

## Leasingham and Roxholm Neighbourhood Plan

Summary of representations submitted by North Kesteven District Council to the independent Examiner following the regulation 16 Draft Plan Consultation, held between 30 May and 18 July 2022. For actual documents, please refer to the downloads under the link <https://www.n-kesteven.gov.uk/residents/living-in-your-area/localism-your-community/neighbourhood-plans/leasingham-and-roxholm-neighbourhood-plan/regulation-16-consultation/>

Rep No.	Representation	Comments
1	Environment Agency	<p>Thank you for consulting us on the Leasingham and Roxholm Neighbourhood Plan - Regulation 16 Consultation. Based on a review of environmental constraints for which we are a statutory consultee, we find that there are areas of fluvial flood risk and watercourses within the neighbourhood plan area. In particular, we note that the boundary does extend into areas of flood zones 2 and 3 of the River Leasingham Beck.</p> <p>On the basis that future development is steered away from the sensitive aspects of the environment highlighted, we do not consider there to be potential significant environmental effects relating to these environmental constraints.</p> <p>Nevertheless we recommend the inclusion of relevant policies to cover the management of flood risk. If I can be of any further assistance please do not hesitate to contact me on the number below.</p>
2	Historic England	<p>Thank you for consulting us on the Regulation 16 stage of the Leasingham and Roxholm Neighbourhood Plan.</p> <p>We have no further comments to add to our original response at Regulation 14 stage which is attached for your information. <a href="https://www.n-kesteven.gov.uk/resources/assets/attachment/full/0/136500.pdf">https://www.n-kesteven.gov.uk/resources/assets/attachment/full/0/136500.pdf</a></p>
3	National Grid	<p>Please find attached our letter of representation. <a href="https://www.n-kesteven.gov.uk/resources/assets/attachment/full/0/136646.pdf">https://www.n-kesteven.gov.uk/resources/assets/attachment/full/0/136646.pdf</a></p>
4	National Highways	<p>National Highways (We) welcome the opportunity to comment on the draft version of the Leasingham and Roxholm Draft Neighbourhood Plan.</p> <p>We have been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Leasingham and Roxholm Parish Council area, the nearest SRN junctions are on the A1 and the A46, both of which are located a considerable distance away from the Parish Council area (approx. 20km).</p> <p>We understand that a Neighbourhood Plan is required to be in conformity with relevant national and District-wide planning policies. Accordingly, the Draft Neighbourhood Plan for Leasingham and Roxholm Parish is required to be in</p>

		<p>conformity with the adopted Central Lincolnshire Local Plan (2022-2036) and this is acknowledged within the document.</p> <p>Under the provisions of the Central Lincolnshire Local Plan, Leasingham has a growth level of 108 dwellings between 2012 and 2036, which equates to 4-5 homes per year. The latest monitoring by North Kesteven District Council indicates that 14 homes have already been built and a further 21 homes have planning permission. The Draft Neighbourhood Plan notes that this is not a target for the village but that the Plan cannot restrict the potential for this level of growth to be reached. No further housing growth is currently expected. It is noted that North Kesteven District Council will implement the policies within the plan with particular interest in this instance, being policies 1 and 2 relating to new development.</p> <p>Due to the Neighbourhood Plan area's distance from the SRN and the limited level of growth currently being proposed across the Neighbourhood Plan area, we do not expect that there will be any adverse impacts on the operation of the SRN.</p> <p>We have no further comments to provide and trust the above is useful in the progression of the Leasingham and Roxholm Draft Neighbourhood Plan. National Highways offer no objection to the Leasingham and Roxholm Draft Neighbourhood Plan at this stage.</p>
5	The Coal Authority	The Coal Authority is only a statutory consultee for coalfield Local Authorities. As North Kesteven District Council lies outside the coalfield, there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans.
6	West Lindsey DC	<p>The plan is well presented and easy to read.</p> <p>In terms of detail I only have one comment to make and that concerns the section Maintaining Separation. It appears that policy 2 and supporting map on page 27 partly relate to an area of separation which is actually outside the designated area for the plan. I recognise the intention of the policy but it is my understanding that a NP policy can only apply to development proposals within its area.</p>
7	Natural England	<p>Leasingham and Roxholm Neighbourhood Plan - Regulation 16 Consultation</p> <p>Thank you for your consultation on the above dated 25 May 2022 which was received by Natural England on 25 May 2022</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p>

		<p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan. <a href="https://www.n-kesteven.gov.uk/resources/assets/attachment/full/0/136851.pdf">https://www.n-kesteven.gov.uk/resources/assets/attachment/full/0/136851.pdf</a></p> <p>For any further consultations on your plan, please contact: <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>.</p>
8	Witham Third District Internal Drainage Board	<p>Thank you for the opportunity to comment on the above Neighbourhood Plan it is partly within Witham Third District Internal Drainage Board area.</p> <p>The Board has no comments on this consultation. It is noted a flood risk area has been identified on the plan and there is reference to it.</p>
9	NHS Lincolnshire Integrated Care Board	<p>Thank you for the opportunity to review the Leasingham &amp; Roxholm Neighbourhood Plan.</p> <p>NHS Lincolnshire Integrated Care Board doesn't have any comments.</p>
10	Resident 1	<p>Policy 5 - comments</p> <p>1) Development on the Moor lane (site NK/LEAS/006) needs to preserve of the distinct rural identity of Leasingham by maintaining the green wildlife corridors of hedgerows, trees, and verges along entrance to village.</p> <p>2) Plans for development (Sites NK/LEAS/001 and NK/LEAS/006) should positively protect, enhance, and extend the existing green wildlife corridors with their native biodiversity.</p> <p>3) There needs to be provision for retention and protections of the hedgerows and trees along Moor Lane (site NK/LEAS/006) and the trees and hedgerows along stream (Sites NK/LEAS/001 and NK/LEAS/006).</p> <p>4 ) Development plans must protect stream which runs along part of the site against excessive rainwater run off and from possible contamination during building.</p>

		<p>5) Plan must protect colony of migratory Martins nest in sand bank down stream of both sites (NK/LEAS/001 and NK/LEAS/006). Increased /raised water levels and pollution would be injurious to colony</p> <p>5) Plans should create new green networks to improve wildlife corridors by providing sanctuary for nature where possible.</p> <p>Policy 7 – comments</p> <p>Meadow lane (site NK/LEAS/001) is utilised for recreation; with its hedgerows and wildlife enjoyed by walkers, dog walkers and wildlife enthusiasts.</p> <p>Access to site via Meadow Lane would see this amenity lost.</p> <p>Development proposals should plan positively for the protection, and enhancement of the green infrastructure for both wildlife and people.</p> <p>Policy S22: - support with modifications NPPF 4.1.1 Plan should deliver size, type, sizes and tenure of housing.</p> <p>Developments should address the local needs, rather than large 'attractive' homes that the government wishes to see built</p> <p>There is a lack of affordable housing.</p> <p>There is a need for more housing for young families.</p> <p>There is a demand for homes suitable for first time buyers and young families</p> <p>There is a need and a demand for affordable bungalows, to enable older village residents to downsize whilst remaining in their community and more importantly freeing up larger family houses. There is no real enthusiasm by local residents for units larger than 3 bedrooms.</p> <p>Policies S60 and S61 – comments Development should minimise adverse effect of development not result in loss/reduction of Biodiversity:</p>
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Sites NK/LEAS/001 and NK/LEAS/006

Both sites are frequented by a number of wild animals. Egret and Kingfisher can be occasionally observed in the stream. Red Kite, Peregrine and Buzzards can frequently be seen and in Summer Sand Martins and Swallows hunt over fields. Small eared Owls and Woodpecker observed in Trees (Site NK/LEAS/001). Munjac Deer, Badgers and Foxes observed (Site NK/LEAS/006) and frequenting the stream. Downstream from both sites, past the footbridge, is a large sandy stream bank which for many years has hosted a migratory colony of Martins. Increased water levels within the stream, due to loss of buffer zones, increase in surface water; run off from building work, and building themselves would have an adverse effect on the sandy bank and on the colony itself. Given the reduction in numbers of returning migratory birds these developments could have a deleterious effect on this population.

Policy S21 (a) - Oppose

Development should not affect integrity of existing flood defences

NK/LEAS/001 and NK/LEAS/006 Flood Zone 2 and 3.

Following sustained periods of heavy rainfall flooding frequently occurs to roads, gardens and occasionally properties themselves within the lower lying areas of Leasingham. During these times site NK/LEAS/001 floods and remains flooded, thus acting as a buffer zone holding water and reducing risk of flooding to properties and villages further downstream. Several buildings, such as St Andrew's C of E School and Duke of William Community Public house, have installed automatic pumping systems to reduce risk of damage to their property, these systems move water downstream towards sites NK/LEAS/001 and NK/LEAS/006 and villages downstream.

The land off Spring Lane, similarly a flood zone and the source of the stream, has planning permission (20/0577/FUL) with the mature trees on the site to be removed. In periods of heavy rainfall, the combination of a reduction in porous land, tree loss, and an increase in run off from these buildings and roads, will further increase the volume of water flowing into the stream and cause water levels within the stream to rise, necessitating an increase in the size/capacity of the buffer zone at site NK/LEAS/001 rather than a reduction in buffer size. Houses built on site NK/LEAS/001 will be subject to frequent flooding.

Given the changing climate there is an even greater need for the preservation of flood zones, not only to protect the lower lying parts of Leasingham but also villages such as Ruskington, further downstream, from flooding as was witnessed in 2021.

		<p>The County Council has an obligation, a legal duty of care; to ensure new developments do not have the potential to cause harm, or developments themselves be subject to harm.</p>
11	Resident 2	<p>Page 40 Traffic and Transport – comments</p> <p>Whilst the community speedwatch, manned by volunteers is successful whilst in operation, a comparable “undercover” operation would indicate if it genuinely contributes to a reduction in speeding traffic on many/all roads through Leasingham.</p> <p>Excess development will increase road traffic and therefore speeding traffic.</p> <p>Policy 1 and Policy 2 – comments</p> <p>I agree with the plan’s proposal that “development proposals of up to and including 9 homes.....” Policy 1,2. However, I note that planning applications have been approved for a nine home development north of Moor Lane but with a proposal total of 78!!</p> <p>Also land off Meadow Lane proposed 25 properties. Not only is this considered inappropriate by the NP, it will reduce the separation from Ruskington (Policy 2).</p> <p>Housing: Page 28 Character – design of future development – comments</p> <p>The current infrastructure within Leasinghyam and surrounding areas (including Sleaford*) is not able to sustain large housing developments:</p> <p>Leasingham School – over subscribed. Parking of cars/commercial vehicles on the roads are already a problem. Inadequate provision within new properties is unlikely to cater for the number of cars per household. *Dental/hospital/GP/homecare not meeting the needs of the currently occupancy.</p> <p>Policy 3, page 29 – comments The likelihood of flooding along the end of Meadow Land should not be discounted. It is not predictable, but it <u>does</u> occur.</p>

12	Resident 3	<p>The total plan – comments</p> <p>I am thoroughly impressed by the dedication afforded to this document by everybody concerned.</p> <p>I hope this if approved it serves to protect the interests of our lovely village of Leasingham.</p>
13	Leasingham Hall Ltd	<p>I write on behalf of my client, Leasingham Hall Ltd, to provide representations in respect of the Regulation 16 consultation on the draft Leasingham and Roxholm Neighbourhood Plan (NP).</p> <p>Leasingham Hall Ltd is the owner of the land adjacent to Leasingham Hall, Captain’s Hill (see attached Location Plan at Appendix 1), which constitutes a key landholding in the village of Leasingham.</p> <p>My client has secured consent (ref 21/1664/FUL &amp; 21/1665/LBC) for the refurbishment of Leasingham Hall to provide 7no residential apartments and has commenced the implementation of these consents, to bring the Hall back in to positive beneficial use, providing much needed new homes in the village.</p> <p>Representations on Regulation 16 Draft Neighbourhood Plan.</p> <p>Representations were submitted on behalf of my client at the Regulation 14 stage in August 2021. The further representations on the Regulation 16 draft Plan are set out below. The intention of these representations is to ensure that the NP meets the ‘basic conditions’ as required by legislation, and contributes to the achievement of sustainable development within the village.</p> <p>This will ensure that the NP can guide development in order that the housing needs of the village over the Plan period can be accommodated in the most appropriate and sustainable manner, reflecting the requirements of the existing and future residents of the Village, and having regard to the evidence base information gathered in the preparation of the NP.</p>

**Section 5 – Location of Development, Land Use Categories, Location of Development Policy 1 (pages 23,24 & 25).**

**Support / Support with modifications / Oppose / Have Comments**

As currently drafted, objection is raised to Policy 1 and the supporting text in Section 5 as set out below.

Location of Development

Paragraph 2 on page 23 states that *'it is also important that a mix of housing sizes and affordable housing and types such as bungalows, terraced, detached and semi-detached are delivered to ensure choice for the market. Though each developed site should deliver what is appropriate for that site and context. Taking into consideration of the size of the areas available and the size of the community, preferred sits should not exceed 9 homes'* However this reference to not exceeding 9 homes is not in accordance with the adopted Central Lincolnshire Local Plan (CLLP). Therefore, this reference does not meet the 'basic conditions' for the NP in that it is not in general conformity with the Development Plan for the area (see comments under Policy 1 below). Reference to not exceeding 9 homes should therefore be deleted.

Paragraph 3 of page 23 confirms that the CLLP Policy LP4 identifies an anticipated level of growth in the Parish of 15% which equates to 108 dwellings between 2012 and 2036. This equates to 4.5 new homes per annum. In addition, the same paragraph confirms that only 14 homes have been built in this period. This equates to just 1.4 new homes built per annum. Therefore, there is a demonstrable need for the NP to proactively promote sustainable development in the village to ensure a suitable number of homes are built in the right location.



		<p>Paragraph 4 of page 23 confirms that the parish would prefer to build on brownfield and infill sites, however it also rightly identifies that there are very few brownfield sites remaining which are available for development. Consequently, the next most appropriate form of sites which can most sustainably accommodate new housing will be 'infill' sites in the village and sites immediately adjacent to the existing developed area of the village.</p> <p>In this respect it is noted that planning permission (ref 20/0577/FUL) has recently been granted at Springs Lane, to the west of the land adjacent to Leasingham Hall (the Site), for the development of 9no new homes. Recent discussions with the landowners' advisors confirm that the intention is to bring forward this development through the implementation of this permission, and work is ongoing with the Local Planning Authority to achieve this. The location of this approved development is shown on the site location plan extract from the approved application below.</p>	
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The development of the approved Springs Lane housing pursuant to planning permission ref 20/0577/FUL will have the effect of extending the built-up area of the village to the west, towards the A15 Lincoln Road.

Consequently, the land adjacent to Leasingham Hall (as shown in red outline on the attached Location Plan at Appendix 1), which is currently located immediately adjacent to the existing developed footprint of the village, will become an infill site within the developed footprint of the village. In these terms the site does, and will, represent, in sequential terms, a preferable and sustainable location for new residential development in the village, given that there are no brownfield sites available.

Land Use Categories Map Page 24

The Land Use Categories Map on page 24 is intended to show 'Potential Development Sites'. However, following the updates to Policy 1 at this Regulation 16 stage, it is no longer clear how this relates to the policy criteria set out in draft Policy 1. Despite its title, the map on page 24 doesn't show potential development site, but rather shows environmental designations. This map should therefore be removed, or alternatively replaced with a map showing potential development sites. If the map is to be replaced with potential development sites, as set out above and as justified in previous representations to the Regulation 14 draft Plan, the land adjacent to Leasingham Hall must be included as a sustainable residential development site in order that the Plan meets the basic condition of achieving sustainable development.

Policy 1 – Location of Development

Policy 1 (1) states that development proposals within the developed footprint of Leasingham will be supported (where they comply with the stated criteria). This is supported.

However, there is still no definition of developed footprint within the Plan. In order that the Plan is clear, the definition from the adopted CLLP should be included within the NP. This states as follows:

*Developed footprint of a settlement is defined as the continuous built form of the settlement and excludes:*

- *individual buildings or groups of dispersed buildings which are clearly detached from the continuous built up area of the settlement;*
- *gardens, paddocks and other undeveloped land within the curtilage of buildings on the edge of the settlement where land relates more to the surrounding countryside than to the built up area of the settlement;*
- *agricultural buildings and associated land on the edge of the settlement; and*
- *outdoor sports and recreation facilities and other formal open spaces on the edge of the settlement.*

In addition, the draft Plan includes at Page 6 an extract from the North Kesteven Local Plan showing a boundary around the existing village. It is understood that this is proposed as the 'developed footprint' as this is described as 'Map Showing Developed Footprint Leasingham Village' in the contents page of the Plan. However, there is no title given to the map itself on Page 6.

In any event, this map on Page 6 is out of date. It is taken from the 2007 North Kesteven Local Plan which has now been superseded by the adopted CLLP 2017. The CLLP 2017 does not include any such developed footprint boundary for Leasingham (but rather utilises the description of 'developed footprint' as set out above).

		<p>The inclusion of a map outlining the development footprint of Leasingham is supported in principle, as it ensures Policy 1 and its application can be clear and effective. However, the plan must be up to date, and in particular must include an up-to-date developed footprint boundary. In this respect, for the reasons explained above, in order to remain up to date over the Plan period, the developed footprint boundary must be extended to reflect the granting of planning permission at Springs Lane. The developed footprint boundary should therefore be drawn to include the Springs Lane site (ref 20/0577/FUL) and the land adjacent to Leasingham Hall (as shown in red outline at Appendix 1). This updated plan should therefore be inserted within the explanatory text to Policy 1, where it is most relevant.</p> <p>Policy 1 (2) states that development proposals of up to and including 9 homes within the developed footprint of the village and the immediate environs will be supported provided that they meet the conditions contained in the current Local Plan.</p> <p>It is understood that the intention of this revised wording being included in Policy 1 is to give support for development on the edge of the existing settlement, which is supported in principle. However, it is considered that in order to be clear and effective the policy wording requires redrafting.</p>	
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In particular reference to 'within the developed footprint' in policy 1(2) should be removed as it is not necessary (as proposals within the developed footprint are already supported by Policy 1(1)).

Secondly, reference to up to and including 9 homes should be removed in order to be in conformity with the adopted and emerging CLLP, which allows for development of more than 9 homes in exceptional circumstances (adopted Policy LP2).

Lastly, a clearer form of wording than 'immediate environs' should be used in the Policy. It is understood that the intention of Policy 1(2) is to provide support for development on sites immediately adjacent to the existing developed footprint. Therefore, this should be made clear in the policy wording.

On this basis, it is considered that in order to meet the basic condition of achieving sustainable development, Policy 1(2) should be redrafted as follows:

*'Development proposals on sites immediately adjacent to the existing developed footprint, which confirm with the adopted Local Plan, will be supported.'*

I trust that these representations are of assistance in the further preparation of the draft NP.

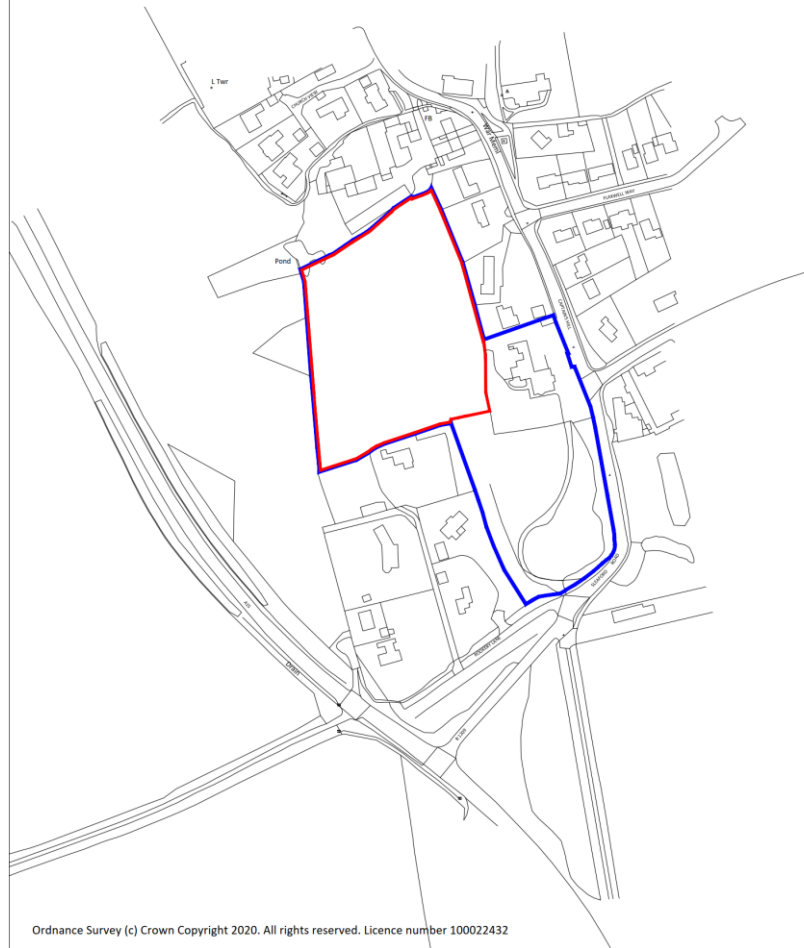
I will be grateful if you can confirm receipt of this letter and ensure that these comments are duly considered. I wish to be notified of the District Council's decision on whether to accept the Examiner's recommendation and any future progress with the plan. If you require any further information or have any queries, please do contact me.

## Appendix 1 – Site Location Map

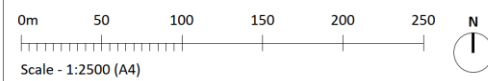
### Land Adjacent to Leasingham Hall

Address: Leasingham Hall, Captain's Hill, Leasingham, Sleaford, NG34 8JP

Drawing Number: L (01) 050



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KEY  
— OWNERSHIP AREA  
— DEVELOPMENT AREA

14	North Kesteven District Council	<p>Leasingham and Roxholm Neighbourhood Plan North Kesteven District Council – Regulation 16 Comments</p> <p><u>Introduction</u> This document has been produced in response to the submission version of the Leasingham and Roxholm Neighbourhood Plan (LRNP) which is being consulted upon between 30 May and 18 July 2022. North Kesteven District Council (NKDC) has provided comments on a number of previous versions of the LRNP in an aim to help the Neighbourhood Planning Steering Group improve the plan before it was submitted to the Council. The aim of this document is to provide a view as to whether the plan, and the policies within it, meet the basic conditions as required by legislation. It also provides a view as to whether any of the policies cause concern for implementation, along with recommended improvements that would benefit the delivery of the plan and would assist in making the plan more aligned to national policy.</p> <p>The Basic Conditions are:</p> <ul style="list-style-type: none"> <li>a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the plan;</li> <li>b) the making of the plan contributes to the achievement of sustainable development;</li> <li>c) the making of the 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);</li> <li>d) the making of the plan does not breach, and is otherwise compatible with, EU obligations; and</li> <li>e) prescribed conditions are met in relation to the plan and prescribed matters have been complied with in connection with the proposal for the neighbourhood plan.</li> </ul> <p>This report is set out in the order of the content of the LRNP.</p> <p><u>Planning Context</u> It is important to note the context within which this consultation has taken place from a local planning perspective. At the time of this consultation commencing, the Local Plan was at an advanced stage of progress having completed the Regulation 19 Proposed Submission Consultation. The plan will be submitted to the Secretary of State in July at which point it will be examined.</p> <p>Whilst the Local Plan is at an advanced stage of production, there are outstanding objections to a number of draft policies, site allocations and the plan as a whole. It remains to be seen what the examination will result in and therefore this assessment has only been undertaken against the adopted 2017 Local Plan. However, it should be noted that at the time this plan is being examined, so will the emerging local plan which proposes a significant number of changes to the policy context which may alter the effectiveness of the LRNP. The submission local plan, and its evidence can be viewed at <a href="https://www.n-kesteven.gov.uk/central-lincolnshire/local-plan-review/">https://www.n-kesteven.gov.uk/central-lincolnshire/local-plan-review/</a>.</p> <p><u>Conclusion</u></p>
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Overall, it is considered that the LRNP contains a number of policies, or parts of policies, which meet the basic conditions but that some further amendments are required in order to ensure that the plan as a whole meets them. It is considered that, subject to the proposed amendments in the below assessment, the plan meets the Basic Conditions as required by the regulations and therefore should proceed to referendum. With these changes the plan is in general conformity with both the adopted Central Lincolnshire Local Plan and it is consistent with national policy.

Assessment of the LRNP

This section provides comments on the submitted LRNP and its performance against the basic conditions, and is presented in plan order.

Location	Comments	Changes recommended
Section 5	There are some elements of this supporting text that cause concern: 1. There is no explanation or justification for the inclusion of a threshold of 9 dwellings. 2. It is important to note that the discussion about the adopted Local Plan and the percentages is proposed to be replaced and will soon not apply. Whilst the new policy in the local plan would still allow for neighbourhood plans to reintroduce growth limits, site allocations and more, such a direct reference to an outgoing policy does raise questions about the longevity of this.	
Land Use Categories Plan	It is unclear what this plan shows. The areas identified as category 2 and 3 do not have any reference to make it clear what they are showing. From checking, it does not appear to be agricultural land grades. It is assumed that this might be a policies map from a historic plan but there is no context to it and as such it performs no real purpose.	It is recommended that this plan be deleted or clarified what it shows and why it is relevant.
Policy 1	The policy title does not fit with much of the contents of the policy.	Amend policy title to “New development in the parish” or something similar to more accurately cover the extent of the policy. This will not

				necessarily apply if parts 3 and 4 of the policy are not retained (see below).
			In part 1 where it says “developed footprint”, this should be defined, much as it does in Policy LP2 of the Local Plan.	<p>Add an asterisk after the term “developed footprint” and at the bottom of the policy (but still within the policy) state</p> <p>“*The term ‘developed footprint’ is defined as the continuous built form of the settlement and excludes:</p> <ul style="list-style-type: none"> <li>a. individual buildings or groups of dispersed buildings which are clearly detached from the continuous built up area of the settlement;</li> <li>b. gardens, paddocks and other undeveloped land within the curtilage of buildings on the edge of the settlement where land relates more to the surrounding countryside than to the built up area of the settlement;</li> <li>c. agricultural buildings and associated land on the edge of the settlement; and</li> <li>d. outdoor sports and recreation facilities and other formal open spaces on the edge of the settlement.” </li></ul>
			In part 1.b) it should also include “significance” as a criteria for a heritage asset not to be harmed.	Add “significance” to bullet point b) after “setting”.
			Part 2 of the policy provides support for development within the developed footprint or its immediate environs if it meets the conditions in the current Local Plan. This is somewhat ambiguous as the Local Plan is being reviewed so it is questionable whether it would then refer to the amended Local Plan once adopted. To provide	<p>Amend the end of part 2 of the policy to “...will be supported provided they satisfy relevant policy requirements of the development plan.”</p> <p>Reconsider wording of “immediate environs”, potentially to align more closely to the draft emerging plan.</p>

			<p>clarity for applicants and decisions makers this should be amended to relate to the development plan as a whole at the time of making a decision.</p> <p>Furthermore, the terminology of “immediate environs” is ambiguous. It should be noted that Policy S4 of the emerging Local Plan provides a change of policy position for sites in and adjacent to villages in light of the percentages being removed.</p>	
			<p>It is unclear how part 3 of the policy will be delivered in practice in a number of ways. Firstly, what type of mix is it referring to – style, size, etc. Secondly, how will an applicant be expected to demonstrate this and using what baseline information?</p> <p>There is no objection to the second sentence in part 3 although the use of the word “discouraged” should be reconsidered to make it clearer for decision makers how it should be applied.</p>	<p>It is recommended that the first sentence in part 3 of the policy is deleted or clarified.</p> <p>Amend the second sentence to read “given the existing form of the parish, buildings of more than two storeys will not normally be permitted, unless it can be clearly demonstrated that the design is wholly appropriate taking into account the site context.”</p>
			<p>In part 4 of the policy, it is not always possible, particularly in small developments to secure all of the infrastructure required. Whilst there is no objection to the principle of such a policy it will be challenging, particularly for developers of small sites to demonstrate such infrastructure capacity.</p>	<p>It is recommended that part 4 of the policy is either deleted or is reworded so that it only applies to major development and then provided that it also clarifies how this can be demonstrated by an applicant.</p>
		Policy 2	<p>The map on page 27 was added to this policy following comments made at the regulation 14 consultation and this addition is welcomed. However, the map does not provide clarity and has no legend to identify where this policy would apply to, and it is suggestive that it would apply to land</p>	<p>Provide replacement map, clearly annotated to show the area that this policy will apply to, being limited to the neighbourhood area.</p> <p>Amend policy wording to “Development proposals located in areas between Leasingham</p>

			<p>outside of the neighbourhood area. In order for this policy to be effective it is considered necessary to provide a clear map showing where the policy would apply and for this area to be wholly within the neighbourhood area.</p> <p>If this is provided the policy would also benefit from rewording to better incorporate the reference to the plan and for the map to be provided with a clear reference.</p> <p>Additionally it would be beneficial to clarify how an applicant should demonstrate adherence to this policy and the use of the term “discouraged” should be amended as it does not provide clarity for applicants or decisions makers. It is important to give applicants the opportunity to demonstrate that their proposal will not reduce the gap.</p>	<p>and Holdingham as shown on map X, will only be supported where they are supported by evidence of the visual impact demonstrating that it would not either visually or physically reduce the separation, or sense of separation.”</p>
		Policy 3	<p>The bulleted list of criteria in part 1 of the policy is a reasonable list of requirements to be considered.</p> <p>In part 2, the wording “will not be considered” would benefit from rewording as a scheme cannot be refused from being considered on design grounds, but potentially can be refused following consideration of an application.</p>	<p>Amend the end of part 2 to “will be refused” or “will not be supported”.</p>
		Policy 4	<p>This policy does not offer anything above the local plan policy and as such there is little value to it. However, by including it, it arguably could undermine local plan policy LP25, therefore making it in conflict with that policy. More importantly it is not consistent with national policy and legislation.</p>	<p>It is recommended that this policy is deleted.</p>

		<p>Policy 5</p>	<p>There are a number of issues with this policy. In part 1 the numbered list does not flow – are items b-d meant to follow on as children to a) as sub bullets?</p> <p>Also as worded the opening paragraph of the policy provides no flexibility for development to demonstrate the suitability of alternatives.</p> <p>In part 2, it offers no clarity over the amount, quality or basis for replacement provision of natural features which could significantly reduce the biodiversity on the site. It is not expected that this was the intention of the policy.</p> <p>There are no concerns about part 3 of the policy in principle.</p> <p>It is also unclear how this policy will sit with biodiversity net gain that is being introduced through the Environment Act.</p> <p>This policy adds nothing to the protection offered in Policies LP20 and LP21. These policies are also proposed to be replaced in the draft Local Plan with more stringent policies which align to biodiversity net gain.</p>	<p>Given the issues with this policy and the wider context of strong existing policy protection it is recommended that this policy be deleted to avoid conflict with Local Plan policies and conflict with the Environment Act.</p>
		<p>Policy 6</p>	<p>There are no concerns about this policy in principle.</p>	
			<p>In part 2, it would be useful to understand what “unacceptable adverse impact” means in this context.</p>	

			In part 3 it is unclear why Roxholm being in the countryside means that easy/pedestrian/cycle access will particularly be encouraged.	
		Policy 7	It is pleasing to see that this policy has been amended from the Regulation 14 version. The map showing the Local Green Spaces should be numbered and the reference to the map amended to be more precise.	It is recommended that the the map on page 37 be given a title and map number and the reference in the policy be amended to reference this map number.
		Policy 8	It is unclear why this policy is separate from policy 6. However, there are no objections to the principle of this policy.	
			In part 2 “where necessary” should be added at the end of the paragraph as it may not always be necessary to include soft landscaping.	Add “where necessary” to the end of part 2.
			In part 4 it is likely that the intention was to enhance connectivity between multiple routes, but as worded it would just support development between such routes without the need to connect them.	Part 4 of the policy should be amended to “Development proposals that enhance connectivity through the village will be considered favourably. Where a development site is located with an opportunity to join up two or more rights of way, the proposal should deliver such a connection and clearly demonstrate this on site plans.”
			In part 5, this should presumably only apply to schemes within the developed footprint or immediately adjacent to it. It would not be reasonable to require this of a rural business that is isolated from the footpath network. This should be clarified.	Amend part 5 of the policy to make it clear that it only applies to development within the developed footprint or immediately adjacent to it.
		Page 40	The title for the next section is lost at the bottom of page 40.	Make it so “Community Assets” appears on the following page.

		Policy 9	Part 1 of this policy is considered to meet the basic conditions.	
			Part 2 is unclear as to what it means. Is it intended to relate solely to retail use or the loss of retail uses? As worded, it is quite unclear and therefore fails to meet the basic conditions. This could likely be overcome through rewording of the policy, but it is difficult to provide a suggestion for such wording without clarity of the intention.	It is recommended that part 2 of the policy be deleted.
			In part 3 of the policy there is some repetition which needs to be deleted to ensure it is clear.	Delete "the use of will only be permitted where at least one of the following conditions is met:"