidance

- 3.4. The National Planning Policy Framework ('the NPPF'), published in February 2019, sets out the requirements for the preparation of Neighbourhood Plans and the role they must play in meeting the development needs of the local area.

3.5. The requirements set out in the NPPF have now been supplemented by the Neighbourhood Plan section of the national Planning Practice Guidance ('the PPG') and its allied sections on Viability, Housing Land Availability Assessment and Strategic Environmental Assessment. The provisions of the NPPF and the PPG are mandatory material considerations for the purposes of basic condition 8(2)(a).

3.6. The NPPF, in placing a presumption in favour of sustainable development at its heart, recognises at paragraph 13 that for Neighbourhood Planning, this will mean:

"The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies."

3.7. Paragraph 29 of the NPPF further makes it clear that Neighbourhood Plans should not undermine local strategic policies and states:

"...Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies¹⁶"

¹⁶ *Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area.* [Savills emphasis].

3.8. The PPG adds at paragraph 040 (Reference ID 41-040-20160211) that "...proportionate, robust evidence should support the choices made and the approach taken" by a Neighbourhood Plan and in respect of their preparation, states that:

"A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared." [Reference ID: 41-041-20140306].

3.9. The PPG also advises that those responsible for a Neighbourhood Plan, i.e. the qualifying body, must demonstrate how the draft Neighbourhood Plan will contribute towards sustainable development, being underpinned by "proportionate evidence....on how the draft neighbourhood plan or order guides development to sustainable solutions" (paragraph 072 Reference ID: 41-072-20190509).

Local Green Space Provisions

- 3.10. Paragraph 99 of the NPPF states that local communities through local and neighbourhood plans “...allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.” [Savills emphasis].
- 3.11. Paragraph 101 of the NPPF acknowledges that “Policies for managing development within a Local Green Space should be consistent with those for Green Belts.” In the Green Belt, paragraph 143 confirms that “inappropriate development should not be approved except in very special circumstances.” As such, the designation of LGS “should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services” (paragraph 99, NPPF).
- 3.12. The NPPF is clear that designation of Local Green Space should only be used where the green space is:
- “a) in reasonably close proximity to the community it serves;
 - b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
 - c) local in character and is not an extensive tract of land.” (Paragraph 100, NPPF).
- 3.13. In order for an area to be designated as Local Green Space, it has to meet all the criteria for designation set by paragraph 100 of the NPPF. It is therefore essential that, when seeking to designate LGSs, plan-makers clearly demonstrate, through compelling evidence, that the requirements for its designation are met in full, these being it is reasonably located to the community it serves; it is demonstrably special to a local community and is of a particular local significance; it is local in character and it is not an extensive tract of land.
- 3.14. The Local Green Space designation affords protection consistent with policy for Green Belts. Therefore, is crucial that plan-makers include evidential and robust information to support their proposed LGS designations and clearly demonstrate that their application meets national planning policy requirements in full. To assist plan-makers further in this regard, the PPG provides the following advice:
- Paragraph: 007 Reference ID: 37-007-20140306: “Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making”.
 - Paragraph: 008 Reference ID: 37-008-20140306: “Local Green Space designation will rarely be appropriate where the land has planning permission for development. Exceptions could be where the development would be compatible with the reasons for designation or where planning permission is no longer capable of being implemented”.

- Paragraph: 009 Reference ID: 37-009-20140306: *“Local Green Spaces may be designated where those spaces are demonstrably special to the local community, whether in a village or in a neighbourhood in a town or city”* [Savills emphasis].
- Paragraph: 011 Reference ID: 37-011-20140306: *“Different types of designations are intended to achieve different purposes. If land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space”*.
- Paragraph: 013 Reference ID: 37-013-20140306: *“The green area will need to meet the criteria set out in paragraph 100 of the National Planning Policy Framework. Whether to designate land is a matter for local discretion. For example, green areas could include land where sports pavilions, boating lakes or structures such as war memorials are located, allotments, or urban spaces that provide a tranquil oasis”* [Savills emphasis].
- Paragraph: 014 Reference ID: 37-014-20140306: *“The proximity of a Local Green Space to the community it serves will depend on local circumstances, including why the green area is seen as special, but it must be reasonably close. For example, if public access is a key factor, then the site would normally be within easy walking distance of the community served”*.
- Paragraph: 015 Reference ID: 37-015-20140306: *“There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed. However, paragraph 100 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name”*. [Savills emphasis].
- Paragraph: 017 Reference ID: 37-017-20140306: *“Some areas that may be considered for designation as Local Green Space may already have largely unrestricted public access, though even in places like parks there may be some restrictions. However, other land could be considered for designation even if there is no public access (e.g. green areas which are valued because of their wildlife, historic significance and/or beauty). Designation does not in itself confer any rights of public access over what exists at present. Any additional access would be a matter for separate negotiation with land owners, whose legal rights must be respected”*.
- Paragraph: 018 Reference ID: 37-018-20140306: *“Areas that may be considered for designation as Local Green Space may be crossed by public rights of way. There is no need to designate linear corridors as Local Green Space simply to protect rights of way, which are already protected under other legislation”*.

- Paragraph: 019 Reference ID: 37-019-20140306: “*A Local Green Space does not need to be in public ownership. However...the qualifying body (in the case of neighbourhood plan making) should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan.*” [Savills emphasis].

The Development Plan

- 3.15. In order to meet basic condition (e), the draft NP must be in general conformity with the “...*strategic policies contained in the Development Plan...*”.
- 3.16. The Local Plan for South Kesteven currently comprises of a suite of Development Plan Documents. These include the Core Strategy (2010), Site Allocations and Policies Development Plan Document (2014) and a few remaining ‘saved’ policies and allocations within the 1995 Local Plan.
- 3.17. South Kesteven District Council are currently preparing a replacement local plan which will replace all current policy advice, and will establish the policy framework for development up to 2036. The replacement plan will set out the strategic direction for sustainable development, covering housing and employment and provide the Council’s objectives and vision for development across the District. This emerging local plan is at an advanced stage, having concluded a consultation on Main Modifications in October 2019. An updated Local Development Scheme published in September 2019 anticipates that the new local plan will be adopted in January 2020.

Adopted Local Plan

- 3.18. Policy SP1 ‘Spatial Strategy’ of the Core Strategy directs the majority of all new development towards Grantham to support and strengthen its role as a Sun-Regional Centre. This also allows new development to support the role of the three market towns, Stamford, Bourne and The Deepings, with priority given to sustainable sites within the built up part of the town. It goes on to state that ‘*if insufficient land within the built-up part of the settlement is available to meet the development needs of each town, appropriate sites on the edges of the towns may also be considered suitable for development*’.
- 3.19. Policy H1 ‘Residential Development’ reinforces the spatial hierarchy for the distribution of housing with an emphasis on delivery within Grantham and the 3 market towns of Bourne, Stamford and the Deepings. It states that ‘*development rates in Stamford and the Deepings should be maintained at a modest level to meet the needs of these market towns, and to support the provision of additional community infrastructure*’.

Emerging Local Plan

- 3.20. Policy SP1 ‘Spatial Strategy’ re-enforces the 2036 vision for South Kesteven and allows for growth within the market towns and larger villages.

- 3.21. Policy SP2 'Settlement Hierarchy' aims to focus most development in Grantham in order to strengthen its role as a Sub-Regional Centre, followed by significant development in the three market towns of Stamford, Bourne and the Deepings, providing the nature and character of the settlement is not compromised. It gives *'priority to the delivery of sustainable sites within the built up part of the town and appropriate edge of settlement extensions'*.
- 3.22. Policy SP4 'Development on the Edge of Settlements' allows for development on the edge of a settlement, where it is in accordance with all other relevant Local Plan policies and other relevant criteria as set out in this policy.
- 3.23. The site was proposed as an allocation for housing in the Regulation 18 Consultative Draft Local Plan 2017 (CDLP) under 'DEP1 H2' for 200 dwellings (indicative). The site was only removed from the Regulation 19 Pre-Submission version of the Local Plan pending the outcome of the subsequently unsuccessful application for Village Green status. The outcome of the Village Green Application was not published until July 2019, over two months after the Local Plan Examination sessions had closed.

Planning application

- 3.24. A planning application for the land was submitted to SKDC in November 2018 (reference S18/2146) and remains undetermined. The indicative layout is submitted at Appendix 1. As the layout demonstrates, the scheme includes a large area of Public Open Space, 2.6ha in size, which equates to 22.5% of the site. The application would therefore contribute a generous amount of recreational space which could be used not only by the new residents of the proposed housing scheme, but also by those already living nearby.
- 3.25. The supporting technical work accompanying the application demonstrates that there are no known constraints which would prevent the site being developed for housing. Responses from the statutory consultees generally confirm this position. No objections have been received from the following statutory consultees (subject to appropriate conditions and measures which would be attached to the planning permission):
- LCC Highways and Flood Risk
 - LCC Countryside Service
 - Welland and Deepings Internal Drainage Board
 - Environment Agency
 - Education
 - Lincolnshire Fire and Rescue
 - Anglian Water
- 3.26. Additional information has been requested by the following bodies which is underway at present:
- Minerals and Waste Policy Team
 - Heritage Lincolnshire
 - Peterborough City Council, Highways

Summary

- 3.27. For a Neighbourhood Plan to proceed to a referendum, it must meet all 'basic conditions' set out at Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended).
- 3.28. It is clear, from the above, that the approach towards the designation of LGS is one which requires compelling evidence to clearly demonstrate that it meets the requirements of national planning policy in full.

4. Representation to Draft Neighbourhood Plan Policy DNP2

- 4.1. This section provides the representations to policy DNP2 of the draft Deepings First NP 'Additional Residential Development in The Deepings', on behalf of LCC CPT.

Policy Wording and Justification

- 4.2. Policy DNP2 reads:

"1. Proposals for residential development, including the conversion of existing buildings over and above that of the allocated sites on Map 3, will only, be supported if the development is located within the existing development limit of the Deepings (illustrated on Map 2). All proposals must also demonstrate that they have met all the following:

- a) It does not significantly harm or alter the built character and appearance of either Market Deeping, Deeping St James or Frognall;*
- b) It does not significantly harm or alter the character and appearance of the surrounding countryside or rural setting of Market Deeping, Deeping St James or Frognall;*
- c) It does not cause any unreasonable harm to the private amenity of any surrounding properties;*
- d) It does not cause any unreasonable negative impact to the capacity or safety of the existing highway network;*
- e) It does not cause any unreasonable negative impact to the capacity of the existing water or sewage infrastructure; and*
- f) It does not lead to an overdevelopment of a site, where the proposal is considered out of character in terms of its scale or its proposed density.*

2. Land outside the development limit, including any individual or small groups of buildings will be treated as open countryside where development will be carefully controlled in line with local and national strategic planning policies."

- 4.3. The supporting justification to this policy is set out in paragraphs 8.6-8.10, which notes that *"an appropriate amount of development will be acceptable in principle"*. It also notes *"Focussing development within the agreed Limits to Development will support existing services within the town centre and protect the countryside and the remainder of the NP area from significant development which is surplus to demand or out of keeping with the rural setting and highly attractive and historic landscapes of the Parish."*

Policy critique

- 4.4. Policy DNP2 and its supporting justification are contradictory. Whilst suggesting that appropriate growth will be acceptable in principle, the settlement boundary has been drawn around the existing extent of development, even excluding allocations which are proposed through the emerging Local Plan, one of which has already been granted permission. Therefore, this approach is inherently anti-growth in its application.
- 4.5. The Deepings are identified within both the adopted and emerging Development Plans as a suitable location for growth. In the emerging Local Plan, The Deepings is identified as one of four Market Towns, and second in the settlement hierarchy, beneath Grantham. Policy SP1 of the emerging Local Plan states: *“The focus for the majority of growth is in and around the four market towns, with Grantham being a particular focal point.”*
- 4.6. In addition, the introduction of a settlement boundary is insufficiently flexible to respond rapidly to any changes in the market and is not therefore compatible with the local authority’s requirement to meet the housing needs of district over the plan-period, which extends until 2036 (emerging Local Plan).
- 4.7. The introduction of a settlement boundary is also not in accordance with the policy approach of either the adopted or emerging Development Plan which identifies The Deepings as a sustainable location for growth. Neither of these plans include the use of settlement boundaries, setting instead a range of policy criteria to determine the location of development. In addition to SP1 which is discussed above, the emerging Local Plan includes additional strategic policies, such as SP2 and SP4, which specifically support growth in Market Towns over and above allocated sites, and growth on the edge of settlements in certain circumstances.
- 4.8. SP2 states:
- “Development which maintains and supports the role of the three market towns of Stamford, Bourne and the Deepings, will be allowed, provided that it does not compromise their nature and character. Priority will be given to the delivery of sustainable sites within the built up part of the town and appropriate edge of settlement extensions.” [Savills emphasis].*
- 4.9. SP4 states:
- “Proposals for development on the edge of a settlement, as defined in Policy SP2, which are in accordance with all other relevant Local Plan policies, will be supported provided that the essential criteria a-f below are met.” [Savills emphasis].*
- 4.10. Therefore, DNP2 directly contradicts the policy approach of the emerging Local Plan, which has significant weight and is due for adoption imminently.

Compliance with national policy

- 4.11. The PPG identifies that *“a neighbourhood plan or Order must not constrain the delivery of important national policy objectives. The National Planning Policy Framework is the main document setting out the Government’s planning policies for England and how they are expected to be applied”*. In being inherently anti-growth/anti-development, Policy DNP2 fails to comply with the requirements of the PPG.
- 4.12. In order that NPs can proceed eventually to referendum, there is a requirement for them to meet the ‘Basic Conditions’ of Town and Country Planning Act 1990.
- 4.13. The Town and Parish Council proposal to introduce a settlement boundary which excludes all land beyond the existing built form of The Deepings is in direct conflict with national planning policy and has the significant and real potential to undermine and restrict the delivery of sustainable development, which is at the heart of the NPPF. In addition, this point would directly contradict the ‘basic condition’ criteria (d) which states *“the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development”*.
- 4.14. Furthermore, the approach is also not in accordance with Basic Conditions (e) which require NPs to be in accordance *“in general conformity with the strategic policies contained in the development plan for the area”*.

Summary

- 4.15. Policy DNP2 and the introduction of a settlement boundary, as defined on Map 3 has the effect of constraining sustainable development, preventing the District Council from meeting its obligations in relation to housing delivery and sustainable development over the plan-period.
- 4.16. The approach is not in accordance with the strategic policies of the Development Plan.

5. Representation to Draft Neighbourhood Plan Policy DNP11

- 5.1. This section provides the representations to policy DNP11 of the draft Deepings First NP 'Green Infrastructure', on behalf of LCC CPT.

Policy Wording and Justification

- 5.2. Policy DNP11 reads:

"1. Where appropriate, new proposals should preserve, and where possible, enhance the existing local green infrastructure network, including the River Welland Green Corridor, the Green Walk, Green Lanes and existing public rights of way.

.....

.....

Green Lanes

4. The Green Lanes, as identified on Map 17, shall be protected from unsympathetic development which would have an adverse impact on the character area concerned. New development in the identified Green Lanes should preserve and, where possible, enhance their rural appearance."

- 5.3. The supporting text of the policy notes:

"This is the network of footpaths and green spaces linking our facilities and parks in a way that enables residents and visitors to navigate safely across and within The Deepings on foot, by cycle, with a buggy, by wheelchair, or mobility scooter. The Green Infrastructure Network also includes more informal open spaces and natural features, including the River Welland Green Corridor, natural green spaces, wildlife sites, woodlands and "Green Lanes".

Policy critique

- 5.4. Two 'green lanes' are identified on Map 17, including one which extends along the whole of Millfield Road. The purpose of the policy and the designation is not clear from the information within the NP. Whilst the policy seeks to protect these routes from unsympathetic development, the justification for the policy approach lacks detail, and the purpose of the designation is unclear.

Compliance with national policy

- 5.5. The PPG indicates that *"proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn on to explain succinctly the intention and rationale of the policies."* In this case, it appears that there is no evidence provided within or accompanying the draft NP to support the policy approach, which is restrictive and imprecise. Policy DNP11 is not therefore in accordance with national planning guidance on the making of a NP.

6. Representation to Draft Neighbourhood Plan Policy DNP13

- 6.1. This section provides the representations to policy DNP13 of the draft Deepings First NP on behalf of LCC CPT.

Policy Wording and Justification

- 6.2. Policy DNP13 reads:

“Policy DNP13: Local Green Spaces

1. The sites, as shown on Maps in Appendix B, are designated as Local Green Spaces:

- a) LGS1: John Eve Field (1.79ha);*
- b) LGS2: Glebe Field (2.47ha);*
- c) LGS3: Rectory Paddock and cemetery (1.47ha);*
- d) LGS4: Riverside Park (0.25ha);*
- e) LGS5: Welland Gardens (0.1ha);*
- f) LGS7: Tattershall Drive, Towngate (1.55ha);*
- g) LGS8: Sandringham Way (1.54ha);*
- h) LGS9: Tattershall Drive (South) (0.45ha);*
- i) LGS16: Cherry Tree Park (0.22ha);*
- j) LGS17: Greenlands (0.73ha);*
- k) LGS18: Mill Field (10.80ha);*
- l) LGS19: Scout Hut Area (0.74ha);*
- m) LGS24: Charter Avenue (0.24ha);*
- n) LGS30: Jubilee Park (2.29ha);*
- o) LGS31: Woody’s Heights (0.44ha);*
- p) LGS33: Millennium Wood (0.22ha); and*
- q) LGS34: Riverside Park DSJ (0.22ha);*

2. Development on these sites will only be supported in very special circumstances.”

- 6.3. Justification for the site’s inclusion is included in Chapter 17, Appendix C – Site LGS18: Mill Field.

Policy Critique

- 6.4. The NPPF and PPG set clear guidance for the designation of LGS, and it is therefore essential that plan-makers clearly demonstrate, through compelling evidence, that the requirements for its designations are met in full, namely in reasonably close proximity to the community it serves; it is demonstrably special to a local community and holds a particular local significance; and it is local in character and is not an extensive tract of land.

6.5. An assessment of the site and commentary on its inclusion as proposed LGS is included in Chapter 17, Appendix C. Comments on these criteria are provided in the table below:

NPPF Criteria (para 100)	Deepings First Justification	LCC CPT response
<p>a) in reasonably close proximity to the community it serves;</p>	<p>Mill Field forms part of the western gateway into the historic, rural town of Market Deeping and as such it provides an attractive setting. Mill Field is now the last area of accessible countryside within Market Deeping and it is situated very close to the community that it serves.</p> <p>Mill Field is used on a daily basis by local residents, regardless of the weather, because it has a natural beauty and it provides a large, open, green area where children and dogs can run and play freely and safely. Other activities include walking, jogging, cycling, kite flying, berry and wild mushroom picking, sunbathing and relaxing. Some residents sketch or paint there and others go there for peace and tranquillity and are refreshed and inspired by nature. It is important because it is free, can be used at any time of the day or night and is a large, informal green space which is very close to home but makes one feels as if one is walking in the open countryside. The proposed route for the Green Walk will also pass directly through Mill Field.</p>	<p>The site is close to the residents of Millfield Road and those living the west of Market Deeping.</p> <p>There are other areas, which are in use as public open space within close proximity to this part of Market Deeping, including:</p> <ul style="list-style-type: none"> • Tattershall Drive, Towngate (approx. 240m away from site); • Sandringham Way (approx. 220m away from site) • Greenlands (approx. 450m away from site) <p>Together, these sites provide around 3.8 ha of recreational open space within 450m of Millfield Road.</p> <p>Whilst the land includes a public footpath on the northern section, it is privately owned and is in use for agriculture. Signage exists around the site explaining that people should not trespass onto it. It's status is not therefore 'accessible countryside' as noted in the NP. It is not accessible by virtue of the signage around the site and its private ownership.</p> <p>It also does not 'serve' the community who have been using it without permission.</p> <p>Over the years, there have been a number of occasions where members of the public have been legitimately able to use the site, such as for the Deepings Show, which had taken place in the town for many years. In these instances, access was permitted via agreement in advance with the land owner. This does not therefore imply that the land at that time was 'public open space' simply that permission had been granted to access the land for a temporary period for a specific event. There was and is no ongoing right to use the land.</p>

		<p>It is important to note that whilst the site is currently laid to pasture, it is possible that in the future, it could be let to another agricultural tenant who undertakes other agricultural activities on the site (such as for livestock or the growing of crops). In this case, it could actually be very unsafe for members of the public to try and access the land.</p>
<p>b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife;</p>	<p>Mill Field is grassland bordered by mature hedgerows and trees which provide a natural habitat for wildlife including muntjac deer, rabbits, owls and woodpeckers. Mill Field is a large area of informal green space which is highly valued by the Town Council and local residents. It epitomizes the rural character of our historic town and for many, many years has significantly benefitted the physical, mental and emotional health of local residents. Mill Field is very valuable to our community because people meet and make lasting friendships there, sharing a common love of nature and walking. Many newcomers to the town make their first contacts and friends at Mill Field and it is also plays a vital part in many lives who are bereaved or lonely.</p> <p>Mill Field has been associated with recreational, sporting and</p>	<p>As noted above, any recreational activities which may have taken place on parts of the site beyond the public footpath have been undertaken without permission. Its agricultural use means that it is not recreational land.</p> <p>Evidence of the use of the site was put forward through the Village Green Application and considered at the Inquiry, however, this concluded that the evidence was not sufficiently robust to support the claim. Much of this evidence was anecdotal, lacking documented proof to support the claims.</p> <p>The ongoing planning application on the site is supported by a wide range of technical reports which have considered matters such as ecology and confirmed that the site is not home to any protected species.</p> <p>It is unclear whether the site is truly special to the community or whether the VGA and subsequent proposal to include the land as LGS are simply a means to prevent the development of this site, both processes following the inclusion of the site within the Regulation 18 Draft of the SKDC Local Plan in 2017.</p>

	<p>cultural events since at least 1882. From 1882 until the First World War, the Oddfellows Charity held a very popular annual Gala, every July, on Mill Field with stalls, brass bands, races, competitions, and fair rides. During the two World Wars there were football matches held on Mill Field and after the second World War the Deepings Agricultural Show, a well-loved, local, community event was held there annually, until 2013. Associated with the Agricultural Show, there were Sometimes community dances and also church services led by the local churches on Mill Field.</p>	<p>Its aesthetic value is affected by the proximity to the A15, which extends along the western boundary of the site.</p> <p>The site exists in its current form as a result of the creation of the road itself.</p> <p>In addition, the site was proposed as an allocation for housing in the Regulation 18 Consultative Draft Local Plan 2017 (CDLP) under 'DEP1 H2' for 200 dwellings (indicative). The site was only removed from the Regulation 19 Pre-Submission version of the Local Plan pending the outcome of the unsuccessful application for Village Green status. The fact of its inclusion within the draft Local Plan confirms that there are no overriding factors relating to the suitability of the site for housing in the future.</p>
c) local in character and is not an extensive tract of land.		<p>This criterion is discussed in detail below. In summary, it is considered that LSG18 does not comprise an "extensive tract of land".</p>

- 6.6. The NPPF is explicit in stating that LGS must not relate to 'extensive tracts of land'. The PPG notes that when it comes to scale, there is *"...no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgment will inevitably be needed"* before adding that paragraph 100 of the NPPF is clear that the Local Green Space designation should only be used where the green area concerned is *"local in character and is not an extensive tract of land"*. The NPPG states: *"Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name"*. [Savills emphasis].
- 6.7. Of the 17 LGSs proposed by the draft NP, LGS18, which is stated as 10.80 ha, is the greatest in size by a considerable margin. The site clearly comprises a large tract of land on the edge of the settlement. This is apparent not only by its scale but when viewed within the context of Market Deeping as the Map on page 143 of the draft NP illustrates. The majority of the proposed LGS sites (10) are less than 1 ha in size, with a further six between 1 ha and 2.47 ha in size. Therefore, there is a considerable difference between LGS18 and the other sites proposed for inclusion as LGS.
- 6.8. At 10.80 ha in size, the site is plainly an extensive tract of land. This assessment is supported by examinations into Drafts of Development Plans.

- The Cheltenham Local Plan 2011-2031 proposes the designation of a number of areas of LGS. The Inspector's Post Hearing Advice (April 2019), which is included in Appendix 2, makes the following points in relation to the designation of LGS:
 - "Care is required to ensure that LGS policies are not misused. Whilst it is a consequence of the successful designation of a site as LGS that it will be protected from future development, that should not be the primary reason for seeking the designation. The aim of the policy is to protect areas of particular importance to local communities and there is nothing in the NPPF which describes their use for the strategic containment of settlements or as a strategic designation to protect the countryside."
 - Many of the proposed LGS areas will be important to local communities. Open spaces will be used by local communities for informal recreational uses including dog walking and relaxation. However these are inevitably commonplace activities, in particular within the rural areas around the urban fringe. Sites may also contain varying levels of wildlife, beauty and tranquillity. Nevertheless the available evidence must sufficiently demonstrate why sites are 'demonstrably special' and of 'particular local significance' to distinguish them from other green areas and open spaces which have similar features in order to reach the high bar necessary for LGS designation.
 - There are several proposed LGS which cover large areas of land. These include King George V Playing Field (11.70ha), Swindon Village (8.89ha) and Pitville Park (19.51ha). Other large areas are proposed at Leckhampton Fields (39.31ha), the North West Strategic Allocation at Swindon Village (24.5ha) and West Cheltenham Strategic Allocation (18.25ha) Although there is no definition of an "extensive tract of land" in national policy or guidance, an LGS should be "local in character". To designate areas of land of this scale as being "local in character" would require a robust justification." [Savills emphasis]
- The Brixworth Neighbourhood Plan (Examiners Report dated July 2016) – the Examiner concluded that in relation to three sites of 22.5ha, 7.2ha and 2.7ha on the edge of the settlement *"all [are] arable agricultural land on the edge of the village. They are not in use as green spaces and the only access to the areas is by way of public and permissive rights of way. All three sites are extensive tracts of land. There is no compelling evidence about why the areas are of particular local significance. Footpaths border some of the sites but this is not in itself a reason to designate a parcel of land as a Local Green Space. The sites are important in the landscape setting of the village, however this is not a reason to designate them as Local Green Space. For an area to be designated as a Local Green Space it must meet all three criteria of NPPF paragraph 77 which these sites clearly do not do."*
- The Tatenhill Neighbourhood Plan (Examiner's Report dated November 2015) – the Examiner considered that at 9.2 and 4.3 hectares respectively, sites to the north and south of Branston Road, proposed to be designated as LGS through the NP, constituted extensive tracts of land and instructed their removal from the draft NP, given their inclusion failed to meet the basic conditions. The Examiner's Report is attached at Appendix 3.
- The Oakley and Deane Neighbourhood Plan (Examiner's Report dated December 2015) – the Examiner concluded that a proposed LGS designation on a site of just over 5 hectares to be contrary to national planning policy. The Examiner's Report is attached at Appendix 4.

- 6.9. Having regard to the above, and its scale in relation to Market Deeping, it is considered that LGS18 comprises an extensive tracts of land and its designation is not therefore permissible within the context of national planning policy.
- 6.10. Through DNP13 and its designation of LGS on this large area of land on the edge of the settlement, the draft NP is seeking to apply a similar level of protection as would be afforded to Green Belt. This approach is not appropriate in relation to development in the open countryside and the scale of protection should be commensurate to the degree of importance. Consequently, the Town and Parish Council's 'blanket designation' of open countryside, being proposed by DNP13, is in direct conflict with national planning policy and has the significant and real potential to undermine and restrict the delivery of sustainable development, which is at the heart of the NPPF. In addition, this point would directly contradict the 'basic conditions' that NPs must adhere to in order to be found sound, including (d) which states "*the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development*".

Notification of land owners

- 6.11. The PPG states that, in respect of LGSs, the qualifying body, i.e. those responsible for the preparation of the Neighbourhood Plan, which in this instance is the Town and Parish Council, "*...should contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a draft plan*".
- 6.12. Savills has been advised that LCC CPT (nor any other part of the organisation) has been notified, at any stage of the draft NP's preparation, of the proposed LGSs affecting land within their control. As a result, this is the first opportunity which LCC CPT has been afforded to make representations to the proposed LGS. The Councils have therefore failed to follow PPG advice and so the application of Policy DNP13 of the draft NP further fails to meet 'basic condition (a)' for this reason.

Summary

- 6.13. This Section clearly demonstrates that the proposed LGS designation LGS18 fails to comply with the requirements of paragraph 100 of the NPPF and in doing so, Policy DNP13 would fail to meet 'basic condition (a)'.
- 6.14. In its current form, DNP13 is extremely restrictive, having real and significant potential to harm and prevent the delivery of sustainable development, contrary to the positive approach required by the NPPF at its paragraph 14. As this Section has explained, the proposed LGS designations at LGS18 fails to comply with the NPPF and in particular, its requirement to exclude 'extensive tracts of land' from LGS designations.
- 6.15. The designation of LGS is wholly inappropriate for anything other than small and very localised areas of land, otherwise it is tantamount to the designation of Green Belt without any of the proper scrutiny and examination. Green Belt designation is a strategic issue and such strategic issues are not appropriate for Neighbourhood Plans.

7. Conclusions

- 7.1. As this Report as highlighted, there are several areas of concern in relation to The Deepings First NP. The majority of these issues relate to the restrictive nature of policies such as DNP1 and DNP13 which threaten to severely prejudice the delivery of sustainable development.
- 7.2. It will therefore be important that any examination into the NP be undertaken in a public forum, via a hearing.
- 7.3. The presently undetermined planning application on the site has the potential to offer a large area of public open space which the community would be welcome to use. As the masterplan in Appendix 1 demonstrates, the indicative design retails a green boundary along Millfield Road, which would reinforce the green character of the route. It is therefore essential that the NP considers this site in the context of what it is able to offer to Market Deeping over the plan-period.

Draft Deepings First Neighbourhood Plan

Land off Millfield Road



Appendix 1: Indicative site layout

Proposed Residential Development at Millfield Road, Market Deeping



Draft Deepings First Neighbourhood Plan
Land off Millfield Road



**Appendix 2: Cheltenham Local Plan 2011-Inspector's Post Hearing
Advice (April 2019)**

Background Document
Con6 - Draft NP Consultation Response 2019
Cheltenham Borough Council
Local Plan 2011-2031
EXAMINATION
www.cheltenham.gov.uk/LPexamination

Examination into the soundness of the Cheltenham Plan (CP) 2011-2031

Post Hearing Advice

Introduction

1. At this stage I consider that the CP is a Plan which could be found sound subject to main modifications (MMs). However I have reached no final conclusions at this time. The MMs will be subject to consultation and I will reach my final conclusions taking any representations into account.
2. During the hearing sessions a number of potential MMs were discussed and a list has been maintained by the Council. In addition I indicated at the hearings that there were matters on which I would need to deliberate before I would be in a position to advise the Councils as to whether any additional work or further MMs should be considered. This letter provides my views on these matters. It also sets out the administrative arrangements relating to all potential main modifications.
3. I am not inviting any comments about the contents of this letter, although I am **seeking the Council's response on the matters raised**. I will detail my full reasoning on these issues in my final report on the CP.

Further potential main modifications

Leckhampton School Site (MD5)

4. Overall I consider that adequate work has been undertaken of the potential environmental impacts of the school site proposed within the MD5 allocation to meet the requirements for sustainability assessment. The site has also been subject to public consultation at the pre-submission stage; and the results of that consultation are before my examination.
5. However, the NPPF requires proposals to be deliverable. The allocated site is within the control of Miller Homes and is not currently available for Gloucestershire County Council (GCC) as education authority to purchase. GCC has undertaken further work into the need for a school site and concluded that a smaller site would be suitable [M3-1321 paras 14-15]. There is land owned by GCC immediately south of the MD5 proposal, which currently forms a part of the proposed Leckhampton Fields Local Green Space (LGS). I deal with the issue of the LGS designations below. I make no comment on the suitability of the alternative site for the school.
6. With the opposition to acquisition from Miller Homes, and the potential availability of an alternative site **in GCC's ownership**, it is uncertain that GCC could successfully use CPO powers to purchase the school site as allocated within MD5. In these circumstances it is not certain that the allocation of the school site as currently proposed within Policy MD5 is capable of being delivered.
7. There is an agreement between GCC and Cheltenham Borough Council that a new secondary school is required in the Leckhampton/Warden Hill area. In addition, the NPPF para 72 requires LPAs to take a proactive, positive and collaborative approach to meeting the requirements for new school places to ensure there is a sufficient choice to meet needs. In these circumstances it is appropriate that the Council seek to make provision for the identified need in the emerging CP.

8. It is for the Council to consider the modification which should be brought forward to ensure that provision is made in the CP for the new school. There are two options which the Council might pursue to modify the CP and provide for a new school at Leckhampton, both of which were raised in discussion at the hearings.
9. GCC has indicated that a total site area of 5.9ha is required for the School, rather than the 7ha which was originally identified. On this basis, the area required for the school within the MD5 allocation could be reduced. Consideration may also be given to restricting the MD5 land to the accommodation of the main school buildings alone, with the playing fields and car parking located within the GCC owned land south of the allocation. Having reduced the area of land within the MD5 allocation which is required for education purposes, an assessment should also be made of the extent to which the school is required to meet future needs arising from the new housing proposed at MD5. Provided there is a demonstrable link, changes can be made to Policy MD5 to require that the school site is provided prior to the completion of all or part of the residential development of MD5. Such a modification to the Policy (provided it can be justified) would ensure that an agreement can be reached between the current landowners and GCC.
10. The other option is to allocate the land already owned by GCC as the site for the school. GCC has submitted substantial evidence to demonstrate the impacts on the landscape of a school development in this location, and detailed assessments have been carried out of traffic and other environmental impacts. The Council should give careful thought to the evidence as submitted in order to reach a view as to whether a modification to allocate this site and remove the school from MD5 should be pursued.
11. Through the reduction in size or relocation of the school, land would be released within MD5 for alternative use. I deal with housing and Local Green Space (LGS) later in this note. The land which is released could be considered for an increase in housing numbers, for the provision of LGS to serve the new housing within MD5, or a combination of both.
12. Any proposal to modify Policy MD5 and/or the site of the school may require a review of the SA. The Council will also need to make changes to the site map (currently p84) and the Policies Map to identify the area to be allocated for the school site. As part of the work on the modification to the Plan the Council, in consultation with GCC as highway authority, will need to be satisfied that the traffic impact from a new school site can be accommodated together with the traffic impact from the new and proposed residential development within the area.

Employment

13. In view of the Environment Agency comments on site E4 Land at Chelt Walk, it would not be appropriate to include any residential development within the site. A MM should be made to the text in para 3.25 to reflect the findings of the Level 2 Strategic Flood Risk Assessment (SFRA) and delete the reference to residential development within any future scheme.
14. **It is not clear whether the sites listed as "new" employment allocations** in Policy EM3 have been previously included within the 63ha of employment land referred to in JCS paragraph 3.2.21. I have not yet had the results of the work requested at the hearings on this matter.
15. To the extent that Policy EM3 may identify previous allocations and extant permissions which have been included in the figure of 63ha referred to in the JCS, **it is not appropriate for such sites to be included in the CP as "New employment allocations"** in Policy EM3. Policy EM1 deals with safeguarding key

existing employment land and buildings. In the interests of clarity and to avoid any potential for double counting, sites listed in Policy EM3 which are included within the 63ha referred to in the JCS should be transferred to Policy EM1. If Policy EM3 is to be retained, it should only include sites which were not identified within the 63ha and which are clearly a new employment designation.

Housing

16. There is no date provided in Table 2 to indicate the base date for the housing **figures in the Plan. Table 2 should be updated to the Council's latest monitoring point**, with the base date included within the updated table. Similarly, the housing trajectory provides no base date for the assessment provided for the delivery of housing sites. The trajectory should also be updated to the latest available monitoring point, and the Council should consult with landowners, agents and or developers to clarify the potential delivery of each of the sites within the trajectory using the monitoring point as the base date.
17. When updating the housing figures in Table 2 and in the housing trajectory, changes to the figures which arise from my comments on Sites MD1, MD5, and HD4 will need to be taken into account

Site MD1

18. This site is in active commercial use and has been recently refurbished. Although the landowner raises no objection to the allocation for housing, this is not a reliable indication that a change in the use would be forthcoming. Although it may be appropriate to retain site MD1 as a potential housing site, unless there is evidence to demonstrate that the site will be brought forward before 2031, I consider it should not be counted as contributing to the supply of housing within the Plan period.

Site MD5

19. With any modification to the size or location of the school site proposed for Leckhampton, there is potential for an increase in the housing numbers above 250 dwellings within the allocation, together with the possible provision of LGS to serve the new housing. I look to the Council to identify and agree a satisfactory uplift in the housing numbers for the site. The Council, in consultation with the GCC as highways authority, will need to be satisfied that the traffic impact of any increase in the scale of housing, in addition to the traffic from a potential school site and the housing development at Farm Lane, can be accommodated in accord with Government policy.

Site HD4

20. The site is allocated for some 29 dwellings, and the Council has refused planning permission for a development of 69 houses. I note the position of Historic England (HistE) which raises issues relating to potential impact on the settings of the Grade II* listed Ashley Manor and the Grade II listed Charlton Manor. However, the views of HistE are disputed by expert evidence which I have taken into account in my consideration of the potential for development of the site. I visited the site on the 5 March 2019.
21. Historic England proposes amendments to the wording of Policy HD4. These would restrict new housing to the west of the site behind the existing tree belt and require improvements to be secured to the Ice House which lies between Charlton Manor and Ashley Manor. However, having reviewed the evidence and visited the site, I consider that the reduction in the area of the development recommended by HistE is not justified. Nevertheless, there is good reason to amend the boundaries of the development area from that currently proposed in

the CP, and to require new tree planting around the east and south boundaries to safeguard the settings of both listed buildings.

22. New housing should be located away from the setting of the west elevation of Ashley Manor. This could be achieved through the amendment to the southern boundary of the allocation site so that it continues in a straight line westwards from the rear of the northernmost school building. In addition, to provide an undeveloped buffer between the rear garden boundary of Charlton Manor and the new development, the eastern boundary of the site should be repositioned at least 30 metres west of the rear boundary with Charlton Manor. The Ice House would remain within the confines of the site, but its future could be secured through the inclusion of the requirement put forward by Historic England as bullet point 2.
23. An MM is required to Policy HD4 to identify the boundaries of the site as suggested above; to identify the level of new housing which could realistically be accommodated within the new site boundary; to identify the need for new tree planting around the east and south boundaries of the site; and to require the improvements to the Ice House in accordance with the views of HistE. Changes will also be required to the Plan of HD4 (currently on page 70) and to the Policies Map.

Site HD8

24. The changes put forward by HistE for Policy HD8 should be included as a MM.

Green Belt (GB) and Green Infrastructure

Policy GB2

25. The test in Policy GB2 Clause d) is potentially too restrictive since any new building is, by definition, harmful to the openness of the GB. I would suggest a MM to Clause d) to ensure that it complies with the wording in the final bullet point of NPPF para 89.

Local Green Space (LGS)

26. **Having reviewed the Council's assessments for the designation** of LGS proposed within the CP, I am concerned that the methodology and overall assessment for LGS designation has not been sufficiently rigorous to comply with national policy and guidance.
27. The NPPF sets a significantly high bar for LGS designation given that paragraphs 76-78 state that it **"...will not be appropriate for most green areas or open space"; that on such sites new development is ruled out "other than in very special circumstances" and that they are to be managed in line with Green Belt policy.**
28. Care is required to ensure that LGS policies are not misused. Whilst it is a consequence of the successful designation of a site as LGS that it will be protected from future development, that should not be the primary reason for seeking the designation. The aim of the policy is to protect areas of particular importance to local communities and there is nothing in the NPPF which describes their use for the strategic containment of settlements or as a strategic designation to protect the countryside.
29. **The Council's LGS Study Report, refers to the "threat of development" as an example of the factors to be considered by communities when assessing possible LGS sites, whereas the primary reason for designation should be that the site is of such demonstrable significance to the local community that it should be protected. The use made of Natural England's Accessible Natural Greenspace**

Standards (ANGSt) in the LGS Study, and comparisons of the scale of LGS to that of SSSIs are unhelpful since it diverts attention from the criteria set out clearly in National policy and guidance.

30. Many of the proposed LGS areas will be important to local communities. Open spaces will be used by local communities for informal recreational uses including dog walking and relaxation. However these are inevitably commonplace activities, in particular within the rural areas around the urban fringe. Sites may also contain varying levels of wildlife, beauty and tranquillity. Nevertheless the available evidence must sufficiently demonstrate why **sites are 'demonstrably special' and of 'particular local significance' to distinguish them from other green areas and open spaces which have similar features in order to reach the high bar necessary for LGS designation.**
31. Many of the sites proposed for LGS in the CP have established uses which are subject to other policy protection. Before putting these sites forward as LGS, consideration should be given to whether the additional designation is justified. For example, the designation of sports pitches and playing fields as LGS is useful where the specific facility is intended to be retained in that location and serves a special purpose for the local community. However, if there is a possibility of alternative or better facilities being provided in the future then the LGS designation would be inflexible and para 97 of the NPPF would provide a more appropriate form of protection. The Victoria Cricket Ground is an example of a sports field for which LGS designation is unlikely to be justified.
32. In addition to the 12 sites which were assessed through the LGS study, the Council has identified all the sites allocated as Public Green Space (PGS) in the 2006 Local Plan as LGS without any consideration as to whether the site would meet the high bar for designation set out in the NPPF and in the associated Planning Practice Guidance (PPG). A further 2 sites are added on the basis that they are owned and managed by the Council and are similar to other PGS sites. Whether or not the PGS allocation was a precursor to the LGS designation, given the particular qualities required to support LGS designation, each of the PGS sites needs to be assessed and justified before the new designation is proposed.
33. There are several proposed LGS which cover large areas of land. These include some of the existing PGS such as the King George V Playing Field (11.70ha), Swindon Village (8.89ha) and Pitville Park (19.51ha). Other large areas are proposed at Leckhampton Fields (39.31ha), the North West Strategic Allocation at Swindon Village (24.5ha) and West Cheltenham Strategic Allocation (18.25ha) which were specifically discussed at the hearings. Although there is no definition of an "extensive tract of land" in national policy or guidance, an LGS should be "local in character". To designate areas of land of this scale as being "local in character" would require a robust justification.
34. Leckhampton Fields is an attractive rural area at the foreground of the Cotswolds AONB, and valued by local residents for its public footpaths, wildlife and tranquillity. However, there is no evidence that the particular features of this area of countryside are so special as to justify its long term protection as an extensive area of LGS. In view of the proposals for large scale residential development within the Leckhampton area, I agree with the Inspector at the JCS examination that an area of LGS would be justified. However, the boundaries fall to be determined through the CP, and the area selected must accord with national policy and advice. I consider that the area of 39.31ha as currently proposed is not justified, and that a new assessment is required to identify an area which would meet the criteria in the NPPF and PPG. LGS proposed within the Leckhampton area will be needed to serve existing and new residential development.

35. These comments also apply to the proposed area of 24.5ha for LGS at the North West Strategic Allocation. An area was identified through a Statement of Common Ground (SoCG) between the developers, Swindon Parish Council and Save the Countryside in April 2016. The area proposed in the SoCG amounts to some 5.9ha. This remains a significant area for designation as LGS. However, in view of the scale of new and existing development which it would serve and the buffer which would be provided between the existing and new housing, I consider the area to be justified. Detailed boundaries should be agreed with the developer and the allocation within the CP modified accordingly.
36. The Council indicated at the hearings that the LGS proposed for West Cheltenham required review. I therefore make not comment at this stage on the proposal in the CP for LGS at West Cheltenham.
37. The PPG states that landowners should be contacted at an early stage about proposals to designate any part of their land as LGS and have opportunities to make representations. Submissions indicate that a number of landowners were unaware of the potential designation of their land as LGS. The views of landowners should be sought during the the LGS selection process and their comments should be robustly addressed within any assessments.

Further work on LGS

38. Having regard to the issues I have identified with regard to the methodology adopted in the identification of LGS, and the particular shortcomings in those discussed at the hearings, I suggest that the Council has the following options:

Option 1 – to revisit the assessments for LGS designation of all the sites proposed as LGS in Table 8 of the CP and as shown on the Policies Map having regard to the factors which are highlighted above. Consequential changes may be required to Policy GI1, the supporting text and the Policies Map. This option would require a pause in the examination until all the work is completed, landowners have been contacted and a public consultation has been carried out of the results. It may then be necessary to hear evidence at a further hearing session. Inevitably this would result in a lengthy delay in the examination.

Option 2 – to restrict the new assessment for LGS designation to sites 1-11, 83 & 84 in Table 8 which were not previously designated as PGS in the 2006 Local Plan. The sites to be tested against the factors which are highlighted above, and where amendments are necessary, proposals for LGS to be brought forward as a modification to the CP and as changes to the Policies Map. Consequential changes may be required to Policy GI1 and the supporting text. Those sites previously allocated as PGS (sites 12-82) to be deleted from Table 8 and the Policies Map, pending a separate and fully detailed assessment of each of the PGS sites against National policy and guidance for the designation of LGS. This separate assessment of the PGS sites to be carried out either as a one policy update of the CP, the production of a separate DPD or as part of the 5 year CP review. The PGS policy (GE 1) in the 2006 Local Plan could continue to be saved pending this process. The CP would need to make it clear that these 2006 policies were not being superseded. This option would require a less extensive pause in the examination until the work is completed, and a public consultation has been carried out of the results. It may be necessary to hear evidence at a further hearing session.

Option 3 - to remove all the LGS designations from the Policies Map, delete Table 8 and the accompanying text and make consequential changes to Policy GI1. The Council could then undertake a comprehensive review of the LGS assessment process, either as a one policy update of the CP, the production of a separate DPD or as part of the 5 year CP review. There is the option of continuing to save

PGS policy (GE 1) in the 2006 Local Plan pending this process, provided such an approach is made clear in the modification to the CP.

Flooding

39. Version 2 of the Level 2 SFRA has been reviewed by the Environment Agency (EA). In their letter to CBC dated 20 February 2019, the EA has set out requests for amendments to the policy wording of the following sites: site EM3, MD4, HD8, HD7 and HD3. In addition, Severn Trent Water (STW) has identified local infrastructure constraints for a number of sites. I agree that site specific policy wording is required for sites highlighted amber or red in the STW email of the 1 February 2019. I look to the Council to produce MMs to meet the requirements of the EA and of STW.

Historic and Built Environment

40. The Council acknowledge that the CP does not provide the statutory framework **within which to carry out a review of the Borough's** Conservation areas. Paragraphs 9.22 to 9.30 together with Table 1 should be deleted from the CP as a MM.

Natural Environment

41. JCS Policy SD7 provides adequate protection for the Cotswolds AONB and its setting from the harmful effects of new development. Paragraph 8.5 of the CP is not necessary or justified and should be deleted through a MM.

Gypsy, traveller and travelling showpeople

42. The site proposed to be allocated through Policy GT1 is located within the AONB outside any settlement and conflicts with Government policy as set out in **"Planning policy for traveller sites"**. **The site should be deleted from the CP.**
43. The current need for traveller sites is met as a result of the temporary planning permission on the site proposed for allocation. A permanent solution to this and any future need should be met in the 5 year review of the CP, through the allocation of a site which complies with Government policy. Meanwhile, the criteria based Policy SD13 in the Gloucester, Cheltenham and Tewkesbury Joint Core Strategy (JCS) will provide the basis for the determination of future planning applications.

Next Steps

44. The Council should now consider its options in relation to
- An amended school site to meet the need for the Leckhampton/Warden Hill area;
 - The deletion of MD1 from the housing supply;
 - A modification to the Policy wording of MD5, to the scale of housing development for the allocation and the possible inclusion of an area of LGS;
 - the scale of housing development for Oakhurst Rise site HD4;
 - the alternative approaches set out above for the review of the LGS designations.
45. Details of the work which the Council intends to undertake, together with the timescales for the work, should be clearly set out in a programme to be submitted to the Programme Officer by April 26 2019.

46. The additional MMs which will be required as a consequence of the issues raised in this note will need to be incorporated into a consolidated schedule of all the potential MMs. The Councils should also consider the need for any consequential changes to the CP and to the Policies Map that might be required in connection with any potential MMs. All changes to the submission Policies Map must be made available for comment alongside the MMs.
47. I will need to see the draft schedule of MMs and changes to the Policies Map and may have further comments on it. I will also need to agree the final version of the schedule before it is made available for public consultation. For clarity and to avoid an excessive number of MMs, it is best to group all the changes to a single policy together and to include any consequential changes to the explanatory text of that policy as one MM.
48. The Council should also satisfy itself that it has met the requirements for sustainability appraisal by producing an addendum to the Sustainability Appraisal of the submitted plan in relation to the potential MMs, as appropriate. I will need to see a draft of the addendum and may have comments on it. The addendum should be published as part of the future MMs public consultation.
49. The Council may also produce a list of proposed additional modifications (AMs). The AMs are a matter solely for the Council and are not before me to examine. If the Council intends to publicise or consult on them it should be made clear that such changes are not a matter for the Inspector.
50. Advice on main modifications and sustainability appraisal, including on consultation, **is provided in "Examining Local Plans Procedural Practice"**. Amongst other things this states that the scope and length of the consultation should reflect the consultation at the Regulation 19 stage (usually at least 6 weeks). It should be made clear that the consultation is only about the proposed main modifications and not about other aspects of the plan and that the main modifications are put forward without prejudice to the Inspector's final conclusions.
51. The Procedural Practice also states that the general expectation is that issues raised on the consultation of the draft main modifications will be considered through the written representations process and further hearing sessions will only be scheduled exceptionally.
52. I look forward to hearing from the Council by the 26 April 2019, with its work programme and decision as to which approach it wishes to pursue to review the LGS designations. If there are any queries or matters that require clarification please contact me through the Programme Officer.

Wendy Burden

Inspector

Draft Deepings First Neighbourhood Plan
Land off Millfield Road



Appendix 3: Tatenhill Neighbourhood Plan (Examiner's Report dated November 2015)

TATENHILL NEIGHBOURHOOD PLAN 2012 - 2031

A Report to East Staffordshire Borough Council
of the Examination into the Tatenhill Neighbourhood Plan

by Independent Examiner, Nigel McGurk BSc(Hons) MCD MBA MRTPI

Nigel McGurk

Erimax Land, Planning and Communities

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November 2015

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1. Introduction

The Neighbourhood Plan – Background

This Report provides the findings of the Examination into the Tatenhill Neighbourhood Plan (referred to as the Neighbourhood Plan) carried out during October and November 2015.

I examined a previous version of the Tatenhill Neighbourhood Plan in August 2014 (referred to as the Neighbourhood Plan 2014) and the subsequent Examiner's Report was published in September 2014.

The Examiner's Report recommended changes necessary for the plan to meet the Basic Conditions (the Basic Conditions are referred to later on in this Report). On consideration of these recommendations, Tatenhill Parish Council decided that, whilst most recommended changes could be accepted, others would be so significant as to, in the opinion of the Parish Council, potentially result in a "No" vote at Referendum.

Amongst other recommended changes, Tatenhill Parish Council was particularly concerned with the recommended deletion of Policy LC2 – Protected Green Spaces and Green Gap. Whilst its inclusion meant that the Neighbourhood Plan 2014 failed to meet the basic conditions – and so, the Neighbourhood Plan could not have progressed to Referendum whilst it included the Policy - Policy LC2 was strongly supported by members of the local community.

Choosing not to abandon the significant work undertaken and start all over again, Tatenhill Parish Council sought to work together with East Staffordshire Borough Council, in the spirit of the Localism Act (2011) and with the specific aim of achieving a positive solution, as quickly as appropriate. This resulted in the production of the Neighbourhood Plan the subject of this Examination.

By and large, this Neighbourhood Plan is the same as the Neighbourhood Plan 2014. The main differences being that it incorporates the majority of the Examiner recommendations made previously; it includes two completely revised versions of Policies LC2 and IN2 ("Highways Safety"); it includes information to support the revised Policy LC2; and it includes a small number of other changes.

The (revised) Neighbourhood Plan was submitted to East Staffordshire Borough Council and underwent a formal six week consultation period during August and September 2015. East Staffordshire Borough Council, with the agreement of Tatenhill Parish Council, then submitted the Neighbourhood Plan for examination.

This is an unusual situation. In the case of neighbourhood planning, it is my understanding that it is unprecedented. Consequently, I consider the process in more detail below.

The Neighbourhood Plan - A "Second Examination"

It is a requirement of the Town and Country Planning Act 1990¹ that the recommendations made in an Examiner's Report must be considered by the relevant local authority, which must then decide on what action to take in response to each recommendation.

If the local authority is satisfied that the Basic Conditions and any legal requirements are met as a result of modifying the neighbourhood plan in accordance with the Examiner's recommendations, then a Referendum must be held to determine whether the neighbourhood plan should be *made* (the neighbourhood planning equivalent of "adopted") by the local authority.

The Town and Country Planning Act 1990 states² that where

"the local authority propose to make a decision which differs from that recommended by the examiner, and the reason for the difference is (wholly, or partly) as a result of new evidence or a new fact or a different view taken by the authority as to a particular fact, the authority must notify prescribed persons of their proposed decision (and the reason for it) and invite representations. If the authority consider it appropriate to do so, they may refer the issue to independent examination."

In this case, East Staffordshire Borough Council has proposed to make a decision that differs from the Examiner's recommendations and in particular, it has taken a different view from the Examiner in respect of part of the following three Policies: Policy HE1, Policy LC2 and Policy IN2. It has also taken a different view from the Examiner with regards a minor part of Policy HE5 and the content of some of the Neighbourhood Plan's supporting text.

Taking the above into account, further to changes being made to the Neighbourhood Plan 2014 East Staffordshire Borough Council decided to undertake a full, six week, submission consultation on the (revised) Neighbourhood Plan. As noted above, this was carried out during August and September 2015.

Following this consultation period, East Staffordshire Borough Council considered it appropriate to refer the (revised) Neighbourhood Plan to independent examination. Taking this and all the above into account, it appears to me that East Staffordshire Borough Council has carried out its duty with full regard to the requirements of the Town and Country Planning Act 1990, with specific regard to the paragraph highlighted above.

I also consider it relevant to point out that the approach taken by East Staffordshire Borough Council appears to sit comfortably within the spirit of the Government's approach to Localism and planning. In January 2015, when introducing a raft of

¹ Paragraph 12, Schedule 4B.

² Paragraph 13, Schedule 4B (as inserted by the Localism Act 2011).

proposals to speed up and simplify the neighbourhood planning process, Housing Minister, Brandon Lewis stated that

“...I want to see more communities making the most of the powers we’ve put in their hands. These measures will speed up the process, making it quicker and easier to get a neighbourhood plan together...”

In this light, in my view, East Staffordshire Borough Council is to be commended for what appears to be the adoption of a pro-active approach to bringing forward a neighbourhood plan without unnecessary delay, whilst at the same time, carrying out its duties with full regard to the requirements of the Town and Country Planning Act 1990.

The Setting Out of This Report

The Neighbourhood Plan has been submitted to me for examination. I confirm that I have examined it, and all relevant supporting documents, as a whole. As might be expected, this Report focuses particular attention on those changes that do not necessarily reflect the previous Examiner recommendations. In addition, as time has passed since the previous examination and planning policy – and the world of town planning - is dynamic, I have considered all aspects of the Neighbourhood Plan.

In the above regard, there have been changes to planning over the last year or so, not least as a result of new national planning policy and advice. In addition, the East Staffordshire Borough Council Local Plan was adopted during the course of this examination, on Thursday 15 October 2015. I have taken these factors into account in completing this Report.

The Neighbourhood Plan

Neighbourhood planning provides communities with the power to establish their own policies to shape future development in and around where they live and work.

“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.”

(Paragraph 183, National Planning Policy Framework)

Tatenhill Parish Council is the *qualifying body* responsible for the production of this Neighbourhood Plan. This is in line with the aims and purposes of neighbourhood planning, as set out in the Localism Act (2011), the National Planning Policy Framework (2012) and Planning Practice Guidance (2014). The Parish Council established a working group, with the Tatenhill Parish Community Group, to lead on the production of the Neighbourhood Plan.

This Examiner’s Report provides a recommendation as to whether or not the Neighbourhood Plan should go forward to a Referendum. Were it to go to Referendum and achieve more than 50% of votes in favour, then the Neighbourhood Plan would be *made* by East Staffordshire Borough Council. It would then be used to determine planning applications and guide planning decisions in the Tatenhill Neighbourhood Area.

Role of the Independent Examiner

I was appointed by East Staffordshire Borough Council, with the consent of Tatenhill Parish Council, to conduct an examination and provide this Report as an Independent Examiner. As explained above, I also examined the Neighbourhood Plan 2014.

I am independent of the qualifying body and the local authority. I do not have any interest in any land that may be affected by the Neighbourhood Plan and I possess appropriate qualifications and experience. I am a chartered town planner and an experienced Independent Examiner of Neighbourhood Plans. I have extensive land, planning and development experience, gained across the public, private, partnership and community sectors.

As the Independent Examiner, I must make one of the following recommendations:

- a) that the Neighbourhood Plan should proceed to Referendum, on the basis that it meets all legal requirements;
- b) that the Neighbourhood Plan, as modified, should proceed to Referendum;
- c) that the Neighbourhood Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.

If recommending that the Neighbourhood Plan should go forward to Referendum, I must then consider whether or not the Referendum Area should extend beyond the Tatenhill Neighbourhood Area to which the Plan relates.

In examining the Plan, I am also required, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:

- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;
- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 PCPA (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);
- the Neighbourhood 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.

Subject to the contents of this Report, I am satisfied that all of the above points have been met.

Neighbourhood Plan Period

A neighbourhood plan must specify the period during which it is to have effect. The front cover of the Neighbourhood Plan clearly states that it covers the period from 2012 to 2031. I therefore confirm that the Neighbourhood Plan satisfies the relevant requirement in this regard.

East Staffordshire Borough Council

In its representation to consultation (September 2015), East Staffordshire Borough Council confirmed that, in its view, the Neighbourhood Plan meets the Basic Conditions.

Public Hearing

According to the legislation, *when the Examiner considers it necessary* to ensure adequate examination of an issue, or to ensure that a person has a fair chance to put a case, then a public hearing must be held.

However, the legislation establishes that it is a general rule that neighbourhood plan examinations should be held without a public hearing – by written representations only.

Further to consideration of the written representations submitted, I am satisfied that it was possible to complete the examination of the Tatenhill Neighbourhood Plan without the need for a Public Hearing.

2. Basic Conditions and Development Plan Status

Basic Conditions

It is the role of the Independent Examiner to consider whether a neighbourhood plan meets the “Basic Conditions.” These were *set out in law*³ following the Localism Act 2011. In order to meet 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 for the area;
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

I have examined the Neighbourhood Plan against all of the Basic Conditions above.

EU and ECHR Obligations

I am satisfied that the Neighbourhood Plan has regard to fundamental rights and freedoms guaranteed under the ECHR, that it does not breach, nor is in any way incompatible with the ECHR and that it complies with the Human Rights Act 1998. There is no substantive evidence to the contrary.

Planning Practice Guidance states that where a neighbourhood plan *could* have significant effects, it *may* fall within the scope of European legislation, whereby an SEA is required. According to European legislation, a Habitats Regulations Assessment (HRA) is required when it is considered that likely negative, significant effects could occur on protected sites as a result of the implementation of a plan or project.

A Basic Conditions Statement and an SEA Screening Report were produced for the Neighbourhood Plan 2014. These reports stated that there would be no effect on any habitats subject to the relevant Articles of the Habitats Directive. Whilst the changes between the Neighbourhood Plan 2014 and this Neighbourhood Plan do not appear so significant as to alter this (and there is no substantive evidence to the contrary), I note that the SEA Screening Report which was revised in the light of the revisions to the Neighbourhood Plan 2014, reached the same conclusion – that an SEA was not required.

During the previous examination of the Neighbourhood Plan 2014, I noted comments submitted by Natural England. In referring to European designated sites

³ Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.

located within the vicinity of the Neighbourhood Area, Natural England previously stated that

"...in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) there are unlikely to be significant environmental effects from the proposed plan."

Natural England has commented upon the Neighbourhood Plan and has not raised any points that conflict with this previous view.

Natural England also previously commented that the boundary of the Neighbourhood Area is 14.5km from Cannock Chase Special Area of Conservation and that housing development that comes forward within the 15km Cannock Chase Zone of Influence should be subject to screening under the Conservation of Habitats and Species Regulations (2010).

As noted in the previous examination, there is no suggestion in the Neighbourhood Plan that housing will be built within the 15km zone and Natural England did not consider that the plan *"would result in likely significant effects on Cannock Chase SAC."* In commenting on the Neighbourhood Plan, Natural England has provided the further comment that

"We have considered the distance between the parish and the Cannock Chase Special Area of Conservation (SAC) and have no objections to the amended policy."

I note that the Basic Conditions Statement states that the Neighbourhood Area is *"covered by the National Forest"* but that the National Forest is not, itself, subject to Articles 6 and 7 of the European Habitats Directive.

With regards to whether or not a neighbourhood plan requires an SEA and/or a sustainability appraisal, Planning Practice Guidance is clear:

"the local planning authority must decide whether the draft neighbourhood plan is compatible with EU regulations."

As stated above, East Staffordshire Borough Council considers that the Neighbourhood Plan meets the Basic Conditions. Taking this, the information before me and all of the above into account, I am satisfied that the Neighbourhood Plan does not require an SEA and that it is compatible with European obligations.

3. Background Documents and Tatenhill Neighbourhood Area

Background Documents

In undertaking this examination, I have considered a number of documents, in addition to the Tatenhill Neighbourhood Plan, including:

- The National Planning Policy Framework (The Framework) (2012)
- Planning Practice Guidance (2014)
- The Town and Country Planning Act 1990 (as amended)
- The Localism Act (2011)
- The Neighbourhood Planning Regulations (2012)
- East Staffordshire Local Plan (Adopted 2015) (Local Plan)
- Tatenhill Neighbourhood Plan Basic Conditions Statement
- Tatenhill Neighbourhood Plan Consultation Report
- Decision Statement by East Staffordshire Borough Council (17 August 2015)

Also:

- Representations received during the publicity period

In addition, I undertook unaccompanied site visits in the Tatenhill Neighbourhood Area, with particular reference to proposed Local Green Space.

Tatenhill Neighbourhood Area

The Tatenhill Neighbourhood Area coincides with that of the parish boundary. The first page of the Neighbourhood Plan shows a plan of the Neighbourhood Area ("Plan Boundary").

Further to an application made by the Parish Council, East Staffordshire Borough Council approved the designation of Tatenhill as a Neighbourhood Area in December 2012.

This satisfied a requirement in line with the purposes of preparing a Neighbourhood Development Plan under section 61G (1) of the Town and Country Planning Act 1990 (as amended).

4. Public Consultation

Introduction

As land use plans, the policies of neighbourhood plans will become the basis for planning and development control decisions. Legislation requires the production of neighbourhood plans to be supported by public consultation.

Successful public consultation enables a neighbourhood plan to reflect the needs, views and priorities of the local community. It can create a sense of public ownership, help achieve consensus and provide the foundations for a successful 'Yes' vote at Referendum.

Tatenhill Neighbourhood Plan Consultation

In the previous Examiner's Report, I considered consultation in some considerable detail. I found that the Consultation Report complied with neighbourhood planning *regulations*⁴ and that the public consultation undertaken was significant, robust and central to the production of the Neighbourhood Plan.

As above, this Neighbourhood Plan examination is somewhat unusual. Whilst a "Consultation Statement" has been submitted, this simply sets out how consultation has taken place further to receipt of the Examiner's Report for the Neighbourhood Plan 2014. In so doing, it refers to who was consulted and how, together with the outcome of the consultation. In this regard, the Consultation Statement meets the requirements of the neighbourhood planning regulations.

From consideration of the evidence, it appears to me that Tatenhill Parish Council worked in a positive and collaborative manner with East Staffordshire Borough Council to amend the Neighbourhood Plan 2014 with the specific aim of meeting the basic conditions. A public meeting was held, at which modifications were reviewed and opportunity was provided for comment. The results were published (in the Parish Council's Newsletter) and actions agreed "*at public meetings in June 2015.*"

Further to the above, I note that the six week consultation period undertaken during August and September 2015 provided the opportunity for interested parties, including statutory consultees, to comment upon the Neighbourhood Plan.

⁴Neighbourhood Planning (General) Regulations 2012.

5. The Neighbourhood Plan – Introductory Sections

Where modifications are recommended, they are presented as bullet points and highlighted in bold print, with any proposed new wording in italics.

The policies of the Neighbourhood Plan are considered against the Basic Conditions in Chapter 6 of this Examiner's Report. However, I have also considered the introductory sections of the Neighbourhood Plan and make recommendations below. These are aimed at making it a clearer and more user-friendly document.

Introduction

Given the circumstances of this examination, I consider it inappropriate that the Neighbourhood Plan does not refer to the previous Neighbourhood Plan 2014, especially as a major part of the Introduction to the Neighbourhood Plan comprises a description of how it was prepared. This presents a good opportunity to provide clarity with regards the process undergone. I also note that the Introduction includes information that is out-dated and incorrect.

I recommend:

- Para 1.1, change line five to “*...in general conformity with the strategic policies of the development plan and have regard to national policy and advice.*” (delete rest of paragraph)
- Para 1.2, delete first sentence and final sentence. Change second sentence to “*...project (one of 200 such projects supported by the government) in Summer 2012.*”
- Para 1.3, change start to “*Neighbourhood plans are to be...community.*” Change line two to “*...Group was to act...*”
- New Para after 1.3 “*This Neighbourhood Plan incorporates changes to a previous Neighbourhood Plan that underwent independent examination in 2014. These changes were made in order to meet the aims of the local community whilst ensuring that the neighbourhood planning Basic Conditions were met, in line with legislation.*”
- Para 1.5 change to “*...must be in general conformity with the strategic policies of the East...*”
- Para 1.6, line three, delete “*...held over the course of a year.*”
- Para 1.7, delete “*..,for more detail...Report.*”

- Add new row to Table on page 3, with reference to the first three columns of that Table

“Revisions to previous Plan.

“Together with East Staffordshire Borough Council, changes were made to the previous Neighbourhood Plan, following publication of the Examiner’s Report. These were considered at public meetings.

“January 2015-September 2015.

- Add new row to Table on page 3, with reference to the first three columns of that Table

“Submission Consultation.

Formal six week consultation, including statutory consultees.

19/08/15 to 30/09/15.

- Delete Para 1.11

Vision and Objectives

I note that the Objectives set out on pages 7 and 8 of the Neighbourhood Plan are simply that and that they do not form Policies of the Neighbourhood Plan. With regards Objective 4, I note that the Neighbourhood Plan will not implement traffic calming measures.

In the interest of clarity, I recommend:

- Page 8, re-word *“The TDNDP should create an attractive and useable public realm...services.”*

Paragraph 4.2 is unnecessary, confusing and adds little to the Neighbourhood Plan. There is no reason, for example, why a development proposal in a village should be subject to a Policy that concerns development outside of the villages.

- Delete Paragraph 4.2

6, Neighbourhood Plan Policies

The Neighbourhood Plan clearly distinguishes between Policies and supporting text. Policies are set out in boxes, which themselves are colour-coded, depending upon which category the Policies fall into (eg Housing and Employment, Landscape and Countryside). This provides for a clear and easy to navigate document.

Further to the above, the numbering of the policies is simple. It reflects the relevant categories and adds to clarity.

Strategic Policies

For the reasons given above, I recommend:

- **Delete the first sentence of Para 5.1**

The Policies do not ensure “*that development preserves and enhances the landscape setting and local design features.*” Such a requirement would be unduly onerous and is not contained in the Policies. I recommend:

- **Para 5.3, delete “...with a strong focus...features.”**

Policy SP1 – Settlements (General Principles of Development)

Part of Policy SP1 is rather vague and could be taken to mean that any development will be supported, so long as it actively contributes to the improvement of services, infrastructure and facilities. This could result in apparent Policy support for inappropriate development. For clarity, I recommend:

- **Policy SP1, change third sentence to “*The improvement of Parish services...will be supported.*”**

Subject to the above, the Policy supports development and has regard to the Framework, which promotes sustainable growth.

Policy SP2 – Landscape Features

Policy SP2 seeks to protect those qualities of the landscape highly valued by the local community. It has regard to national policy, which seeks to protect local character and recognises the natural environment as being essential to wellbeing.

The Policy contributes to the achievement of sustainable development by protecting and enhancing the natural environment and is in general conformity with Local Plan policy SP30, which amongst other things, protects landscape character.

However, as worded, the Policy sets out requirements without providing substantive evidence to demonstrate that all such requirements are achievable. To address this, I recommend:

- **Policy SP2, change second sentence to “*Where possible and appropriate, development outside of villages should seek to achieve the following:*”**

Subject to the above, Policy SP2 meets the basic conditions.

Policy SP3 – Contextually Responsive Design (design that fits with its surroundings)

National policy recognises good design as a key aspect of sustainable development, indivisible from good planning. Together, the Framework and Local Plan policy SP24 seek to encourage high quality design and to protect local character.

Policy SP3 builds upon a previously prepared Parish Design Statement (2012) and establishes design policy for the Neighbourhood Area. It provides for quality development, distinctive to the Neighbourhood Area and in this way, it meets the Basic Conditions.

Policy SP4 – Sustainability and Climate Change

Policy SP4 seeks to encourage sustainable development. It has regard to national policy and meets the basic conditions.

Housing and Employment (HE) Policy

I note above the position with regards the East Staffordshire Local Plan. Given this, I recommend:

Para 6.2, delete “...emerging...”

Policy HE1 – Parish Housing Strategy

Policy HE1 supports the development of “approximately 25 dwellings.” It goes on to require an “approximate” approach to the distribution of dwellings around the Neighbourhood Area.

The Framework, in establishing a presumption in favour of sustainable development, states that plans should meet objectively identified needs, with sufficient flexibility to adapt to rapid change. It recognises that sustainable development is about *positive growth*.

By use of the phrase “approximately,” I consider that Policy HE1 provides for flexibility whilst adopting a pro-active and supportive approach to sustainable growth. It does not unduly restrict or limit development from coming forward, but provides for some degree of certainty by identifying broad locations for sites. Furthermore, I find that the approach will not undermine local character and there is no evidence to demonstrate otherwise. Consequently, the Policy enables the Neighbourhood Plan to provide for sustainable growth in an appropriately flexible manner.

The final sentence of the policy states that applications for the development of more than 6 dwellings in Rangemore and for 6 dwellings in Tatenhill will not be permitted. This approach takes into account the size of the settlements and local character, and is intended to reflect the community aspiration to prevent the development of “large blocks” or areas of land for housing. Whilst the overall approach has regard to national policy, and is in general conformity with Local Plan policy SP24, in that it seeks to protect local character, it provides no substantive evidence for treating Tatenhill differently to Rangemore.

National policy is clear in its support for sustainable growth and the efficient use of land and for clarity, I recommend:

- **Change the final sentence of Policy HE1 to “*Applications for more than 6 dwellings in Tatenhill and Rangemore villages will not be supported.*”**

Paragraph 6.9 refers to overall housing targets. The Neighbourhood Plan identifies broad locations but does not set any housing targets. I recommend:

- **Para 6.9, delete “...but should be counted towards overall housing targets.”**

Subject to the modifications proposed, Policy HE1 has regard to national policy, is in general conformity with adopted local strategic policy and contributes to the achievement of sustainable development. It meets the Basic Conditions.

Policy HE2 – Local Housing Needs

Policy HE2 is a supportive Policy that recognises local needs identified through the plan-making process and supports development that meets these needs. The Policy has regard to the Framework, which empowers local communities to bring forward the sustainable development they need and meets the Basic Conditions.

The final sentence of policy HE2 simply refers to the provisions of another document not under the control of the Neighbourhood Plan. Consequently, Policy HE2 does not, itself, set out planning policy. Whilst I note that the reference provides some guidance with regards affordable housing, I consider that this is a matter sufficiently dealt with by the supporting text.

In addition, I consider it sufficient to simply refer to the Local Plan, rather than to seek to summarise affordable housing requirements in the Neighbourhood Plan. I recommend:

- **Policy HE2, delete final paragraph**
- **Para 6.11, delete “...with a target...balanced community.” (For clarity, end the paragraph at “current Local Plan.”)**

Policy HE3 - Employment and Retail

This policy is supportive of development that supports the vitality and viability of village centres and restricts retail uses away from villages. This has regard to national policy and is in general conformity with Local Plan policy SP21.

Policy HE4 – Tatenhill Airfield

Policy HE5 supports economic growth. It is in general conformity with Local Plan policy SP14, which allows for the assessment of development proposals against various factors including environmental impacts and economic/employment advantages, and it contributes towards the achievement of sustainable development.

By reference to uses that will be “particularly” supported, the Neighbourhood Plan encourages high tech engineering and aerospace related development. This is a

locally distinctive, pro-active approach that contributes to the achievement of sustainable development.

Policy HE4 meets the Basic Conditions.

Recreation and Tourism (RT) Policies

The policies in this section reflect the high value placed by the local community on sport and recreation within the Neighbourhood Area, and recognise opportunities for tourism.

Policy RT1 – Footpaths/Bridleways/Cycle paths

Policy RT1 seeks to support the improvement of existing and provision of new footpath and cycle connections. This has regard to the Framework, which promotes walking and cycling and supports development that seeks to improve health and wellbeing. To prevent the Policy from inadvertently supporting inappropriate development, I recommend:

- **Policy RT1, change first line to “*the improvement of footpath and cycle connections within the Parish will be supported.*”**

Policy RT2 – Designated Trails (Gyms, Heritage)

Policy RT2 supports the improvement of existing and the creation of new, recreational routes and trails and like Policy RT1, the Policy meets the Basic Conditions.

However, an objection has been received that points out that one of the designated trails shown on the Proposals Map comprises private land and is, therefore, incorrectly included.

Whilst I note later that, visually, the Proposals Maps are of poor quality, it is still essential that all of the information shown on them is correct. If the Proposals Map is showing private land that does not benefit from public access as a designated trail, then this must be removed.

- **Analyse the Proposals Maps and ensure that all information is entirely accurate. Remove any inaccuracies.**

Policy RT3 – Recreation and Sports Pitches

This Policy supports the protection of existing recreation and sports facilities. The policy is in general conformity with Local Plan policy SP32, which, amongst other things, seeks to prevent the undue loss of sports pitches and related facilities.

Policy RT3 goes on to support development that helps deliver play facilities in Tatenhill. This has regard to national policy, which promotes health and well-being. Policy RT3 meets the Basic Conditions.

Policy RT4 – Tourism and Visitor Assets

This Policy seeks to support the protection and enhancement of existing tourism assets. In line with previous recommendations, with the aim of providing for clarity, I recommend:

- ***Policy RT4, change to “The preservation and/or enhancement of existing tourism...and cycling will be supported.”***

Taking the above into account, Policy RT4 has regard to the Framework, which promotes tourism and meets the Basic Conditions.

Landscape and Countryside (LC) Policies

The second sentence of Paragraph 8.2 is incorrect. There is no evidence to demonstrate that national or local planning policy requires local character to be enhanced. This would be an onerous requirement that may not be relevant, or achievable, in all circumstances. Consequently, ensuring that this occurs does not have regard to national policy, nor is it in general conformity with the strategic policies of the development plan. I recommend:

- **Para 8.2, delete second sentence**

Policy LC1 – Key Views and Vistas

Policy LC1 requires all new development to protect and/or to enhance key views, vistas and gateways. This has regard to national policy and is in general conformity with adopted strategic local policy, which, together, protect local character.

There is no policy requirement for development to enhance Conservation Areas and Paragraph 8.4 should therefore reflect this. I recommend:

- **Para 8.4, line 3, change to “and/or enhancing”**

Subject to the above modifications, Policy LC1 contributes towards the achievement of sustainable development and meets the Basic Conditions.

Policy LC2 – Local Green Spaces

The Framework enables local communities to identify, for special protection, green areas of particular importance to them. Paragraph 76 states that

“By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.”

Local Green Space is a restrictive and significant policy designation. The Framework requires the managing of development within Local Green Space to be consistent with policy for Green Belts. Effectively, Local Green Spaces, once designated, provide protection that is comparable to that for Green Belt land. Notably, the Framework is explicit in stating that

“The Local Green Space designation will not be appropriate for most green areas or open space.” (Para 77)

Consequently, when designating Local Green Space, plan-makers must clearly demonstrate that the requirements for its designation are met in full. These requirements are that the green space is in reasonably close proximity to the

community it serves; it is demonstrably special to a local community and holds a particular local significance; and it is local in character and is not an extensive tract of land.

Policy LC2 seeks to designate “Local Green Spaces.” It refers to these as being shown on the accompanying proposals map. The Proposals Maps do not form part of the Neighbourhood Plan, but have been included as Appendices. This is inappropriate – especially where the Maps include designated areas of land.

Further to the above, the quality of the Proposals Maps is very poor. They are difficult to read, they do not show boundaries in any great detail and they lack general detail. In short, they are inappropriate for inclusion in a Neighbourhood Plan. With specific regard to the designation of Local Green Space, it is essential that each Local Green Space is identified in such detail that all boundaries are clearly visible at a legible scale.

For the reasons given above, I recommend below that a new series of Proposals Maps are produced, using an Ordnance Survey base and that these are included within the Neighbourhood Plan itself, rather than as Appendices to it.

The final paragraph of Policy LC2 does not accurately reflect Local Green Space policy, as set out in the Framework. Rather than have regard to the Framework, it seeks to introduce a new approach to Local Green Space. No evidence has been provided to support such a significantly different approach to that set out in the Framework and Policy LC2 fails to meet the basic conditions in this regard.

The supporting text provides a disjointed summary of Green Belt policy. This is neither helpful nor necessary, but adds much confusion.

Policy LC2 seeks to designate six areas of Local Green Space. These are listed in the Policy but are not individually identified with any clarity on the Proposals Maps. This is inappropriate. Not least given the importance of the designation, each Local Green Space should be clearly labelled.

Policy LC2 goes on to refer to “*these green spaces*.” This fails to have regard to national policy. The Framework, in paragraphs 76 to 78, refers to the ability of local communities to designate “Local Green Space,” rather than “green spaces” in general.

Appendix 4 is entitled “Local Green Space Justification Table.” This appendix sets out why, in the opinion of Tatenhill Parish Council, the proposed areas of Local Green Space meet the requirements of the Framework.

Three areas of Local Green Space are proposed for Rangemore. The Recreation Area/Bowling Green is demonstrably special to the local community because of its recreational value. Land to the south of the Church and School, and land to the rear of Rangemore Club comprise two sites demonstrably special to the local community

largely because of their historic significance. All three sites are in close proximity to the community they serve and comprise land that is local in character and not extensive.

Land to the south of Cedars, Tatenhill and land opposite The Old Rectory, Tatenhill comprise sites demonstrably special to the local community largely because of their historic significance. The two areas of land are in close proximity to the community they serve and comprise land that is local in character and not extensive.

The two remaining sites comprise land to the north and south of Branston Road, Tatenhill. The sites are immediately adjacent to one another, separated by Branston Road. The smaller of the two sites, to the south of Branston Road, comprises 4.3 hectares. Relative to the size of Tatenhill village, this is a very large site.

By way of example, Policy H1 of the Neighbourhood Plan refers to the delivery of approximately 25 dwellings during the plan period. At a suburban average of 30 dwellings per hectare, all of these dwellings would fit on to less than one third of the site to the north of Branston Road. Furthermore, during my site visit, I estimated that the site was the size of at least five full size football pitches and that the majority of the urban area of Tatenhill village would fit within it.

Taking all of the above into account, it is my view that, relative to the Neighbourhood Area, the proposed Local Green Space to the south of Branston Road comprises an extensive tract of land. Consequently, its designation fails to meet all of the tests set out in the Framework and does not meet the basic conditions.

The proposed Local Green Space to the north of Branston Road is more than twice as large as that to the south. There is no doubt whatsoever that this is an extensive tract of land. In addition, it is located some considerable distance away from the community that it “serves.” The proposed designation of land to the north of Branston Road fails to meet all of the tests set out in the Framework and does not meet the basic conditions.

Whilst for the reasons given above, the designation of these two sites fails to meet the basic conditions, I am also concerned with the reasoning behind the “justification” for the proposed designation of these two sites.

National policy is unambiguous in establishing that the Local Green Space designation will not be appropriate for most green areas or open space. Much of the case for both sites being demonstrably special to the local community appears to be founded on the land being undeveloped and providing a “buffer” to the nearby settlement of Burton on Trent. Indeed, the justification refers specifically to “visual separation.” However, the land is not unique in this regard, as there are many hectares that “visually separate” Tatenhill from Burton.

Furthermore, the Framework provides specific examples of why a site might hold a particular local significance – because of its beauty, historic significance, recreational

value, tranquillity or richness of its wildlife. There is no compelling evidence to demonstrate particular local significance for either site in any of these respects. Whilst I note that some information relating to local history has been presented, much of this could relate to many parts of the wider area and I note that Historic England, the body responsible for the protection of England's heritage assets, has not provided any substantive evidence in support of the proposed designation.

Taking the above into account, there is little in the way of compelling evidence to demonstrate that land to the north and south of Burton Road is, in the context of the Framework, demonstrably special and locally significant.

For all of the reasons set out above, the proposed designation of the two sites as Local Green Space does not meet the basic conditions.

I acknowledge that many members of the local community wish to prevent future development on these two sites. However, this is not a factor that means that the sites pass the necessary tests set out in the Framework.

Taking the above into account, I recommend:

- **Change title of Policy LC2 to “*Local Green Space*”**
- **Produce new Local Green Space Proposals Maps. These should be on an Ordnance Survey base and show the boundaries of the Local Green Space designations in clear detail. Each Local Green Space should be clearly labelled.**
- **Move the Proposals Map from the Appendices into the body of the Neighbourhood Plan. This Map includes the boundary of the Neighbourhood Area and it is important that this is included within the Neighbourhood Plan.**
- **Policy LC2, change first paragraph to “*The following areas of land are designated as Local Green Space:* (delete second sentence, which is unnecessary)”**
- **Delete the fourth and fifth bullet points. For clarity, the land to the north and south of Branston Road is not designated as Local Green Space**
- **Delete final paragraph and replace with “*Within Local Green Space, development is ruled out other than in very special circumstances.*”**
- **Remove Appendix 4 from the Neighbourhood Plan. Delete Paragraphs 8.7, 8.8, 8.9 and the last sentence of Paragraph 8.10.**

Subject to the above, Policy LC2 meets the basic conditions.

Policy LC3 – National Forest and Green and Blue Infrastructure

Policy LC3 is supportive of development that meets the aims of the National Forest. It contributes to the achievement of sustainable development and meets the basic conditions.

Design and Conservation (DC) Policies

Policy DC1 – Design in Conservation Areas

Policy DC1 aspires to high quality design. This has regard to national policy, which recognises good design as integral to sustainable development.

Policy DC2 – Front Boundaries

The intent of Policy DC2 is to protect local character. This is in general conformity with adopted local strategic policy and has regard to national policy.

Infrastructure (IN) Policies

Policy IN1 – Community Buildings

Policy IN1 supports mixed use development and the diversification of community buildings and land. This has regard to national policy, which supports sustainable growth.

Policy IN2 – Highway Safety

The opening paragraph of Policy IN2 comprises a positive approach to land use planning. It has regard to national policy and to the strategic policies of the East Staffordshire Local Plan, which together seek to ensure that development provides for a safe environment. The wording of this paragraph can be tightened through the recommendation below.

No indication is provided with regards what *“calming measures and landscape designs which define settlements”* actually means. Consequently, this part of the Policy does not provide decision makers with a clear indication of how to react to a development proposal.

The last paragraph, as worded, is vague. It refers to *“these works”* but no specific works have been identified. No indication is provided as to what *“appropriate contributions”* might be and it is entirely unclear how the Neighbourhood Plan will appropriately seek contributions from development outside the Parish. Furthermore, there is no detailed information to demonstrate how the potential impact of development inside and outside the Parish to *“increase traffic flows”* along every route and junction within the Parish will be measured, including for example, what criteria will be used to establish negative impacts.

In addition, I note that, grammatically, the final paragraph is ambiguously worded - it suggests traffic calming measures being *“negatively impacted,”* rather than routes and junctions.

Taking all of the above into account, I recommend

- **Policy IN2, change first sentence to *“Improvements to highway safety within the parish...Rangemore School, will be supported.”***
- **Re-word the second and third paragraphs of Policy IN2 *“Proposals for traffic calming measures which improve highway safety will be supported. Developer contributions, including the use of the Parish receipts from CIL, may be sought for appropriate traffic calming measures from developments which are likely to significantly increase traffic on routes where there are highway safety problems.”***

Policy IN3 – Public Realm in Villages

Policy IN3 seeks to preserve the public realm and supports development that enhances the public realm. This has regard to national policy, which protects local character.

7. Neighbourhood Plan – Other Matters

The Neighbourhood Plan includes four appendices, including the Proposals Maps and a Glossary. I recommend above that Appendix 3 be removed and that plans be included within the Neighbourhood Plan itself; and that Appendix 4 be deleted.

Part of Appendix 1 reads as though it were a Policy, which it is not. I recommend:

- **Delete last sentence of Appendix 1 ("The Parish...this list.")**

8. Summary

There has been a sustained community effort to revise the Tatenhill Neighbourhood Plan in order to meet the Basic Conditions. It is a document that reflects the hard work and commitment of many people.

I have recommended a number of modifications to the Neighbourhood Plan. Subject to these recommended modifications, the Tatenhill Neighbourhood Plan:

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies of the development plan for the area;
- does not breach, and is compatible with European Union obligations and the European Convention of Human Rights.

Consequently, the Tatenhill Neighbourhood Plan meets the Basic Conditions. I have already noted above that the Plan meets paragraph 8(1) requirements.

9. Referendum

I recommend to East Staffordshire Borough Council that, subject to the modifications proposed, the **Tatenhill Neighbourhood Plan should proceed to a Referendum.**

Referendum Area

Neighbourhood Plan Area - I am required to consider whether the Referendum Area should be extended beyond the Tatenhill Neighbourhood Area. I consider the Neighbourhood Area to be appropriate and no evidence has been submitted to suggest that this is not the case.

I recommend that the Plan should proceed to a Referendum based on the Tatenhill Neighbourhood Area as approved by East Staffordshire Borough Council in December 2012.

Nigel McGurk, November 2015
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Draft Deepings First Neighbourhood Plan
Land off Millfield Road



Appendix 4: Oakley and Deane Neighbourhood Plan (Examiner's
Report dated December 2015)

OAKLEY AND DEANE NEIGHBOURHOOD PLAN

Oakley and Deane Neighbourhood Plan Examination,
A Report to Basingstoke and Deane Borough Council

by Independent Examiner, Nigel McGurk BSc(Hons) MCD MBA MRTPI

Nigel McGurk

Erimax Land, Planning and Communities

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December 2015

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- **Housing**
- **Housing Site Policies**
- **Community**
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- **Employment and Skills**
- **Design**
- **Traffic and Transport**

7. Summary

8. Referendum

1. Introduction

The Neighbourhood Plan

This Report provides the findings of the examination into the Oakley and Deane Neighbourhood Plan (referred to as the Neighbourhood Plan).

Neighbourhood planning provides communities with the power to establish their own policies to shape future development in and around where they live and work.

“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.”
(Paragraph 183, National Planning Policy Framework)

Oakley and Deane Parish Council is the *qualifying body* responsible for the production of this Neighbourhood Plan. This is in line with the aims and purposes of neighbourhood planning, as set out in the Localism Act (2011), the National Planning Policy Framework (2012) and Planning Practice Guidance (2014).

This Examiner’s Report provides a recommendation as to whether or not the Neighbourhood Plan should go forward to a Referendum. Were it to go to Referendum and achieve more than 50% of votes in favour, then the Plan would be *made* by Basingstoke and Deane Borough Council. The Neighbourhood Plan would then be used to determine planning applications and guide planning decisions in the Oakley and Deane Neighbourhood Area.

Role of the Independent Examiner

I was appointed by Basingstoke and Deane Borough Council, with the consent of the qualifying body, to conduct an examination and provide this Report as an Independent Examiner. I am independent of the qualifying body and the local authority. I do not have any interest in any land that may be affected by the Neighbourhood Plan and I possess appropriate qualifications and experience.

I am a chartered town planner and an experienced Independent Examiner of Neighbourhood Plans. I have extensive land, planning and development experience, gained across the public, private, partnership and community sectors.

As the Independent Examiner, I must make one of the following recommendations:

- a) that the Neighbourhood Plan should proceed to Referendum, on the basis that it meets all legal requirements;
- b) that the Neighbourhood Plan, as modified, should proceed to Referendum;
- c) that the Neighbourhood Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.

If recommending that the Neighbourhood Plan should go forward to Referendum, I must then consider whether or not the Referendum Area should extend beyond the Oakley and Deane Neighbourhood Area to which the Plan relates.

In examining the Plan, I am also required, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:

- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;
- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 PCPA (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);
- the Neighbourhood 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.

Subject to the contents of this Report, I am satisfied that all of the above points have been met.

Neighbourhood Plan Period

A neighbourhood plan must specify the period during which it is to have effect. The Neighbourhood Plan is clear in this regard. The title page of the Neighbourhood Plan includes a reference to the plan period, 2011-2029.

In addition to the above, paragraph 1.5 on page 7 of the Neighbourhood Plan states that the Neighbourhood Plan will “be in force” until 2029; and page 1 of the Basic Conditions Statement also refers to the plan period.

Taking the above into account, I confirm that the Neighbourhood Plan satisfies the relevant requirement in this regard.

Public Hearing

According to the legislation, *when the Examiner considers it necessary* to ensure adequate examination of an issue, or to ensure that a person has a fair chance to put a case, then a public hearing must be held.

However, the legislation establishes that it is a general rule that neighbourhood plan examinations should be held without a public hearing – by written representations only.

Further to consideration of the written representations submitted, I confirmed to Basingstoke and Deane Borough Council that I was satisfied that the Oakley and Deane Neighbourhood Plan could be examined without the need for a Public Hearing.

2. Basic Conditions and Development Plan Status

Basic Conditions

It is the role of the Independent Examiner to consider whether a neighbourhood plan meets the “basic conditions.” These were *set out in law*¹ following the Localism Act 2011. In order to meet 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 for the area;
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

I have examined the Neighbourhood Plan against all of the basic conditions above.

The Neighbourhood Plan refers to the basic conditions in the introductory section on page 6. However, it states that the Neighbourhood Plan must “*have appropriate regard*” to national planning policy. This is not quite the case. Furthermore, paragraph 1.4.1 on page 6 goes on to state that the Neighbourhood Plan should “*contribute to the (sic) sustainable development*” and again, this is not quite the case. Furthermore, the basic conditions statement incorrectly asserts that the Neighbourhood Plan “*must comply with*” national policy and guidance.

Whilst these may seem like minor points – and it is not uncommon for neighbourhood plans to seek to paraphrase the basic conditions - the wording of the basic conditions is the result of careful consideration. Paraphrasing them almost inevitably, as in this case, results in their misapplication. In this regard, I note that it is *my* role, as independent examiner, to consider the Neighbourhood Plan against the basic conditions. In this case, no harm has arisen from the small errors noted above.

I recommend:

- **Page 6 Paragraph 1.4.1, change to “*have regard to national policies and advice...contribute to the achievement of sustainable development...*”**

¹ Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.

European Convention on Human Rights (ECHR) Obligations

I am satisfied that the Neighbourhood Plan has regard to fundamental rights and freedoms guaranteed under the ECHR and complies with the Human Rights Act 1998 and there is no substantive evidence to the contrary.

European Union (EU) Obligations

There is no legal requirement for a neighbourhood plan to have a sustainability appraisal². However, in some limited circumstances, where a neighbourhood plan is likely to have significant environmental effects, it may require a Strategic Environmental Assessment.

With the above in mind, draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects. This process is referred to as a “screening” assessment. If the screening assessment identifies likely significant effects, then an environmental report must be prepared.

The Basic Conditions Statement confirms that Basingstoke and Deane Borough Council undertook a screening assessment and found that,

“when considered in relation to the environmental constraints and the amount of development proposed in the Neighbourhood Area, namely 150 new homes...significant effects on the environment are likely.”

Consequently, it was determined that a Strategic Environmental Assessment was required. The Basic Conditions Statement confirms that the Neighbourhood Plan “was informed and influenced” by a Sustainability Appraisal, incorporating the requirements of the European Strategic Environmental Assessment Directive. This was submitted alongside the Neighbourhood Plan. Evidence has been submitted to demonstrate that the Sustainability Appraisal was integral to the plan-making process and was consulted upon.

As part of the consultation process, responses from the statutory bodies, the Environment Agency, English Heritage (now, with regards to planning matters, Historic England) and Natural England were considered and taken into account. None of the statutory consultees has raised any concerns with the Sustainability Appraisal or its conclusions.

A Habitats Regulations Assessment (HRA) is required if the implementation of the Neighbourhood Plan may lead to likely negative significant effects on protected European sites. The Basic Conditions Statement confirms that there are no European

² Paragraph 026, Planning Practice Guidance 2014.

sites within a 10km radius of the Neighbourhood Area and Basingstoke and Deane Borough Council is satisfied that an HRA is not required.

In addition to the above, I am mindful that national guidance establishes that the ultimate responsibility of determining whether or not a draft neighbourhood plan meets European obligations lies with the local authority,

“the local planning authority must decide whether the draft neighbourhood plan is compatible with EU regulations.” (Planning Practice Guidance 11-031)

With regards this latter point, Basingstoke and Deane Borough Council has stated that whilst *“it would have preferred if SA (Sustainability Appraisal) work was undertaken to appraise other reasonable alternatives”* with regards the assessment of alternative development sites, it has not stated, anywhere, that in its opinion, the Neighbourhood Plan is not compatible with European obligations.

I note that Basingstoke and Deane Borough Council has stated that it

“is satisfied that the Neighbourhood Plan and process followed complies with the statutory requirements as set out in paragraph 6 of Schedule 4B of the Town and Country Planning Act 1990 (as amended).”

Basingstoke and Deane Borough Council has also *“welcomed”* the *“careful consideration”* of its comments concerning the Sustainability Appraisal by plan-makers and has recognised that *“a useful addition”* has been incorporated into it, *“including a new section (9.4) titled “Assessment of options for reserve sites.”* This section includes appraisal of reasonable alternatives for the reallocation of dwellings should one of the allocated sites not come forward and also assesses the merits of different scales of development at each site.

Thus, whilst representations have been submitted in objection to the Neighbourhood Plan on the basis that the Sustainability Appraisal should have been carried out differently, having regard to the above and paragraph 11-031 in particular, I reach the conclusion below.

I also note that there is no legislative requirement for the Sustainability Appraisal to *“be revisited to test whether (the) plan is capable of delivering a pro-growth scenario in the event that the emerging Local Plan requirement is not sufficient to meet the (Borough’s) housing needs,”* as suggested by one objector.

Taking all of the above into account, I am satisfied that the Neighbourhood Plan is compatible with EU obligations.

3. Background Documents and Oakley and Deane Neighbourhood Area

Background Documents

In undertaking this examination, I have considered various information in addition to the Oakley and Deane Neighbourhood Plan. This has included:

- National Planning Policy Framework (The Framework) (2012)
- Planning Practice Guidance (2014)
- Town and Country Planning Act 1990 (as amended)
- The Localism Act (2011)
- The Neighbourhood Planning Regulations (2012)
- Basingstoke and Deane Borough Adopted Local Plan (2006) (Saved 2009)
- Basic Conditions Statement
- Consultation Statement
- Sustainability Appraisal

Also:

- Representations received during the publicity period

In addition, I spent an unaccompanied day visiting the Oakley and Deane Neighbourhood Area.

Post-Consultation Submission

The Parish Council has submitted a document entitled *“Amendment to Regulation 16 version of the Plan prior to Examination.”* This was submitted after the close of the Regulation 16 consultation. The comments were submitted on the basis of *“improving clarity”* and with the support of Basingstoke and Deane Borough Council, as *“a helpful approach for the examiner.”*

However, it is not a legislative requirement for additional comments to be submitted for examination after the close of Regulation 16 consultation – unless perhaps called for by the Examiner, possibly as part of a public hearing process. For clarity, I did not request the above document.

Public consultation is precisely that. It provides opportunities for people to consider matters in an open and transparent manner. The above document has not been consulted upon in any way, shape or form.

The Submission Version of a neighbourhood plan is the final version submitted for examination. Legislation does not allow for it to comprise *“a sort of final version”* the content of which can change, subject to the qualifying body wishing to respond to Regulation 16 consultation.

Whilst I acknowledge that, inevitably, plan-makers are concerned to ensure that the “best” version of their plan is examined, legislation exists for good reason. It provides appropriate opportunities for consultation and sets a requirement for defined and publicised “cut-off” dates. If legislation is not followed, then legislative requirements are unlikely to be met. This may mean that a neighbourhood plan will not progress to Referendum, or even if it does, that it will be open to subsequent legal challenge.

Having regard to the above, I have not taken “*Amendment to Regulation 16 version of the Plan prior to Examination*” into account as part of this examination.

However, in the above

Oakley and Deane Neighbourhood Area

A plan showing the boundary of the Oakley and Deane Neighbourhood Area is provided on page 7 of the Neighbourhood Plan.

Further to an application made by Oakley and Deane Parish Council, Basingstoke and Deane Borough Council approved the designation of Oakley and Deane as a Neighbourhood Area on 24 July 2013.

This satisfied a requirement in line with the purposes of preparing a Neighbourhood Development Plan under section 61G (1) of the Town and Country Planning Act 1990 (as amended).

4. Public Consultation

Introduction

As land use plans, the policies of neighbourhood plans form part of the basis for planning and development control decisions. Legislation requires the production of neighbourhood plans to be supported by public consultation.

Successful public consultation enables a neighbourhood plan to reflect the needs, views and priorities of the local community. It can create a sense of public ownership, help achieve consensus and provide the foundations for a successful 'Yes' vote at Referendum.

Oakley and Deane Neighbourhood Plan Consultation

In line with legislative requirements, a Consultation Statement was submitted to Basingstoke and Deane Borough Council. Further to consideration, I can confirm that this sets out who was consulted and how, together with the outcome of the consultation. In this regard, the Consultation Statement meets the requirements of the neighbourhood planning *regulations*³.

At the start of the process, a Neighbourhood Planning Group was formed, with the aim of representing different age ranges and different areas of the Parish. Following background work, the first public consultation took place during January 2014. A leaflet drop to all households in the Neighbourhood Area was followed by four meetings held in three separate locations. During this stage, 21 possible development sites were identified, along with a number of other issues. Over 300 representations were received and considered.

A second consultation period took place during April 2014. Key issues, including potential development sites, were considered and consulted upon. Two public meetings, which included presentations, were well attended and 655 representations were received.

A third consultation, during September 2014, involved a vote on site options, the results of this informed the residential allocations in the plan. Nearly 2,000 people took part in the vote.

The draft plan was then produced and underwent a six week consultation period during March and April 2015. Hard and electronic copies of the plan were made available and people were invited to comment.

³Neighbourhood Planning (General) Regulations 2012.

Consultation was widely communicated and well-publicised in a variety of ways, including via the Parish Council website, where relevant documents and information could be accessed; via email and social media; via the delivery of leaflets; through notices and posters; and through frequent, regular coverage in Link: The Oakley, Deane, Newfound, Malshanger and Wootton St Lawrence Community Magazine.

Taking all of the above into account, the Consultation Statement presents an audit trail to demonstrate that consultation was wide-ranging, comprehensive and transparent. Comments were pro-actively sought and comments received were duly considered. Evidence has been provided to demonstrate that the Neighbourhood Plan reflects the views of local people.

Consultation was carried out in an open manner, and people and organisations were not just provided with a fair chance to have their say, but were actively encouraged to engage in shaping the Neighbourhood Plan.

I am satisfied that the consultation process was comprehensive and robust.

5. The Neighbourhood Plan – Introductory Section

Where modifications are recommended, they are presented as bullet points and highlighted in bold print, with any proposed new wording in italics.

The policies of the Neighbourhood Plan are considered against the basic conditions in Chapter 6 of this Examiner's Report. I have also considered the Introductory Section of the Neighbourhood Plan and make recommendations below which are aimed at making it a clear and user-friendly document.

The Neighbourhood Plan is well presented. The use of plans and diagrams is supplemented with interesting and informative photographs. Text is clearly set out and Policies are distinctive from supporting information.

The Contents spread across three pages. This seems excessive and to my mind, affords the start of the document an off-putting and unduly technical appearance. It would make the Neighbourhood Plan appear more succinct and readable if the following recommendation was taken into account:

- **Contents – reduce to one page by just showing section headings (rather than the detail of what's on every page)**

The Foreword provides a good introduction. There are a couple of unnecessary references to the emerging Basingstoke and Deane Local Plan 2011-2029 (referred to in this Report as the emerging Local Plan). It is not the role of the Neighbourhood Plan to "*help deliver the...aspirations*" of the emerging Local Plan and I find that the references to it in the Foreword add confusion, not clarity. I recommend:

- **F1, delete "...for the Basingstoke...2029." Delete F2 ""...identified by...2029."**

Part of Paragraph 1.1 is confusing and inaccurate. I recommend:

- **1.1 line 5, delete "...to establish strategic general...neighbourhood."**

Paragraph 1.3 shows an incorrect date re: the designation of the Neighbourhood Area. I recommend:

- **1.3 line 6, change "2014" to "2013"**

I recommend changes to Paragraph 1.4.1 earlier in this Report. In addition to these, the opening part of this Paragraph is inaccurate and confusing. A neighbourhood plan is not "*strategic in nature*." I recommend:

- **1.4.1, delete "is strategic in nature and"**

Paragraph 1.4.2 is also inaccurate and introduces confusion. I recommend:

- **1.4.2 line 6, delete “therefore needs to” and change “take” to “takes”**

Paragraph 1.4.2 refers to the strategic allocation at Manydown. Taken as a whole, the Neighbourhood Plan is unclear about Manydown. Whilst it is referred to and indicated on a plan, little indication of the relationship between the strategic allocation and the Neighbourhood Plan is provided. The strategic allocation will potentially have a significant influence on the Neighbourhood Area and in the light of this, and for clarity, I recommend:

- **1.4.2, delete “(see Map1)” and replace with “*It is anticipated that Manydown, as a strategic allocation, will come forward through the emerging Local Plan. The Neighbourhood Plan does not, itself, allocate land at Manydown for development, but it has been prepared in the expectation of development at Manydown coming forward during the plan period. Map 1 shows the expected extent of the Manydown strategic site and related masterplanning area. The residential allocations in the Neighbourhood Plan do not include new dwellings that may come forward at Manydown.*”**

The final sentence of Paragraph 1.5 reads as though the Parish Council has some kind of statutory role to monitor plan progress and take “*appropriate actions as required.*” It does not. Whilst it is anticipated that the Parish Council will monitor the impacts of the Neighbourhood Plan, any changes will need to be the result of an appropriate due process. I recommend:

- **1.5, delete last sentence**
- **2.1.10 line 1 “and” for “an”**

Paragraph b in Section 3, on page 12, refers to “*at the time of writing.*” As such, the paragraph includes information that is, or will become, out of date. Furthermore, part of the Paragraph reads as though it were a Policy, which it is not. I recommend:

- **Section 3, page 12, delete paragraph b**

Part of Paragraph 3.1.2 also reads as though it were a Policy, which it is not. I recommend:

- **3.1.2 line 13, re-word “*The Parish Council will seek to prioritise the combined Project list, with the aim of funding Projects through the Community Infrastructure Levy and Section 106 Agreement funds. The list...*”**

Whilst the final sentence of Paragraph 4.7.2 refers to land being retained for school expansion, no substantive evidence is provided in this regard. I recommend:

- **4.7.2, delete final sentence**

6. The Neighbourhood Plan – Neighbourhood Plan Policies

Housing Policies

Policy 1 – New Housing Development Volume

Paragraph 5.3 adds little in the way of clarity. The first bullet point introduces the confusing idea of “conforming” to something that is still emerging (and need not be conformed with) and the second bullet point appears as a rather vague statement. I recommend:

- **Delete Paragraph 5.3, retaining title only**

Given the likely scale of the anticipated Manydown development, it would be helpful if the Neighbourhood Plan provided clarity within Policy 1, with regards the relationship between the allocations and Manydown.

In addition, it is inappropriate to allocate sites but not include the plans showing the allocations within the Neighbourhood Plan itself. I recommend:

- **Re-word Policy 1, “...2029. *The allocated sites are shown in Policy 6 below and identified on the accompanying plans. The allocation of approximately 150 dwellings does not include new dwellings that may come forward as part of the Manydown strategic allocation. For clarity, the housing policies of the Neighbourhood Plan do not apply to the Manydown strategic allocation and dwellings that come forward as part of the Manydown strategic allocation will be additional to those allocated in this Neighbourhood Plan.*”**
- **Move Revised Settlement Boundary and Site Plans from Appendices to page 30, to follow Policy 6**

Paragraph 5.3.1.1 provides little in the way of an explanation to Policy 1 and furthermore, it could be read as being in conflict with the Manydown strategic allocation – whereas the Neighbourhood Plan does not seek to prevent Manydown from coming forward.

Paragraph 5.3.1.2 is confusing. It reads as though it is a requirement for neighbourhood planning policies to be in general conformity with those of an emerging plan, which is not the case and could be read as implying that any residential development of less than ten dwellings, within a settlement boundary altered by the Neighbourhood Plan, does not count towards housing numbers. I recommend:

- **Delete Paragraphs 5.3.1.1 and 5.3.1.2**

Neither unusually nor uniquely, a number of representations have been made suggesting that the Neighbourhood Plan should allocate more sites for more housing than it does. However, there is no substantive evidence to demonstrate that Policy 1 does not meet the basic conditions in providing land for approximately 150 dwellings. The figure of approximately 150 dwellings has been derived from the assessment of relevant information and notably, Basingstoke and Deane Borough Council has not raised any concerns in this regard.

The Neighbourhood Plan is being brought forward before an up-to-date Local Plan is in place. In such circumstances, Planning Practice Guidance is explicit in stating that neighbourhood plans *“can be developed before or at the same time as the local planning authority is producing its Local Plan”* (41- 009). Indeed, neighbourhood plans provide an important opportunity to give communities *“direct power”* to provide up to date planning policy that may otherwise not exist due to the absence of an up to date Local Plan.

Whilst I recognise that there is an emerging Local Plan and that housing land matters have not been resolved at the Borough-wide level, I find that the Neighbourhood Plan has been positively prepared with the aim of providing for sustainable growth. In this regard, the Neighbourhood Plan does not actively seek to prevent sustainable development from coming forward, rather, it not only provides for approximately 150 dwellings, but also includes references to a major strategic allocation that will, if it comes forward during the plan period, deliver significantly in excess of 150 new homes.

Policy 1 has emerged through robust public consultation, with evidence provided to demonstrate that the community support the allocations, and further to consideration of available, relevant information, much of it associated with the emerging Local Plan.

The Policy supports sustainable growth, having regard to national policy and it contributes to the achievement of sustainable development. It does not set out a maximum housing number and does not necessarily prevent or preclude sustainable development from coming forward. The Policy meets the basic conditions.

Policy 2 – Allocation of Affordable Housing

Paragraph 5.3.2.1 reads as though it were a Policy, which it is not. Furthermore, it sets out the detailed content of a non-adopted policy in an emerging document. This is inappropriate.

The subsequent Paragraphs provide justification for Policy 2. The Policy aims to ensure that people with a defined local connection are offered affordable housing before other people.

Chapter 6 of the Framework supports planning policy that is responsive to local circumstances and reflects local needs. It supports the delivery of housing that reflects local demand and provides a wide choice of high quality homes. However, whilst I recognise that there is evidence of demand for housing to meet the needs of those with a local connection, Policy 2 is unclear and comprises a Policy that would be difficult to control.

The Policy implies that being offered occupancy is the same thing as actual occupancy. This is not the case. Furthermore, it requires potential occupants to have both parents and children living in the Neighbourhood Area. This is an exceptionally onerous requirement. However, in contrast to such an onerous approach, it then states that someone with *“an offer of employment within the Parish”* would be considered to have a strong local connection. However, this does not appear to relate to another requirement, which is that *“through their work provides important services to the Parish.”* No definition is provided of what such important services would be and would not be.

Taken as a whole, Policy 2 appears contradictory, is confusingly worded and does not provide decision makers with a clear indication of how to respond to a development proposal. It fails to have regard to national policy and does not meet the basic conditions.

I recommend:

- **Delete Policy 2**
- **Delete paragraphs 5.3.2.1 to 5.4.2 inclusive**

In recommending the above, I note that the Neighbourhood Plan does not seek to set out a different level of affordable housing within the Neighbourhood Area to that within the Borough as a whole.

Policy 3 – Mix of Dwellings

It is not clear how Policy 3 will give “*development preference*” to schemes that improve the overall balance of housing in the area. I address this in my recommendation below. Further, as worded, the Policy refers to “*the target*” but does not make it clear that this is a policy requirement. A target is something to aim at, but no indication is provided as to what might happen if this is not hit, met or achieved. I note that, in referring to 90%, the Policy appears to be aimed at developments of ten dwellings or more.

The Framework, as set out in Chapter 6, requires policies to plan for the delivery of a wide choice of homes, reflecting trends, needs and local demand. Policy 3 aims to provide a higher proportion of smaller homes and provides evidence to demonstrate that such an approach is supported by local opinion.

Furthermore, by allowing for viability to be taken into account, it seeks to ensure that such an approach can still reflect trends, needs and demand, as appropriate. Consequently, subject to the recommendations below, Policy 3 has regard to the Framework and contributes to the achievement of sustainable development.

I recommend:

- **Policy 3, re-word “*Proposals for ten dwellings or more should demonstrate how they meet the requirement to increase the proportion of smaller homes in the Neighbourhood Area. Unless viability or other material considerations show a robust justification for a different mix, at least 90% of dwellings in new developments should have less than four bedrooms. Of this 90%, 40% to 50% should have two bedrooms or less.*”**
- **Paragraph 5.7, add at the beginning “*With the exception of the Manydown strategic allocation, large scale development is not supported by...*”**

Policy 4 – Site Allocations

The introductory Paragraphs to Policy 4 summarise how the Neighbourhood Plan determined the residential allocations and the Policy allocates specific sites for *“approximately 150 dwellings.”*

Whilst Policy 4 supports the allocation of 30 dwellings at Oakley Hall, the Neighbourhood Plan recognises that there is a *“full vision”* for land at Oakley Hall to provide a retirement village, comprising around 120-150 dwellings. However, it states that the proposal for the retirement village *“does not address the housing needs of people in the Neighbourhood Area”* with regards it providing *“a complete solution to the housing needs of the community.”*

Evidently, some consideration has therefore been given to the land at Oakley Hall providing most, if not all, of the *“approximately 150 dwellings”* referred to in Policy 1. However, plan-makers have determined that it would be preferable for *“approximately 150 dwellings”* to be allocated to *“multi-sites”* around the Neighbourhood Area, rather than to a single site, at Oakley Hall.

There is evidence to demonstrate that the local community favours a multi-site approach and there is no substantive evidence to demonstrate that such an approach conflicts with the basic conditions. In this regard, the inclusion of land at Oakley Hall, as part of the multi-site approach, adds to the scope for the Neighbourhood Plan to provide for a wide choice of housing, having regard to Chapter 6 of the Framework.

No explanation is provided as to why only the Oakley Hall allocation has the word *“contributing”* included before the allocation and I address this below.

The second part of Policy 4 states that development should be contiguous to existing built development. This is an odd requirement, given that the allocations are the allocations – and are defined in the relevant plans. There is no substantive evidence to demonstrate that this requirement will contribute to the achievement of sustainable development.

I recommend above that the Revised Settlement Boundary plan be moved into the Neighbourhood Plan from the Appendices. However, the plan itself is unclear, incorrect and confusing. It states that it comprises the Revised Settlement Boundary (which I note that the Neighbourhood Plan refers to in different terms in different locations within the document), yet it shows the previous settlement boundary together with dotted lines around various locations. Some of these locations are referred to in Policy 4 as being within the Revised Settlement Boundary, whereas land at Andover Road, for example, is not.

Taking all of the above into account, I recommend:

- Re-word the start of Policy 4 *“Residential land is allocated on the following basis:”* (bullet points to follow)
- Delete “contributing” in the fifth bullet point
- Delete “...contiguous to and...” in P4.2
- Change P4.3 to *“The Revised Settlement Boundary is shown on a plan, together with plans of each of the allocations, following this Policy.”*
- Correct the Revised Settlement Boundary plan to show the actual revised settlement boundary.

Policy 5 – Constraints Management

Paragraph 6.1.9, in introducing Policy 5, refers to “*any development in the Neighbourhood Area.*” The content of Policy 5 is not relevant to many different types of development.

Policy 5 prevents development if proposals cannot demonstrate requirements that are the responsibility of other bodies to control. Furthermore, the requirements set out are unclear. For example, no information is provided to set out what the volume of traffic is in “*existing residential areas,*” which are themselves undefined. It is therefore unclear what an application would measure increases in the volume of traffic against.

In addition, there is no substantive evidence to demonstrate that say a 90% increase in the volume of traffic would not result in significant harm, or that, say a 100% increase in traffic would result in significant harm. It is therefore unclear how the approach set out in Policy 5 will contribute to the achievement of sustainable development.

In addition to the above, no evidence is provided to set out why local roads and/or bridges need to be improved to minimise the impact of development on the local highway network. There is no evidence to demonstrate that such an approach has regard to national policy or is in general conformity with the strategic policies of the Local Plan.

Taking all of the above into account, I recommend:

- **Delete Policy 5 and Paragraph 6.1.9**

Policy 6 – Site Specific Requirements

Policy 6 seeks to provide detailed requirements for each residential allocation. The first requirement of P6.1 is an odd one. The allocated site is provided on Map 7. There is no need to then state, as a Policy requirement, that development will be permitted if it “...is in the area known as...” Such an approach simply adds unnecessary confusion.

Policy 6 introduces the phrase “will be permitted.” Such an approach effectively pre-approves development proposals without considering all irrelevant matters of detail. Further, the Neighbourhood Plan, were it made, would simply comprise part of the development plan. As such, it would be used as a basis against which to consider planning applications, rather than as a tool to formally “permit” them. I address this below.

The second part of P6.1 is not a land use planning policy. It is, rather, a statement relating to an intention.

Taking the above into account, I recommend:

- **P6.1, change to “Development proposals will be supported if:”**
- **Under P6.1 Andover Road, add “No site specific requirements” and delete a) and b)**

The wording of P6.2 is unclear – there are already public pavements throughout the Highland Drive estate. Rather than provide an access “through” the estate, it would be clearer for the Policy to refer to an access “to” the estate. Similarly, it would be clearer if P6.2 referred to direct access to the adjacent footpath, rather than “public footpath 9” – as there is no evidence to demonstrate that most people know what numbers relate to what public footpaths.

Part d) of P6.2 is convoluted and grammatically incorrect. Taking this and the above into account, I recommend:

- **P6.2, change to “Development proposals will be supported if:”**
- **P6.2 a), change “through” to “to”**
- **Delete P6.2 b)**
- **Delete P6.2 c) and d) and replace with “B) the development provides direct access to and where possible, upgrades the adjacent footpath to the schools; and provides allotments as part of the development.”**

It is not clear how the proposed new footpath referred to in P6.3 will be delivered and maintained or how it will connect with other footpaths. There is insufficient

evidence to demonstrate the deliverability of this proposal. However, I note that national policy encourages the enhancement of public rights of way (Framework, Paragraph 75). I recommend:

- **P6.3, delete and replace with “*Support will be given to improvements to the local footpath network delivered in association with the development of this site.*”**

Part c) of P6.4, is unclear and poorly worded. Further, it relies on information not set out in any detail in the Neighbourhood Plan and effectively comprises a statement rather than a requirement. I recommend:

- **P6.4, change to “*Development proposals will be supported if:*”**
- **P6.4, delete parts a) and c). Re-word Policy as “*Development proposals will be supported if at least 40%...bungalows.*”**

Part 6.5 largely comprises a general, if rather confusing, statement rather than a land use planning policy. I note that SSSI’s are already protected by planning policy and that the approach set out in 6.5 a) provides significantly less protection than that which already exists. Furthermore, 6.5 b) provides no information or detail as to what might comprise “*appropriate landscape assessment*” and so provides little, if anything, in the way of clarity. I also note that national and local policy afford protection to heritage assets.

I recommend:

- **Under P6.5 Oakley Hall, add “*No site specific requirements*” and delete all other text**

Paragraph 6.4 reads as though it were a Policy, which it is not. I recommend:

- **Delete the first sentence of Paragraph 6.4**

Community Policies

Policy 7 – Protection of Existing Allotments

The Neighbourhood Plan establishes the importance of allotments within the Neighbourhood Area. National policy recognises the role that the provision of shared space and community facilities has to play in enhancing the sustainability of communities (Framework, Chapter 8, “*Promoting healthy communities*”).

In protecting allotments, Policy 7 has regard to national policy and contributes to the achievement of sustainable development. It meets the basic conditions and no changes are recommended.

Policy 8 - New Allotments

Policy 8 encourages the provision of allotments in new developments. This is a positive policy that has regard to the Framework, as considered above.

Policy 8 meets the basic conditions and no changes are recommended.

I note that part of Paragraph 7.2 is worded as though it is a Policy, which it is not. The Neighbourhood Plan is not responsible for other policies in other documents and I recommend:

- **Replace last sentence of Paragraph 7.2 with “*It is noted that the Borough Council applies open space standards to development proposals, as appropriate.*”**

Protection and Enhancement of the Environment

Policy 9 – Conservation Areas

National policy recognises heritage assets as being irreplaceable. Chapter 12 of the Framework, “*Conserving and enhancing the historic environment*” sets out a carefully worded and positive strategy for the conservation and enjoyment of the historic environment.

In setting out just part of national policy, Policy 9 presents an entirely different approach to heritage assets to that established in the Framework. The Policy does not allow for any possible harm or loss to the significance of a heritage asset to be balanced against possible benefits that might result from a development proposal. Consequently, it does not contribute to the achievement of sustainable development and fails to have regard to national policy.

Policy 9 goes on to effectively require Conservation Area Appraisals to be taken into account. However, where adopted Conservation Area Appraisals exist, they must be taken into account in any case.

As Policy 9 does not meet the basic conditions, I recommend:

- **Delete Policy 9. The supporting Paragraphs to be retained as useful background information.**

Policy 10 – Protection and Enhancement of the Environment

The first two parts of Policy 10 seek to introduce a number of requirements relating to ancient woodland, trees, hedgerows and Local Green Space. The last part, P10.3, is confusing. It seeks to retain something that doesn't exist, as well as retain non-designated existing woodland as something called "*natural green (space)*." Natural green space is not defined anywhere in the Neighbourhood Plan and there is no indication of what such a designation would mean for development proposals.

The protection afforded by Policy 10 to ancient woodland, veteran trees and hedgerows does not allow for circumstances whereby the need for and benefits of development clearly outweigh any loss arising. Consequently, this part of Policy 10 fails to have regard to national policy, as set out in Paragraph 118 of the Framework.

In making the recommendation below, I note that planning policy affords significant protection to ancient woodland and veteran trees, and aims to conserve and enhance biodiversity.

Policy 10 seeks to designate Local Green Space. It states that "*Green areas that are demonstrably special...are designated Local Green Space (see Appendix A)*." Paragraph A.1.2 of Appendix A states "*These are the designated Local Green Spaces...and the demonstrably special reasons for designating them (see also Map 5)*." Three separate tables under three different headings then follow, containing eleven different sites, along with a "*Reason for designation*" alongside each site.

Appendix A then includes a further table, under the title "*Green Gap*." This is split into four separate sites, with a further "*Reason for designation*" alongside each. Map 5, entitled "*Local Green Spaces, Green Gap and Views and Vistas in Oakley*" shows 15 separate designations, under a Legend, whereby seven allocations are named as "*Local Green Spaces*," four designations as "*Accessible natural green space*" and four designations as "*Green Gap*."

In addition to the above, Map 5 also includes land labelled as "*Green pathway*" which relates to a proposal in Policy 12.

I set out all of the above, as it demonstrates that, in practice, if not intentionally, Policy 10 only actually seeks to designate seven areas of Local Green Space. However, I note that the tables in Appendix A provide a "*Reason for designation*" for fifteen separate sites.

As set out, the approach to Local Green Space is unclear and inappropriate. It is further obfuscated by the absence of clear plans showing precise boundaries for each proposed Local Green Space.

Local Green Space is a restrictive and significant policy designation. The Framework states that

“By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances” (Paragraph 76)

and goes on to state, explicitly, that

“The Local Green Space designation will not be appropriate for most green areas or open space.” (Paragraph 77)

Consequently, when designating Local Green Space, plan-makers must clearly demonstrate that the requirements for its designation are met in full. These requirements are that the green space is in reasonably close proximity to the community it serves; it is demonstrably special to a local community and holds a particular local significance; and it is local in character and is not an extensive tract of land. Furthermore, identifying Local Green Space must be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.

Whilst Policy 10 is poorly conceived and drafted, I recognise that there is community support for the designation of Local Green Space. Consequently, with the exception of the areas identified in the Appendices as D1 to D4, Green Gap – an entirely separate designation to Local Green Space and the subject of a separate Policy in the Neighbourhood Plan (and which, I note, mainly comprise extensive tracts of land, designated for the purpose of providing *“visual and physical separation”*) – I have considered whether each of A1-A2, B1-B5 and C1-C4 meet the Local Green Space tests set out in the Framework.

Of these, A1-A2, B1-B4 and C1-C4 all meet the tests set out in the Framework, including being demonstrably special for reasons of beauty, recreational value, tranquillity and richness of wildlife.

However, I note that B5 is some considerable distance from, rather than within reasonably close proximity to, the community it serves. Furthermore, it comprises an extensive tract of land. On further assessment of B5, I note that large areas of farmland are included in the proposed designation, as well as a cricket ground. For these reasons and in the absence of detailed and substantive evidence to the contrary, I am not satisfied that the proposed designation of B5 has regard to the Framework. The designation of B5 as Local Green Space does not meet the basic conditions.

The Framework requires the managing of development within Local Green Space to be consistent with policy for Green Belts. Effectively, Local Green Spaces, once designated, provide protection that is comparable to that for Green Belt land. Further, the Framework is explicit in stating that the development of Local Green Space will only be permitted in very special circumstances.

However, Policy 10 seeks to introduce its own version of Local Green Space policy, not least by introducing some kind of requirement for “*replacement Local Green Space*.” In so doing, as worded, Policy 10 fails to have regard to national policy.

Taking all of the above into account, I recommend:

- **Replace Policy 10 with a completely revised Policy 10 “*Local Green Space is designated at the sites shown on the plans below, for the reasons set out in the supporting text. Development of Local Green Space will only be permitted in very special circumstances.*”**
- **Create new plans, identifying the precise boundaries of each Local Green Space and show these plans after Policy 10. For clarity, the Local Green Space designation is afforded to A1, A2, B1, B2, B3, B4, C1, C2, C3 and C4. B5 is not designated as a Local Green Space.**
- **Provide the first three tables set out in Appendix A (excluding B5) in the supporting text to Policy 10.**

Subject to the above, Policy 10 contributes to the achievement of sustainable development and meets the basic conditions.

There has been an objection to the designation of C3 as a Local Green Space. However, C3 meets the tests set out in the Framework and I note, specifically, that as a narrow band of land close to Oakley, it is neither extensive nor a considerable distance from the community it serves. The fact that the site is subject to a non-adopted policy of an emerging plan does not prevent it from being designated as a Local Green Space.

I note, in the above regard, that a Local Green Space designation provides protection comparable to that for Green Belt land and that, as such, the designation does not prevent all forms of development.

Policy 11 – Protection of the Green Gap

This Policy seeks to designate a Green Gap, to provide physical and visual separation for Newfound and Oakley from Basingstoke. Paragraph 8.4.4 states that the Green Gap *“is the western fringe of the Basingstoke-Oakley Strategic Gap.”*

Whilst the Basic Conditions Statement submitted alongside the Neighbourhood Plan suggests, on page 14, that Policy 11 is in general conformity with Saved Policy EM5 of the Local Plan, no such Saved Policy exists. I note that Policy EM2 of the emerging Local Plan is a *“Strategic Gaps”* Policy.

By its very nature, a *“Strategic Gaps”* Policy is strategic. Whilst there is no adopted Borough-wide Strategic Gaps Policy, I note above that one is currently emerging through the planning process.

In seeking to designate a Strategic Gap before there is a Borough-wide *“Strategic Gaps”* Policy, the Neighbourhood Plan appears to be “jumping the gun” and taking on strategic Borough-wide matters itself. Furthermore, it seeks to do so in a manner whereby it will introduce a different designation to a Strategic Gap, namely a *“Green Gap.”*

Notwithstanding this approach and the confusion therein, I am concerned that the Green Gap proposed, whilst apparently based on the emerging *“Strategic Gaps”* is different to that proposed in the emerging Local Plan. The justification for such a departure is based on a very general overview provided in a table in Appendix A. This comprises general references to views, rural setting and visual quality. There is no substantive evidence to demonstrate that the *“Green Gap”* is the result of robust, detailed analysis.

Taking all of the above into account, it is not clear to me that Policy 11 will contribute to the achievement of sustainable development. Furthermore, I find that it is not in general conformity with the strategic policies of the Local Plan and there is no substantive evidence before me to the contrary. I recommend:

- **Delete Policy 11 and Paragraph 8.4.4**
- **Delete Appendices page 49**

Policy 12 – Protection of Views and Vistas

The Neighbourhood Plan establishes that the view towards St Leonard's church from specific nearby footpaths is "*A favourite view.*" There is evidence to demonstrate that it forms an important part of local character. Policy 12 seeks to protect the area between the church and the footpaths from changing.

Whilst I note that national and strategic local policy protect local character, I am concerned that, as worded, Policy 12 protects a significant area of land "*from development or obtrusive interference.*" As such, it seeks to prevent development simply for the sake of preventing development, whether or not it harms local character. No substantive evidence has been provided to justify such an approach.

The reference to public footpath numbers is confusing. It would be preferable to show the precise area in question on a map, rather than refer to features that, by their very nature, extend well beyond the area directly impacted by Policy 12.

The Policy refers to the view from St Leonard's church. No indication is provided as to where this view ends and no justification is provided to protect the view from St Leonard's church, within the arc referred, to as far as the horizon.

The Policy goes on to list some "*improvements*" that are "*not excluded.*" This is a confusing approach. The list is by no means comprehensive and its inclusion is unnecessary. I also note that it conflicts with the earlier wording of the Policy considered above.

Taking the above into account, I recommend:

- **Policy 12, re-word as "*The character of the area seen in views of St Leonard's Church from the public footpaths in the area shown on the plan below will be protected from development proposals that would harm it.*"**
- **Include a new plan beneath the Policy. This should identify the specific area protected. It is proposed that this should be in the form of a shaded area over an OS Base.**
- **Delete the second half of Paragraph 8.4.5, from "The present vista...Appendix A)."**

Policy 13 – Woodlands and Trees and Rights of Way in New Developments

Policy 13 largely has regard to Chapter 11 of the Framework, “*Conserving and enhancing the natural environment*” by seeking to encourage biodiversity, and to Chapter 7, “*Requiring good design*,” by encouraging the provision of trees and green space.

However, there is no substantive evidence to demonstrate that every public right of way that passes through or bounds the edges of new development can be enhanced to create green corridors. Consequently, there is a lack of evidence to demonstrate that this part of Policy 13 is deliverable.

I recommend:

- **Delete last sentence of Policy 13**
- **Delete the final sentence of Paragraph 8.4.6 which reads as though it were a Policy, which it is not**

Policy 14 - Biodiversity

The Framework states that the planning system should minimise impacts on biodiversity and provide net gains in biodiversity where possible (Paragraph 109).

Policy 14 has regard to national policy and contributes to the achievement of sustainable development.

I note that the final sentence of the Policy refers to the plan period. This is unnecessary, the Neighbourhood Plan is effective during the plan period. Map 4 on page 40 refers to features that are not the subject of Policies in the Neighbourhood Plan. This is confusing.

I recommend:

- **Delete the final four words of Policy 14**
- **Delete Map 4**

Employment and Skills

Policy 15 – Protection of Employment

Policy 15 seeks to protect employment sites. However, no employment sites are identified in the Neighbourhood Plan and the phrase “*employment sites*” is not defined. It is therefore unclear what Policy 15 is seeking to protect. In this regard, I note that Paragraph 9.1.2 refers to “*two small retail centres.*” Whilst not clear, this would suggest that the Neighbourhood Plan may include shops within its undefined term “*employment sites.*”

Paragraph 9.1.1 refers to home working. There is no indication as to whether the offices of home-workers are intended to be included by the undefined term “*employment sites.*” Taking this and the above into account, the first part of the Policy does not provide decision makers with a clear indication of how to react to a development proposal.

Whilst I note that Appendix B contains a list of “*Buildings Used for Business, Education and Trade,*” this is simply a wide-ranging list of all kinds of uses and Policy 15 does not provide any direct link to it.

The second part of the Policy is positive and supports the provision of new or improved employment “*opportunities.*” Whilst, in land use planning terms, the word “*opportunities*” is perhaps inappropriate, the intent of this part of the Policy is clear and has regard to national policy’s support for economic growth, as established in Paragraph 18 of the Framework.

I recommend:

- **Delete P15.1**
- **Change remainder of Policy 15 to “*This plan supports the provision of new or improved employment space, subject to it not harming local character or residential amenity.*”**
- **Paragraph 9.1.1 and 9.1.2, change “Appendix C” to “Appendix B”**

Policy 16 – Protection of local facilities

Policy 16 is a positive Policy that supports local retail. The word “*upgrade*” appears inappropriate in land use planning terms and use of the reference “*suitable*” leads the Policy to appear somewhat vague. However, the Policy has regard to national policy’s requirement for positive planning for community facilities (Paragraph 70). I recommend:

- **Change Policy 16 to read “*Proposals for new or additional local retail facilities will be supported subject to such development not harming existing facilities, local character or residential amenity.*”**

Design Policies

Policy 17

Good design is recognised by national policy as comprising a key aspect of sustainable development. It is indivisible from good planning and national policy requires good design to contribute positively to making places better for people (Paragraph 56, the Framework).

The Oakley Village Design Statement is an adopted planning document that is distinctive to the Neighbourhood Area. The first part of Policy 17 refers to this and in so doing, has regard to recent changes in national planning policy and advice.

The second part of Policy 17 seeks to promote “*zero carbon buildings policy*” by requiring Building Regulations standards to be exceeded. This fails to have regard to the Ministerial Statement of March 2015, which established that “*neighbourhood plans, or supplementary planning documents*” should not set “*any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings.*”

Taking the above into account, I recommend:

- **Policy 17, delete from “Each new development...” to the end of the Policy**

Traffic and Transport

Policy 18 – Traffic and Safety

The Framework establishes that

“Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe” (Paragraph 32).

The opening sentence of Policy 18 is vague to the point of supporting any development whatsoever – say, a nuclear power station – as long as it results in improvements to the free flow of traffic in Oakley. Clearly such an approach could have unintended consequences and is therefore inappropriate.

Policy 18 then seeks to impose a range of requirements on development, whether or not residual cumulative impacts are severe. Such an approach is in clear conflict with the Framework and does not meet the basic conditions.

Taking the above into account, I recommend:

- **Delete Policy 18**

In making the above recommendation, I note that the supporting text in the Traffic and Transport section provides interesting and useful background information and there is no reason why this should not remain in the Neighbourhood Plan.

7. Summary

I have recommended a number of modifications further to consideration of the Oakley and Deane Neighbourhood Plan against the basic conditions.

Subject to these modifications, the Oakley and Deane Neighbourhood Plan

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies of the development plan for the area;
- does not breach, and is compatible with European Union obligations and the European Convention of Human Rights.

Taking the above into account, I find that the Oakley and Deane Neighbourhood Plan meets the basic conditions. I have already noted above that the Plan meets paragraph 8(1) requirements.

8. Referendum

I recommend to Basingstoke and Deane Borough Council that, subject to the modifications proposed, the **Oakley and Deane Neighbourhood Plan should proceed to a Referendum.**

Referendum Area

Neighbourhood Plan Area - I am required to consider whether the Referendum Area should be extended beyond the Oakley and Deane Neighbourhood Area. I consider the Neighbourhood Area to be appropriate and there is no substantive evidence to demonstrate that this is not the case.

I recommend that the Plan should proceed to a Referendum based on the Oakley and Deane Neighbourhood Area as approved by Basingstoke and Deane Borough Council on 24 July 2013.

Nigel McGurk, December 2015
Erimax – Land, Planning and Communities

www.erimaxltd.com

Appendix 2

The Deepings Neighbourhood Plan Group response to Lincolnshire County Council's Comments

Related documents are:

Submission Plan:

Appendix B - Local Green Spaces, Justification and Maps

Appendix C - Protected Green Lane Justification

Appendix J - Background Report on Millfield

Deepings First: Neighbourhood Plan Group. Response to Savill's Objection **Objection submitted on behalf of Lincolnshire County Council Property Team (LCC PT)**

Response summary

Para 1.2 makes the nature of the LCC Objection clear. It states that *"Lincolnshire County owns land around the county which has been used either by the Council or rented out for farming. The Council is considering the sale of these pockets of land to raise income and, in some cases, encourage residential development to help meet the need for more housing. The ownership includes the following site: 11.6ha of land at Millfield Road"*.

The basis of the Objection relates to three specific new policies contained within the Deepings *draft* Neighbourhood Plan (DNP) (issued September 2019) that would have a potential impact on the future saleability of the land to the west of Millfield Road for use as residential development. This land is known locally and referred to here as Mill Field. The policies are:

- i) **Policy DNP2** (*Providing guidelines for additional residential development*) seeks to establish a 'Development Boundary' in order to contain future development within the Deepings.
- ii) **Policy DNP11** (*Developing and enhancing the local green infrastructure*) seeks to protect Millfield Road as a 'Green Lane'.
- iii) **Policy DNP13** (*Designating and protecting Local Green Spaces*) in which Mill Field is designated with other pieces of socially important land as Local Green Space (LGS).

The LCC Objection challenges the three Deepings Neighbourhood Plan policies above and seeks to remove or make amendments to them so that LCC can pursue its intention to sell the land for development.

The various DNP consultation activities undertaken during the Neighbourhood Planning period, along with data from Savill's/LCC own Statement of Community Involvement* (survey undertaken in May 2018), provides strong evidence to show that this western side of the Deepings is valued by the community as natural open space and is considered to contribute greatly to the health and well-being of residents. The need for access to safe natural environments has been particularly evident during the recent coronavirus outbreak.

*Paras 5.1.7 / 5.1.11 / 5.1.14 identify a strong theme arising from the LCC public survey relating to retention of the site as green/open space for community, recreation and leisure use – pointing to a lack of public open space in the Deepings.

In accordance with the Localism Act 2011, which is designed to empower local communities to develop a shared vision for their neighbourhood, the people of the Deepings have expressed a clear wish to retain the Mill Field in its current form as natural open space – to continue to enjoy the country walk along Millfield Road, to carry on using the area as a whole, and to appreciate the open view across the field to the trees lining the by-pass. Additionally, to continue to enjoy walking, dog walking, and jogging along the Public Right of Way that passes through the Mill Field. The Mill Field was considered by the community and the Neighbourhood Planning Team to meet the criteria for designation as LGS and it has therefore been included in Deepings *draft* Neighbourhood Plan.

Throughout the consultations, the people of the Deepings have generally embraced the prospect of additional homes for the area (subject to a matched increase in the level of local services and amenities) and the DNP accepts its allocation of housing in full – a mix of sizes and styles to suit all needs - to be delivered within the assigned sustainable sites shown in policy DNP1. Mill Field is not currently allocated in the SKDC Local Plan and if it were to be granted planning permission for development then this would risk undermining the established process for site allocations.

There is no shortage of other suitable land as there is also plenty of additional land available for sustainable development to the north-east of the Deepings for future allocations (the evidence here is the SKDC Sites and Settlements Consultation July 2016 - <http://www.southkesteven.gov.uk/CHttpHandler.ashx?id=24348&p=0>). Whilst these future sites (mainly to the east of Linchfield Road) remain to be evaluated in the context of ongoing plan making, there is plainly no absolute need for a future housing site allocations exercise to rely partly or solely on Mill Field. Mill Field is therefore not required as a site to ever meet housing demand now or in the future.

There is however, a recognised shortage of natural green space for community benefit.

The SKDC Local Plan has reached its final stage and Mill Field is not judged by the examining Inspector to be included a designated development site at this time. Any speculative outline planning application (S18/2146) relating to Mill Field is recognised by Savill's as non-policy compliant (para 3.1.22 Community Involvement Report November 2018).

The DNP development group has found the Savill's/LCC Objection to be helpful in highlighting a number of issues for discussion. These discussions have now taken place and have resulted in proposed amendments to the content of the final Deepings Neighbourhood Plan, namely:

- i) Removal of the designation of a 'Development Boundary' around the Deepings.
- ii) Providing a more adequate justification for including Millfield Road as a protected Green Lane in the final DNP

- iii) Applying the LGS criteria more rigorously and thereby reducing the total number of designated LGSs across the Deepings from 17 to 8 in the final DNP
- iv) Providing a more detailed justification for including Mill Field as a LGS in the final DNP
- v) Reviewing all policies to ensure all policy tests and the required Basic Conditions for NPs have been met.

These revisions are now in the submission draft of the Deepings Neighbourhood Plan (June 2020).

Additional points

Section 1 Introduction

The Objection was received within the consultation period and is therefore a valid consideration requiring a response.

We accept that in its draft form (as at September 2019), some areas of justification were not adequate and may not have met Basic Conditions or be in accordance with planning policy. These aspects have been addressed in the final version.

Section 2 Site

Para 1.2 of the Savill's/LCC report (referred to above) describes Mill Field as a 'pocket of land'. Additionally, Section 2 is descriptive and we agree with the description of the site:

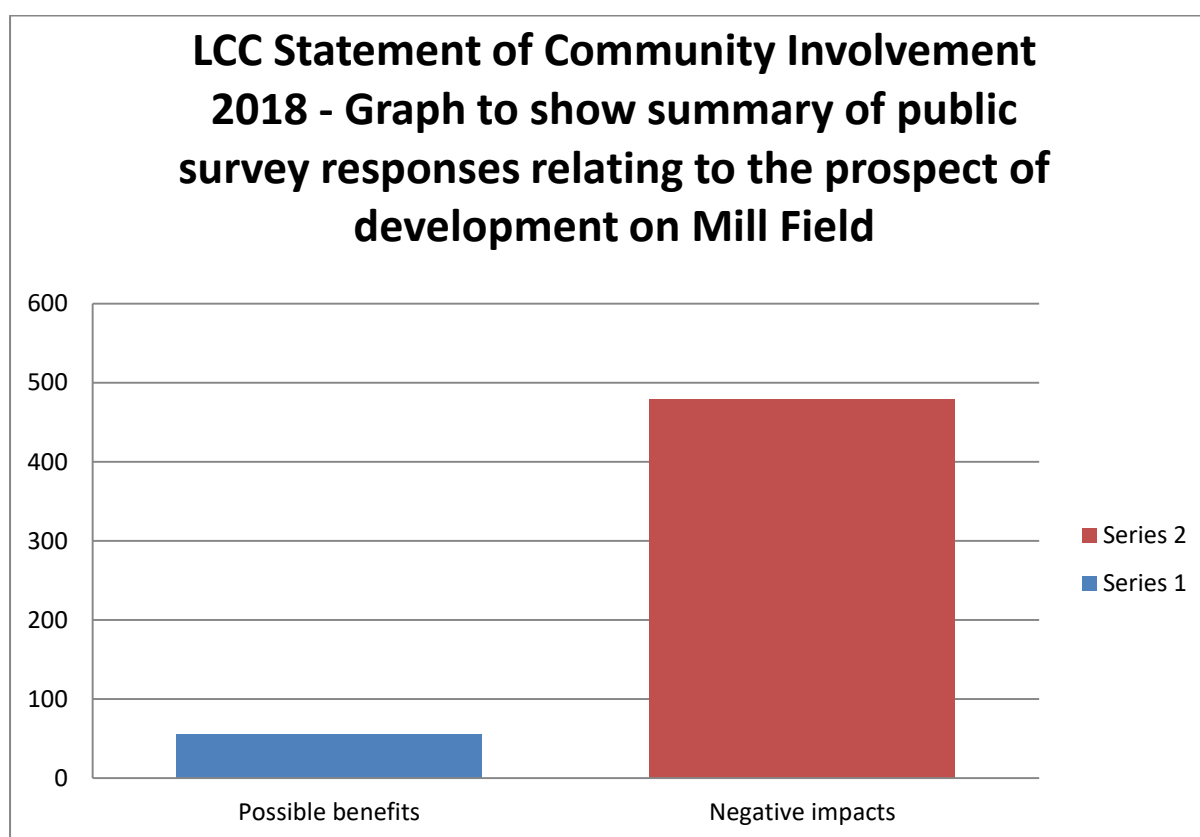
Para 2.3 "The site is located to the west of Market Deeping and is enclosed by the A15 which extends along the entire western boundary. It is bordered by extensive mature trees and hedging along its eastern, southern and western boundaries. The northern boundary of the site has limited containment, with two agricultural fields beyond. An earth bund runs the length of the eastern (should say western) boundary separating the site from the A15. The two fields are separated by one another by a brook that connects to a ditch which runs the length of the western (should say eastern) boundary between the site and Millfield Road."

Savill's/LCC report also describe the site in para 6.4.1 of their Statement of Community Involvement (2018) as

"The site is open greenfield land but is on the edge of the built up area of Market Deeping. The site is well related to existing development which currently exists along the eastern edge of the site. The site is well contained with boundary hedgerows which limit views into the site from Millfield Road to the east and the A15 bypass to the west."

We find these three descriptions by Savill's/LCC very helpful in our justification for designating Mill Field as a LGS i.e. the area is presented as a contained piece of land and not described as, nor does it sound like, an extensive tract of land. It can also be noted that the land known as Mill Field is of modest proportions when seen alongside the overall size of the Deepings area.

Para 2.5 States that the site is not subject to any statutory designations. Through consultation by both the DNP group and by Savill's/LCC, the people of the Deepings consistently consider that Mill Field needs protection, hence inclusion as LGS in policy DNP13. Refer to graph below for visual representation of the data collected by LCC in 2018.



Section 3 *Policy Context*

This whole section is largely a presentation of policy extracts to serve as a reminder of the context for local planning, for neighbourhood planning and for designating LGS. As such, these are simply statements of fact that we are already aware of.

Para 3.15-3.17 Anticipates the inclusion of Mill Field as a site for housing allocation. However, it is now known that the site is not included in the new SKDC Local Plan.

Para 3.28 concludes the section by stating:

“It is clear, from the above, that the approach towards the designation of LGS is one which requires compelling evidence to clearly demonstrate that it meets the requirements of national planning policy in full.”

We agree with this and have now provided compelling evidence for LGS in the final DNP submission document.

Section 4 *Relating to DNP2*

Development Boundary - The comments are welcomed and, after consideration, the proposal for a Development Boundary is removed from the Submission NP.

Section 5 *Relating to DNP11*

Green Lanes - Further evidence and justification for protection of the two Green Lanes is now provided in the Submission NP.

Section 6 *Relating to DNP13*

Local Green Spaces - Further evidence and justification for protection of the eight Local Green Spaces and additional justification for Mill Field is now provided in the Submission NP.

Conclusion

The Objection has been considered for its purpose in preventing LGS designation of the piece of land known locally as Mill Field. The application of Policy Tests and Basic Conditions applicable to the Neighbourhood Plan have been examined and we conclude that:

- i. The proposed Development Boundary has been removed from the Submission NP
- ii. A more rigorous justification for designating Millfield Road as a Green Lane has been provided
- iii. A more rigorous justification for designating Mill Field as LGS has been provided

Appendices to the Savill's/LCC Objection include copied materials from other areas:

- Cheltenham Local Plan (April 2019) *population c115,000*

- Tatenhill Neighbourhood Plan (December 2015) *population <1,000*
- Oakley & Deane Neighbourhood Plan (December 2015) *population <1,000*

The purpose of these additional documents is unclear from the Savill's LCC report as they are not referred to as examples within the Objection and give no assistance towards providing a clearer definition of LGS. The three Plan areas are not obviously comparable to the size and circumstances of the Deepings. However, the most useful information that can be extracted is:

- The need for a more comprehensive assessment of LGS to show a robust justification of the sites allocated (Cheltenham).
- Better quality/more detailed maps needed to identify LGS designations and better adherence to LGS policy definition. (Tatenhill)
- The need for greater clarity with LGS designation and to show clearer boundaries for each proposed site. (Oakley & Deane)

Notes from other Neighbourhood Plan Examiners Reports relating to LGS with interesting comments highlighted.

Extract: Cheltenham LP Examiners Report

29. The Council's LGS Study Report, refers to the "threat of development" as an example of the factors to be considered by communities when assessing possible LGS sites, whereas the primary reason for designation should be that the site is of such demonstrable significance to the local community that it should be protected. The use made of Natural England's Accessible Natural Greenspace

.....

Extract: Plumpton, East Sussex (January 2018) (*population <2,000*) NP Examiner's Report

169. Whilst the largest Local Green Space, "*Fields on Little Inholmes Farm*," covers some 6.8 hectares, but find that, in relation to Plumpton Green as a whole, this does not appear as an extensive tract of land. I also note that its larger size, in relation to the other areas of Local Green Space in the Neighbourhood Area, is simply reflective of its nature and importance to the local community as a connected series of fields separated by hedgerows and shaws close to the centre of the village.

170. Taking all of the above and the fact that the Neighbourhood Plan has emerged through robust consultation into account, I find that the inclusion of the five areas of Local Green Space in the Neighbourhood Plan meets

the basic conditions.

.....

Extract: Repton (July 2019) (population <3,000) NP Examiners Report

50. Paragraph 6.2.1 of the Plan records the fact that there is considerable local support for policies to protect existing local open spaces within the settlements, and it goes on to list nine areas to be preserved as Local Green Spaces, a term which derives from NPPF paragraph 77.

52. Savills say there is no need for the policy because SDDC are presently consulting on a Green Space plan of their own; this seems to me an inadequate basis for objection. The inclusion of the northern part of site 2 (Mathews Farm) is the subject of objection on behalf of its owners, who say that it is a private paddock without public access, and that the Parish Council have failed to provide evidence to show that it is “demonstrably special”, in the terms set out in the NPPF. Similar criticisms are made in relation to site 8 (The Orchard, Main Street, Milton).

53. There is some comment in background document CEF5, but little overall to explain in detail how each of the identified sites “performs” against the NPPF criteria. The Plan would have been more robust had this not been the case, but I do not see that there is a strong argument (on the basis of my visit to the area or the grounds of objection) for treating these two parcels of land any differently from the other seven identified for protection in the policy.

.....

Extract: Winslow (May 2014) (population 4,400) NP Examiners Report

Green Space Policies Policy 19:

Local Green Spaces Policy 19 designates six Local Green Spaces. These have been found to be special to the local community and the supporting text provides further information pertaining to each designation. Policy 19 has regard to national policy, which allows neighbourhood plans to identify for protection those green areas that are of particular importance to them. National policy states that the designation should be used where the green area is in reasonably close proximity to the community, is local in character and is not an extensive tract of land, and is demonstrably special to the local community. The six Local Green Spaces meet these criteria. (no sizes given in the NP)
Policy 19 meets the Basic Conditions.

.....

Extract: Torquay (July 2018) (population c65,000) NP Examiners Report

281 Part of Policy TE4 seeks to designate 100 areas of Local Green Space. Whilst this might seem like a lot of areas, I note earlier in this Report that the Neighbourhood Area covers a

wide and varied geographical area and that it is home to a lot of people. Further, there is no restriction on the number of areas of Local Green Space that a Neighbourhood Plan can designate.

282 With the exception of two sites, it has been demonstrated that each of the areas designated meet the requirements of the Framework, as set out above.

283 Whilst Torbay Development Agency objected to the designation of all areas of Local Green Space, no substantive evidence was provided in respect of the contention that all of the designations are not consistent with the local planning of sustainable development. I note earlier in this Report that Torbay Council supports and welcomes the housing land allocations in the Neighbourhood Plan, as they support the growth strategy for Torbay.

289 As above, the Local Green Space designation is very important. Given this, rather than append the list of areas of Local Green Space, I recommend that it be included, along with an indicative plan, within the Neighbourhood Plan itself. Given the number of deletions recommended in this Report, I note that the Local Green Space Policy will become one of, if not the, most important land use planning Policies in the Neighbourhood Plan and it is therefore important that it is clearly presented.

Deepings First: Neighbourhood Planning Group

May 2020

Appendix 3

South Kesteven District Council Response

Planning Policy comments on the Draft Deepings Neighbourhood Plan

In relation to the Councils comments on certain paragraphs and Policies:

Text that the Council suggests is deleted has been ~~crossed-out in red~~.

Text the Council suggests is added is in light blue

General comments the Council have made are in green

<u>Policy / Paragraph Number/ Table/Map</u>	<u>Comment / Recommendation</u>												
Paragraph – 8.6 – 8.14 Policy 2 Map 2	<p>The Council would like to discuss the matter of the Deepings “development limits” when we meet with the Neighbourhood Plan Group on the 11th of December. The Council have the following questions regarding the highlighted paragraphs including Map 2 and Policy 2 of the Plan.</p> <ul style="list-style-type: none">• What is the core evidence behind the “Deepings development limit”?• How is this in strategic conformity with SKDC emerging Local Plan policies SP2 and SP4?• What is the advantage of creating the “development limit”?• How is the “development limit” in conformity with the NPPF para 71 entry level exception sites.• Could this create a false potential about what development could come forward within the Deepings?• Do the proposed SKDC LP Allocations for the Deepings need to be included within the limits to development?												
Paragraph 9.5	<p>The SKDC LP now only identifies two proposed allocations within the Deepings totalling 753 units. This is due to the site “west of Linchfield Road” being removed through the examination as it already has planning permission.</p>												
Table 2	<p>Table 2 will therefore need updating to show the following changes to density and allocation codes;</p> <table><tr><th>SKLP Site Reference</th><th>Location</th><th>Site Area (Ha) Indicative</th><th>Number of Dwellings</th></tr><tr><td>DEP1-H1</td><td>Towngate West</td><td>5.08</td><td>73</td></tr><tr><td>DEP1-H2</td><td>Land off Linchfield Road</td><td>32.89</td><td>680</td></tr></table>	SKLP Site Reference	Location	Site Area (Ha) Indicative	Number of Dwellings	DEP1-H1	Towngate West	5.08	73	DEP1-H2	Land off Linchfield Road	32.89	680
SKLP Site Reference	Location	Site Area (Ha) Indicative	Number of Dwellings										
DEP1-H1	Towngate West	5.08	73										
DEP1-H2	Land off Linchfield Road	32.89	680										
Map 3	<p>A new map will be required to show the updated Deepings allocations in line with what is in the SKDC Local Plan to avoid confusion. The Council can provide this.</p>												
Paragraph 9.10	<p>Will need updating to reflect the changes in site allocations within the Deepings</p>												

Paragraph 9.12	Will need updating to reflect the changes to site allocations within the Deepings, noting that site “west of Linchfield Road” has now been deleted
Paragraph 9.13	<p>The council suggests the following wording changes to the paragraph;</p> <p>Our aim is to create functional, well-integrated new neighbourhoods by designing places that everyone can visit are suitable for all. These new places will connect people through new routes and strong visual links. Residents will live among and enjoy abundant green space and large trees. A range of homes will ensure that living here appeals to as wider an audience as possible, so that a new community is formed. These new neighbourhoods will be calm, connected and have good access that will encourage people move around sustainably through walking and cycling</p>
Policy 1	<p>The Council suggests the following changes to Policy 1;</p> <div data-bbox="363 801 1318 2024" style="border: 1px solid black; padding: 10px;"> <p>Policy DNP1: The Allocation of Residential Sites DEP1-H1/H2/H3</p> <p>The following sites are allocated within the SKDC local Plan for residential development:</p> <p>DEP1-H1 Towngate West (SKLP254) - 9.441ha Indicative number: 73 dwellings</p> <p>DEP1-H2 Land West of Linchfield Road (SKLP39) Indicative number: 145 dwellings</p> <p>DEP1-H2 Linchfield Road (SKLP253) 32.862ha Indicative number: 590 dwellings 680</p> <p>2. In addition to the more general principles identified in SKLP Policy DNP1, all development proposals for sites in part 1 of this Policy should demonstrate, in their masterplan, how they have considered the following detailed design principles for the comprehensive development of the proposed site allocations. These detailed design principles follow.</p> <p>a) <i>Streets as Places</i>. Streets must be considered as a ‘social space’ to be used by all, not just vehicles. It is essential that the design of new development should include streets that incorporate needs of pedestrians, cyclists and if applicable public transport users to help minimise the use of the private car.</p> <p>b) <i>Integrated pedestrian paths or linkages</i>. Where possible, new routes should integrate into existing pedestrian routes and networks that surround the site</p> <p>c) <i>Routes should be laid out in a permeable pattern</i>. This will allow for multiple connections and choice of routes, particularly on foot. Any cul-de-sacs should be relatively short and include wide and overlooked provision</p> </div>

	<p>for onward pedestrian links. Shared central green spaces in cul-de-sacs are encouraged.</p> <p>d) <i>Strong frontages on to existing streets.</i> They should be aligned to existing buildings. Where set back, they should replicate to create a feeling of openness and connection with appropriate hard or soft landscape treatment.</p> <p>e) <i>At Land west of Linchfield, retain existing perimeter maturing plants and trees. The present planted landscape strip is an asset to be protected and enhanced into a "walking corridor" and contribute towards the implementation of the Green Walk Project.</i> Not needed as allocation has been deleted.</p> <p>f) <i>Development adjoining public open spaces.</i> These should enhance the character of these spaces by either providing a positive interface (properties facing onto them to improve natural surveillance) and a soft landscaped edge. Substantial landscaped areas should buffer the edge of the development and prevent development sprawling into the countryside;</p> <p>g) <i>Primary and secondary streets.</i> These should differentiate from one another in scale, level of enclosure, use of materials and landscaping features to help provide a clear and distinctive highway network.</p> <p>h) <i>Gateway and significant built elements.</i> Highlight Access or arrival to newly developed sites should be highlighted. Buildings up to two and a half storeys should be used to increase legibility (meaning ease of recognition with notable features). Where houses front onto landscape areas, they should increase passive surveillance and give a sense of enclosure to these open areas.</p> <p>i) <i>Variable densities.</i> These should ideally increase towards the existing built up area. Densities should reduce towards the periphery of developments where they neighbour agricultural fields. This will ensure diversity within plots and a landscape setting that reflects the transition from urban to rural;</p> <p>j) <i>Height of housing.</i> The majority of the housing should be two storeys to reflect existing residential areas. Where the new development is adjacent to existing residential development housing should be similar in height to the existing to avoid any negative privacy issues. The exception is where gateway and entrance features form part of the design.</p> <p>Policy letters should also be updated as a general formatting change.</p>	
<p>Paragraph 10.10 onwards</p>	<p>There appears to be a formatting issue (spacing) with some of the paragraphs here.</p>	

<p>Policy 3</p>	<p>The Council Suggest the following changes to Policy 3;</p> <div data-bbox="376 304 1318 1944" style="border: 1px solid black; padding: 10px;"> <p>Policy DNP3: Housing Type and Mix</p> <p>1.Type and Proposals for 10 or more dwellings will provide an appropriate mix of housing types and sizes, including 1, 2- and 3- bedroom dwellings to help meet the need for smaller accommodation in the community – particularly for younger families and older people. Where possible, these dwellings should also include space for adaptability taking inspiration from the Lifetime homes guidance. Number of bedrooms does not need to be stated within the policy, as it would be subject to need on a case by case basis. The final sentence doesn't add anything to the policy and could add confusion for decision makers.</p> <p>2. The subdivision of an existing dwelling or the provision of an onsite annex to accommodate a family member will be supported where it does not cause a detriment to the private amenity of existing occupants or any adjoining occupants. The Council thinks that making this policy specifically for a family member will be difficult to enforce.</p> <p>3. Developers will be required to supply high quality affordable housing in line with the requirements identified in the South Kesteven Local Plan + subsequent development plan documents. The provision of affordable housing through Starter Homes or Shared Ownership schemes will be particularly supported as there is an under provision of owner-occupied affordable housing in the Parish. The Council suggests that this policy also states about meeting future need as the demand for Starter Homes/Shared ownership may change to a different affordable type in the future.</p> <p>4. The affordable housing stock should be made available as an integral part of the development, should be visually indistinguishable from the equivalent market housing on the site and dispersed throughout the development.</p> <p>5. Where possible, affordable rental housing within the Neighbourhood Plan area shall be allocated to eligible households with a connection to the area. The council questions where the line is drawn about the connection to the Deepings as the Market Town does also serve a much wider area incorporating many smaller villages. A good example of a step-based connection policy can be found in the Horncastle Neighbourhood Plan.</p> <p>Horncastle Neighbourhood Plan Affordable housing section; pages 36-43</p> <p>https://www.e-lindsey.gov.uk/media/6110/Horncastle-Neighbourhood-Development-Plan-2014-2029-Including-Appendix-A-to-H-and-S-/pdf/Horncastle_Neighbourhood_Development_Plan_2014-2029_(Including_Appendix_A_to_H_and_S).pdf?m=636782181780270000</p> </div>

	<p>6. Proposals for new care or specialised facilities (public or private) accommodation for the older people and those with additional needs, including dementia housing, should be within a reasonable walking distance, to existing public transport services, walking and cycling routes and be easily accessible to nearby shops and health facilities. Proposals which use opportunities for the multiuse and co-location of care facilities and accommodation for older people with other services and facilities, and thus co-ordinate local care and provide convenience for users, will be supported.</p> <p>7. Proposals for self and custom build will be supported if they comply with other relevant policies of this Plan.</p>										
Table 3	<p>The following labels on the table will need changing to reflect the employment allocation changes through the SKDC LP.</p> <table border="1"> <thead> <tr> <th>SKLP Site Reference</th><th>Location</th><th>Site Area (Ha)</th></tr> </thead> <tbody> <tr> <td>DEP-E1</td><td>Land fronting Peterborough Road, Market Deeping</td><td>4.20</td></tr> <tr> <td>DEP-SE1</td><td>Extension to Northfields Industrial Estate</td><td>21.1</td></tr> </tbody> </table>	SKLP Site Reference	Location	Site Area (Ha)	DEP-E1	Land fronting Peterborough Road, Market Deeping	4.20	DEP-SE1	Extension to Northfields Industrial Estate	21.1	
SKLP Site Reference	Location	Site Area (Ha)									
DEP-E1	Land fronting Peterborough Road, Market Deeping	4.20									
DEP-SE1	Extension to Northfields Industrial Estate	21.1									
Policy 4	<p>The Council Suggest the following changes to Policy 4;</p> <div> <p>Policy DNP4: Employment Opportunities</p> <p>1. The following sites, as identified on Map 3, are allocated in the SKLP for employment uses under SKLP Policy E1 E2 & E3:</p> <p>DEP-E1 (SKLP 281) 4.20ha – E3 DEP-SE1 (SKLP177) 14.00ha – E2</p> <p>2. Northfields Industrial Estate is protected for employment use under SKLP Policy E2 and Policy E6.</p> <p>3. Hard's Lane* at Frognall is protected for employment use under SKLP Policy E3 and E5.</p> <p>The Council notes that the NP group have allocated this site themselves. Therefore, the site would require a separate policy as it cannot be added to the SKLP policies due to its advanced stage (the separate policy for "Hards Lane" can however copy the wording of emerging SKLP policies E3/E6. The Council also would like to see evidence of why "Hards Lane" needs protecting over other possible employment clusters within the Deepings.</p> </div>										

	<p>4. Existing areas of employment are protected under SKLP Policy E6. – not needed</p> <p>This does not add anything to the policy.</p> <p>Any additional employment development will be encouraged subject to the following criteria: -</p> <p>a) development should be visually attractive, compatible with the character of the surrounding area and include necessary screening and be of a scale, design and appearance appropriate to the locality, particularly where development can be viewed from the highway, public spaces or residential areas;</p> <p>b) development must not cause detriment to valuable areas or features of nature conservation or heritage assets; - The Council questions what is a valuable area and how would it best be defined?</p> <p>c) development must include appropriate access, parking, areas for loading and unloading, servicing and manoeuvring;</p> <p>d) any outside storage areas and air conditioning should be appropriately sited and screened from public view, including from and neighbouring residential properties;</p> <p>e) development should have no unduly adverse effect on residential amenity from its proposed height, scale, noise, smell, vibrations, glare, dust, emissions, vehicle movements or its operating hours;</p> <p>f) where possible, utilise roof and wall space for the use of renewable energy generation and living wall opportunities; - The council questions how enforceable this policy is, in addition to how this could be difficult for a decision maker to implement or base a refusal off.</p> <p>g) it does not have a detrimental impact on the capacity or safety of the existing highway network. The Council would argue that this part of the policy is not in conformity with NPPF para 109 which states that</p> <p><i>“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”</i></p> <p>*This site is not identified as an existing employment site in the SKLP and therefore it has been added as an existing employment site under this policy. – Please see comments under section 3 of this policy.</p>	
	<p>Policy letters should also be updated as a general formatting change</p>	

Map 6	Suggest moving this map to coincide with the new policy for “Hards Lane” once it has been established.
Map 5 and Policy 5	The Council would like to discuss why the area has been extended when we meet with the group on the 11 th of December.
Policy 6	<p>The Principle of the policy is sound – however the council would question why certain churches have been included over others such as –</p> <ul style="list-style-type: none"> • Deeping Methodist Church • Deeping open Door Baptist Church
Policy 7	<p>The Council Suggest the following changes to Policy 7;</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>Policy DNP7: Local Centres</p> <p>1. Proposals involving the change of use, at ground floor level, of these retail facilities, to non-retail uses, within the Local Centres, as identified on Maps 7-11, will not be supported unless it can be demonstrated, to the satisfaction of the Local Planning Authority, that there is no longer a need for the facility or the premises are unsuitable or not economically viable for the continued provision of a retail facility.</p> <p>The council questions whether other use classes (such as A2, A3, A4, A5) are also not acceptable in these locations?</p> <p>It is also worth noting that many use class changes may not be exempt from needing permission under permitted development rights – the following webpage highlights what these are; https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use/2</p> <p>2. Development for the provision, alteration or replacement of shop fronts and signs in the Local Centres will be supported provided the design, colour, materials and details of the alterations to and replacements of shop fronts and signage sustain or enhance the character of the building and surrounding shop frontages and are in-keeping with the relevant character area.</p> <p>3. Proposals that seek to improve the structures and public realm of the Local Centres will be supported where the materials design and materials contribute towards the improvement of the character and the amenity value of the area.</p> </div>
Policy 8	<p>The Council Suggest the following changes to Policy 8; (further comment on this policy will be provided separately by our Urban Design Officer.)</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>Policy DNP8: General Design Principles</p> <p>1. All new development must be of a high-quality design that both physically and visually enhances and reflects the positive features that make up the character of the local area and both physically and visually enhances and compliments the local area.</p> </div>

	<p>The Council has suggested a slight rewording here.</p> <p>2. Proposals will only be supported where they are designed to meet the key design principles for delivering high quality development set out below and, more specifically, in including the incorporation of the Character Walk descriptions and the Urban Character Assessment.</p> <p>Site characteristics</p> <p>3. New development should consider the retention of any important historic or natural features, buildings and structures on site. Any retention should be appropriately incorporated into the design of the development, whilst not leading to these features being compromised by the construction of the scheme or by the future occupants of the site.</p> <p>Local Character and settlement structure</p> <p>4. New development should respect the historic character of the local area in terms of the form, density, style, height, scale, orientation, plot sizes and position to existing buildings. Developments should not be designed as 'standalone' additions with no clear relationship to the existing settlement in terms of its character and connectivity.</p> <p>Architectural quality and materials</p> <p>5. New development should respect its context and improve the quality of local architecture in terms of its sustainability, use of materials and durability. Developments should take inspiration from the positive local architectural features and materials in their designs and not simply produce a development with no reference to local architectural or material merit or distinctiveness. Proposals for new innovative buildings should reflect the highest standards in architecture, utilising modern construction methods and environmentally sustainable materials whilst minimising its impact on the surrounding built and natural character of the area.</p> <p>Landscaping</p> <p>6. New development should provide a positive hard and natural landscaping scheme, including boundary treatments that complement the development and respect the surrounding context, particularly where a development site is adjoin surrounding countryside. Where trees or hedgerows are being used, they must be appropriate to the size of the site and consider their proximity to the new buildings. Surfacing must be appropriate for its intended use.</p> <p>Private Amenity</p> <p>7. New development should ensure that it provides a decent reasonable standard of private amenity space, allowing adequate spaces for waste, recycling, parking, servicing and cycle storage. The amount of land that should be provided for amenity space will be determined by the size of the development proposed and by the character of surrounding development –</p>	
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	<p>Amenity areas should not be compromised by shading from buildings or shading from trees, leaf litter and anxiety of established significant trees and hedges that would lead to future pressure to prune or remove these landscape features.</p> <p>The Council questions how the amenity space will be calculated – what happens if there is a block of flats proposed?</p> <p>Accessibility</p> <p>8. New development where appropriate should ensure that all people, including those with disabilities, can easily and comfortably move through and into around it. Developments should prioritise safe, easy and direct pedestrian movement and the creation of a network of attractive, well-connected public spaces; establish both visual and functional relationships between different parts of a the development and between the development and its wider setting.</p> <p>9. Where neighbouring or functionally linked sites come forward together, applicants will be expected to work together and with the Council to ensure that proposals are, or can be, properly integrated</p>
Paragraph 11.98	The council feels that having Photographs of these “important gateways” would be helpful in establishing more context.
Policy 9	<p>The Council Suggest the following changes to Policy 9; (further comment on this policy will be provided separately by our urban design officer.)</p> <div> <p>Policy DNP9: Important Gateways</p> <p>1.Development which impacts on important gateways 50m of the areas, identified on the Map 13, will only be supported provided that the proposed built form, massing, scale and density of the development will create a strong and visually attractive gateway into the Deepings and avoids any unnecessary ‘hard edges’ towards the countryside.</p> <p>The Council is overall supportive of the policy however would question what justifies a 50m area around the gateway? (i.e. what if a development was 51 meters away).</p> </div>
11.99	There appears to be some formatting issues with this paragraph.
Policy 10	<p>The Council Suggest the following changes to Policy 10;</p> <div> <p>Policy DNP10: Area of Separation</p> <p>An Area of Separation is designated, as identified on Map 14: a) Between Deeping St James and Frognall.</p> <p>1. The Area of Separation has been identified to fulfil the following roles and function of preventing the physical merging between Deeping St James and</p> </div>

	<p>Frognall, preserving their separate identity and local character. Proposals for development, within the identified Area of Separation, will only be supported where it can be demonstrated that the proposed development is not contrary or detrimental to Part 2 of this Policy preserving their separate identity and local character.</p> <p>2. development within the All gateways to have well designed highly visible signage to set the scene and portray the character of the Deepings.</p> <p>4. Proposals for development, within the identified Area of Separation, will only be supported where it can be demonstrated that the proposed development is not contrary or detrimental to Part 2 of this Policy.</p> <p>The Council has suggested merging both criteria 2 and 4 in this policy.</p> <p>The Council would also like to discuss why the extent of the area of separation has been chosen when we meet with the group on the 11th of December.</p>	
Map 14	<p>Needs the following copyright statement</p> <p><i>Ordnance survey © Crown copyright and database rights 2019 Ordnance survey 100054750 you are permitted to use this data solely to enable you to respond to or interact with the organisation that provided you with the data. You are not permitted to copy, sub- licence, distribute or sell any of this data to third parties in any form.</i></p>	
12.11	<p>The Council questions where the information that an LGS has to be between 0.2ha and 20ha in size has come from? – it should follow the criteria set out in paragraph 100 of the NPPF</p>	
Map 15	<p>Needs the following copyright statement</p> <p><i>Ordnance survey © Crown copyright and database rights 2019 Ordnance survey 100054750 you are permitted to use this data solely to enable you to respond to or interact with the organisation that provided you with the data. You are not permitted to copy, sub- licence, distribute or sell any of this data to third parties in any form.</i></p>	
Map 16	<p>Needs the following copyright statement</p> <p><i>Ordnance survey © Crown copyright and database rights 2019 Ordnance survey 100054750 you are permitted to use this data solely to enable you to respond to or interact with the organisation that provided you with the data. You are not permitted to copy, sub- licence, distribute or sell any of this data to third parties in any form.</i></p> <p>Additionally the key to the map appears to be missing.</p>	
Map 17	<p>Needs the following copyright statement</p> <p><i>Ordnance survey © Crown copyright and database rights 2019 Ordnance survey 100054750 you are permitted to use this data solely to enable you to respond to or interact with the organisation that provided you with the data. You are not permitted to copy, sub- licence, distribute or sell any of this data to third parties in any form.</i></p> <p>Additionally, the key to the map appears to be missing.</p>	

<p>Policy 11</p>	<p>The Council Suggest the following changes to Policy 11;</p> <div data-bbox="367 300 1386 1839" style="border: 1px solid black; padding: 10px; background-color: #f0f0f0;"> <p>Policy DNP11: Green Infrastructure</p> <p>1. Where appropriate, new proposals should preserve, and where possible, enhance the existing local green infrastructure network, including the River Welland Green Corridor, the Green Walk, Green Lanes and existing public rights of way.</p> <p>Green Walk</p> <p>2. Where appropriate, development proposals will be expected to contribute towards the implementation of the Deepings Green Walk, as identified on Map 15, by:</p> <ul style="list-style-type: none"> a) enhancing the attractiveness of walking and non-motorised transport in and around the town; b) contributing to the connectivity between other existing footpaths, roadways and cycleways in and around the built-up area, to the town centre, and within the adjacent countryside; c) accommodating the requirements of people with limited mobility to access existing and new Green Infrastructure provision; and d) enhancing the use of existing open spaces, promoting biodiversity, and adding to the connectivity between existing green spaces. <p>New Public Green Spaces on new Developments</p> <p>3. The provision of new on-site public open space should be well designed, safe, overlooked, located within an easily accessible part of the development and well-defined in terms of the typology of open space proposed. Pockets of plain grassland or space with no identified clear intended use will not be supported as a green space.</p> <p>Green Lanes –</p> <p>4. The Green Lanes, as identified on Map 17, shall be protected from unsympathetic development which would have an adverse impact on the character area concerned. New development in the identified Green Lanes should preserve and, where possible, enhance their rural appearance.</p> <p>The Council would also like to see the evidence and process of how these “Green Lanes” have been identified when we meet with the group on the 11th of December.</p> </div>
<p>Policy 12</p>	<p>The Council Suggest the following changes to Policy 12;</p> <div data-bbox="367 1982 1386 2018" style="border: 1px solid black; padding: 5px; background-color: #f0f0f0;"> <p>Policy DNP12: Open Space</p> </div>

	<p>The sites, as shown on Maps in Appendix A, are identified as Important Open Spaces and are protected through SKLP Policy OS1:</p> <p>a) OS6: Towpath by the Riverbank (0.11ha); b) OS10: Cedar Close (0.87ha); c) OS11: The Woodlands (0.72ha); d) OS12: St Guthlac Avenue (0.16ha); e) OS13: Meadway (0.13ha); f) OS14: Osborne Way (0.15ha); g) OS15: Burnside (0.12ha); h) OS21: Centre off Godsey Crescent (A) (0.04ha); i) OS22: Godsey Crescent (B) (0.03ha); j) OS23: Godsey Crescent (c) (0.04ha); k) OS26: Windsor Gardens (0.18ha); l) OS27: Frontage of Tesco (0.02ha); m) OS28: The Green at Churchgate (0.005ha); Area is far too small to warrant Open space designation n) OS29: Lady Margaret Ave (0.019ha); p) OS34 Fraser Close (0.19ha); p) OS35 Boundary Bowling Green (0.15ha); q) OS36 Hereward Way (0.018ha); r) OS37 Campion Drive A B & C (0.07 +0.05 + 0.06); s) OS38 Marigolds/Foxgloves A B & C (0.07 + 0.04 + 0.01); Only A is identified as OS by SKDC t) OS39 Towing Close (0.19); u) OS40 The Brambles (0.03); v) OS41 Swift Close by Nursery (0.07); w) OS42 Wade Park Avenue by school (0.15); x) OS43 Kesteven Close (0.17); y) OS44 Elm Close (0.09); z) OS45 Wade Park Avenue (0.01); aa) OS46a A-K Heron lea Pocket Parks (0.05).</p> <p>Those sites that have been highlighted Green have already been identified as Open space by SKDC, and therefore do not require any further protection from the same policy.</p> <p>Labels on the Open Space map say “LGS” – The Council assumes they need to say “OS” instead.</p>
<p>Policy 13</p>	<p>The Council Suggest the following changes to Policy 13;</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>Policy DNP13: Local Green Spaces</p> <p>1. The sites, as shown on Maps in Appendix B, are designated as Local Green Spaces:</p> <p>a) LGS1: John Eve Field (1.79ha); b) LGS2: Glebe Field (2.47ha); c) LGS3: Rectory Paddock and cemetery (1.47ha); d) LGS4: Riverside Park (0.25ha); e) LGS5: Welland Gardens (0.1ha);</p> </div>

	<p> f) LGS7: Tattershall Drive, Towngate (1.55ha); g) LGS8: Sandringham Way (1.54ha); h) LGS9: Tattershall Drive (South) (0.45ha); i) LGS16: Cherry Tree Park (0.22ha); j) LGS17: Greenlands (0.73ha); k) LGS18: Mill Field (10.80ha); l) LGS19: Scout Hut Area (0.74ha); m) LGS24: Charter Avenue (0.24ha); n) LGS30: Jubilee Park (2.29ha); o) LGS31: Woody's Heights (0.44ha); p) LGS33: Millennium Wood (0.22ha); and q) LGS34: Riverside Park DSJ (0.22ha); </p> <p style="text-align: center;"> 1. Development on these sites will only be supported in very special circumstances.-- </p> <p style="color: green;">The Council has been through and assessed each of the LGS and determined which ones they agree and disagree with as found below.</p> <p><u>LGS justification.</u></p> <p>LGS1 –Already identified as OS by SKDC and gifted to the people of MD does not need further LGS protection – Disagree</p> <p>LGS2 – Already identified as OS by SKDC and owned by the Town Council. Does not need further protection - Disagree</p> <p>LGS3 – Already identified as OS by SKDC and owned by the Town Council. Does not need further protection - Disagree</p> <p>LGS4 – Already identified as open space but demonstrably meets all criteria and given location LGS would be sufficient– agree</p> <p>LGS5 – Already identified as OS by SKDC and owned by the Town Council. Does not need further protection - Disagree</p> <p>LGS7 = Already identified as OS by SKDC also appears to be quite and extensive tract of land, no real historical value no further protection needed- Disagree</p> <p>LGS8 – Already identified as OS by SKDC, no real historical value, no further protection needed – Disagree</p> <p>LGS9 – Already identified as OS by SKDC, no real historical value, no further protection needed – Disagree</p> <p>LG16 - Already identified as open space but demonstrably meets all criteria and given location LGS would be sufficient– agree</p> <p>LGS17 - Already identified as OS by SKDC, no real historical value, no further protection needed – Disagree</p>
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	<p>LGS 18– Site meets the special and historical requirements, however is a far to much of an extensive tract of land to be considered an LGS. Disagree</p> <p>LGS 24 –Not protected, Site has no historical value as it is part of a new housing estate. Disagree</p> <p>LGS30 (incorrectly labelled as 29 on map) - Already identified as OS by SKDC, site has social value and has been around for over 100 years – Disagree</p> <p>LGS31 - Already identified as OS by SKDC, no real historical value, no further protection needed – Disagree</p> <p>LGS32 – appears not to have been assessed in the table? – N/A</p> <p>LGS33 (needs label on map) - no district protection, but owned by the Parish Council is deemed special and has some historical merit– agree</p> <p>LGS34 – Appears not to be in the policy? – N/A</p>
Policy 14	<p>The Council Suggest the following changes to Policy 14;</p> <div style="border: 1px solid black; padding: 10px; background-color: #f0f0f0;"> <p>Policy DNP14: Biodiversity, Nature Conservation and the River Welland Green Corridor</p> <ol style="list-style-type: none"> 1. Where appropriate, development proposals should promote preservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority species populations where applicable. This could include, for instance, the incorporation of roosting opportunities for bats or the installation of bird nest boxes and swift boxes as part of any new development proposal. 2. Development proposals that cannot avoid (through locating an alternative site with less harmful impacts), adequately mitigate, or, as a last resort, compensate for the loss of a locally or nationally identified site of biodiversity value will not be supported. This will need to be backed up in cases where an EIA is required. 3. Where appropriate, development proposals must demonstrate that there is no unacceptable loss of or damage to existing trees, woodlands or hedgerows. – The Council questions this policy as there is no definition of what is deemed an “unacceptable loss” as replacement / compensation can always be made. 4. Development proposals for riverside sites on of the River Welland should incorporate and/ or safeguard land for the construction of a pathway next to the river, wide enough for shared use by pedestrians and cyclists. <ol style="list-style-type: none"> a) Where appropriate, links should be provided to the river corridor from new developments alongside the river. Existing links should be protected that lead to the wider residential areas, the surrounding countryside; </div>

	<p>b) Development proposals immediately adjacent to the river should include design features that will help animate public space, such as cafes, pubs or other social activities that will enhance enjoyment of the riverside; Therefore, if a wholly residential scheme can come forward would this be enough grounds for refusal?</p> <p>c) Where appropriate, development proposals should open new views to the river and access to the riverside;</p> <p>d) New developments adjacent to the river must demonstrate that they will not impact on the river's ability to function naturally and should enhance green infrastructure and wildlife corridors.</p>
<p>Policy 15</p>	<p>The Council Suggest the following changes to Policy 14;</p> <div data-bbox="376 768 1386 2024"> <p>Policy DNP15: Sustainable Travel and Transport Infrastructure</p> <p>1. Development proposals will be supported where they:</p> <p>a) give the highest priority to pedestrians, cyclists and other 'active travel' modes when developing or maintaining streets and roads;</p> <p>b) where possible connect to the Deepings Green Walk, as identified on Map 15;</p> <p>c) Where possible plan and provide a comprehensive network of accessible routes for walking and cycling which offer convenient, safe and attractive access to employment, homes, schools and other public facilities;</p> <p>d) ensure Encourage the integration of transport and active travel networks (i.e. walking, cycling and buses);</p> <p>e) promote 'active travel' for example ensuring new developments have adequate bicycle provision, including safe storage, or that new workplaces contain showers and clothes drying areas which will facilitate walking and cycling to work;</p> <p>f) ensure there is easy, clear and safe access to transport nodes, such as bus stops;</p> <p>g) identify and implement measures to reduce transport severance, noise levels and air pollution;</p> <p>h) recognise the needs and responses of different social groups, particularly those experiencing health inequalities; and- The Council questions how this criterion would be measured and how a decision maker would utilise it effectively?</p> <p>i) Where appropriate, provide off-street car parking provision that does not rely upon garages as parking spaces, particularly on developments where there is a mix of housing types and tenures and where there is a reliance on the car for commuting;</p> </div>

	<p>j) Garages with doors will be classed as storage not parking spaces – The council does not believe this criterion can be effectively implemented. The Council believes that this idea is covered through the “appropriate off-street car parking” section of criteria i)</p>
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Appendix 4

The Deepings Neighbourhood
Plan Group response to South
Kesteven District Council's
comments

Policy/Para/Table/Map	Comment/Recommendation	Review outcome/action												
Paragraph – 8.6 – 8.14 Policy 2 Map 2	The Council would like to discuss the matter of the Deepings “development limits” when we meet with the Neighbourhood Plan Group on the 11th of December. The Council have the following questions regarding the highlighted paragraphs including Map 2 and Policy 2 of the Plan. • What is the core evidence behind the “Deepings development limit”? • How is this in strategic conformity with SKDC emerging Local Plan policies SP2 and SP4? • What is the advantage of creating the “development limit”? • How is the “development limit” in conformity with the NPPF para 71 entry level exception sites. • Could this create a false potential about what development could come forward within the Deepings? • Do the proposed SKDC LP Allocations for the Deepings need to be included within the limits to development?	Group feel Luke needs to review this point and advise. The section would probably benefit from tightening the wording. 8.12 – Brown Field sites?												
Paragraph 9.5	The SKDC LP now only identifies two proposed allocations within the Deepings totalling 753 units. This is due to the site “west of Linchfield Road” being removed through the examination as it already has planning permission.	Group agree remove DEP2 – H2 row from table 2 on pg 21 Query should we have something in to protect Towngate West if existing planning application is resubmitted for more housing for phase as yet unbuilt												
Table 2	Table 2 will therefore need updating to show the following changes to density and allocation codes; <table><tr><th>SKLP Site Reference</th><th>Location</th><th>Site Area (Ha) Indicative</th><th>Number of Dwellings</th></tr><tr><td>DEP1-H1</td><td>Towngate West</td><td>5.08</td><td>73</td></tr><tr><td>DEP1-H2</td><td>Land off Linchfield Road</td><td>32.89</td><td>680</td></tr></table>	SKLP Site Reference	Location	Site Area (Ha) Indicative	Number of Dwellings	DEP1-H1	Towngate West	5.08	73	DEP1-H2	Land off Linchfield Road	32.89	680	As comment above
SKLP Site Reference	Location	Site Area (Ha) Indicative	Number of Dwellings											
DEP1-H1	Towngate West	5.08	73											
DEP1-H2	Land off Linchfield Road	32.89	680											

Policy/Para/Table/Map	Comment/Recommendation	Review outcome/action
Map 3	A new map will be required to show the updated Deepings allocations in line with what is in the SKDC Local Plan to avoid confusion. The Council can provide this.	Agree
Paragraph 9.10	Will need updating to reflect the changes in site allocations within the Deepings	Agree
Paragraph 9.12	Will need updating to reflect the changes to site allocations within the Deepings, noting that site "west of Linchfield Road" has now been deleted	Agree
Paragraph 9.13	<p>The council suggests the following wording changes to the paragraph;</p> <p>Our aim is to create functional, well-integrated new neighbourhoods by designing places that everyone can visit are suitable for all. These new places will connect people through new routes and strong visual links. Residents will live among and enjoy abundant green space and large trees. A range of homes will ensure that living here appeals to as wider an audience as possible, so that a new community is formed. These new neighbourhoods will be calm, connected and have good access that will encourage people to move around sustainably through walking and cycling</p>	Group is happy with wording changing
Policy 1	<p>The Council suggests the following changes to Policy 1; Policy DNP1: The Allocation of Residential Sites DEP1- H1/H2/H3</p> <p>The following sites are allocated within the SKDC local Plan for residential development:</p> <p>DEP1-H1 Towngate West (SKLP254) - 9.441ha Indicative number: 73 dwellings</p> <p>DEP1-H2 Land West of Linchfield Road (SKLP39) Indicative number: 145 dwellings</p> <p>DEP1-H2 Linchfield Road (SKLP253) 32.862ha Indicative number: 590 dwellings 680</p> <p>2. In addition to the more general principles identified in SKLP Policy DNP1, all development proposals for sites in part 1 of this Policy should demonstrate, in their masterplan, how they have considered the following detailed design principles for the comprehensive development of the proposed site allocations. These detailed design principles follow.</p> <p>a) Streets as Places. Streets must be considered as a 'social space' to be used by all, not just vehicles. It is essential that the design of new development should include streets that incorporate needs of pedestrians, cyclists and if applicable public transport users to help</p>	<p>Agree with proposed wording changes with exception of :</p> <p>point b, Group feel using Where possible will only serve to water down</p> <p>point e, keep all existing wording with the exception of At Land west of Linchfield, retain and replace with Retention of</p>

	<p>minimise the use of the private car.</p> <p>b) Integrated pedestrian paths or linkages. Where possible, new routes should integrate into existing pedestrian routes and networks that surround the site</p> <p>c) Routes should be laid out in a permeable pattern. This will allow for multiple connections and choice of routes, particularly on foot. Any cul-de-sacs should be relatively short and include wide and overlooked provision for onward pedestrian links. Shared central green spaces in cul-de-sacs are encouraged.</p> <p>d) Strong frontages on to existing streets. They should be aligned to existing buildings. Where set back, they should replicate to create a feeling of openness and connection with appropriate hard or soft landscape treatment.</p> <p>e) At Land west of Linchfield, retain existing perimeter maturing plants and trees. The present planted landscape strip is an asset to be protected and enhanced into a “walking corridor” and contribute towards the implementation of the Green Walk Project. Not needed as allocation has been deleted.</p> <p>f) Development adjoining public open spaces. These should enhance the character of these spaces by either providing a positive interface (properties facing onto them to improve natural surveillance) and a soft landscaped edge. Substantial landscaped areas should buffer the edge of the development and prevent development sprawling into the countryside;</p> <p>g) Primary and secondary streets. These should differentiate from one another in scale, level of enclosure, use of materials and landscaping features to help provide a clear and distinctive highway network.</p> <p>h) Gateway and significant built elements. Highlight Access or arrival to newly developed sites should be highlighted. Buildings up to two and a half storeys should be used to increase legibility (meaning ease of recognition with notable features). Where houses front onto landscape areas, they should increase passive surveillance and give a sense of enclosure to these open areas.</p> <p>i) Variable densities. These should ideally increase towards the existing built up area. Densities should reduce towards the periphery of developments where they neighbour agricultural fields. This will ensure diversity within plots and a landscape setting that reflects the transition from</p>	
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	<p>urban to rural;</p> <p>j) Height of housing. The majority of the housing should be two storeys to reflect existing residential areas. Where the new development is adjacent to existing residential development housing should be similar in height to the existing to avoid any negative privacy issues. The exception is where gateway and entrance features form part of the design.</p> <p>Policy letters should also be updated as a general formatting change.</p>	
Paragraph 10.10 onwards	There appears to be a formatting issue (spacing) with some of the paragraphs here.	Agree – refer to Luke when producing final draft
Policy 3	<p>The Council Suggest the following changes to Policy 3; Policy DNP3: Housing Type and Mix</p> <p>1.Type and Proposals for 10 or more dwellings will provide an appropriate mix of housing types and sizes, including 1, 2- and 3-bedroom dwellings to help meet the need for smaller accommodation in the community – particularly for younger families and older people. Where possible, these dwellings should also include space for adaptability taking inspiration from the Lifetime homes guidance. Number of bedrooms does not need to be stated within the policy, as it would be subject to need on a case by case basis. The final sentence doesn't add anything to the policy and could add confusion for decision makers.</p> <p>2. The subdivision of an existing dwelling or the provision of an onsite annex to accommodate a family member will be supported where it does not cause a detriment to the private amenity of existing occupants or any adjoining occupants. The Council thinks that making this policy specifically for a family member will be difficult to enforce.</p> <p>3. Developers will be required to supply high quality affordable housing in line with the requirements identified in the South Kesteven Local Plan + subsequent development plan documents. The provision of affordable housing through Starter Homes or Shared Ownership schemes will be particularly supported as there is an under provision of owner-occupied affordable housing in the Parish. The Council suggests that this policy also states about meeting future need as the demand for Starter Homes/Shared ownership may change to a different affordable type in the future.</p> <p>4. The affordable housing stock should be made available as an integral part of the development,</p>	<p>Point 1 – Group disagree wording should remain Happy with proposed wording changes to all other groups Group to review the link suggested for Horncastle at point 5</p>

	<p>should be visually indistinguishable from the equivalent market housing on the site and dispersed throughout the development.</p> <p>5. Where possible, affordable rental housing within the Neighbourhood Plan area shall be allocated to eligible households with a connection to the area. The council questions where the line is drawn about the connection to the Deepings as the Market Town does also serve a much wider area incorporating many smaller villages. A good example of a step-based connection policy can be found in the Horncastle Neighbourhood Plan.</p> <p>Horncastle Neighbourhood Plan Affordable housing section; pages 36-43</p> <p>https://www.e-lindsey.gov.uk/media/6110/Horncastle-NeighbourhoodDevelopment-Plan-2014-2029-Including-Appendix-A-to-H-and-S/pdf/Horncastle_Neighbourhood_Development_Plan_20142029_(Including_Appendix_A_to_H_and_S).pdf?m=636782181780270000</p> <p>6. Proposals for new care or specialised facilities (public or private) accommodation for the older people and those with additional needs, including dementia housing, should be within a reasonable walking distance, to existing public transport services, walking and cycling routes and be easily accessible to nearby shops and health facilities. Proposals which use opportunities for the multiuse and co-location of care facilities and accommodation for older people with other services and facilities, and thus co-ordinate local care and provide convenience for users, will be supported.</p> <p>7. Proposals for self and custom build will be supported if they comply with other relevant policies of this Plan.</p>													
Table 3	<p>The following labels on the table will need changing to reflect the employment allocation changes through the SKDC LP.</p> <table border="1"> <thead> <tr> <th>SKLP Site Reference</th><th>Location</th><th>Site Area (Ha)</th></tr> </thead> <tbody> <tr> <td>DEP-E1</td><td>Land fronting Peterborough Road, Market Deeping</td><td>4.20</td></tr> <tr> <td>DEP-SE1</td><td>Extension to Northfields Industrial Estate</td><td>21.1</td></tr> <tr> <td></td><td></td><td></td></tr> </tbody> </table>	SKLP Site Reference	Location	Site Area (Ha)	DEP-E1	Land fronting Peterborough Road, Market Deeping	4.20	DEP-SE1	Extension to Northfields Industrial Estate	21.1				Agree
SKLP Site Reference	Location	Site Area (Ha)												
DEP-E1	Land fronting Peterborough Road, Market Deeping	4.20												
DEP-SE1	Extension to Northfields Industrial Estate	21.1												
Policy 4	<p>Policy DNP4: Employment Opportunities</p> <p>1. The following sites, as identified on Map 3, are allocated in the SKLP for employment uses under SKLP Policy E1 E2 & E3:</p>	<p>Clarity required from Roger, Group agree point 3 should be an additional Policy – AP has provided suggested wording for review Point 4b remove word valuable</p>												

	<p>DEP-E1 (SKLP 281) 4.20ha – E3 DEP-SE1 (SKLP177) 14.00ha – E2</p> <p>2. Northfields Industrial Estate is protected for employment use under SKLP Policy E2 and Policy E6.</p> <p>3. Hard’s Lane* at Frognall is protected for employment use under SKLP Policy E3 and E5. The Council notes that the NP group have allocated this site themselves. Therefore, the site would require a separate policy as it cannot be added to the SKLP policies due to its advanced stage (the separate policy for “Hards Lane” can however copy the wording of emerging SKLP policies E3/E6. The Council also would like to see evidence of why “Hards Lane” needs protecting over other possible employment clusters within the Deepings.</p> <p>4. Existing areas of employment are protected under SKLP Policy E6. -not needed This does not add anything to the policy.</p> <p>Any additional employment development will be encouraged subject to the following criteria: -</p> <p>a) development should be visually attractive, compatible with the character of the surrounding area and include necessary screening and be of a scale, design and appearance appropriate to the locality, particularly where development can be viewed from the highway, public spaces or residential areas;</p> <p>b) development must not cause detriment to valuable areas or features of nature conservation or heritage assets; - The Council questions what is a valuable area and how would it best be defined?</p> <p>c) development must include appropriate access, parking, areas for loading and unloading, servicing and manoeuvring;</p> <p>d) any outside storage areas and air conditioning should be appropriately sited and screened from public view, including from and neighbouring residential properties;</p> <p>e) development should have no undue adverse effect on residential amenity from its proposed height, scale, noise, smell, vibrations, glare, dust, emissions, vehicle movements or its operating hours;</p>	<p>Point 4f group disagree with suggested wording change Point 4g Group agree with removing this point</p>
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	<p>f) where possible, utilise roof and wall space for the use of renewable energy generation and living wall opportunities; - The council questions how enforceable this policy is, in addition to how this could be difficult for a decision maker to implement or base a refusal off.</p> <p>g) it does not have a detrimental impact on the capacity or safety of the existing highway network. The Council would argue that this part of the policy is not in conformity with NPPF para 109 which states that</p> <p>“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”</p> <p>*This site is not identified as an existing employment site in the SKLP and therefore it has been added as an existing employment site under this policy. – Please see comments under section 3 of this policy.</p> <p>Policy letters should also be updated as a general formatting change</p>	
Map 6	Suggest moving this map to coincide with the new policy for “Hards Lane” once it has been established.	Agree
Map 5 and Policy 5	The Council would like to discuss why the area has been extended when we meet with the group on the 11th of December.	Andy and Gordon to lead discussion with Roger here
Policy 6	The Principle of the policy is sound – however the council would question why certain churches have been included over others such as – • Deeping Methodist Church • Deeping open Door Baptist Church	Group agree with comments this needs review and amendment
Policy 7	<p>The Council Suggest the following changes to Policy 7; Policy DNP7: Local Centres</p> <p>1. Proposals involving the change of use, at ground floor level, of these retail facilities, to non-retail uses, within the Local Centres, as identified on Maps 7-11, will not be supported unless it can be demonstrated, to the satisfaction of the Local Planning Authority, that there is no longer a need for the facility or the premises are unsuitable or not economically viable for the continued provision of a retail facility. The council questions whether other use classes (such as A2, A3, A4, A5) are also not acceptable in these locations?</p>	<p>Clarity re class changes required from Roger</p> <p>Group agree with proposed wording changes re point 3</p>

	<p>It is also worth noting that many use class changes may not be exempt from needing permission under permitted development rights – the following webpage highlights what these are; https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use/2</p> <p>2. Development for the provision, alteration or replacement of shop fronts and signs in the Local Centres will be supported provided the design, colour, materials and details of the alterations to and replacements of shop fronts and signage sustain or enhance the character of the building and surrounding shop frontages and are in keeping with the relevant character area.</p> <p>3. Proposals that seek to improve the structures and public realm of the Local Centres will be supported where the materials design and materials contribute towards the improvement of the character and the amenity value of the area.</p>	
Policy 8	<p>The Council Suggest the following changes to Policy 8; (further comment on this policy will be provided separately by our Urban Design Officer.) Policy DNP8: General Design Principles</p> <p>1. All new development must be of a high-quality design that both physically and visually enhances and reflects the positive features that make up the character of the local area and both physically and visually enhances and compliments the local area. The Council has suggested a slight rewording here.</p> <p>2. Proposals will only be supported where they are designed to meet the key design principles for delivering high quality development set out below and, more specifically, in including the incorporation of the Character Walk descriptions and the Urban Character Assessment.</p> <p>Site characteristics</p> <p>3. New development should consider the retention of any important historic or natural features, buildings and structures on site. Any retention should be appropriately incorporated into the design of the development, whilst not leading to these features being compromised by the construction of the scheme or by the future occupants of the site.</p> <p>Local Character and settlement structure</p>	<p>Group agree with suggested wording changes for Point 1 Point 2</p> <p>With regards to Point 7 group would prefer high to reasonable as suggested Clarity required from Roger re amenity space calculation comment Point 8 Group disagree</p>

	<p>4. New development should respect the historic character of the local area in terms of the form, density, style, height, scale, orientation, plot sizes and position to existing buildings. Developments should not be designed as 'standalone' additions with no clear relationship to the existing settlement in terms of its character and connectivity.</p> <p>Architectural quality and materials</p> <p>5. New development should respect its context and improve the quality of local architecture in terms of its sustainability, use of materials and durability. Developments should take inspiration from the positive local architectural features and materials in their designs and not simply produce a development with no reference to local architectural or material merit or distinctiveness. Proposals for new innovative buildings should reflect the highest standards in architecture, utilising modern construction methods and environmentally sustainable materials whilst minimising its impact on the surrounding built and natural character of the area.</p> <p>Landscaping</p> <p>6. New development should provide a positive hard and natural landscaping scheme, including boundary treatments that complement the development and respect the surrounding context, particularly where a development site is adjoin surrounding countryside. Where trees or hedgerows are being used, they must be appropriate to the size of the site and consider their proximity to the new buildings. Surfacing must be appropriate for its intended use.</p> <p>Private Amenity</p> <p>7. New development should ensure that it provides a decent reasonable standard of private amenity space, allowing adequate spaces for waste, recycling, parking, servicing and cycle storage. The amount of land that should be provided for amenity space will be determined by the size of the development proposed and by the character of surrounding development – Amenity areas should not be compromised by shading from buildings or shading from trees, leaf litter and anxiety of established significant trees and hedges that would lead to future pressure to prune or remove these landscape features. The Council questions how the amenity space will be calculated – what happens if there is a block of flats proposed?</p> <p>Accessibility</p>	
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	<p>8. New development where appropriate should ensure that all people, including those with disabilities, can easily and comfortably move through and into around it. Developments should prioritise safe, easy and direct pedestrian movement and the creation of a network of attractive, wellconnected public spaces; establish both visual and functional relationships between different parts of a the development and between the development and its wider setting.</p> <p>9. Where neighbouring or functionally linked sites come forward together, applicants will be expected to work together and with the Council to ensure that proposals are, or can be, properly integrated</p>	
Paragraph 11.98	The council feels that having Photographs of these “important gateways” would be helpful in establishing more context.	Agree
Policy 9	<p>The Council Suggest the following changes to Policy 9; (further comment on this policy will be provided separately by our urban design officer.)</p> <p>Policy DNP9: Important Gateways</p> <p>1.Development which impacts on important gateways 50m of the areas, identified on the Map 13, will only be supported provided that the proposed built form, massing, scale and density of the development will create a strong and visually attractive gateway into the Deepings and avoids any unnecessary ‘hard edges’ towards the countryside. The Council is overall supportive of the policy however would question what justifies a 50m area around the gateway? (i.e. what if a development was 51 meters away).</p>	Agree
11.99	There appears to be some formatting issues with this paragraph.	Agree refer to Luke
Policy 10	<p>The Council Suggest the following changes to Policy 10;</p> <p>Policy DNP10: Area of Separation An Area of Separation is designated, as identified on Map 14:</p> <p>a) Between Deeping St James and Frognall.</p> <p>1. The Area of Separation has been identified to fulfil the following roles and function of preventing the physical merging between Deeping St James and Frognall, preserving their separate identity and local character. Proposals for development, within the identified Area of Separation, will only be supported where it can be demonstrated that the proposed development is not contrary or detrimental to Part 2 of this Policy preserving their separate identity and</p>	<p>Agree in general with suggested wording changes</p> <p>Group feel Point 2 should be removed as it sits better in Policy 9</p>

	<p>local character.</p> <p>2. development within the All gateways to have well designed highly visible signage to set the scene and portray the character of the Deepings.</p> <p>4. Proposals for development, within the identified Area of Separation, will only be supported where it can be demonstrated that the proposed development is not contrary or detrimental to Part 2 of this Policy.</p> <p>The Council has suggested merging both criteria 2 and 4 in this policy. The Council would also like to discuss why the extent of the area of separation has been chosen when we meet with the group on the 11th of December. Map</p>	
Map 14	<p>Needs the following copyright statement</p> <p>Ordnance survey © Crown copyright and database rights 2019 Ordnance survey 100054750 you are permitted to use this data solely to enable you to respond to or interact with the organisation that provided you with the data. You are not permitted to copy, sub- licence, distribute or sell any of this data to third parties in any form.</p>	Agree
12.11	<p>The Council questions where the information that an LGS has to be between 0.2ha and 20ha in size has come from? – it should follow the criteria set out in paragraph 100 of the NPPF</p>	Agree
Map 15	<p>Needs the following copyright statement</p> <p>Ordnance survey © Crown copyright and database rights 2019 Ordnance survey 100054750 you are permitted to use this data solely to enable you to respond to or interact with the organisation that provided you with the data. You are not permitted to copy, sub- licence, distribute or sell any of this data to third parties in any form.</p>	Agree
Map 16	<p>Needs the following copyright statement</p> <p>Ordnance survey © Crown copyright and database rights 2019 Ordnance survey 100054750 you are permitted to use this data solely to enable you to respond to or interact with the organisation that provided you with the data. You are not permitted to copy, sub- licence, distribute or sell any of this data to third parties in any form.</p>	Agree

	Additionally the key to the map appears to be missing.	
Map 17	<p>Needs the following copyright statement</p> <p>Ordinance survey © Crown copyright and database rights 2019 Ordnance survey 100054750 you are permitted to use this data solely to enable you to respond to or interact with the organisation that provided you with the data. You are not permitted to copy, sub- licence, distribute or sell any of this data to third parties in any form.</p> <p>Additionally, the key to the map appears to be missing.</p>	Key is on map
Policy 11	<p>The Council Suggest the following changes to Policy 11; Policy DNP11: Green Infrastructure</p> <p>1.Where appropriate, new proposals should preserve, and where possible, enhance the existing local green infrastructure network, including the River Welland Green Corridor, the Green Walk, Green Lanes and existing public rights of way.</p> <p>Green Walk</p> <p>2. Where appropriate, development proposals will be expected to contribute towards the implementation of the Deepings Green Walk, as identified on Map 15, by:</p> <p>a) enhancing the attractiveness of walking and non-motorised transport in and around the town;</p> <p>b) contributing to the connectivity between other existing footpaths, roadways and cycleways in and around the built-up area, to the town centre, and within the adjacent countryside;</p> <p>c) accommodating the requirements of people with limited mobility to access existing and new Green Infrastructure provision; and</p> <p>d) enhancing the use of existing open spaces, promoting biodiversity, and adding to the connectivity between existing green spaces.</p> <p>New Public Green Spaces on new Developments</p> <p>3.The provision of new on-site public open space should be well designed, safe, overlooked,</p>	Group to provide additional evidence to support

	<p>located within an easily accessible part of the development and well defined in terms of the typology of open space proposed. Pockets of plain grassland or space with no identified clear intended use will not be supported as a green space.</p> <p>Green Lanes –</p> <p>4. The Green Lanes, as identified on Map 17, shall be protected from unsympathetic development which would have an adverse impact on the character area concerned. New development in the identified Green Lanes should preserve and, where possible, enhance their rural appearance. The Council would also like to see the evidence and process of how these “Green Lanes” have been identified when we meet with the group on the 11th of December.</p>	
Policy 12	<p>The Council Suggest the following changes to Policy 12; Policy DNP12: Open Space</p> <p>The sites, as shown on Maps in Appendix A, are identified as Important Open Spaces and are protected through SKLP Policy OS1:</p> <p>a) OS6: Towpath by the Riverbank (0.11ha); b) OS10: Cedar Close (0.87ha); c) OS11: The Woodlands (0.72ha); d) OS12: St Guthlac Avenue (0.16ha); e) OS13: Meadway (0.13ha); f) OS14: Osborne Way (0.15ha); g) OS15: Burnside (0.12ha); h) OS21: Centre off Godsey Crescent (A) (0.04ha); i) OS22: Godsey Crescent (B) (0.03ha); j) OS23: Godsey Crescent (c) (0.04ha); k) OS26: Windsor Gardens (0.18ha); l) OS27: Frontage of Tesco (0.02ha); m) OS28: The Green at Churchgate (0.005ha); Area is far too small to warrant Open space designation n) OS29: Lady Margaret Ave (0.019ha); p) OS34 Fraser Close (0.19ha); p) OS35 Boundary Bowling Green (0.15ha); q) OS36 Hereward Way (0.018ha); r) OS37 Campion Drive A B & C (0.07 +0.05 + 0.06); s) OS38 Marigolds/Foxgloves A B & C (0.07 + 0.04 + 0.01); Only A is identified as OS by SKDC t) OS39 Towning Close (0.19); u) OS40 The Brambles (0.03); v) OS41 Swift Close by Nursery (0.07); w) OS42 Wade Park Avenue by school (0.15); x) OS43 Kesteven Close (0.17); y) OS44 Elm Close (0.09); z) OS45 Wade Park Avenue (0.01); aa) OS46a A-K Heron lea Pocket Parks (0.05).</p> <p>Those sites that have been highlighted Green have already been identified as Open space by SKDC, and therefore do not require any further protection from the same policy. Labels on the Open Space map say “LGS” – The Council assumes they need to say “OS” instead.</p>	<p>Group would like to see the evidence of protection of these sites</p> <p>General note for Luke – Group think an explanation should be given to ensure the difference between an Open Space and a Green Space is understood</p>

Policy 13	<p>The Council Suggest the following changes to Policy 13; Policy DNP13: Local Green Spaces 1. The sites, as shown on Maps in Appendix B, are designated as Local Green Spaces:</p> <p>a) LGS1: John Eve Field (1.79ha); b) LGS2: Glebe Field (2.47ha); c) LGS3: Rectory Paddock and cemetery (1.47ha); d) LGS4: Riverside Park (0.25ha); e) LGS5: Welland Gardens (0.1ha);</p> <p>f) LGS7: Tattershall Drive, Towngate (1.55ha); g) LGS8: Sandringhm Way (1.54ha); h) LGS9: Tattershall Drive (South) (0.45ha); i) LGS16: Cherry Tree Park (0.22ha); j) LGS17: Greenlands (0.73ha); k) LGS18: Mill Field (10.80ha); l) LGS19: Scout Hut Area (0.74ha); m) LGS24: Charter Avenue (0.24ha); n) LGS30: Jubilee Park (2.29ha); o) LGS31: Woody's Heights (0.44ha); p) LGS33: Millennium Wood (0.22ha); and q) LGS34: Riverside Park DSJ (0.22ha);</p> <p>1. Development on these sites will only be supported in very special circumstances. – The Council has been through and assessed each of the LGS and determined which ones they agree and disagree with as found below. The Council has been through and assessed each of the LGS and determined which ones they agree and disagree with as found below. LGS justification.</p> <p>LGS1 –Already identified as OS by SKDC and gifted to the people of MD does not need further LGS protection – Disagree</p> <p>LGS2 – Already identified as OS by SKDC and owned by the Town Council. Does not need further protection - Disagree LGS3 – Already identified as OS by SKDC and owned by the Town Council. Does not need further protection - Disagree</p> <p>LGS4 – Already identified as open space but demonstrably meets all criteria and given location LGS would be sufficient– agree</p> <p>LGS5 – Already identified as OS by SKDC and owned by the Town Council. Does not need further protection - Disagree</p> <p>LGS7 = Already identified as OS by SKDC also appears to be quite and extensive tract of land, no</p>	<p>Whilst Group appreciate that SKDC feel further protection is not required as the sites are designated an Open Space they feel these particular areas merit a higher level of protection.</p> <p>Group intend to revisit this section and rework the individual justifications to further explain why they have been identified</p>
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	<p>real historical value no further protection needed- Disagree</p> <p>LGS8 – Already identified as OS by SKDC, no real historical value, no further protection needed – Disagree</p> <p>LGS9 – Already identified as OS by SKDC, no real historical value, no further protection needed – Disagree</p> <p>LGS16 - Already identified as open space but demonstrably meets all criteria and given location LGS would be sufficient– agree</p> <p>LGS17 - Already identified as OS by SKDC, no real historical value, no further protection needed – Disagree</p> <p>LGS 18– Site meets the special and historical requirements, however is a far to much of an extensive tract of land to be considered an LGS. Disagree</p> <p>LGS 24 –Not protected, Site has no historical value as it is part of a new housing estate. Disagree</p> <p>LGS30 (incorrectly labelled as 29 on map) - Already identified as OS by SKDC, site has social value and has been around for over 100 years – Disagree</p> <p>LGS31 - Already identified as OS by SKDC, no real historical value, no further protection needed – Disagree</p> <p>LGS32 – appears not to have been assessed in the table? – N/A</p> <p>LGS33 (needs label on map) - no district protection, but owned by the Parish Council is deemed special and has some historical merit– agree</p> <p>LGS34 – Appears not to be in the policy? – N/A</p>	
Policy 14	<p>The Council Suggest the following changes to Policy 14; Policy DNP14: Biodiversity, Nature Conservation and the River Welland Green Corridor</p> <p>1. Where appropriate, development proposals should promote preservation, restoration and recreation of priority habitats, ecological networks and the protection and recovery of priority</p>	<p>Further clarity required from Roger re point 2 Group to provide additional detail to support point 3 Group agree point 4a and 4b should be removed 4c needs rewording</p>

	<p>species populations where applicable. This could include, for instance, the incorporation of roosting opportunities for bats or the installation of bird nest boxes and swift boxes as part of any new development proposal.</p> <p>2. Development proposals that cannot avoid (through locating an alternative site with less harmful impacts), adequately mitigate, or, as a last resort, compensate for the loss of a locally or nationally identified site of biodiversity value will not be supported. This will need to be backed up in cases where an EIA is required.</p> <p>3. Where appropriate, development proposals must demonstrate that there is no unacceptable loss of or damage to existing trees, woodlands or hedgerows. – The Council questions this policy as there is no definition of what is deemed an “unacceptable loss” as replacement / compensation can always be made.</p> <p>4. Development proposals for riverside sites on of the River Welland should incorporate and/ or safeguard land for the construction of a pathway next to the river, wide enough for shared use by pedestrians and cyclists. a) Where appropriate, links should be provided to the river corridor from new developments alongside the river. Existing links should be protected that lead to the wider residential areas, the surrounding countryside; b) Development proposals immediately adjacent to the river should include design features that will help animate public space, such as cafes, pubs or other social activities that will enhance enjoyment of the riverside; Therefore, if a wholly residential scheme can come forward would this be enough grounds for refusal? c) Where appropriate, development proposals should open new views to the river and access to the riverside; d) New developments adjacent to the river must demonstrate that they will not impact on the river’s ability to function naturally and should enhance green infrastructure and wildlife corridors.</p>	
Policy 15	<p>The Council Suggest the following changes to Policy 14; Policy DNP15: Sustainable Travel and Transport Infrastructure</p> <p>1. Development proposals will be supported where they:</p>	<p>Group disagree with proposed wording change for point 1c point 1d could be merged into a reworded f and e also should we add a point to support disabled access here</p>

	<p>a) give the highest priority to pedestrians, cyclists and other ‘active travel’ modes when developing or maintaining streets and roads;</p> <p>b) where possible connect to the Deepings Green Walk, as identified on Map 15;</p> <p>c) Where possible plan and provide a comprehensive network of accessible routes for walking and cycling which offer convenient, safe and attractive access to employment, homes, schools and other public facilities;</p> <p>d) ensure Encourage the integration of transport and active travel networks (i.e. walking, cycling and buses);</p> <p>e) promote ‘active travel’ for example ensuring new developments have adequate bicycle provision, including safe storage, or that new workplaces contain showers and clothes drying areas which will facilitate walking and cycling to work;</p> <p>f) ensure there is easy, clear and safe access to transport nodes, such as bus stops;</p> <p>g) identify and implement measures to reduce transport severance, noise levels and air pollution;</p> <p>h) recognise the needs and responses of different social groups, particularly those experiencing health inequalities; and- The Council questions how this criterion would be measured and how a decision maker would utilise it effectively?</p> <p>i) Where appropriate, provide off-street car parking provision that does not rely upon garages as parking spaces, particularly on developments where there is a mix of housing types and tenures and where there is a reliance on the car for commuting;</p> <p>j) Garages with doors will be classed as storage not parking spaces – The council does not believe this criterion can be effectively implemented. The Council believes that this idea is covered through the “appropriate off-street car parking” section of criteria i)</p>	<p>Point h requires clarity Group disagrees with proposed wording change for point i Point J requires further discussion with Roger</p>
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