

13/2/16	Mr Kinge	Policy 3.3	Not straight forward – confusing. Why neighbouring parishes?	Wording is maybe confusing to some people. Look at how the policy is set out and the wording.	No action required
29/2/16	Village Resident	Policy 3	We support the supply of affordable housing in the area as this is a huge problem for residents who want to remain in the area but are unable to afford to buy or privately rent properties available. This is a huge problem for further generations of families here.	Acknowledge the positive feedback regarding the Policies	No action required
29/4/16	David George, Strategic Planning, Environment & Economy, Lincolnshire County Council  Phone: 01522 554815		The emphasis on provision of affordable housing is also welcomed. It is noted that the criteria for selection of occupiers closely mirrors the local connection criteria proposed by East Lindsey DC in Annex 1 to their draft Core Strategy. As you may know, this is now publically available, having been considered by their Planning Policy Committee, but the County Council has not yet been formally consulted. Annex 1, however, only applies to Coastal East Lindsey, which is defined as the combined Flood Hazard zones from the Coastal Study, and does not include most of your Parish. Your proposed local connection criteria therefore appear to go beyond the draft Core Strategy, both in the area covered and by having more levels of priority. Whilst the County Council accept that it is for you and East Lindsey DC to justify your respective policies, there may be an element of risk if they are not consistent. The County Council would support the principle of having local connection criteria, but you may wish to take advice to check that they comply with relevant laws.	To be better able to address this comment the NDP Team contacted - David Postle Hub Co-ordinator / Deputy Team Leader Housing & Well-being East Lindsey District Council, Room 22, Tedder Hall, Manby Park, Manby Louth, Lincolnshire, LN11 8UP – for advice and clarification. Subsequently the wording of the Policy 3 has been amended.	Policy 3 wording amended

**Policy 4**

**Implementation of Holon le Clay Green Plan**

6/2/16	Village Resident [REDACTED]	Policy 4	Village Hall needs to be further developed.		No action required
6/2/16	Village Resident [REDACTED]	Policy 4	Identified all the requirements of a good green plan.	Acknowledge the positive feedback regarding the Vision, Objectives and Policies	No action required
6/2/16	Village Resident [REDACTED]	Policy 4	The need for green space has been properly highlighted.	Acknowledge the positive feedback regarding the Vision, Objectives and Policies	No action required
6/2/16	Village Resident	Policy 4	Recreational areas should be diverse and suitable for the whole community. This impacts on health and well-being of children, families and the aging population. Creating a healthy and active society delivering growth.	Prime function of the Green Plan.  Review plan to ensure it covers these points Covered in Green Plan	No Action Required
6/2/16	Village Resident [REDACTED]	Policy 4	Plenty of trees at boundaries of properties is fine if they are maintained.	Maintenance of public green spaces is an issue but is it part of NDP. Maybe need to include in the vision or justification in Green Plan. New development will have to have a planning condition covering maintenance public area/green space/trees/hedges etc	No action required.

6/2/16	Village Resident [REDACTED]	Policy 4	Public footpaths from roads have to be signed but once they leave the road no further signage appears on many of them.	Footpath sign - should it be written into Green Plan somewhere?? Green Plan 5.6 covers this.	No action required.
9/12/15	Parish Council	Policy 4.7	Parish Council would like to see this policy less binding and allow for sale/disposal of the Parish Amenity if ever required.	The Green Plan is a key policy as evidenced by the village questionnaire. The retention of this highly valued village amenity should be a Parish Council obligation and duty.	No action required
6/2/16	Village Resident	Policy 4.1	The existing cricket ground should be retained. You cannot simply build a new one, they take years to mature and an English Semi-Rural village must have a cricket ground.	This is an issue that is unfortunately outside of the NDP. The re-design of the proposed development on Louth Road covers these issues	No action required.
6/2/16	Village Resident	Policy 4.1	Dwelling for local people – Holton-le-Clay No foreigners whatsoever.	No comment	No action required
6/2/16	Village Resident	Policy 4.1->4.8	Agree Grass verges on streets if possible.	Acknowledge the positive feedback regarding the Vision, Objectives and Policies	No action required
1/2/16	Village Resident [REDACTED]	Policy 4.6	Non-vehicular links with neighbouring villages must be included as part of the development proposals to encourage cycling for both employment and recreation particularly to New Waltham via the old railway line. This will also encourage walking which is unpleasant along the busy A16 route. Similar routes to be identified such as a path to Tetney.	This is the intent of having a Green Plan.  The Green Plan is aspirational in its intent. It is a long-term plan and will evolve with the development of the village	No action required.
6/2/16	Village Resident	Policy 4.6	Concern over sustainability in view of bus service.	Sustainability of public services including the bus service is an on-going issue and will continue to be during the financial cutbacks at Lincolnshire County Council and East Lindsey District Council. It is these high-level councils that subsidise local services.	No action required
13/2/16	Mr Kinge	Policy 4 Vision	Fairly accurate. Boundaries must be firmly enhanced. We are very much the edge of Lincolnshire.	Green Plan – and retaining green boundaries is important in retaining the village and to stop it merging with the surrounding villages.	No action required
13/2/16	Mr Kinge	Policy 4 Vision	Where are the cycle tracks?	Green Plan is designed to be an evolving plan. The Parish Council will work with the developers, landowner and planners to identify the most appropriate routes.	No action required
13/2/16	Mr Kinge	Policy 4 Justification	Agree	Acknowledge the positive feedback regarding the Vision, Objectives and Policies	No action required
13/2/16	Mr Kinge	Policy 4 Justification	You mention again cycle paths - where?	Green Plan is designed to be an evolving plan. The Parish Council will work with the developers, landowner and planners to identify the most appropriate routes.	No action required
13/2/16	Mr Kinge	Polices 4.1 4.2 4.3 4.4 4.5 4.6 4.7 4.8	All agree	Acknowledge the positive feedback regarding the Vision, Objectives and Policies	No action required
29/2/16	Village Resident	Policy 4	Again, policies in the green plan are vital in assuring that as we develop as a village that we retain and improve our green spaces and facilities for everyone to enjoy, the elderly as well as the younger generation. We fully support all points made.	Acknowledge the positive feedback regarding the Policies	No action required

3/5/16	Sean Johnson Program Manager Wider Determinants of Public Health	Policy 4	Policy on renewable energy or community energy schemes; Electric vehicle charging points to each new dwelling to encourage residents to choose a low emission car;	ELDC does not have a formal policy regarding Electric Cars/renewable energy or community energy schemes. After discussions with ELDC Planning Policy it is felt it would not add value to include a policy that covers these comments. The inclusion of such a policy could make developments non-viable. If individual builders wish to supply renewable energy or community energy infrastructure schemes in their developments it would be warmly welcomed.	Re-word Policy 1 Development Design to suggest that thought and consideration be given to Green Energy/Recycling.
3/5/16	Sean Johnson Program Manager Wider Determinants of Public Health	Policy 4.8	Extend design for people with limited mobility to limited ability to include other groups of people such as those with sight impairments or dementia.	Fair comment	Change Policy 4.8 wording as suggested
3/5/16	Sean Johnson Program Manager Wider Determinants of Public Health	Policy 4	Promote opportunities for growing healthy foods (e.g. allotments (it is understood there is widespread demand for allotments across East Lindsey), community growing spaces and/or orchards);	To address this comment the Holton-le-Clay Parish Clerk interrogated the Parish Gardens records and provided the following data- Parish has 38 however 12 of these will be split into smaller sections as the current tenants give them up providing a further 12. It must be noted that they are on consecrated burial land and will very gradually be reclaimed to meet burial requirements – I believe it was estimated over the next 25 years however hard to quantify that. Current occupancy of the Parish Gardens is all full – however this is the first time in two years that this is the case, following a campaign to recruit new gardeners. There have been give or take between 7 and 2 vacant plots at any one time over the last 2 years. Typical waiting list numbers is now 2, however this is the first time in the 2 years I have been here that a waiting list has existed, however in the past there had always been a rather lengthy waiting list – interest has decreased in the last 5-10 years dramatically and current tenants are in the majority senior citizens. Currently interest is dwindling and tenants are of an age where they may well give up gardens in the foreseeable future – however trends change and as the village grows who knows? – however the Parish Council owns land such as the old railway and the 8 acres that could be utilised should this be necessary.	No Action Required

**Policy 5**

**Sustainable Urban Drainage**

6/2/16	Village Resident [REDACTED]	Policy 5	Suds – I am glad that this has been highlighted – flooding and drainage is important in national terms and obviously in the village.	Acknowledge the positive feedback regarding the Vision, Objectives and Policies	No action required
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6/2/16	Village Resident	Policy 5	Drainage – any further development cannot have a neutral or negative effect on current poor drainage. They must show a positive benefit to increase current capacity i.e. Carmen Crescent estate.	The Neighbourhood Development Plan team has worked extensively with the agencies that are accountable for and manage surface water drainage to ensure they fully understand the existing issue we suffer in Holton-le-Clay. ELDC Draft Core Strategy – Chapter 9 – Inland Flood Risk covers this issue. National Planning Policy Framework Chapter 10 covers this issue	No action required
6/2/16	Village Resident	Policy 5	There have been on-going issues with new builds/drainage in the village. This must be adequate and sustainable for the growth now and the future.	The Neighbourhood Development Plan team has worked extensively with the agencies that are accountable for and manage surface water drainage to ensure they fully understand the existing issue we suffer in Holton-le-Clay. ELDC Draft Core Strategy – Chapter 9 – Inland Flood Risk covers this issue. National Planning Policy Framework Chapter 10 covers this issue	No action required
6/2/16	Village Resident	Policy 5.1	Drainage within village needs to be sorted out before any further development is allowed to be carried out.	As above	
6/2/16	Village Resident	Policy 5.1	Drainage should be laid down before development proceeds and inspected.	As above	
6/2/16	Village Resident	Policy 5.1 - >5.3	Agree with 5.1 ->5.3	Acknowledge the positive feedback regarding the Vision, Objectives and Policies	No action required
13/2/16	Mr Kinge	Policy 5 Vision	Agree	Acknowledge the positive feedback regarding the Vision, Objectives and Policies	No action required
13/2/16	Mr Kinge	Policy 5 Justification	Agree but what input and consideration has come from Highways and Anglian Water? Will the present sewage works cope?	The Neighbourhood Development Plan team has worked extensively with the agencies that are accountable for and manage surface water drainage to ensure they fully understand the existing issue we suffer in Holton-le-Clay. ELDC Draft Core Strategy – Chapter 9 – Inland Flood Risk covers this issue. National Planning Policy Framework Chapter 10 covers this issue	Drainage Policy 5.1 & 5.2 cover this.  No action required
13/2/16	Mr Kinge	Policies 5.1 5.2 5.3	Agree – you have addressed this well	Acknowledge the positive feedback regarding the Vision, Objectives and Policies	No action required
20/4/16	Stewart Patience Planning Liaison Manager Anglian Water Services Limited	Policy 5	<u>Sustainable Urban Drainage - Policies (page 18)</u>  Reference is made to preventing further surface water discharge from new developments into the existing drainage system through the use of SuD's.  Anglian Water support the requirement to use SuD's and that the use of SuD's should be maximised on site so as not to increase flood risk and to reduce flood risk where possible.  In relation to foul drainage it is important that applicants demonstrate that there is capacity available within the foul sewerage network or that capacity can be made available.  Therefore, it is proposed that the wording of Point 5.2 should	Fair comment	Re-word Policy 5.2 wording and use the suggested wording.

			<p>be amended as follows:</p> <p>'The foul water disposal infrastructure should not be overloaded. Applicants should demonstrate that capacity is available within the foul sewerage network or that capacity can be provided in time to serve the development. Necessary improvement of the system should be addressed through the phasing of development'</p>		
29/4/16	<p>David George, Strategic Planning, Environment &amp; Economy, Lincolnshire County Council</p> <p>Phone: 01522 554815</p>	Policy 5	<p>The County Council welcomes the inclusion of a section on Sustainable Urban Drainage. It is noted, however, that it makes an assumption that SuD's will be maintained by a management company. There are, in fact, a range of possible management options, of which a management company is the least preferred. This could be addressed by simply re-wording to take the emphasis off a putative management company and replace it with a general statement that maintenance arrangements for the long-term should be robust, sustainable and realistic.</p> <p>Also, whilst you may feel that surface-water flooding is the only risk you can easily influence, there are other sources of flood-risk and unfortunately SuD's cannot alleviate all of them. Whilst coastal and river flooding risks just affect the edge of your Parish it is worth including reference to the publically accessible Environment Agency flood maps.</p>	<p>Bob to look at this comment.</p> <p>Include a river flood map. Waithe Beck is within the Parish.</p>	Policy reworded and River Flood Map included.
4/16	<p>Kerrie Ginns Sustainable Places - Planning Adviser Direct dial 02030 253304 Direct e-mail kerrie.ginns@environment-agency.gov.uk</p>		<p>Thank you for referring the Neighbourhood Development Plan for Holton-le-Clay, which was received on 01 April 2016.</p> <p><b>Plan Area Constraints</b> The Plan area falls mostly within Flood Zone 1, defined by the Planning Practice Guidance (PPG) as having a low probability of flooding. Drainage from new development must not increase flood risk either on-site or elsewhere. Government policy strongly encourages a sustainable drainage system (SuDs) approach to achieve these objectives. Guidance on how to address specific local surface water flood risk issues may also be available through the Strategic Flood Risk Assessment or Surface Water Management Plans produced by your Local Authority.</p> <p><b>Preliminary Opinion</b> We are able to provide a free preliminary opinion to a developer/applicant per development site. This will</p>	<p>This is covered on Policy 5.1 Surface Water Drainage and Policy 5.2 Foul Water Infrastructure</p>	No Action Required

			<p>outline our position and highlights any key environmental risks that we are concerned about as a statutory consultee and provide developers with an idea of what we would expect to receive within a planning application.</p> <p><b>Charged Service for Planning Advice</b></p> <p>If further bespoke advice is required outside of a formal planning application then this will form part of our charged for planning advice service. Please note that this response is based on the information provided at this time and if this changes in the future we would need to consider our position again. We trust that the above information is of assistance.</p>		
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**Policy 6**

**Employment and Business**

6/2/16	Village Resident [REDACTED]	Policy 6	The village would lose the title of Service Village if it lost its public transport and hence access to nearby settlements.	Sustainability of public services including the bus service is an ongoing issue and will continue to be during the financial cutbacks at Lincolnshire County Council and East Lindsey District Council. It is these high-level councils that subsidise local services.	No action required
6/2/16	Village Resident	Policy 6	By having a balance of housing suitable for all will ensure local people are available to use and support the growth of local businesses.	Acknowledge the positive feedback regarding the Vision, Objectives and Policies	No action required
6/2/16	Village Resident	Policy 6	Especially agree with 6.2 Agree with Green Plan.	Acknowledge the positive feedback regarding the Vision, Objectives and Policies	No action required
6/2/16	Village Resident [REDACTED]	Policy 6	Existing businesses need to be supported by the villagers but the local authorities should ensure that they are encouraged.	Acknowledge the positive feedback regarding the Vision, Objectives and Policies ELDC Draft Core Chapter 7 – Diverse Economy, Town/Village Centres – covers this issue.	No action required
1/2/16	Village Resident [REDACTED]	Policy 6.1	Existing businesses can be encouraged to network once a month perhaps for an hour given by the Village Hall to build resilience and develop sustainable profitable businesses. Also encourage take-up of council provisions including funding to improve shop-fronts/facias – when available/appropriate.	This is more of a Parish Council topic rather than that of the Neighbourhood Development Plan.	Forward topic to Parish Council
6/2/16	Village Resident	Policy 6.1->6.5	Agree. What is going to be done about the empty convenience store on Louth Road?	A concern shared by all of us but unfortunately it is outside of the remit of the Neighbourhood Development Plan Team.	No action required
1/2/16	Village Resident [REDACTED]	Policy 6.4	Public transport needs better integration with NEL – current disparity means NEL residents can enjoy travel anywhere up to Toll Bar for £10.50 / week. As we are in the neighbouring authority this rockets to £2.50 per single journey. Putting low income, young and elderly at a severe disadvantage – reducing take up.	This type of detail is outside of the Neighbourhood Development Plan. Team recognised the need to include Travel & Transport Statement but not a full policy.	Write a Traffic/Travel Statement and include in plan
6/2/16	Village Resident	Policy 6.4	Large businesses such as supermarkets should not be allowed. Such only employ local people.	ELDC Draft Core Chapter 7 – Diverse Economy, Town/Village Centres – covers this issue.	No action required
1/2/16	Village	Policy	Extension of Peacefields is very	ELDC Draft Core Chapter 7 – Diverse	No action

	Resident [REDACTED]	6.5	welcome. I would also like recreational /retail/hospitality development sites being identified to boost employment opportunities, perhaps development of former Air Field land. A big ask definitely but will bring exciting changes. Possibly even allowing hotel/restaurant services.	Economy, Town/Village Centres – covers this issue.	required
4/2/16	Limagrain	Electrical Infrastructure	Restriction of electrical supply could adversely impact on the planned expansion of Limagrain business.	This issue is covered in ELDC Draft Core Strategy Chapter 15 – Infrastructure and S106 Obligations para 12 Electricity Distribution.	No action required.
13/2/16	Mr Kinge	Policy 6 Vision	Agree with 1 <sup>st</sup> & 2 <sup>nd</sup> paragraphs. Paragraph 3 should be expanded. There are many more. You need to include Internet listed	Good point do we need to expand and document the services??	Re-word vision to state – “Examples” rather than being exhaustive.
13/2/16	Mr Kinge	Policy 6 Justification	See above – more coverage many people work from home.	Plan focuses on businesses that offer something apparent and visual to the village. People and businesses operated from home are hard to quantify and even hard to determine what they offer to the sustainability of the village.	No action required
13/2/16	Mr Kinge	Policy 6.1	Agree	Acknowledge the positive feedback regarding the Vision, Objectives and Policies	No action required
13/2/16	Mr Kinge	Policy 6.2	Agree – council needs to be more proactive.	Acknowledge the positive feedback regarding the Vision, Objectives and Policies	No action required
13/2/16	Mr Kinge	Policies 6.3 6.4 6.5	Agree	Acknowledge the positive feedback regarding the Vision, Objectives and Policies	No action required
3/5/16	Sean Johnson Program Manager Wider Determinants of Public Health	Policy 6 – Employment and Business	Policies 6.1 to 6.5 – seek to avoid an over concentration of fast food takeaways.	At present the village is well served with fast food facilities. The plan supports growth in services and business but they should be a broad spectrum rather than a pre-dominance of any one type.	Amend Policy 6 to give clarity range of shops/services/businesses.

## Appendix 6

### Development Plan Health Check Report

#### 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

#### CONTEXT

The 'health check' is a desk based review designed to help the qualifying body to identify issues that may cause delay or rejection of Plans or Orders at the submission or independent examination stages.

The 'health check' considers whether there are any obvious problems in meeting the basic conditions and other legal requirements. This 'health check' is less comprehensive than a formal examination and only deals with the Plan and the Basic Conditions and Consultation Statements. It does not include background documentation or processes. A 'health check' does not involve re-writing the Plan but provides general advice on what changes may need to be made. The 'health check' is advisory only and has no legal status.

#### FINDINGS

Work is underway to achieve a Neighbourhood Development Plan (NDP) for Holton-le-Clay. Pre-Submission consultation on the NDP has been undertaken in various guises since December 2014. Progress has been made to the point where a revised Draft Neighbourhood Plan document has now been prepared dated 2nd June 2016.

From my review of the latest version of the Draft Plan it is evident that considerable effort has been put into working on the Holton-le-Clay Neighbourhood Development Plan. The NDP has been advanced by a Steering Group that includes volunteers from the local community. The Plan has been developed through wide consultation. The inclusive approach to engaging key stakeholders appears to have been most successful.

This 'health check' review has found the NDP to be demonstrably grounded in local opinion. With some adjustment, the Plan has the potential to offer a sound basis for future decision making in respect of planning proposals emerging in the plan area over the next 13 years. It is a particular strength of the Plan that it focuses on issues that are central to local community aspirations.

The findings of this review have led to the making of a number of recommendations on matters to be addressed and these are set out below. Paragraph references relate to the Draft Plan document dated 2nd June 2016.

The observations and comments made are intended to help Holton-le-Clay Parish Council reach a successful outcome with a 'made' plan.

#### PART 1: PROCESS

##### **Have the necessary statutory requirements been met in terms of the designation of the neighbourhood area?**

Yes — An application for designation of Holton-le Clay Parish as a Neighbourhood Area was submitted to East Lindsey District Council, appropriate consultation was undertaken and the application was approved on 8th January 2013. The Neighbourhood Plan Area covers the whole of the Parish.

The map of the Neighbourhood Plan Area presented in Figure I of the Plan confirms the plan area has been defined by the Parish boundary. Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 (the Regulations) requires that the area to which the Neighbourhood Plan applies must be defined. Also, that no other neighbourhood plan has been made for the neighbourhood area and the Neighbourhood Plan does not relate to more than one neighbourhood area and therefore complies with those restrictions. It may therefore be helpful to include such definitive reference within the Plan Introduction supported by the subsequent parish plan area.

##### **Have the requirements been met in terms of the designation of a neighbourhood forum?**

Not applicable as Holton-le-Clay Parish Council are a Qualifying Body able to prepare a Neighbourhood Development Plan.

##### **Has the NDP been the subject of appropriate pre-submission consultation?**

The Parish Council should ensure that consultation is duly undertaken in respect of Regulation 14 of the Neighbourhood Planning (General) Regulations 2012 (the Regulations) including consultation with the bodies referred to in paragraph 1 of schedule 1 of the Regulations.

##### **Has there been a programme of community engagement proportionate to the scale and complexity of the NDP and has a consultation statement been prepared?**

Yes — An extensive programme of community consultation has occurred throughout the plan evolution period. Appendices to the NDP provide reference to the extensive level of community engagement. On this basis, it would appear that the Consultation Statement when finalised will demonstrate appropriate community involvement in plan preparation.



### **Are arrangements in place for an independent examiner to be appointed?**

Not at present. The person appointed as independent examiner must be appropriately qualified and experienced and must not have an interest in any of the land affected by the NDP. It is good practice to be able to demonstrate a proper selection process has occurred.

### **Is there a clear project plan for bringing the NDP into force and does it take account of local authority committee cycles?**

It would be useful for the Steering Group to ensure that a project plan is 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'.

### **Has an SEA screening been carried out by the LPA?**

A Neighbourhood Planning Screening Report; Strategic Environmental Impact Assessment (SEA) and Habitats Regulations Assessment has been prepared by ELDC dated 26th November 2014. That report considered that an SEA is required in relation to the Holton-le-Clay Neighbourhood Plan. Although the Neighbourhood Plan has subsequently been prepared without inclusion of allocations for development as originally intended, a 'light touch' Sustainability Appraisal (incorporating the requirements for SEA) has nevertheless been undertaken. This follows the advice given.

### **Has an assessment been made regarding likely significant effect on a European site?**

A Neighbourhood Planning Screening Report; Strategic Environmental Impact Assessment and Habitats Regulations Assessment (HRA) has been prepared dated 26th November 2014. The Screening Report concludes that the Neighbourhood Plan would need to be subject to a HRA. However, the NDP is no longer proposing to allocate development sites although a 'light touch' Sustainability Appraisal (incorporating the requirements for SEA) has nevertheless been undertaken. This follows the advice given.

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.

## **PART 2 - CONTENT**

### **Are there any general points relating to content?**

#### **(a) Format**

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.

I consider it appropriate that the 'style' of the Neighbourhood Plan does not follow any generic planning document format, but reflects the desires and intentions of the qualifying body.

However, it is also important that the NDP is easily understood by the community — the people who will vote in a referendum on whether the plan should 'made' (brought into force).

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'.

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 community' (or should this reference be 'aspirations') referenced at 2.1, within the Introduction would provide better understanding for the relevant objectives.

Such a structure, leading to planning policies (grouped by topic with relevant mapping and graphics) would mirror the guidance offered by Locality based on their experience.

A link to that guidance follows:  
([http://www.rtpi.org.uk/media/1282945/structuring\\_your\\_neighbourhood\\_plan\\_template.pdf](http://www.rtpi.org.uk/media/1282945/structuring_your_neighbourhood_plan_template.pdf))

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.

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.

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).

## (b) Policies

With reference to the content and wording of the draft policies, the vocabulary to be used is critical to ensuring that the policy delivers the desired outcomes,

In this respect, there are a number of established 'ground rules' that should be adhered to.

Firstly, it is important to understand that policies can't be worded in a negative way so that they can be interpreted as blocking development as this will not be compliant with the NPPF.

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.

There are generally three types of planning policies:

- **Criteria led policy.** This is a policy with a series of requirements that a development proposal should meet. The requirements are usually set out as separate bullet points. You need to be clear whether the criteria are inclusive or exclusive i.e. you need to provide clarity on whether in order for a development to be acceptable, it would have to meet all of the criteria or only one, or perhaps some but not all.

- **Site specific policy.** This is a policy that applies to a particular area of land. Site specific policies either allocate land for a particular type of development, for example housing, or identify specific areas of land to which a policy will apply, for example a Local Green Space designation or the retail centre in a high street.

- **Generic policy.** This is a policy that will be applied universally to all development across the neighbourhood plan area. Examples include design, renewable energy and affordable housing policies.

It is suggested that the policy wording should be reviewed in accordance with the comments above.

Furthermore, in recognition that the basis of decision making is the development plan unless material considerations indicate otherwise. The material considerations at the time of determination of a future planning application are unknown and therefore cannot be dismissed through a policy that states development will be permitted or not permitted.

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

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 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.

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.'

There is a need to ensure that the underpinning evidence is robust but also duly acknowledged within the relevant policy justification. Independent examiners have raised concerns about the lack of evidence to support policies and have recommended that policies are either modified or deleted where the evidence is not robust.

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.

## (C) Specific Policies

Notwithstanding the above general observations, for completeness, the following comments are made specific to draft policies and references in the Draft NDP:

**2.2.1** - 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 considered with other criteria based policies) for safeguarding a nucleated settlement form (this objective is equally supported by the NDP evidence base).

**3.2** - rather than 'take a positive approach' suggest 'will support the development of.... whilst ensuring that Holton-le-Clay remains etc'

**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.