

4.3.10 and 4.4 - It should be noted that the definition of affordable housing may shortly change. This is likely to include reference to discount market housing which may be sympathetic to the views expressed by local residents. If so, then perhaps reference could be made here?

4.310 - 4.7 - These are observations, rather than part of an 'overview' of the village. Should these references be elsewhere, perhaps as objectives?

5.1 - This is a positive statement for engagement with potential developers and quite appropriate. However, the remaining paragraphs within Section 5 do not flow from this statement. It may be that dialogue with the Parish Council will be able to help shape development proposals by identifying needs and suitable mitigation (in accordance with CIL Regulations/tests for s.106 agreements). Re-wording the section should clarify this. Please note that at 5.4, it is not possible to force a developer to liaise with the Parish council. Re-wording of this section to 'encourage' such communication would however be appropriate.

6 - This is really an 'Urban Design' section. However, it is unclear whether this section is to relate to all development types or just residential. The subsequent Justification and draft policies suggest residential only. If so, the heading should reflect this. Although comment is made below in respect of the specific policy references that follow from 6.6, I would suggest that a single revised policy should be formed. Many of the specific requirements of 6.6 onwards would be best seen as guidance, perhaps contained within the justification section, or by reference to the supporting Village Character Assessment evidence base as well as other 'Best practice' guidance such as Building for Life 12.

6.3 - Further clarity needs for the reference to the North-East Lincolnshire housing strategy. What does it say and what is the relevance to Holton-le Clay?

6.4 - What is the evidence of need for traffic management? Is this just a response to perceived issues and concerns or is there more detailed evidence requiring such specific responses?

6.6 - No definition of 'large' developments is provided. Equally, how does breaking the area into smaller development parcels reflect village character? Is it just that more opportunity to develop 'sense of place' can be provided? Needs further clarity or reference to evidence.

6.7 - This is too prescriptive and inappropriate to good design outcomes. Also, contrary to NPPF requirements and unlikely to be supported by the adopting Highway Authority.

6.8 - Secured by Design objectives and use of cul de sacs can be at odds with other design objectives. NPPF policy (paragraph 60) seeks to promote local distinctiveness, but warns against imposition of architectural styles or development forms or styles which can stifle innovation and opportunities for place making. I would be concerned that some of the policy requirements would not pass examination and that a criterion based policy be developed related to anticipated outcomes rather than overly rigid and specific design requirements. For example, the policy could require new housing developments to be sympathetic in scale, form and appearance to their immediate context, establish its own 'sense of place' whilst having regard to the wider character of the village (as outlined in the village Character Appraisal and Green Plan) and safeguarding amenity of existing and new residential occupiers. The supporting justification can be used to provide the relevant design reference sources. It may be worth looking at the Design policies in the draft Dunholme Neighbourhood plan as an example of how this could be done.

A comparable policy from that document reads:

Policy 4: Design Principles

Where appropriate, development proposals should preserve or enhance the village of Dunholme by:

1. Recognising and reinforcing the distinct local character in relation to height, scale, spacing, layout, orientation, design, and materials of buildings.

2. Respecting and protecting designated and non-designated local heritage assets and their settings.

3. Considering the visual impact of proposals on key views and vistas of the local landscape and minimising adverse impacts on these views.

4. Incorporating adequate landscaping to mitigate the visual impact of the development and to ensure that proposals are in keeping with the existing village context. Where appropriate, landscaping schemes should seek to include native species.

5. Seeking to retain mature or important trees. Development that damages or results in the loss of ancient trees or trees of good arboricultural and/or amenity value will not normally be permitted unless justified by professional tree survey and arboricultural statement. Where removal of a tree(s) of recognised importance can be justified, a replacement(s) of similar amenity value and maturity should be provided on site.

6. Ensuring new boundary treatments reflect the distinct local character in relation to materials and design.

7. Ensuring that car parking is positioned and designed to have minimal impact on the street scene.

8. For major developments, applicants will be required to produce a report to demonstrate that their scheme accords with national design standards (BFL 12 or equivalent); and

9. Developments should also seek to, where possible, provide adaptable homes through the lifetime homes standard in order to cater for a changing demographic.

10. Where possible, make better connections to other areas of the parish, including access to local services and public open spaces.

6.16 - Why? What does this actually mean? It is presumed that the intention is to support development that provides interesting, attractive and useable areas of open space to foster a sense of place? If so, then that text may provide a more understandable policy position.

6.18 - Transport assessments can only be required for certain types/scale of development. It would be more appropriate to require that new development proposals satisfactorily address traffic generation and management issues arising from the development in a proportionate manner and not have any unacceptable adverse impact on road users or pedestrians. It may be appropriate to use wording as per the NPPF.

6.19 - I would suggest a re-wording, perhaps incorporated with 6.18.

6.20 - 6.21 - The Highway Authority as usual adopting authority of roads and footpaths will need to accept any highway standards advocated by the NDP. See also reference 6.7.

7- As with Section 6, I would suggest that the policy should be of a more simplified 'outcome' or criteria based format with reference to specific aspirations and explanation being evident in the justification text. The NPPF makes it clear that policies should provide a clear indication of how a decision maker should react to a development proposal. To achieve that, policies should be precise in terms of expected outcomes rather than in attempting to prescribe design requirements without appropriate justification. For example, 7.4 references distances between dwellings derived from a Northern Ireland Policy document. I would advocate a more simplified policy requirement for new development to provide adequate amenity space, safeguard amenity for existing occupiers of dwellings and ensure a form of development appropriate to the character of the area. The supporting justification should then provide the relevant cross references to best practice guidance or evidence confirming what is meant by 'adequate' etc.

Section 8 - I have made reference earlier in this report to an emerging national policy position that perhaps should be considered here. Equally, I have previously provided under separate cover a suggested Terms of Priority for Occupiers as utilised by ELDC in recent s.106 agreements. In order to ensure accordance with the emerging Local plan position, the policy justification should acknowledge the requirement for up to 30% of new housing proposals to be provided (on site as a preference)

Section 9 - It is clear that the Holton—le-Clay Green Plan is intended to be considered as part of the NDP. This should however be identified in the introduction to the NDP together with reference of justification for its preparation and intended purpose.

9.12 - Care should be taken in choice of vocabulary and by provision of a clear definition of terms. The adopted approach that "opportunity provided by new development to improve and extend the provision of green space where possible" may not be considered as consistent with the NPPF and the requirement for designation to take place at the time a plan is prepared or reviewed, if it is interpreted as constituting 'Local Green Space' (see NPPF and NPPG)).

9.17 - reference has already been made to the potential inappropriateness of defining a village envelope as a tool for restricting development.

9.19 - seeks to protect against residential development. Notwithstanding more general concerns about the village envelope approach and negative wording of draft policies, it is presumed that the intention is to safeguard against all types of development that may undermine the strategic objectives of the Green Plan. As an aside, it is also important that liaison with relevant landowners has taken place in formulating this policy stance.

9.23 - General policy observations re: wording apply, but as an example, it is advised that such prescriptive requirement as that proposed by this particular policy would require very clear and site-specific justification. It may be, for example, that green spaces provided central to a particular site, or to the rear, would, depending on site context best deliver the outcomes suggested by the policy statement. Similar observation is made in respect of other policy statements such as 9.24.

10.1 - a better expression would be 'safeguard against and reduce where possible' rather than 'minimise'. This ensures a starting position of 'nil detriment' from new development rather than 'best achievable'.

10.4 - It is not always the case that a private management company needs be established to manage SUDS. The Lead Local Flood Authority (presently Lincolnshire County Council) and Anglian Water will in certain circumstances adopt. It would be sufficient to explain in the justification the benefits and necessity for suitable management regimes to be secured.

10.6 - this policy needs to be re-worded. As per the general policy comments expressed previously, a single criterion based policy would be more easily understood. Additionally, although it is incumbent (see national and local planning policy) for any new development to not increase flood risk (utilising SUDS when appropriate), it may be impractical for new development to result in a decreased level of flood risk (e.g. below an existing greenfield runoff rate). Equally, requirement for a new development to reduce flood risk across the village would be an unreasonable expectation and not in accordance with CIL Regulations.

Section 11 - The Vision and Justification is clear. However, the subsequent policies should be re-considered as it is not considered that they would be in accord with strategic or national policy. For example, at 11 .8, (notwithstanding potential permitted development rights) the draft policy would presume against a change of use from retail to restaurant, or to a new doctor's surgery. A policy aimed at safeguarding against loss of existing village facilities may be more appropriate. Furthermore, use of words such as 'reasonable' and 'appropriate' lack clarity. How would a decision maker or applicant know whether they had complied with these requirements? Again, it is considered that a single, criteria policy would be appropriate to deliver the desired objectives.

Equally at **11.9**, the desire to safeguard against loss of employment uses is appropriate, but the draft policy position requiring a viability case to be made in respect of the whole Business Park is not reasonable or compliant with the NPPF.

Appendix 7

Holton-le-Clay Neighbourhood Development Plan Steering Group feedback, comments and actions to the Development Plan Health Check

Holton-le-Clay Neighbourhood Development Plan 'Health Check' Review for Holton-le-Clay Parish Council

Report prepared by Andy Booth BA (Hons) MRTPI October 2016

Health Check Feedback and Recommendations (dated October 2016) NDP Team Decisions and Actions

Actions and Changes after discussion with Andy Booth BA (Hons) December 2016.

Actions and Changes after discussion with Andy Booth BA (Hons) January 2017.

Policy No	Feedback/Recommendation October 2016	NDP Team Decision October 2016	Action / Changes October 2016 & December 2016	Actions / Changes NDP Team Jan 2016
Plan Introduction	Include definitive reference in Plan Introduction to supported Parish Plan Area.	Valid point and agree to amending Introduction to include reference to support Parish Plan Area.	Introduction to the Holton-le-Clay Neighbourhood Development Plan placed at beginning of the plan.	
NDP Project Plan	NDP Project Plan should be included in the list of supporting documents on the Neighbourhood Development Plan website. It is now appropriate to review the future timetable in the context of progress to date and actions outstanding including issues arising from this 'health check' review and update the project plan against which progress can be monitored as the Neighbourhood Plan is taken to a successful outcome of being 'made'.	Valid point about reviewing the NDP Project Plan and placing it on the NDP page of the Parish Council Website	Update Project Plan and place on Web Site	
Basic Conditions Statement	A statement should however be included in the Basic Conditions Statement, confirming, whether the NDP will have any likely significant effects on a European site or a European offshore marine site and whether a Habitats Regulations Assessment (HRA) is required.	Basic Conditions Statement - The Plan is in conformity with strategic policies contained in East Lindsey's District planning policies; and meets relevant EU obligations.	No actions required	
Plan Front Cover Period of Plan	It is a requirement of the Planning and Compulsory Purchase Act 2004 that the Neighbourhood Plan should state the period in which the plan will have effect. It would be helpful if the plan document on the front cover clearly stated the period for which the NDP will have effect which is to 2029.	Valid Point to have the Plan Period on the front cover of the plan	Plan Period 2017 – 2029 on front cover of plan.	
Vision	Although the intended construction and presentation of the Draft Neighbourhood Plan is generally clear, I consider that it would be advantageous to identify how the Vision was arrived at and how it has been 'market tested'.	Valid point.	Introduction updated to include a statement on how the Vision was informed and how it was market tested in the community.	
Introduction	The introduction, would also benefit from a brief explanation as to why the Parish Council decided to pursue a NDP and the key issues identified. This would ensure that the main issues identified by the community link neatly and flow logically to the Vision and Objectives of the Plan. As example, identification of 'the needs of the	Valid point.	Update plan introductions to show direction from Localism Act to Community Aspirations to Vision to Objectives and the plan.	

	community' (or should this reference be 'aspirations') referenced at 2.1, within the Introduction would provide better understanding for the relevant objectives.			
Policy 2.2.1	At 2.2.1, there is an objective for preparing Design Briefs identified, but this is not realised by the later content of the NDP. This should be omitted.	Valid point.	Remove 2.2.1	
Section 4 Overview	It is also suggested that Section 4 (Overview of Holton-le-Clay) may equally fit better as an explanatory, pre-cursory link to the Vision and Objectives.	Valid point.	Re – title Section 4 to "Overview of Vision and Objectives"	
Section 3	I would also suggest that (perhaps within Section 3 as elaboration on 3.4) the objectives for the NDP should acknowledge the need to support the levels of growth proposed through the Local Plan. Equally, there should be acknowledgement that Local Plan policy does not represent a cap on growth. This is considered an important element in order to demonstrate accordance with strategic policy and a regard to the National Planning Policy Framework (NPPF).	<p>NDP Team not comfortable with this comment.</p> <p>Team feels it is more of a ELDC Planning Policy / Local Plan responsibility – rather than a NDP issue.</p> <p>Section 3 – 3.4 already states the Plan does not seek to set out proposed housing targets or allocate land for development. As these will be tested through the core strategy examination process.</p>	<p>Reword 3.4 to form linkage to the Village Character Assessment. Plans seeks to maintain the semi-rural charter of the village.</p> <p>Need to include: NDP aims will be in accordance with ELDC Emerging Local Plan</p> <p>NDP prepared to satisfy basic conditions.</p>	Included in 3.4 To be in accordance with ELDC Emerging Local Plan
Policies General Wording of the draft policies, the vocabulary to be used is critical to ensuring that the policy delivers the desired outcomes.	Instead, wording should ideally be framed as "development will be supported provided that . . ." or, where objection is necessary, wording should be along the lines of "any proposals to ... will be resisted unless . . ." or "development must avoid/mitigate etc...". Many of the draft policies however, use the expression 'must'. This does not provide for the degree of flexibility allowed for by the NPPF and would only be appropriate where requirements of a policy are compulsory in all instances. To justify such a stance will require appropriate evidence. The use of 'should' and 'should not' provides a degree of flexibility and leaves room for a development proposal to justify why the policy shouldn't apply in a particular instance.	<p>Team not comfortable with this comment. Team believes the plan has sufficient latitude and flexibility already.</p> <p>The use of "Should" and "Must" in the policies is has already been discussed with ELDC Planning policy. To ensure the Key Community Policies are given the appropriate priority.</p>	Policies reviewed for the correct use of "Should" - "Must" – "Will" are valid and the "Must" policies. Team agreed the important and key policies should use the word must.	
Policies General	Although it is appreciated that the document reviewed is still in draft form, the planning policies should be more easily identifiable from the main and supporting text	Valid point	This is a formatting issue that will be addressed. General consensus it to put the policies in a "BOX" and colour can be used.	
Policies General	Draft policy content is occasionally overlapping and confusing. For example, 9.28 (safe and direct access to public transport) sits within the intended Green Plan implementation policy section. However, other	Valid point.	Remove 9.28 from Green Plan to 6.17	

	sustainable transport objectives are embodied within Development (Urban) Design policy. I would suggest that latter section provides a more appropriate place for seeking to secure sustainable transport provision as part of new development proposals.			
Policies General	A final observation is that it is sometimes unclear as to the evidence basis on which the proposed policy relies. National Planning Practice Guidance advises (amongst other things) that policies in Neighbourhood Plans should be ' concise, precise and supported by appropriate evidence '. Furthermore, 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.' One option would be to provide a simplified overview of the evidence base and the wider context for proposed policies. A tabulated format as suggested by Planning Aid could be adopted.	Team not sure how this comment will improve the plan. What is seems to be asking for is to put all of the policies in a table. Which feels like a duplication of the plan in a different format. Basic Conditions Statement tests objectives and policies against NPPF and the three East Lindsey strands of sustainability; economic, social and environmental criteria. Health Check process checked the policies against ELDC Saved Policies and the emerging local plan.	Ensure Basic Conditions Statement is updated to reflect any changes to policies.	
Policy 9.5 Green Plan Implementation	The use of a village envelope as a tool for restricting development does not fit comfortably with the objectives of the NPPF. The emerging Local Plan establishes a role for the village through its position within the settlement hierarchy/typology and also a level of development through the identification of housing allocations. Notwithstanding some of the concerns expressed by the Community, against additional growth, per Se, the NDP needs to respond appropriately to the emerging policy position (which requires some level of flexibility for delivering appropriate levels of additional development) and the underlying evidence base. The Green Plan seeks to identify more sensitive character areas to be safeguarded from development for wider strategic reasons. This approach appears to be well founded (although as a note of caution, I am aware that for Nettleham Neighbourhood Plan extension of a Green Wedge was not supported on examination because it was seen as being restrictive without justification and was not considered to be in general accordance with the strategic policies of the emerging Local Plan) and potentially a more appropriate policy basis (when	The Village Envelop is a key part of the NDP and should be retained. The wording used in the draft plan policy can be considered to be negative and possibly restrictive.	Policies 9.17 / 9.18 rewritten to retain this Key Policies – at the same time as using less restrictive language. Need further justification for Green plan. Use Character Assessment as a justification and the level of growth in the ELDC emerging Local Plan. Aims of Green Plan: 1 - To the north – seek to safeguard against coalescence with NEL. 2 – Respond to clearly defined village edge / envelope. 3- Green Plan is a positive tool to safeguard village character whilst facilitating levels of growth.	Par 9.1, 9.2 & 9.3 To include ELDC Local Plan Chapter 12 Policy 25/26 Protect and Enhance our Environment & Green Infrastructure

	considered with other criteria based policies) for safeguarding a nucleated settlement form (this objective is equally supported by the NDP evidence base).			
Policy 3.2	Rather than 'take a positive approach' suggest 'will support the development of... whilst ensuring that Holton-le-Clay remains etc'	Valid point	Reword 3.2 and 3.4 to encompass "will support development..."	
Policy 3.5	Reference should be made to East Lindsey District Council or Local Planning Authority as the 'decision maker' for the determination of planning applications in the first instance.	Valid point	Reword 3.5 - use "decision make"	
Policy 4.3.10 and 4.4	It should be noted that the definition of affordable housing may shortly change. This is likely to include reference to discount market housing which may be sympathetic to the views expressed by local residents. If so, then perhaps reference could be made here?	The definition of Affordable Housing is subject to change at any time in the future - as are other planning policies.	Use definition as is commonly used by ELDC at this point in time.	
Policy 4.3.1 - 4.7	These are observations, rather than part of an 'overview' of the village. Should these references be elsewhere, perhaps as objectives?	Team feels 4.3.1 - 4.7 are objective and are in the correct place.	No actions required	
Policy 5.1	This is a positive statement for engagement with potential developers and quite appropriate. However, the remaining paragraphs within Section 5 do not flow from this statement. It may be that dialogue with the Parish Council will be able to help shape development proposals by identifying needs and suitable mitigation (in accordance with CIL Regulations/tests for s.106 agreements). Re-wording the section should clarify this. Please note that at 5.4, it is not possible to force a developer to liaise with the Parish council. Re-wording of this section to 'encourage' such communication would however be appropriate.	Valid comment	Reword 5.1 and 5.2 to reflect the feedback.	
Policy 6	This is really an 'Urban Design' section. However, it is unclear whether this section is to relate to all development types or just residential. The subsequent Justification and draft policies suggest residential only. If so, the heading should reflect this. Although comment is made below in respect of the specific policy references that follow from 6.6, I would suggest that a single revised policy should be formed. Many of the specific requirements of 6.6 onwards would be best seen as guidance, perhaps contained within the justification section, or by reference to the supporting Village Character Assessment evidence base as well as other 'Best practice' guidance such as Building for Life 12.	Valid point in some respects.	Reword 6.1 and 6.2	
Policy 6.3	Further clarity needs for the reference to the North-East Lincolnshire housing strategy. What does it say and what is the relevance to Holton-le Clay?	Valid point	Reword 6.3 to reflect NEL emerging local plan and Waltham Community Led Plan.	

Policy 6.4	What is the evidence of need for traffic management? Is this just a response to perceived issues and concerns or is there more detailed evidence requiring such specific responses?	Agree with some aspects of the feedback.	Reword 6.4 and remove the need for a traffic management.	
Policy 6.6	No definition of 'large' developments is provided. Equally, how does breaking the area into smaller development parcels reflect village character? Is it just that more opportunity to develop 'sense of place' can be provided? Needs further clarity or reference to evidence.	Valid point – large is a rather subjective term.	Reword to use Government Planning definition in Hectares of land.	
Policy 6.7	This is too prescriptive and inappropriate to good design outcomes. Also, contrary to NPPF requirements and unlikely to be supported by the adopting Highway Authority.	Highways have been previously consulted as plan was formed and no concerns expressed.	Team considers policy 6.7 is justified and retains local character and semi-rural sense of place.	
Policy 6.8 Dunholme NDP Policy 4: Design Principles <i>Where appropriate, development proposals should preserve or enhance the village of Dunholme by:</i> <i>1. Recognising and reinforcing the distinct local character in relation to height, scale, spacing, layout, orientation, design, and materials of buildings.</i> <i>2. Respecting and protecting designated and non-designated local heritage assets and their settings.</i> <i>3. Considering the visual impact of proposals on key views and vistas of the local landscape and minimising adverse impacts on these views.</i> <i>4. Incorporating adequate landscaping to mitigate the visual impact of the development and to ensure that proposals are in keeping with the existing village context.</i>	Secured by Design objectives and use of cul de sacs can be at odds with other design objectives. NPPF policy (paragraph 60) seeks to promote local distinctiveness, but warns against imposition of architectural styles or development forms or styles which can stifle innovation and opportunities for place making. I would be concerned that some of the policy requirements would not pass examination and that a criterion based policy be developed related to anticipated outcomes rather than overly rigid and specific design requirements. For example, the policy could require new housing developments to be sympathetic in scale, form and appearance to their immediate context, establish its own 'sense of place' whilst having regard to the wider character of the village (as outlined in the village Character Appraisal and Green Plan) and safeguarding amenity of existing and new residential occupiers. The supporting justification can be used to provide the relevant design reference sources. It may be worth looking at the Design policies in the draft Dunholme Neighbourhood plan as an example of how this could be done.	Holton le Clay is a "Car Dependent Village" and the principles in Secure by Design are used to proactively address new development traffic generated issues. Cul de sacs are part of the of the local character of Holton le Clay and 6.8 helps integrate new development into the village character – rather than just having add on estates.	Team considers accepting the feedback would tend to Generalise the development plan rather than it being a development plan for Holton-le-Clay	

<p><i>Where appropriate, landscaping schemes should seek to include native species.</i></p> <p><i>5. Seeking to retain mature or important trees. Development that damages or results in the loss of ancient trees or trees of good arboricultural and/or amenity value will not normally be permitted unless justified by professional tree survey and arboricultural statement. Where removal of a tree(s) of recognised importance can be justified, a replacement(s) of similar amenity value and maturity should be provided on site.</i></p> <p><i>6. Ensuring new boundary treatments reflect the distinct local character in relation to materials and design.</i></p> <p><i>7. Ensuring that car parking is positioned and designed to have minimal impact on the street scene.</i></p> <p><i>8. For major developments, applicants will be required to produce a report to demonstrate that their scheme accords with national design standards (BFL 12 or equivalent); and</i></p> <p><i>9. Developments should also seek to, where possible, provide adaptable homes through the lifetime homes standard in order to cater for a changing demographic.</i></p>				
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<p>10. Where possible, make better connections to other areas of the parish, including access to local services and public open spaces.</p>				
<p>Policy 6.16</p>	<p>Why? What does this actually mean? It is presumed that the intention is to support development that provides interesting, attractive and useable areas of open space to foster a sense of place? If so, then that text may provide a more understandable policy position.</p>	<p>Valid point</p>	<p>Reword and enhance 6.17</p>	
<p>Policy 6.18</p>	<p>Transport assessments can only be required for certain types/scale of development. It would be more appropriate to require that new development proposals satisfactorily address traffic generation and management issues arising from the development in a proportionate manner and not have any unacceptable adverse impact on road users or pedestrians. It may be appropriate to use wording as per the NPPF.</p>	<p>Valid comment</p>	<p>Rewrite 6.18 to address the feedback.</p>	
<p>Policy 6.19</p>	<p>I would suggest a re-wording, perhaps incorporated with 6.18.</p>	<p>Prefer to leave 6.19 as a separate policy</p>	<p>No Action Required</p>	
<p>Policy 6.20 and 6.21</p>	<p>The Highway Authority as usual adopting authority of roads and footpaths will need to accept any highway standards advocated by the NDP. See also reference 6.7.</p>	<p>Highways have viewed and commented on this policy and did not offer feedback</p>	<p>No Action Required.</p>	
<p>Section 7</p>	<p>As with Section 6, I would suggest that the policy should be of a more simplified 'outcome' or criteria based format with reference to specific aspirations and explanation being evident in the justification text. The NPPF makes it clear that policies should provide a clear indication of how a decision maker should react to a development proposal. To achieve that, policies should be precise in terms of expected outcomes rather than in attempting to prescribe design requirements without appropriate justification. For example, 7.4 references distances between dwellings derived from a Northern Ireland Policy document. I would advocate a more simplified policy requirement for new development to provide adequate amenity space, safeguard amenity for existing occupiers of dwellings and ensure a form of development appropriate to the character of the area. the supporting justification should then provide the relevant cross references to best practice guidance or evidence confirming what is meant by 'adequate' etc.</p>	<p>Policies written to reflect views expressed in forming the Village Character Assessment.</p> <p>Policy tested positive against NPPF in Basic Conditions Statement.</p> <p>Remove NI reference and replace with Lincolnshire reference</p>	<p>Rewrite 7.5 and remove NI reference and replace with Lincolnshire Design Guide for Residential Areas.</p>	

Section 8	I have made reference earlier in this report to an emerging national policy position that perhaps should be considered here. Equally, I have previously provided under separate cover a suggested Terms of Priority for Occupiers as utilised by ELDC in recent s.106 agreements. In order to ensure accordance with the emerging Local plan position, the policy justification should acknowledge the requirement for up to 30% of new housing proposals to be provided (on site as a preference)	ELDC have updated the "Terms of Priority for Occupiers for Affordable Housing" The acknowledgement of the requirement for a given percent of Affordable Housing is comprehensively covered in Emerging Local Plan,	Replace the "Terms of Priority for Occupiers for Affordable Housing" with ELDC latest version.	
Section 9	It is clear that the Holton—le-Clay Green Plan is intended to be considered as part of the NDP. This should however be identified in the introduction to the NDP together with reference of justification for its preparation and intended purpose.	Valid Comment	Rewrite Plan Introduction to address the feedback.	
Policy 9.12	Care should be taken in choice of vocabulary and / or provision of a clear definition of terms. The adopted approach that "opportunity provided by new development to improve and extend the provision of green space where possible" may not be considered as consistent with the NPPF and the requirement for designation to take place at the time a plan is prepared or reviewed, if it is interpreted as constituting 'Local Green Space' (see NPPF and NPPG)).	Think there is an opportunity to amend 9.12 using different wording to achieve the same ends	Amend wording	
Policy 9.17	Reference has already been made to the potential inappropriateness of defining a village envelope as a tool for restricting development.	This is a Key Policy for the growth and development of the village and supported by the community	Rewrite 9.17 and include new policy 9.18	
Policy 9.19 now Policy 9.20	Seeks to protect against residential development. Notwithstanding more general concerns about the village envelope approach and negative wording of draft policies, it is presumed that the intention is to safeguard against all types of development that may undermine the strategic objectives of the Green Plan. As an aside, it is also important that liaison with relevant landowners has taken place in formulating this policy stance.	Aspirational policy which is linked to the Green Plan. As the village grows and develops the liaison and engagement with Land Owners, Land Agents and developers will take place as outlined in Section 5 Developer Consultation.	9.17 and 9.18 address this issue.	
Policy 9.23	General policy observations re: wording apply, but as an example, it is advised that such prescriptive requirement as that proposed by this particular policy would require very clear and site-specific justification. It may be, for example, that green spaces provided central to a particular site, or to the rear, would, depending on site context best deliver the outcomes	Team considers the wording of the policy is not over prescriptive. The policy leave scope for creativity and development form and design.	9.24 minor word change.	

	suggested by the policy statement. Similar observation is made in respect of other policy statements such as 9.24.			
Policy 10.1	A better expression would be 'safeguard against and reduce where possible' rather than 'minimise'. This ensures a starting position of 'nil detriment' from new development rather than 'best achievable'.	Valid comment	Reword 10.1 using word "Safeguard"	
Policy 10.4	It is not always the case that a private management company needs be established to manage SUDS. The Lead Local Flood Authority (presently Lincolnshire County Council) and Anglian Water will in certain circumstances adopt. It would be sufficient to explain in the justification the benefits and necessity for suitable management regimes to be secured.	Valid comment	Rewrite 10.2 to address the feedback.	
Policy 10.6	This policy needs to be reworded. As per the general policy comments expressed previously, a single criterion based policy would be more easily understood. Additionally, although it is incumbent (see national and local planning policy) for any new development to not increase flood risk (utilising SUDS when appropriate), it may be impractical for new development to result in a decreased level of flood risk (eg below an existing greenfield runoff rate). Equally, requirement for a new development to reduce flood risk across the village would be an unreasonable expectation and not in accordance with CIL Regulations.	Valid comment	Rewrite 10.6 using "betterment where possible"	
Section 11	The Vision and Justification is clear. However, the subsequent policies should be re-considered as it is not considered that they would be in accord with strategic or national policy. For example, at 11 .8, (notwithstanding potential permitted development rights) the draft policy would presume against a change of use from retail to restaurant, or to a new doctor's surgery. A policy aimed at safeguarding against loss of existing village facilities may be more appropriate. Furthermore, use of words such as 'reasonable' and 'appropriate' lack clarity. How would a decision maker or applicant know whether they had complied with these requirements? Again, it is considered that a single, criteria policy would be appropriate to deliver the desired objectives.	Valid comment	Rewrite 11.7 / 11.8 to address the feedback. Remove words reasonable and appropriate.	

Policy 11.9	Equally at 11.9, the desire to safeguard against loss of employment uses is appropriate, but the draft policy position requiring a viability case to be made in respect of the whole Business Park is not reasonable or compliant with the NPPF.	Valid comment	As above rewrite 11.9 making the policy less restrictive.	
General Remark	The main focus of this report is on the main body of the NDP and its policies. However, parts of the evidence base including the Green Plan are presumed to be considered as part of the plan and certainly an important part of the evidence base. Consequently, and in part because prescriptive design outcomes are referenced, it is recommended that the Steering Group satisfy themselves that relevant adopting authorities (e.g. Highway Authority/Lead Local Flood Authority/ Anglian Water) are supportive of the requirements.	Adopting authorities have been consulted and their feedback fed into the plan	No actions required	
General Remark	The Independent Examiner will consider whether the NDP is compatible with the Convention rights. 'The Convention rights' has the same meaning as the Human Rights Act 1998. Whilst not a requirement it would be helpful for there to be some evidence of consideration of Human Rights issues through inclusion of a brief statement in the Basic Conditions Statement in particular relating to Article 8 (privacy); Article 14 (discrimination); and Article 1 of the first Protocol (property) of the European Convention on Human Rights	Covered in Basic Conditions Statement 5. Compatibility with EU obligations and legislation	No actions required.	
General Remark	The Neighbourhood Plan should make it clear that it does not seek to introduce any cap on the total amount of housing development that can occur during the plan period. The Neighbourhood Plan is concerned with non-strategic matters. The Neighbourhood Plan focusses on issues of local importance and fulfils the national intention that Neighbourhood Plans should shape and direct sustainable development in their area.	Team feels this has been covered in Section 3 – 3.1	No actions required.	
Policy 11 Business / Employment	Number of small business exist on Airfield. These should be included in policy	Add - other established business		11.3 Included Former Airfield
11.9	Demonstrate that opportunities provided outweigh the loss of those removed	Use "benefits" rather than opportunities.		11.9 Included Benefits

6.7	Design of streets / roads	6.7 should be removed and placed in the Justification for the policy. Add policy's wording using words such as: Road layout and design to respect the context of the development and take into account the Village character Assessment. Use / Reference "manual for streets" New development should incorporate safe road layouts		Keep in Policy but include wording Road layout and design to respect the context of the development and take into account the Village character 6.4 All new developments should incorporate road safety layouts in accordance with Department for Transport Manual for Streets.
6.16	In order to preserve the Character	Preserve should be replaced by word "Strengthen"		Changed wording
6.16	Small and large spaces	Replace with "interesting"		Changed wording
General	Use of words "Green Spaces"	This must be consistent throughout the plan. Use of Local Green Space should not be used. As it has predefined legal connotations. Reference NPPF 74/75		More research of national guidance undertaken to clarify the meanings of Open Spaces and Green Spaces - and to distinguish between the two. Use of both in NDP, Green Plan and Village Character Assessment reviewed and amended where appropriate.
9.24	Open public green space to be positioned to front of new developments.	This should be used in description text. Change policy 9.24 to: Incorporate open shared green space with wider community		Re word paragraph to use wording Incorporate open shared green space with wider community
Village Envelope	OK to use and is a good tool. Need to clear define: 1 Why you want it? 2 Its purpose? 3 Evidence who wants it.? 4 justification	Need to be in very positive terms that cannot be construed as being restrictive to growth or development.		9.5 Identity, non Coalescence. Villagers need identified that they need to belong to the Village, Promotes social cohesiveness and sense of community. It is believed that these features underline the feeling of safety described by the residents in the Village Surveys.
All Policies			Need to run through each policy and ask yourselves: 1 Is it a policy (not a justification) 2 What is the policy intended to do? 3 Will it achieve the	Checked

			aims?	
All Policies			Read through all policies to ensure they are clear, precise, unambiguous. Each policy should have a good strong, precise verb and have action in the verb.	Checked

Appendix 8

Feedback from meeting with Anne Shorland (Service Manager Planning Policy and Research) on 15th May 2017

Policy No	Feedback/Recommendation	NDP Team Decision	Action / Changes
6.23	A plan for the lifetime maintenance of the highways and public green places should be presented as part of the planning process so that suitable management regimes may be secured.	Adopt.	Amend policy.
7.5	The 2011 census showed that the 16-34 age group represents 17% of the population, the 35-54 age group represents 28% of the population and the over 55s represent 36% of the population. At the public consultation, some younger members of the community remarked that there were few houses in the village they could afford and some older residents said that they would like to 'downsize' if suitable properties became available in the village.	To include in the policy.	Amend policy to include.
7.6	Design of new developments should reflect the above by incorporating properties with a range of styles, types, height and density including single storey housing for older people or those with limited mobility.	Check policy and amend where necessary.	Amend policy.
7.12	Major developments should consider providing a recycling area for use by the wider community.	This issue has recently been raised by the Parish Council. To adopt.	Amend policy.
9.18	If, as a result of development, public green space or amenity is removed it must be replaced with a similar space which is accessible and suitable for the activities for which the space is used. (ref. ELDC Local Plan)	Adopt.	Amend policy.
11.8	Suggested amendment: Existing village facilities, services and businesses will be safeguarded to ensure the sustainability of the village. For this reason, any proposed change of use for existing retail shops, post office facilities, pubs, services, and food outlets will be considered with regard to maintaining the character of the village.	Adopt	Amend policy.

Appendix 9

Holton-le-Clay Neighbourhood Development Plan Steering Group feedback, comments and actions from 6-week Public Consultation.

18TH JULY TO 29TH AUGUST 2017

Policy No	Feedback/Recommendation	NDP Team Decision	Action / Changes
<p>Design Policy Justification 6.3 Design Policy HLC1 6.24</p>	<p>Historic England</p> <p>Your Neighbourhood Plan includes a number of designated heritage assets including 1 GII* listed building, 5 GII listed buildings and 1 scheduled ancient monument. It will be important that the strategy you put together for this area safeguards those elements which contribute to the importance of those historic assets. This will assist in ensuring they can be enjoyed by future generations of the area and make sure it is in line with national planning policy.</p> <p>The conservation officer at East Lindsey District Council is the best placed person to assist you in the development of your Neighbourhood Plan They can help you to consider how the strategy might address the area's heritage assets. At this point we don't consider there is a need for Historic England to be involved in the development of the strategy for your area.</p>	<p>We had missed the White House in our Character Assessment.</p> <p>Contact the Conservation Officer at ELDC to confirm our Grade II listed buildings and surroundings are covered by the local plan SP11.2.</p> <p>Anne Shorland Comments: I am not sure why Historic England want you to go to such lengths when listed buildings and their settings are given national protection and you don't need to repeat national policy in your plan. You may want to add an explanatory paragraph into your design policy explaining the importance of your listed buildings and list them and then a further clause into your design policy reiterating the protection they are afforded.</p>	<p>Add 'White House' as a listed Building in the Character Assessment.</p> <p>Also details what grading each building is listed under.</p> <p>As Anne has commented: Listed Buildings have National Protection and are protected in accordance with National Planning Policy.</p> <p>Addition to 6.3 & HLC1 6.24- pointing out that listed buildings are protected.</p>
	<p>Lindsey Marsh Drainage Board</p> <p>Thank you for the opportunity to comment on your Neighbourhood Development Plan 2017.</p> <p>The Board advises that Holton le Clay sits within the catchment of Humberston Beck. The catchment discharges by gravity into the Louth Navigation Canal system and is subject to tide locking. The Board is aware that historically there has been incidents of flooding within the catchment. Areas that are at highest flood risk include Humberston Fitties, Newton Marsh Sewerage Treatment Works and lowlands adjoining the Beck.</p> <p>The Board supports development in Holton le Clay but only where it can be demonstrated it will not result in increased flood risk within the catchment.</p> <p>We therefore fully support your principle of HLC Policy 5 – Sustainable Urban Drainage which will effectively</p>	<p>They Support our Policy 5</p>	<p>No Actions Required</p>

	limit flows of discharge of surface water to the villages drainage system.		
Policy HLC1 – Design and its impact on surroundings	<p>Anglian Water – Stewart Patience spatience@anglianwater.co.uk</p> <p>It is noted that Policy HCL1 includes reference to grey water recycling being incorporated in new developments within the Parish.</p> <p>The emerging East Lindsey Local Plan includes a specific water efficiency standard (110 litres/person/per day) for residential developments within the district which is supported by Anglian Water.</p> <p>It is suggested that consideration should be given to the implications of the Ministerial Statement which sets out the Government’s approach to building standards following the abolition of the Code for Sustainable Homes in 2015.</p>	Plan asks potential developers to say how they will recycle grey water. Elsewhere it is clear that they have to comply with ELDC Local Plan & NPPF	<p>Building Regulations Water Consumption Standard details SP10.6 the emerging local plan and NPPF. Will be applied by the local Planning Department.</p> <p>Delete ‘Grey Water’ in Par. 6.12 of HLC1</p>
	<p>Natural England Natural England does not have any specific comments on this draft neighbourhood plan.</p>	They have no comments.	No Actions Required
	<p>Sport England</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Planning Policy Statement: ‘A Sporting Future for the Playing Fields of England’.</p> <p>http://www.sportengland.org/playingfieldspolicy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 74 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the</p>	<p>Sports England’s comments provide helpful general advice.</p> <p>It suggests that we look at Section 8 of the NPPF to ensure conformity. The NPPF and ELDC Emerging Local Plan cover Open Green Space and Sports, Recreational Provision.</p> <p>Our NDP Section 9 has been checked with the NPPF and the emerging East Lindsey Strategic Policy 26 and minor amendments have been made which then cover our exacting preferences for the village.</p> <p>The East Lindsey and District Council Sport and Recreational Audit – Outdoor Provision Sept 2013. Acknowledges that Holton le Clay does not meet the minimum standard for Sports Pitches recommended in The Fields in Trust (FIT) Six</p>	<p>Added in Justification 9.13 to reflect the fact that the village has insufficient sports and recreational facilities.</p> <p>Added in Policy 9.21: “New development must demonstrate how it preserves locally important vistas, landmarks and spaces for retention, and identify locations and specifications for the inclusion of accessible (communal) open space and sports recreational provision”.</p>

	<p>neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.</p>	<p>Acres Standard. possible Parks and recreational areas.</p>	
	<p>http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.</p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section:</p>		

<https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance:
<https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

Appendix10

Feedback from ELDC in response to issues raised and amendments made following the 6-week consultation.

Holton-le-Clay NDP.

Final check list (following e-mail from Anne Shorland (**Service Manager Planning Policy and Research** at ELDC) 8th November 2017

).

One hard copy & one electronic copy of submission to be provided.

Criterion	Location	Action needed
1. Map or statement of area to which the plan relates.	NDP p6	None
2. Consultation statement – including those consulted, summary of issues & concerns & how addressed.	Basic Conditions Statement	To be updated.
3. Proposed NDP	NDP	None
4. Basic Conditions statement including:	Basic Conditions Statement	
I. Regard to national policy & guidance from the Secretary of State.	Basic Conditions Statement	None – all documentation checked with ELDC
II. Contribution to Sustainable Development.	(-meeting development goals whilst sustaining ability of natural systems to provide natural resources & ecosystem) All policies – basic premise of NDP.	None
III. General conformity with local strategic policy (ELDC Local Plan)	Basic Conditions Statement. Checked with ELDC periodically during process.	None – all documentation checked with ELDC
IV. Compatible with EU obligations.	Basic Conditions Statement. Checked with ELDC periodically during process.	None – all documentation checked with ELDC
V. Information to enable environmental assessments.	Character Assessment. Green Plan.	None.

Response from ELDC following Final Submission.

Formal notification of submission.		
Publicity of NDP & invitation for representations.		
Notification of bodies in Consultation Statement.		
Appointment of Examiner.		
Appointment with Parish Council		