

Keelby Neighbourhood Development Plan

Examiner's Clarification Note

This Note sets out my initial comments on the submitted Plan. It also sets out areas where it would be helpful to have some further clarification. For the avoidance of doubt, matters of clarification are entirely normal at this early stage of the examination process.

Initial Comments

The Plan provides a clear and concise vision for the neighbourhood area.

The presentation of the Plan is very good. The difference between the policies and the supporting text is clear. The Plan makes good use of various maps. The various appendices helpfully underpin the policies.

Points for Clarification

I have read the submitted documents and the representations made to the Plan. I have visited the neighbourhood area and am now able to raise issues for clarification with the Parish Council.

The comments made on the points in this Note will be used to assist in the preparation of my report and in recommending any modifications that may be necessary to ensure that the Plan meets the basic conditions.

I set out specific clarification points below in the order in which the policies appear in the submitted Plan:

Policy 1

I can see the broader ambitions of the policy.

However, does the policy intend to designate the Sports Ground as a local green space? If so, has it undertaken an assessment of the Ground against the contents of paragraphs 101 and 102 of the NPPF?

Policy 2a

In general terms this is a good policy

For my clarity are the various criteria (a-n) in the policy the 'design code' referenced in the opening part of the policy?

In criterion a) is there any evidence to support the 20% figure? In any event is a figure too prescriptive to respond to potentially-changing circumstances in the Plan period?

Would the first part of the criterion work equally well if it referred to the most up-to-date assessment of local housing need?

Policy 2b

This is an equally good policy.

Policy 3

This is another good policy. It is a good local response to Section 12 of the NPPF.

For my clarity is it intended to apply to general housing development and not to the allocated housing site (which has its own design criteria in Policy 2)?

Policy 4

In the round this is a good policy. It will do much to deliver the economic dimension of sustainable development.

As submitted, the fifth part of the policy reads in a complicated way due to its double negative approach. Could it be turned into a positive policy by identifying what would be supported?

Policy 5

What is the intended purpose of part d) of the policy? As worded it does not relate well to the format of the remainder of the policy.

In any event is it supporting text (explaining a process to be followed) rather than a land use policy?

Policy 6

What is the underpinning purpose of this policy?

What is meant by the 'redevelopment' of a road?

Is the policy intending to refer to the identified roads more generally or the parts of those roads (where relevant) which are in the neighbourhood area?

In any event if major works are undertaken to the roads concerned, they will be addressed under highways rather than planning legislation.

Representations

I would find it helpful if the Parish Council commented on the representation received from the District Council?

Protocol for responses

I would be grateful for responses by 28 February 2023. Please let me know if this timetable may be challenging to achieve. It is intended to maintain the momentum of the examination.

If certain responses are available before others, I would happy to receive the information on a piecemeal basis. Irrespective of how the information is assembled, please could it come to me directly from the District Council and make direct reference to the policy or the matter concerned.

Andrew Ashcroft

Independent Examiner

Keelby Neighbourhood Development Plan.

31 January 2023