

Reepham Neighbourhood Plan

Regulation 16 Submission Consultation

Responses

Document 1 of 3

From: Damon Blackband <[REDACTED]>
Sent: 07 December 2023 15:48
To: WL - Neighbourhood Plans
Subject: Reepham Neighbourhood Plan

Hi

I would like to suggest an addition to section 9 of the Neighbourhood Plan in reference to cycling and walking access.

Developments of more than 9 houses should have cycling and walking access to the village centre – This would be better served by insisting that shared use paths or segregated paths adhere to LTN 1/20 (ideal government standards) design principles, to allow non-confrontational access and use by all permitted wheeled vehicles including mobility scooters, cargo bikes and tandems etc. The design principles within LTN 1/20 allow for this use and are the best solution for future proof shared access. If you merely opt for the developer's cheapest solution you will risk conflict amongst user groups and limit access space for certain user groups.

Best Regards

Damon

Damon Blackband
Network Development Manager / Greater Lincolnshire / North and NE Lincolnshire

[REDACTED]



Sustrans is the charity making it easier for people to walk and cycle. We connect people and places, create liveable neighbourhoods, transform the school run and deliver a happier, healthier commute. Join us on our journey. <http://www.sustrans.org.uk/>

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From: Nick Feltham
Sent: 07 December 2023 16:45
To: Nev Brown
Subject: RE: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

Dear Nev

Just to confirm that North Kesteven District Council has no comments in relation to the above however presumably you are also seeking comments directly from the Central Lincs Local Plans team,

Regards
Nick Feltham



Nick Feltham
Assistant Development Manager



From: NK - Planning <[redacted]>
Sent: Thursday, December 7, 2023 3:36 PM
To: Nick Feltham <[Nick_Feltham@\[redacted\]](mailto:Nick_Feltham@[redacted])>
Cc: NK - Planning <[redacted]>
Subject: FW: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

Hi Nick
Do you just want this setting up as a NEIAUT?
If so who should I give it to?

Sarah



Planning Administration Team



From: Nev Brown <[redacted]>
Sent: Thursday, December 7, 2023 3:33 PM
Subject: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

Dear Consultee,
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The Plan and its supporting documents are available from:
[Reepham NP](#)

From: LINC-SECTION106 (NHS LINCOLNSHIRE ICB - 71E) <[REDACTED]>
Sent: 07 December 2023 16:52
To: Nev Brown
Cc: LINC-SECTION106 (NHS LINCOLNSHIRE ICB - 71E)
Subject: FW: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

CAUTION: External email, think before you click!

Good Afternoon

Thank you for sharing the information on the Reepham Neighbourhood Plan - Regulation 16 Submission Consultation.

NHS Lincolnshire Integrated Care Board does not have any comments to make at this time.

Kind Regards
Patrycja

Patrycja Bienko
S106 Team
NHS Lincolnshire Integrated Care Board

 [Chat to me on MS Teams](#)

From: Nev Brown <[REDACTED]>
Sent: 07 December 2023 15:36
Subject: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

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Email: [neighbourhoodplans@\[REDACTED\]](mailto:neighbourhoodplans@[REDACTED])
Post: Neighbourhood Planning, Guildhall, Marshall's Yard, Gainsborough, Lincs, DN21 2NA.
If you require assistance accessing the documents, please call WLDC's customer services on (01427) 676676.

When making your comments please indicate if you wish to be notified of WLDC's decision on the Plan under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.
If you would like to know more about how WLDC uses your data in respect of the Plan's consultation, what your rights are and how to contact us if you have any concerns, please read our privacy notice:
[Privacy Notice](#)

Regards

Nev Brown
Senior Neighbourhood Planning Policy Officer

DM2 -50

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Sent: 07 December 2023 16:52
To: Nev Brown
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Patrycja

Patrycja Bienko
S106 Team
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Regards

Nev Brown
Senior Neighbourhood Planning Policy Officer

DM2 -50

From: .Box.Assetprotection (National Gas) <[REDACTED]>
Sent: 08 December 2023 11:24
To: Nev Brown
Subject: RE: [EXTERNAL] Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

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Nev,

Thank you for your email.

Regarding your Reepham Neighbourhood plan, there are no National Gas Transmission assets affected in this area.

If you would like to view if there are any other affected assets in this area, please raise an enquiry with www.lsbud.co.uk. Additionally, if the location or works type changes, please raise an enquiry.

Kind regards

Asset Protection Team

From: Nev Brown <[REDACTED]>
Sent: 07 December 2023 15:33
Subject: [EXTERNAL] Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

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Regards

Nev Brown
Senior Neighbourhood Planning Policy Officer

DM51 to 98

From: Luke Bamforth <[REDACTED]>
Sent: 08 December 2023 16:23
To: WL - Neighbourhood Plans
Subject: Reepham Neighbourhood Plan
Attachments: Reepham.docx

Good Afternoon

I hope you are well.

Please find attached the GLNP response to the consultation on the Reepham Neighbourhood Plan. Thank you for the opportunity to respond and if you require any further information or detail on the response do not hesitate to get in touch.

Kind regards
Luke.

Luke Bamforth AMIEnvSc
Policy Officer
[REDACTED]

Achieving more for nature



Greater Lincolnshire Nature Partnership
Banovalum House, Manor House Street, Horncastle, LN9 5HF

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Reepham Neighbourhood Plan

Regulation 16 consultation GLNP response



Thank you for the opportunity to consult on the Reepham Neighbourhood Plan. The GLNP feel that joint working is key to robust planning policy and are keen to work closely with Local Authorities in the preparation of environmental policy within their local planning policy. The GLNP is a partnership of 49 organisations working together to achieve more for nature. This response is based on the joint values and positions as agreed by our members.

Overall **18 Natural Environment** is a positive and detailed section of the plan and the GLNP is glad to see the consideration that has gone into it.

Specifically, the GLNP supports the intention laid out in **paragraph 18.7** to take every opportunity to create new green spaces, this should include natural spaces. The GLNP also supports **paragraph 18.9** which includes a target of improved biodiversity within the parish.

Paragraph 18.15 Green Corridors is welcome, further mention of wider ecological networks within this paragraph would be beneficial.

For accuracy please note that the Environmental Records Centre and the Lincolnshire Environmental Records Centre are the same. It should be named as the Lincolnshire Environmental Records Centre and be made clear that it is managed by the Greater Lincolnshire Nature Partnership, as stated in **paragraph 18.1**, not the Lincolnshire Wildlife Trust as stated in **paragraph 18.2**.

The GLNP supports **Policy 12: Environment Policies** especially noting its reference to biodiversity net gain. Again, we would suggest that the term 'wider ecological network' be used alongside 'green corridor'.

In regards to **Policy 12.2.c** the use of the term 'credits' is restricted to the purchase of national statutory credits, with other units, either created or purchased from a habitat bank, to be referred to simply as units. Suggested alternative wording for this policy could be:

"Utilise only ~~credits~~ onsite units or offsite units that come from enhancement of the area immediately surrounding the site".





In regards to **Policy 12.5**, the GLNP would be keen to see the inclusion of “*other appropriate habitats*” to ensure that every opportunity to enhance the natural environment are taken.

Thank you again for the opportunity to respond to this consultation. If you have any questions or require any further detail please feel free to contact me at



From: Planning-Advice <[REDACTED]>
Sent: 11 December 2023 09:58
To: Nev Brown
Subject: RE: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

CAUTION: External email, think before you click!

Good morning,

Thank you for your email and interest in ATE.

ATE is not a statutory consultee for Neighbourhood Plans. There is guidance available for neighbourhood groups that are developing a Neighbourhood Plan. This explains which transport matters a neighbourhood plan can address, including planning for active travel (walking, cycling and wheeling). You can access this on [Locality's Neighbourhood Planning website](#).

We have recently launched a discovery project for planning policy and Local Plans to scope out opportunities for ATE's involvement in the future. Should there be any changes to the planning system due to this project then we will update planning authorities at that time.

Should you have any queries on the above then please get in touch with the team at: Planning-Advice@activetravelengland.gov.uk.

Many thanks,
Imogen

Imogen Toulmin | Planning Inbox Manager, Active Travel England, Active Travel England
2nd Floor | 07977695573 |

From: Nev Brown <[REDACTED]>
Sent: Thursday, December 7, 2023 3:36 PM
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Regards

Nev Brown
Senior Neighbourhood Planning Policy Officer

DM2 -50



Guildhall | Marshall's Yard | Gainsborough | Lincolnshire | DN21 2NA 01427 676676

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From: Darl Sweetland <[REDACTED]>
Sent: 31 January 2024 16:16
To: Nev Brown
Cc: WL - Neighbourhood Plans; Carry Murphy
Subject: RE: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

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Dear Nev & the West Lindsey planning policy team,

Thank you for consulting Anglian Water on the Reepham Neighbourhood Plan Review (RNP) Reg 16 submission. Anglian Water supports neighbourhood plans and their role in delivering environmental and social prosperity in the region. Our review of the RNP and the comments below are informed by the current policy position including the Local Plan to 2040, adopted in 2023.

- Local Plan & planning application issues

In the 2023 Local Plan (Policy S1), Reepham is one of the Medium Villages identified as the fifth tier of locations for growth as part of the spatial strategy and settlement hierarchy. Appendix 1, Table A1.1 of the 2023 Local Plan identifies a Requirement for 14 homes for the village as part of the Plan housing need to 2040. This is comprised of the single home built in the first three years of the Plan period and the 13 homes which now planning permission. Noting the position of these consents, whilst AWS would usually recommend that the developer is directed to Anglian Water at the earliest opportunity to consider site layout and design options, along with the District and Parish Councils in pre application, we recognise that this opportunity may now have passed. If an amended application is submitted or the period for consents to be implemented need to be extended contact can be made via planningliaison@angliannwater.co.uk. With regards to paragraph 2.4 in the RNP, Map 1A and the Reepham Beck, we note that two sites in Reepham outside Flood Zone 3 were considered in the Stage 1 SFRA for the 2023 Local Plan and the Council considered it was not necessary to take those sites forward to the Stage 2 SFRA.

- Anglian Water investment and infrastructure

With reference to growth of the village, I can confirm that past and planned growth in Reepham is considered in Anglian Water's five-year investment plans for water supply and wastewater recycling. When new sites are allocated in a new Local Plan, such as the Central Lincolnshire Local Plan adopted in April 2023, and when planning permission is granted for new sites, then these will be factored into the annual review of investment prioritisation. Reepham is the Central Lincolnshire Water Resource Zone (WRZ) along with Lincoln. As set out in the AWS Non-Household Water Demand Policy circulated to Councils in June 2023, AWS has a statutory duty to plan for water supplies for domestic customers and planned new customers identified from growth in Local Plans. The quantum of housing growth in Reepham can therefore be accommodated. Planned non-domestic growth on the south Humber, which is also within the Central Lincolnshire (WRZ) means that significant further non-domestic/ business demand for water may not be able to be provided until and unless additional supplies including non-potable water sourced from final effluent re use or other sustainable options are developed. We note though from chapter 11 of the RNP that significant non-domestic growth is unlikely in Reepham.

AWS supports Policy 2: Design of New Development and specifically part 3 of the policy which recognises the threat of climate change, the imperative to minimise water consumption and maximise water recycling. The wording of Policy 2 as drafted supports water efficiency in new development but does not require these to be included in the Design and Access statement. These are though covered by and required through Policy S12 in the 2023 Local Plan.

On the question of wastewater growth in Reepham would consideration of the need for investment in the Reepham Water Recycling Centre (WRC) and network.

Based upon the Environment Agency permit for the Reepham WRC and dry weather flows in from 2019 to 2023, the WRC could serve some additional homes and would not reach the Q90 level of flows until and unless a further 380 homes were constructed and occupied. Anglian Water's approach to increasing capacity at the WRC in the medium term (to 2035) is for all development to utilise Sustainable Drainage Systems (SuDS) to eliminate and remove flows of rainwater and surface water from new development which enter the public sewer network. This is required by Policy S21 of the adopted Local Plan for all sites in addition to be a first option under the drainage hierarchy to address any drainage issues at the Reepham sites. In the long term (to 2050) the approach in DWMP is to reduce surface water being directed to the public sewer network by 25%. Based on permitted housing numbers and dry weather flows to the WRC, Anglian Water would need to consider providing additional capacity at Reepham WRC until after the Local Plan period in 2040.

AWS supports Policy 3: Residential Development on Infill Sites and specifically Part 1, c) requiring development to be 'served by sustainable infrastructure provision such as water supply, surface water, wastewater drainage, sewage treatment'. This should ensure that if additional flows are received by the WRC, possibly because of surface water continuing to be directed to the public sewer network rather than using SuDS, sufficient capacity is available. This may be through the development reducing flows and surface flood risk elsewhere in the village and so creating headroom in the network and WRC capacity. Sites H1.1, H1.2 and H1.3 are ones which AWS records indicate have not been the subject of pre application discussions. Developers of these sites are therefore

advised to contact AWS via the above planning liaison email.

- Climate change, drainage, and local action

We welcome the text including page 44 considering climate change and the need to take local action (mitigation and adaptation) through higher environmental standards in new developments. To support this action, it may be helpful if the text in the Design Code included a reference to embedded carbon in constructing new homes and supporting infrastructure in the village. UK Green Building Council research in 2021 showed that embodied carbon emissions from the construction, maintenance, and demolition of buildings, creates 40-50 million tonnes of CO2 each year.

We note that the RNP Design Code makes no reference to drainage including SuDS or the importance of green-blue infrastructure. AWS notes though that this is covered by Policy S21 in the 2023 Local Plan and so would be required to prevent surface water discharge into the sewage system and would require with RNP Policy 2 and 3 that those developments to be designed to accommodate climate change and provide betterment, to reduce flood risk for the existing community. We would welcome work by the neighbourhood plan group; as is being undertaken by other neighbourhood plan groups in the county, to address water and energy efficient measures in existing properties. This could include promotion of water efficiency and measures such as rainwater harvesting.

- Water use and resilience

On water use, Anglian Water is currently consulting Local Planning Authorities on an updated Joint Water Efficiency Protocol drafted with the Environment Agency and Natural England. This will see a move towards a 100 litres per person standard in new homes as well as the introduction of Water Resource Assessments for major non- domestic development. That consultation closes on 23.2.24 and we would welcome comments both from the LPA perspective and from the LPA's experience in working with and considering how neighbourhood plan groups can utilise the Protocol.

I can confirm that AWS would want to be notified at the Reg 19 stage. I have copied in my new colleague Carry who will probably be picking up the neighbourhood plan function when she joins us later this month.

Please let me know if you require any clarification on the above points .



Darl Sweetland DMS, MRTPI
Spatial Planning Manager – Sustainable Growth



Pronounced: dahl-sweetlund (he/him)

Anglian Water Services Limited
Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire, PE29 6XU

Our Purpose

To bring environmental and social prosperity to the region we serve through our commitment to **love every drop.**

From: Nev Brown <[REDACTED]>
Sent: Thursday, December 7, 2023 3:36 PM
Subject: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

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Regards

Nev Brown

Senior Neighbourhood Planning Policy Officer

ORC 51 to 99



From: Hazel Smith <[REDACTED]>
Sent: 21 December 2023 11:13
To: Nev Brown
Cc: WL - Neighbourhood Plans
Subject: RE: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation
Attachments: Response CRTR-POL-2023-40560.pdf

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Hi Nev,

Please find attached the response of the Canal & River Trust to the above proposal.

Kind regards

Hazel Smith
MRTPI
Area Planner – Midlands

[REDACTED]

Please note that I do not usually work on a Monday.



Canal & River Trust
The Kiln, Mather Road, Newark, Notts. NG24 1FB
canalrivertrust.org.uk

Help #KeepCanalsAlive
Join our campaign...find out more www.canalrivertrust.org.uk/keepcanalsalive

Sign up for the Canal & River Trust e-newsletter canalrivertrust.org.uk/newsletter
<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

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Regards

Nev Brown
Senior Neighbourhood Planning Policy Officer



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Canal & River Trust is a charitable company limited by guarantee registered in England & Wales with company number 7807276 and charity number 1146792. Registered office address National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW.

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Mae Glandŵr Cymru yn gwmni cyfyngedig drwy warant a gofrestrwyd yng Nghymru a Lloegr gyda rhif cwmni 7807276 a rhif elusen gofrestredig 1146792. Swyddfa gofrestredig: National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW.





**Canal &
River Trust**

Making life better by water

West Lindsey District Council
Guildhall
Marshall's Yard
Gainsborough
Lincolnshire
DN21 2NA

Your Ref

Our Ref CRTR-POL-2023-40560

Thursday 21 December 2023

Dear Nev Brown,
Reepham Neighbourhood Plan

Thank you for your consultation on the above document.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded, and enhanced within an appropriate policy framework.

The River Witham is the Trust's nearest waterway to Reepham village at a distance of approximately 2km to the south. As such the Trust have no waterways, assets or land interests within the area covered by the document and so we have no comment to make.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Hazel Smith MRTPI
Area Planner - Midlands



<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

Canal & River Trust Planning Team

Canal & River Trust, National Waterways Museum, Ellesmere Port South Pier Road Ellesmere Port Cheshire CH65 4FW
T: 0151 355 5017 E: nationalwaterwaysmuseum@canalrivertrust.org.uk W: canalrivertrust.org.uk

Patron: H.R.H. The Prince of Wales. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792, registered office address National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW

From: Richard Horne <[REDACTED]>
Sent: 09 December 2023 17:35
To: WL - Neighbourhood Plans
Subject: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

Dear Sirs,

The Commercial Boat Operators Association (CBOA) represents water freight carriage by barge on the UK's inland and estuarial waterways and is accepted by the Government as the representative industry body.

The CBOA has an interest in promoting use of all waterways for carriage of freight by barge, to relieve road congestion and reduce exhaust emissions. This is particularly relevant where movement of materials is proposed for developments that are adjacent or near to waterways. This is in line with Government proposals for assisting reduction of road congestion for example in London. (See GPG 2122 - Planning for Freight on Inland Waterways <https://canalrivertrust.org.uk/media/library/1265.pdf>).

Although the Reepham Neighbourhood Plan appears to be not bordering the navigable river Witham, I would like to draw attention to the possible use of this waterway for the carriage of materials by barge to or from site, should this be appropriate where any development is concerned.

As a summary, the benefits of barge transport are:-

- Significant reduction of road congestion, where HGVs are a major issue in built up areas
- Lower risk of road accidents/fatalities, particularly where the general public are concerned
- Lower noise on highways
- Reduced highway wear and tear from HGVs, meaning lower long term highway maintenance costs
- Reduced potential damage to street furniture, kerbing etc when using local roads and turning into site
- Lower fuel consumption meaning reduction of the carbon footprint
- Lower exhaust emissions, meaning less air pollution in the district.

The stated Community Objective CO5, calls to "...encourage sustainable modes of transport...", we would assume that this should include freight carriage, to reduce emissions and road hazard as mentioned above.

I hope that this is of assistance in helping the definition of the Neighbourhood Plan.
Please contact me if you require any further information.

Yours faithfully,

Richard Horne.
Commercial Boat Operators Association (CBOA)

[REDACTED]

The CBOA is the prime trade organization involved in sustaining and promoting freight carriage on our waterways for economic and environmental reasons.

From: Christopher.Waldron [REDACTED]
Sent: 02 February 2024 14:01
To: WL - Neighbourhood Plans
Subject: 20240202_MOD_Safeguarding_Response_Reephm Neighbourhood Plan - Regulation 16 Submission Consultation
Attachments: 20231207_MOD_Response.pdf

DIO ref: 10055856_Rev1
Your ref: Reephm Neighbourhood Plan - Regulation 16 Submission Consultation

Dear Sir/Madam,

Please find attached my letter, confirming the safeguarding position of the Ministry of Defence, in respect of the above policy planning consultation

Kind Regards

Chris Waldron
Assistant Safeguarding Manager
St George's House | Defence Infrastructure Organisation Head Office |
DMS Whittington | Lichfield | Staffordshire | WS14 9PY

[REDACTED]



Website: www.gov.uk/dio/
Twitter: @mod_dio
Read DIO's blog <http://insidedio.blog.gov.uk/>



Defence
Infrastructure
Organisation

Christopher Waldron

Ministry of Defence

Safeguarding Department

DIO Head Office

St George's House

DMS Whittington

Lichfield

Staffordshire WS14 9PY

Your reference:
Reepham Neighbourhood Plan -
Regulation 16 Submission Consultation
Our reference:
10055856_Rev1



Nev Brown
Senior Neighbourhood Planning Policy Officer
West Lindsay District Council
Guildhall
Marshall's Yard
Gainsborough
Lincolnshire
DN21 2NA

2nd February 2024

Dear Nev,

It is understood that West Lindsey District Council are undertaking a regulation 16 submission consultation regarding Reepham Neighbourhood Plan. This document will guide the future development of the parish.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

Paragraph 101 of the National Planning Policy Framework (December 2023) requires that planning policies and decisions take into account defence requirements by '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' Statutory consultation of the MOD occurs as a result of the provisions of the Town

and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction.

Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above.

The MOD have an interest within the area covered by any Reepham Neighbourhood Plan, as it contains areas that are washed over by statutory safeguarding zones associated with RAF Waddington, located to the South of the Neighbourhood Plan area. These safeguarding zones are triggered by the height of development and the potential for environments that might attract those large and/or flocking bird species hazardous to aviation safety. Statutory safeguarding zones are designed to ensure that the MOD is consulted where development has the capacity to degrade or otherwise impact the operation and capability of MOD sites and assets

Those safeguarding zones triggered by development height serve to ensure that development does not intrude into, or form an obstacle within, the three-dimensional airspace above and surrounding an aerodrome. Within this airspace aircraft are likely to be at critical stages of flight, whether arriving at, or departing from an aerodrome. Statutory consultation ensures that the effect on protected airspace can be assessed and, if necessary, mitigated. In addition to permanent physical development within these zones, the use of cranes, piling rigs or other tall plant or equipment to implement development may also be of concern.

Birdstrike safeguarding zones have a radius of 12.87km and ensure that development that might increase birdstrike risk is identified and requirements for mitigation can be applied. Development that results in the creation of environments that might attract those large and/or flocking bird species that pose a hazard to aviation safety are a particular concern. This might include the introduction/provision of food sources or scavenging potential, or the creation of environments suitable for roosting or breeding. Examples of these developments may include landscaping schemes associated with large developments, the use of green and/or brown roofs, provision of roof gardens, or the creation of new waterbodies which may include sustainable drainage systems.

For your convenience, please find below a table which provides a summary of the safeguarding zones that would apply to each of the potential development sites identified and the forms of development that would trigger MOD consultation.

POTENTIAL DEVELOPMENT SITES	SAFEGUARDING ZONE(S) AFFECTED	POTENTIAL MOD SAFEGUARDING ASSESSMENT REQUIREMENTS
Site H1.1	RAF Waddington (height and birdstrike safeguarding zones)	Development of or exceeding 91.4m in height above ground level will trigger statutory consultation requirement
Site H1.2	RAF Waddington (height and birdstrike safeguarding zones)	Development of or exceeding 91.4m in height above ground level will trigger statutory consultation requirement
Site H1.3	RAF Waddington (height and birdstrike safeguarding zones)	Development of or exceeding 91.4m in height above ground level will trigger statutory consultation requirement

In addition to the safeguarding zones identified, the MOD may also have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to:

- Solar PV development which can impact on the operation and capability of communications and other technical assets by introducing substantial areas of metal or sources of electromagnetic interference. Depending on the location of development, solar panels may also produce glint and glare which can affect aircrew or air traffic controllers.
- Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of 2m or more; and,
- Any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft.

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely

C Waldron

Chris Waldron
DIO Assistant Safeguarding Manager

From: Milson, Simon <[REDACTED]>
Sent: 18 December 2023 17:11
To: WL - Neighbourhood Plans
Cc: Gildersleeves, Mike (BBC); Plan, Local
Subject: RE: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation elsw ELMG

Good afternoon

Thankyou for the consultation on the Reepham Neighbourhood Plan. I have had chance to review the related documents, albeit this has not been an indepth review. I am responding on behalf of East Lindsey District Council.

It is noted that Reepham Parish is largely rural and is separated from East Lindsey boundaries by further Parishes within West Lindsey. The closest major settlement within EL is Wragby. Reepham contains one main settlement classed as 'Medium' in the Central Lincs Plan. The Census 2021 puts the parish population at 619. It is noted that the housing requirement is identified at 54, nett 44, over the next 20 year period. 3 small sites are proposed to be allocated to cover this. There do not appear to be any commercial allocations or other major areas of growth proposed.

Given the modest size of the Parish, low level of growth of the NDP period and the overall relationship with East Lindsey, any impacts on the District are likely to be inconsequential.

Regards

Simon

Simon Milson
(he/him/his)
Planning Policy and Research Service Manager

[REDACTED]

From: Customer Contact <[REDACTED]>
Sent: 12 December 2023 15:57
To: Milson, Simon <[REDACTED]>
Subject: FW: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation elsw ELMG

Good Afternoon,

ICT have confirmed the below email is for your attention

Many Thanks,

Michelle

Customer Contact
Public Sector Partnership Services Ltd

 [REDACTED]
 [REDACTED]
 [REDACTED]
 [REDACTED]

From: Nev Brown <[REDACTED]>
Sent: 07 December 2023 15:36
Subject: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation elsw ELMG

Dear Consultee,
Reepham Parish Council has submitted its Reepham Neighbourhood Plan (the Plan) and supporting documents to West Lindsey District Council (WLDC) in accordance with Regulations 15 and 16 of the Neighbourhood Planning (General) Regulations 2012.

WLDC is now inviting comments on the submitted Plan and you are being notified as a consultee. The Plan and its supporting documents are available from:

[Reepham NP](#)

The consultation period is until 2 February 2024.

All comments on the Plan should be made in writing and sent to:

Email: [neighbourhoodplans@\[REDACTED\]](mailto:neighbourhoodplans@[REDACTED])

Post: Neighbourhood Planning, Guildhall, Marshall's Yard, Gainsborough, Lincs, DN21 2NA.

If you require assistance accessing the documents, please call WLDC's customer services on (01427) 676676.

When making your comments please indicate if you wish to be notified of WLDC's decision on the Plan under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.

If you would like to know more about how WLDC uses your data in respect of the Plan's consultation, what your rights are and how to contact us if you have any concerns, please read our privacy notice:

[Privacy](#) | [Public Sector Partnership Services Ltd](#)



Regards

Nev Brown

Senior Neighbourhood Planning Policy Officer

OCR 2 to 50



Guildhall | Marshall's Yard | Gainsborough | Lincolnshire | DN21 2NA 01427 676676

Public Sector Partnership Services Limited (PSPS) is a Local Authority Trading Company, wholly owned by East Lindsey District Council, South Holland District Council and Boston Borough Council in Lincolnshire. PSPS delivers services to and on behalf of the three District Councils. Registered Company details: Public Sector Partnership Services Limited, 2 New Bailey, 6 Stanley Street, Salford, Greater Manchester M3 5GS Registered in England, Number – 07289357 Confidentiality: This e-mail and its attachments are intended for the above named only and may contain confidential and privileged information. If you are not the intended recipient or the person responsible for delivering the email to the intended recipient, be advised that you have received this email in error and that any use, dissemination, forwarding, printing, or copying of this email is strictly prohibited. If you have received this email in error, please notify the sender. The views expressed in this message are my own, and any negotiations by email are subject to formal contract. Any correspondence with the sender will be subject to automatic monitoring for inappropriate content. Your information will be processed in accordance with the law, in particular current Data Protection legislation. If you have contacted Public Sector Partnership Services for a service then your personal data will be processed in order to provide that service or answer your enquiry. For full details of our Privacy Policy and your rights please go to our website at <https://www.pspsl.co.uk/privacy>. The information that you provide will only be used for Company purposes unless there is a legal authority to do otherwise. The contents of e-mails may have to be disclosed to a request under the Data Protection Act and

the Freedom of Information Act 2000. [_____]



From: LN Planning <[REDACTED]>
Sent: 29 January 2024 15:54
To: WL - Neighbourhood Plans
Cc: Nev Brown
Subject: RE: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation
Attachments: EA comments Reepham Neighbourhood Plan Reg 16.pdf

CAUTION: External email, think before you click!

Please see the attached response to the Regulation 16 consultation for the Reepham Neighbourhood Plan.

Please contact me if I can be any further assistance.

Kind regards,

Emily Fisher
Planning Advisor

Environment Agency | Sustainable Places | Lincolnshire and Northamptonshire Area
✉ [Environment Agency, Nene House, Pytchley Lodge Road Ind Est, Pytchley Road, Kettering, NN15 6JQ](#)

From: Nev Brown <[REDACTED]>
Sent: Thursday, December 7, 2023 3:36 PM
Subject: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

Dear Consultee,

Reepham Parish Council has submitted its Reepham Neighbourhood Plan (the Plan) and supporting documents to West Lindsey District Council (WLDC) in accordance with Regulations 15 and 16 of the Neighbourhood Planning (General) Regulations 2012.

WLDC is now inviting comments on the submitted Plan and you are being notified as a consultee.

The Plan and its supporting documents are available from:

[Reepham NP](#)

The consultation period is until 2 February 2024.

All comments on the Plan should be made in writing and sent to:

Email: [neighbourhoodplans@\[REDACTED\]](mailto:neighbourhoodplans@[REDACTED])

Post: Neighbourhood Planning, Guildhall, Marshall's Yard, Gainsborough, Lincs, DN21 2NA.

If you require assistance accessing the documents, please call WLDC's customer services on (01427) 676676.

When making your comments please indicate if you wish to be notified of WLDC's decision on the Plan under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.

If you would like to know more about how WLDC uses your data in respect of the Plan's consultation, what your rights are and how to contact us if you have any concerns, please read our privacy notice:

[Privacy Notice](#)

Regards

Nev Brown
Senior Neighbourhood Planning Policy Officer

DM2 -50



Guildhall | Marshall's Yard | Gainsborough | Lincolnshire | DN21 2NA 01427 676676

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FAO: Nev Brown
West Lindsey District Council
Development Policy
Marshalls Yard
Gainsborough
DN21 2NA

Our ref: AN/2007/101718/OT-
45/SB1-L01

Your ref:

Date: 29 January 2024

Dear Nev

Reepham Neighbourhood Plan Review – Regulation 16 Submission Consultation

Thank you for consulting us on the Reepham Neighbourhood Plan Regulation 16 Submission. We have reviewed the Neighbourhood Plan and can confirm that it raises no concerns for us. However we would like to update and add to the previous comments we made on our letter referenced 'AN/2007/101718/OT-37/SB1-L01' (dated 19 August 2022), which was in response to the Regulation 14 consultation.

Flood Risk

There is a small section of Flood Zone 2 and 3 which protrudes down the ordinary watercourse into Reepham. We note this is recognised in paragraph 2.4 of the Neighbourhood Plan where it is stated 'The Reepham Beck is the only watercourse within the Parish that presents a flood risk. The Beck and immediate area alongside to the North and East of Reepham is included within Flood Zone 3 with isolated periphery areas reducing to Flood Zone 2. Whilst this area would clearly not be suitable development, the vast majority of Reepham Parish is in Flood Zone 1 and therefore unaffected by environmental flooding risk'.

Whilst we recognise these comments are addressing the flood risk, they do not guarantee that land in Flood Zone 2 or 3 will not be considered for development. As advised in our letter of 19 August 2022, in accordance with the National Planning Policy Framework (NPPF) paragraphs 165-171, we remind you that the Sequential and/or Exception Test should be undertaken if the Plan is proposing development or promoting growth to ensure development is directed to the areas of lowest flood risk. The application of the Sequential Test should be informed by the Local Planning Authority's Strategic Flood Risk Assessment (SFRA). It is important that the Plan also considers whether the flood risk issues associated with any proposed development can be safely managed to ensure development can come forward. Without this understanding the Plan is unlikely to be compliant with the NPPF.

Ground conditions

NPPF paragraph 180 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected

by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 189). The Plan boundary is underlain by a sequence of bedrock strata comprising, from west to east across the Parish, the Blisworth Clay Formation, Cornbrash Formation (limestone), Kellaways Formation (sandstone, siltstone and mudstone) and the Oxford Clay Formation. The Cornbrash Formation and Kellaways Formation are classified as a Secondary A Aquifers, with the Blisworth and Oxford Clays classified as Unproductive Strata. A band of superficial Alluvial deposits are mapped along the approximate course of the Beck, which is also classified as a Secondary A aquifer. Secondary Aquifers are often capable of supporting water supplies at a local scale and normally provide an important source of flow to some rivers.

We encourage the inclusion of this information on ground conditions, as background information of the Neighbourhood Plan.

Source protection zones

The Plan includes areas which are located on Source Protection Zones. These should be considered within your Plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be seen with reference to our Groundwater Protection guidance:

<https://www.gov.uk/government/collections/groundwater-protection>

The far western extent of the Parish lies within a Source Protection Zone (SPZ) 2, relating to groundwater abstractions located approximately 3 to 4 km to the south of Reepham. SPZs are used for the purpose of protecting groundwater sources used to supply drinking water, with the zones showing the level of risk to the groundwater sources from pollution. Further information on groundwater SPZs can be found at

<https://www.gov.uk/guidance/groundwater-source-protection-zones-spzs>

Groundwater

A groundwater abstraction is located to the north-east of Reepham village at National Grid Reference (NGR) TF04557485 for the purpose of process water for industrial, commercial and public services. The use of groundwater in the area makes parts of the area vulnerable to pollution from certain types of development. We would like to refer the applicant/enquirer to our groundwater position statements in 'The Environment Agency's approach to groundwater protection', available from gov.uk. This publication sets out our position for a wide range of activities and developments, including:

- Waste management
- Discharge of liquid effluents
- Land contamination
- Ground source heat pumps
- Cemetery developments
- Drainage

We are able to provide further advice on protecting groundwater, including guidance on the use of SuDS.

We recommend that developers should:

- Follow the risk management framework provided in <https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm>, when dealing with land affected by contamination
- Refer to our <https://www.gov.uk/government/collections/land-contamination-technical-guidance> for the type of information that we require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health
- Consider using the National Quality Mark Scheme for Land Contamination Management (<https://www.claire.co.uk/projects-and-initiatives/nqms>) which involves the use of competent persons to ensure that land contamination risks are appropriately managed
- Refer to the Contaminated land pages (<https://www.gov.uk/contaminated-land>) on gov.uk for more information

Contaminated land on source protection zones

A small (c. 0.5 ha) historic landfill site is located in the far south-western corner of the parish, to the rear of 41-43 Hawthorn Road at NGR TF0190073200. It is understood that this landfill was licensed to accept inert waste between 1985 and 1992.

The Plan includes historical landfill located on Source Protection Zones. If considering the redevelopment of this land, we recommend that developers:

- Follow the risk management framework provided in CLR11, Model Procedures for the Management of Land Contamination (<https://www.gov.uk/government/collections/land-contamination-technical-guidance>) when dealing with land affected by contamination.
- Refer to the Environment Agency Guiding Principles for Land Contamination (<https://www.gov.uk/government/collections/land-contamination-technical-guidance>)
- for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, such as human health.
- Refer to the Anglian River Basin Management Plan (<https://www.gov.uk/government/collections/river-basin-management-plans-2015#anglian-river-basin-district-rbmp:-2015>) or Humber River Basin Management Plan (<https://www.gov.uk/government/collections/river-basin-management-plans-2015>).
- Refer to our website at <https://www.gov.uk/government/organisations/environment-agency> for more information.

Piling

Piling or any other foundation designs / investigation boreholes / tunnel shafts / ground source heating and cooling systems using penetrative methods can result in risks to potable supplies from, for example, pollution / turbidity, risk of mobilising contamination, drilling through different aquifers and creating preferential pathways. Thus it should be demonstrated that any proposed piling will not result in contamination of groundwater.

Wastewater infrastructure

As previously highlighted in our letter of 19 August 2022 at the Regulation 14 stage of the Plan, we would like to advise you of early consultation with Anglian Water Services to determine whether there is (or will be prior to occupation) sufficient infrastructure capacity existing for the connection, conveyance, treatment and disposal of quantity and quality of water associated with any proposed development within environmental limits of the receiving watercourse.

We note that Reepham, Cherry Willingham and Sudbrook are served by the same, relatively small sewage treatment plant. The cumulative growth impacts of these developments on the Reepham Water Recycling Centre capacity will need to be considered.

The only reference in the plan to sewage treatment infrastructure is Policy 3. We would advise that this is mentioned elsewhere in the Neighbourhood plan, to ensure there is no occupation of new buildings until Anglian Water can confirm capacity in both the sewage network and WRC to be able to cope with the foul drainage from them.

Related to this, we note from the June 2023 Consultation Statement that accompanies the Neighbourhood Plan that Anglian Water were consulted at the Regulation 14 stage but they do not appear to have replied. We would advise you to consult them again to ensure comments are received this time.

In addition, consideration to the Water Framework Directive (WFD) is advised in the Neighbourhood Plan, this would be beneficial in aiding enhancement of the environment.

Water efficiency

Central Lincolnshire lies within the East Midlands area of serious water stress where drought is a cause for concern. In view of this, we welcome Criterion 3 of Policy 2 (Design of New Development) which supports minimising water consumption and maximising water recycling in new developments. However, we consider this should explain further about what targets there are and how this should be achieved. This should be in line with Policy S12 of the Central Lincolnshire Local Plan, which says 'To minimise impact on the water environment all new dwellings should achieve the Optional Technical Housing Standard of 110 litres per day per person for water efficiency as described by Building Regulation G2. Proposals which go further than this (to, for example, 85 litres per day per person) would be particularly supported'. Policy S21 of the same Plan also references 110 litres, further supporting this requirement for new development. In addition, paragraph 3.7.11. of the text prior to Policy S21 says water efficiency can be achieved through the installation of water efficient toilets, showers and taps.

Biodiversity

We welcome the inclusion of Policy 12 (Environmental Policies), in particular the aim for proposals to exceed the minimum percentage requirement of the NPPF for biodiversity net gain. Additionally, we support Policy 15 (Funding provision to meet the needs of our growing community), which aims to prioritise creating, extending and improving green corridors to increase biodiversity.

It is recommended that extracts of the above information are included and used as background information to inform the policies within the Neighbourhood Plan.

We would like to be notified by the Local Planning Authority of the decision on the Neighbourhood Plan under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me using the details below.

Yours sincerely

Miss Emily Fisher
Planning Advisor



From: greetwellparishcouncil [REDACTED]
Sent: 15 January 2024 12:21
To: Nev Brown
Subject: RE: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

CAUTION: External email, think before you click!

Dear Nev

Greetwell Parish Council has no comments to make on the Reepham NP.

Regards

Christine Myers CILCA
Clerk to Greetwell Parish Council

[REDACTED]

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From: Nev Brown <[REDACTED]>
Sent: 07 December 2023 15:37
Subject: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

Dear Consultee,
Reepham Parish Council has submitted its Reepham Neighbourhood Plan (the Plan) and supporting documents to West Lindsey District Council (WLDC) in accordance with Regulations 15 and 16 of the Neighbourhood Planning (General) Regulations 2012.

WLDC is now inviting comments on the submitted Plan and you are being notified as a consultee. The Plan and its supporting documents are available from:

[Reepham NP](#)

The consultation period is until 2 February 2024.

All comments on the Plan should be made in writing and sent to:

Email: [neighbourhoodplans@\[REDACTED\]](mailto:neighbourhoodplans@[REDACTED])

Post: Neighbourhood Planning, Guildhall, Marshall's Yard, Gainsborough, Lincs, DN21 2NA.

If you require assistance accessing the documents, please call WLDC's customer services on (01427) 676676.

When making your comments please indicate if you wish to be notified of WLDC's decision on the Plan under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.

If you would like to know more about how WLDC uses your data in respect of the Plan's consultation, what your rights are and how to contact us if you have any concerns, please read our privacy notice:

[Privacy Notice](#)

Regards

Nev Brown
Senior Neighbourhood Planning Policy Officer

NPCs



Guildhall | Marshall's Yard | Gainsborough | Lincolnshire | DN21 2NA 01427 676676



From: Guy Hird <[REDACTED]>
Sent: 24 January 2024 10:08
To: WL - Neighbourhood Plans
Subject: FW: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

TE-4643-2019-PLN

Dear Sir/Madam

Reepham Parish Council has submitted its Reepham Neighbourhood Plan (the Plan) and supporting documents to West Lindsey District Council (WLDC) in accordance with Regulations 15 and 16 of the Neighbourhood Planning (General) Regulations 2012.

Thank you for the opportunity to comment on the above Neighbourhood Plan. Reepham Parish is partly within Witham Third District Internal Drainage Board area.

The Board has no further comments on the Plan at this stage of the process.

Regards

Guy Hird
Planning and Consents Officer
Normal working days are Tuesday, Wednesday and alternate Thursdays.

We have Engineering vacancies: <https://witham3idb.gov.uk/notices-ads/>

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planning@witham3idb.gov.uk
consents@witham3idb.gov.uk

Witham First District Internal Drainage Board
Witham Third District Internal Drainage Board
Upper Witham Internal Drainage Board
North East Lindsey Drainage Board

Witham House,
Meadow Lane
North Hykeham,
LINCOLN,
LN6 9QU (for sat nav use LN6 9TP)
Tel: 01522 697123

Four independent statutory Land Drainage and Flood Risk Management Authorities working in partnership.

www.witham3idb.gov.uk

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From: Nev Brown <[REDACTED]>
Sent: Thursday, December 7, 2023 3:33 PM
Subject: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

Dear Consultee,

Reepham Parish Council has submitted its Reepham Neighbourhood Plan (the Plan) and supporting documents to West Lindsey District Council (WLDC) in accordance with Regulations 15 and 16 of the Neighbourhood Planning (General) Regulations 2012.

WLDC is now inviting comments on the submitted Plan and you are being notified as a consultee.

The Plan and its supporting documents are available from:

[Reepham NP](#)

The consultation period is until 2 February 2024.

All comments on the Plan should be made in writing and sent to:

Email: [neighbourhoodplans@\[REDACTED\]](mailto:neighbourhoodplans@[REDACTED])

Post: Neighbourhood Planning, Guildhall, Marshall's Yard, Gainsborough, Lincs, DN21 2NA.

If you require assistance accessing the documents, please call WLDC's customer services on (01427) 676676.

When making your comments please indicate if you wish to be notified of WLDC's decision on the Plan under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.

If you would like to know more about how WLDC uses your data in respect of the Plan's consultation, what your rights are and how to contact us if you have any concerns, please read our privacy notice:

[Privacy Notice](#)

Regards

Nev Brown

Senior Neighbourhood Planning Policy Officer

DM51 to 98



Guildhall | Marshall's Yard | Gainsborough | Lincolnshire | DN21 2NA 01427 676676

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From: Ollie Clawson <[REDACTED]>
Sent: 12 January 2024 13:19
To: WL - Neighbourhood Plans
Subject: Reepham Neighbourhood Plan - Regulation 19 Consultation (MGO85/1)
Attachments: Regulation 19 Consultation Representations - 12.01.24.pdf

Good morning,
Please find attached representations submitted on behalf of my client, M Good & Son Ltd, in relation to the above.
Should you have any queries or require anything further in respect of the attached, please do not hesitate to get in touch.
Kind regards,
Ollie
Ollie Clawson
Associate

Knights
[REDACTED]
[REDACTED]
[REDACTED]

Knights

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Neighbourhood Planning
West Lindsey District Council
Guildhall
Marshall's Yard
Gainsborough
DN21 2NA

Dear Sir/Madam,

Reepham Neighbourhood Plan 2023-2043 – Regulation 19 Consultation Draft

I write with regard to the above Reepham Neighbourhood Plan Submission Draft document (**NP Draft**) which was published on 8 December 2023, in order to set out the representations made by my client, M Good & Son Ltd (**Client**), in line with Regulation 19 of the Neighbourhood Planning Regulations 2012 (as amended) (**Regulation 19 stage**).

The representations detailed within this letter follow on from those made on behalf of my Client at the Regulation 14 consultation stage (by way of a letter to the Reepham Neighbourhood Plan Steering Group (**RNPSG**) dated 24 August 2022) and account for the response provided by the RNPSG via Mr George Backovic dated 15 September 2022. As is reflected in the submissions which follow, it is appreciated that both the local planning context and indeed the status of one of my Client's sites has altered following that previous correspondence but, notwithstanding that fact, it is respectfully requested that the submissions submitted at the Regulation 19 stage are read alongside those previously presented at the Regulation 14 stage. A copy of the representations submitted at the Regulation 14 stage is included at **Appendix 1**, with the response provided by the RNPSG included at **Appendix 2**.

It is noted that the local planning authority (**LPA**) is not required to consider whether the NP Draft meets the '*basic conditions*' at the Regulation 19 stage¹ and that this is a matter for the Inspector(s) appointed by the Secretary of State to consider. It is respectfully requested that these representations are submitted to the Inspector for consideration and are

¹ As per Paragraph 053 Reference ID 41-053-20140306 Revision date 06 03 2014 of the Planning Policy Guidance

BY EMAIL

Date

12 January 2024

Our Reference

OCLA1/MGO85/1

Your Reference

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likewise considered by the LPA when considering any recommendation(s) made by the Inspector.

Schedule 4B, Section 61E of the Localism Act (2011) establishes that:

(2)A draft [Neighbourhood Development] order meets the basic conditions if—

(a)having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,

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

(c)having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,

(d)the making of the order contributes to the achievement of sustainable development,

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

(f)the making of the order does not breach, and is otherwise compatible with, EU obligations, and

(g)prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.

It is appreciated that the Basic Conditions Statement forms part of the NP Draft submission and, within which, the RNPSG specifies that it considers the NP Draft to be in general conformity with the provisions of both the National Planning Policy Framework (revised 2023) (**NPPF**) and the Central Lincolnshire Local Plan (adopted 2023) (**CLLP**). It is respectfully suggested by my Client – as detailed in further detail below – that this is not the case.

I would note that my Client, being a family-run agricultural business, has resided within and farmed the land around the village of Reepham for generations. My Client owns a number of sites in and around the village and, for clarity, has previously submitted the following sites for consideration as potential allocations within the NP Draft:

- CL3082 – Site of Hawthorn Road next to Village Hall;
- CL3083 – Behind Cricket Field; and,

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- CL3084 – Farm Yard site.

The 'Farm Yard site' (Ref: CL3084) has, in the period between the Regulation 14 consultation stage and the time of writing, been granted full planning permission for the erection of 8 no. dwellings (Ref: 145047). This is acknowledged within the NP Draft and, accordingly, Map 5A amends the proposed settlement edge to account for the fact that the 'Farm Yard site' clearly forms part of the village footprint.

However, the NP Draft does not – at Map 4 – include the Farm Yard site within the '*Current settlement edge of Reepham Village*'. Whilst it is appreciated that the CLLP's glossary (and indeed its predecessor the 2017 CLLP) excludes "*Agricultural buildings and associated land*" on the edge of a settlement from the definition of the 'developed footprint', the NP Draft's decision to exclude the Farm Yard site from the current settlement edge is entirely inconsistent with the conclusions drawn by Inspector Chamberlain in determining planning appeals APP/N2535/W/19/3221725 & APP/N2535/W/19/3225861. The decisions associated with each of the above planning appeals are available on both the Planning Inspectorate and West Lindsey District Council's website, and quite clearly state that (emphasis added):

"The existing farmyard at the appeal site reads as part of the line of development along the northern side of The Green and is therefore physically part of the village."

The above appeal decision was issued in December 2020 and, as previously noted, is a publicly available document. This was raised to the RNPSG's attention at the Regulation 14 stage but, regrettably, the NP Draft recently submitted seemingly takes no account of the detailed assessment carried out by Inspector Chamberlain. Indeed, in determining planning application 145047, LPA officers confirm that Inspector Chamberlain's conclusions form a "*material planning consideration*", stating that:

"The definition of "appropriate locations" reflects that of the previous iteration of the CLLP as does the definition of developed footprint" and it is acknowledged that this does not include "agricultural buildings and associated land on the edge of the settlement; This was also before the Inspector who in dismissing the appeal made the finding that "The existing farmyard... at the appeal site reads as part of the line of development along the northern side of The Green and is therefore physically part of the village". This is considered a material planning consideration as set out in S4 above."

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The NP Draft fails to provide any reasoned justification as to why it has failed to account for the guidance provided by Inspector Chamberlain, nor why it does not consider the 'Farm Yard site' to be physically part of the village. Given the above, it is respectfully suggested that Map 4 of the NP Draft is inconsistent with the position set out by Policy S4 of the CLLP and must be revised to include the land which has recently been granted full planning permission at the 'Farm Yard' within the current settlement edge of the village.

Moving on from the above, my Client is also concerned by the proposed residential allocation of Sites H1.1 and H1.3 within the NP Draft. Those concerns remain consistent with those set out within the letter submitted during the Regulation 14 consultation stage but, fundamentally, are founded on the fact that the allocation of such land is entirely inconsistent with the approach espoused by the CLLP, which explicitly excludes "*agricultural buildings and associated land on the edge of the settlement*" from the definition of the 'developed footprint' of the village.

Whilst it is appreciated that the RNPSG's response to my Client's Regulation 14 submission (dated 15 September 2022) seek to justify those proposed allocations on the basis that "*additional criteria*" has been taken into consideration in considering development beyond the current shape and form the village. The RNPSG's response goes on to state that the "*sites in this particular location have received the greatest number of positive comments and continue the direction of the most recent multi-plot development in Reepham*". Whilst this may well be the case, it is nevertheless considered that the proposed allocation of these parcels of land would result in a disjointed and visually unpleasant edge to the village when viewed from both the west and south. The 'positive comments' in respect of these proposed allocations must form only part of the assessment process; which must also consider the likely visual amenity impact of the development of this parcel of land. Indeed, in doing so, weight must be afforded to the fact that the *Reepham Neighbourhood Plan Site Assessment* (March 2019) prepared by AECOM (*AECOM Assessment*) discounted these sites from its assessment process, commenting that:

"The site, if developed, would more than double the size of the village, which is contrary to the NPPF Paragraph 127 c) and d)². Therefore, the site is not suitable based on national and local policy".

This is reaffirmed by the fact that *Appendix D – Draft Methodology for site selection* confirms that the local community has, through previous consultation processes, expressed "*prioritised level of support for*

² Paragraph 127 c) and d) is now Paragraph 135 c) and d) within the most recent iteration of the NPPF

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development locations". The two development locations preferred the most by local residents were:

- *Conversion of agricultural buildings (79%)*
- *On brownfield sites (75%)*

Indeed, 69% of respondents also noted that "*sites within Reepham Village footprint*" would be preferred.

Comparatively, only 41% of respondents stated they would wish to see future development "*On Greenfield sites outside the existing village*". Both sites H.1.1 and H1.3 are greenfield sites located outside of the existing village, and as such those proposed allocations can only be considered to be inconsistent with the majority of the respondent's wishes for future sustainable growth of Reepham.

It is acknowledged that the proposed allocations H1.1 and H1.3 are of a smaller size than the portion of land considered by AECOM above but, nevertheless, the conclusion remains that the proposed allocation of H1.1 and H1.3 would be fundamentally contrary to Paragraph 135 of the NPPF and the NP Draft must be revised to account for this.

Notwithstanding the above, the proposed allocation of H1.1 and H1.3 would result in a number of undeveloped parcels of land to the north of those respective draft allocations. Whilst it is noted that the RNPSG's response suggests that those parcels of land would potentially comprise future infill development plots, there is no guarantee that any such land would ever come forward for development (indeed it is noted that Lincolnshire County Council has confirmed it is not interested in relocating the village primary school to one of those plots, as asserted by the RNPSG's response). Rather, those parcels of land could quite realistically be left physically vacant and, as such, would serve as a physical 'break' between the existing built form of the village and the proposed residential allocations further south. This would result in a wholly discordant form of development which is fundamentally contrary to the position espoused by both the NPPF and CLLP Policy S53 – the latter of which seeks to ensure that (emphasis added):

"All development, including extensions and alterations to existing buildings, must achieve high quality sustainable design that contributes positively to local character, landscape and townscape, and supports diversity, equality and access for all".

CLLP Policy S53 goes on to advise that all development proposals will be expected to:

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“Relate well to the site, its local and wider context and existing characteristics including the retention of existing natural and historic features wherever possible and including appropriate landscape and boundary treatments to ensure that the development can be satisfactorily assimilated into the surrounding area”.

It is my Client’s opinion that the proposed allocation of sites H1.1 and H1.3 regrettably fails to do align with the provisions of Policy S53.

Leading on from the above, my Client notes that the land associated with Leigh Farm and Dairy Farm is identified by Map 3 of the NP Draft as “*Rural Farms and businesses*”, albeit the same description is not afforded to the land associated with my Client’s farm located to the north of the village. Despite this, some of the land associated with Reepham Manor is identified as a ‘Rural farm and business’ and, accordingly, it is respectfully suggested that Map 3 is revised to ensure that this is an accurate representation of size and nature of the rural farms and businesses located in and adjacent to the village.

My Client is also concerned as to the accuracy of the information upon which the NP Draft is based upon. Whilst it is appreciated that the NP Draft does quite rightly seek to preserve and enhance, wherever possible, the inherent character and special qualities of the conservation area, it is not considered that the *Mitigated site assessment’s* adopted approach of ‘marking-down’ any sites within the conservation area is appropriate. Indeed, this fails to recognise the NPPF’s desire to ensure that decisions relating to proposals which may impact upon the historic environment take into account “*the desirability of new development **making a positive contribution** to local character and distinctiveness*” (emphasis added). The approach adopted by the NF Draft runs counterintuitively to the position set out by the NPPF and, rather concerningly, implies that *any* development within the conservation area is inherently inappropriate. A different assessment process which is more consistent with the aspirations of central Government may have led to further ‘points’ being awarded to alternative sites which may well contribute far more positively to local place-making than the currently proposed allocated development sites appear to do.

The above should be borne in mind when considering the NP Draft’s assessment of the land behind the cricket field (CL3083). Indeed, the comments received from West Lindsey District Council’s planning department with regard to this site states that:

“Part of the site lies in Reepham conservation area and the rest lies alongside it. Any development proposal on

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the site should conserve or enhance the character and appearance of the Reepham conservation area.”

It is relevant to note that whilst the access route to this site is located within the conservation area, the majority of this site is in fact located outside of the conservation area. Despite this, the NP Draft site assessment affords this site the lowest possible score of ‘0’ for not only its potential conservation area impact, but also its ‘Character Area impact’ and ‘Heritage impact’. Notwithstanding the fact that one could question quite why three naturally inter-related matters have been subdivided into three separate criteria against which sites are assessed, the conclusions reached on each of these topics (reproduced below) appear to be somewhat premature given the **indicative** nature of the material submitted for consideration. In turn, the NP Draft site assessment states:

<i>Criteria</i>	<i>Source</i>	<i>R/A/G</i>	<i>Justification</i>	<i>Score</i>
<i>Conservation area impact</i>	<i>Questionnaire/Statutory</i>	<i>R</i>	<i>Impact on NE quadrant of CA</i>	<i>0</i>
<i>Character area impact</i>	<i>Character area checklist</i>	<i>R</i>	<i>Character area and its connection with the countryside will be heavily impacted.</i>	<i>0</i>
<i>Heritage impact</i>	<i>Questionnaire/Statutory</i>	<i>R</i>	<i>Key part of the heritage and setting of landmark buildings and views. Located in the NE quadrant of conservation area.</i>	<i>0</i>

Table 1: NP Draft mitigated site assessment extract

No sustained justification of the extent of the ‘impact’ suggested above is provided by the NP Draft. Similarly, no such reasoning is provided to support the NP Draft site assessment’s commentary in respect of the ‘In/Out views impact’, which states that “*Views of the landmark buildings in the consideration area would also be lost*”. The NP Draft subsequently affords the land to the rear of the cricket field a score of ‘0’ in this category also.

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Whilst the concerns previously set out within this representation with regard to the NP Draft's implication that '*any development within the conservation area is inherently inappropriate*' are once again relevant, and are stress with regard to the above, it is alarming that such a conclusion has been reached with regard to site CL8083 despite the indicative nature of the material submitted as part of the NP Draft assessment process. Any future development proposal for this site would of course be robustly prepared and justified through a sufficient assessment of any application's likely impact upon the surrounding historic environment. Any assessment can only reasonably be made once formal development proposals have been prepared, as any conclusions reached with regard to that *likely* impact beforehand could only be deemed to be premature. The same conclusion must be reached in respect of the assessment made by the NP Draft.

Similarly, my Client would further call into question the NP Draft assessment's comments in terms of the 'In/Out views impact' which notes that "*Valued views across open countryside to the wolds and the Limewoods would be lost*". Again, such an assessment is premature and does in any case seem to disregard the fact that a 12ft high (approx.) hedgerow exists on site and currently prevents any such views in any case. Whilst it is noted that the RNPSG's response suggests that views can be provided over the field gate access and through the hedgerow at certain times of the year, it is not unreasonable to categorise any such views as 'glimpse' views across that particular site. Equally, it is not unreasonable – at this initial stage – to suggest that any form of development could be designed in such a manner to preserve (or indeed open up) any key glimpses through the site (which is, in any case, a privately owned and maintained field). Accordingly, it must be questioned quite why the NP Draft ascribes this site a score of '0', given that no such views would necessarily be lost as a result of any future development of the site.

With regard to the NP Draft's Important Views, it is noted that paragraph 1.3 states that:

"View from The Green affords two views to open countryside around the entrance to Good's Farm, both through the Hollow to the lime woods..."

Moreover, the NP Draft refers to the 'Hollow' as an important Open Space, describing this as:

"The remains of a sunken way towards Barlings, running between the cricket pitch and Reepham Manor boundary, the Hollow provides a valuable and attractive open space with wild flowers, and mature tree cover. Whilst always privately owned in the last 12 years it has been closed off with a gate, but the view through it is still

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enjoyable from the corner of Smooting Lane and The Green.”

My Client would note that this route was cut out as a farm track to enable access to the field behind and, as far as they are aware, there is no historical significance to this route nor is it the ‘remains of a sunken way towards Barlings’ as suggested by the NP Draft. Whilst it is appreciated that the NP Draft seeks to preserve the view and openness of this route, my Client considers it disingenuous to suggest that the value of this short section of land holds any historical significance.

My Client also has significant concern with regard to the means in which matters of highways, access and parking have also been utilised to further negatively score this submission. The Draft NP assessment offers the following comments on such matters:

“Questionable access. The site with poorest access.”

And,

“The site location gained the most negative comments by community”.

It would appear that the entirety of the assessment made in this regard is based upon the subjective assessment(s) of local residents. Whilst it should be stressed that my Client appreciates that such local knowledge and insight can be very useful in advising of any potential highways-related issues locally, the NP Draft's decision to cast judgment over such matters without the benefit of any quantitative data must be questioned. Any potential future development proposal would of course be supported by a detailed assessment of the likely impact of any such development on the local public highway network, as prepared by a suitably qualified consultant. To utilise the assumed highways impact as a means of determining which sites may be suitable for development does, once again, appear to be wholly premature. Accordingly, my Client would suggest that a scoring matrix which is more appropriate for the initial nature of the potential development sites submitted for assessment may have resulted in this site being considered more favourably.

The prematurity of the NP Draft assessment can also be raised in respect of the ‘Affordable/ mixed housing provision’ against which potential development sites are considered. With regard to the land to the rear of the cricket field, the NP Draft site assessment simply states that there is “*None identifiable*” and as such a score of ‘0’ is awarded. Again, the material submitted in support of this potential allocation was indicative only and would be refined and finalised should any future development be pursued for this site. Any such submission would be prepared in consistency with the relevant national and local planning policy requirements and so to suggest

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that any such development would fail to provide an affordable housing contribution is, at this stage, entirely inappropriate.

It is also relevant to note my Client's concerns in respect of the assessment of the site adjacent to the Village Hall at Hawthorne Road (CL3082). That site is afforded a score of '0' in respect of any potential 'Community Benefit' associated with the development of this site. This seemingly fails to recognise the considerable provision of land (amounting to some 4.75 ha) which is identified on the plans submitted into the site assessment process as being gifted to the local community as Public Open Space should any future development of that site progress. It is also worthy of note that the indicative material submitted in support of this site also indicated the potential for new community facilities and a beck side walk connecting residents to the countryside and the wider surrounding green wedge, further demonstrating the potential community benefit which would potentially be achieved through the development of this particular site. Whilst it is noted that the RNPSG's response acknowledges that this appears to be an "error" and that the "*Community benefit scoring will be looked at again for this site by RNPSG*", it does not appear as though this has occurred prior to the submission of the NP Draft at the Regulation 19 stage. Once again, the seeming inaccuracy of the site assessment process would indicate that this site has been inaccurately 'scored' which, in turn, can only further question the validity of the NP Draft.

It should also be noted that the NPPF places particular emphasis for plans to "*set out a positive strategy for the conservation of the historic environment*", with paragraph 195 highlighting that heritage assets "*are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life and existing and future generations*". Policy S57 of the CLLP similarly seeks to protect, conserve and enhance the historic environment of Central Lincolnshire. Accordingly, it is suggested that the NP Draft is revised to ensure that the description of each of the 7 no. designated heritage assets within the village is consistent with the listings provided by Historic England for each respective asset. This is to ensure the NP Draft is as accurate as possible and reduce the potential for confusion when reference is made to a respective heritage asset. One example here being that "*Laburnum Farmhouse*" is described as such by the NP Draft, whereas Historic England describes that property as "*Laburnum Farmhouse and the Old House*" (Listing Entry No: 1359507). In order to ensure that the NP Draft positively aligns with the provisions of the NPPF and CLLP, it is respectfully suggested that the NP Draft is revised accordingly.

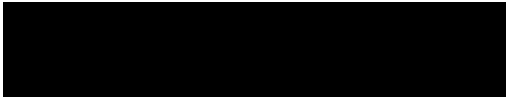
Given my Client's concerns outlined above, it is respectfully suggested that the NP Draft should be revised accordingly in order to ensure that the policies and guidance contained within that document is consistent with the position set out by both the NPPF and the CLLP, prior to any formal

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adoption of the NP Draft. I trust the content of this letter provides sufficient clarity on the respective matters raised within but please do not hesitate to get in touch should you have any queries in respect of my Client's submission.

Yours sincerely



OLLIE CLAWSON MRTPI

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APPENDIX 1 – REGULATION 14 CONSULTATION REPRESENTATIONS

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Date 24 August 2022
Our Reference OCLA1/MGO85/1
Please ask for Ollie Clawson
Mobile [REDACTED]
[REDACTED]

Reepham Neighbourhood Planning Group
Via Parish Clerk & Chair of Neighbourhood Plan Group

SENT ELECTRONICALLY ONLY

Dear Sir/Madam,

Reepham Neighbourhood Plan 2022 – 2042 Regulation 14 Consultation Draft

I write with regard to the above Reepham Neighbourhood Plan Consultation Draft document (**NP Draft**), which was published on 14th July 2022, in order to set out the representations made by my client, M Good and Son Ltd, in line with Regulation 14 of The Neighbourhood Planning (General) Regulations 2012. As I am sure you are aware, 'Regulation 14' states that:

“14. Before submitting a plan proposal to the local planning authority, a qualifying body must—

(a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area—

(i) details of the proposals for a neighbourhood development plan;

(ii) details of where and when the proposals for a neighbourhood development plan may be inspected;

(iii) details of how to make representations; and

(iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;

(b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and

(c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.”

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Unfortunately, at the time of writing, the Neighbourhood Planning page of the Parish Council's website does not provide details of how representations can be made, nor the date by which those representations must be received. Accordingly, the '6-week' stage is assumed to have commenced as of the date of the meeting with local landowners on 14th July 2022 which advised those parties as to the 'success' of their submissions into the NP Draft. The minimum consultation period required from that date would consequently be the 25th August 2022. I trust the representations set out within this letter will be considered by the Neighbourhood Plan Group as the preparation of the Neighbourhood Plan progresses.

As I am sure the Neighbourhood Plan Group is aware, my client – the Good family - have resided within and farmed the land around the village of Reepham for generations. My client owns a number of sites in and around the village and, for clarity, submitted the following sites for consideration as potential allocations within the NP Draft:

- CL3082 – Site of Hawthorn Road next to Village Hall;
- CL3083 – Behind Cricket Field; and,
- CL3084 – Farm yard site.

Whilst the representations set out within this letter relate in part to each of the above sites, it is nevertheless relevant to highlight that the latter of the above sites – the 'Farm yard site' – is currently the subject of a 'live' planning application which has been submitted to West Lindsey District Council (Ref: 145047). That application follows a deep planning history within recent years concerning the need for the farm to relocate its operations hub from this hugely constrained site to a location elsewhere within the Good family's ownership which provides suitable access, security and operational advantages. Doing so would leave behind a previously developed brownfield parcel of land which my client considers to offer an appropriate site to positively contribute towards the future sustainable growth of the village.

All of the documentation associated with planning application 145047 is publicly available on West Lindsey District Council's website. In brief, however, it should be noted that this application seeks full planning permission for the erection of 8 no. dwellings. This offers a significantly reduced form of development to that which has previously been proposed for the site, and seeks to positively respond to the conclusions reached by Inspector Chamberlain in his dismissal of planning appeal APP/N2535/W/19/3221725 & APP/N2535/W/19/3225861. In reaching his conclusions, Inspector Chamberlain confirmed that the principle of housing development in this location was appropriate in policy terms (with regard to the National Planning Policy Framework (**NPPF**) and the Central Lincolnshire Local Plan (**CLLP**)) and that there were no available sites that were sequentially preferable to the farm yard site.

This appeal decision is publicly available both on the Planning Inspectorate and West Lindsey District Council's websites.

With the above in mind, my client is alarmed at some of the conclusions drawn by the NP Draft in respect of the assessment process associated with the selection of future residential allocations within the village. Indeed, the classification of the farm yard site as an 'Outlying farm' (as per Map 3 of the NP Draft), and consequently the site's exclusion from the 'Current settlement edge of Reepham Village' (Map 4) is entirely inconsistent with the conclusions reached by Inspector Chamberlain which confirmed that (emphasis added):

*"The existing farmyard at the appeal site reads as part of the line of development along the northern side of The Green and is **therefore physically part of the village**"*

That appeal decision was issued in December 2020 and, as previously noted, is a publicly available document. As noted above, Inspector Chamberlain confirms that the existing farm yard is read “*as part of*” the existing northern ‘edge’ of the village, and so it is concerning to note that *Appendix A – Reepham Core Shape & Form Review*, which was published in June 2021 (some six months after the issuing of that appeal decision), draws a rather arbitrary line which excludes the northern developed footprint of the village (as reproduced below).



Figure 1: The Northern developed footprint of the village, as defined by Appendix A of the NP Draft

No justification is provided within Appendix A as to quite why the NP Draft differs so substantially from the conclusions reached by Inspector Chamberlain and, accordingly, my client has significant concern with regard to the validity of the evidence upon which the NP Draft is based.

Those concerns are heightened when it is recognised that despite the fact that Appendix A has quite rightly excluded the land at Leigh Farm and Stuffins Farm from being within the curtilage of the village, that land has nevertheless been included within the NP Draft as a considerably sized proposed residential allocation under Sites H1.1 and H1.3. This appears to be entirely inconsistent with the approach espoused by Policy LP2 of the CLLP, which explicitly excludes “*agricultural buildings and associated land on the edge of the settlement*” from the definition of the ‘developed footprint’ of the village. Unlike my client’s farm yard adjacent to Reepham Manor, no such decision has been issued which would plausibly suggest that a development to the south of Leigh Farm and Stuffins Farm would constitute anything other than an expansion into the adjacent open countryside.

Whilst it is noted that Appendix A suggests that “This squaring off of the developed footprint would create a single line facing open countryside”, it is not considered that this would be the case in reality. Indeed

Map 5: Proposed Residential Site Allocations

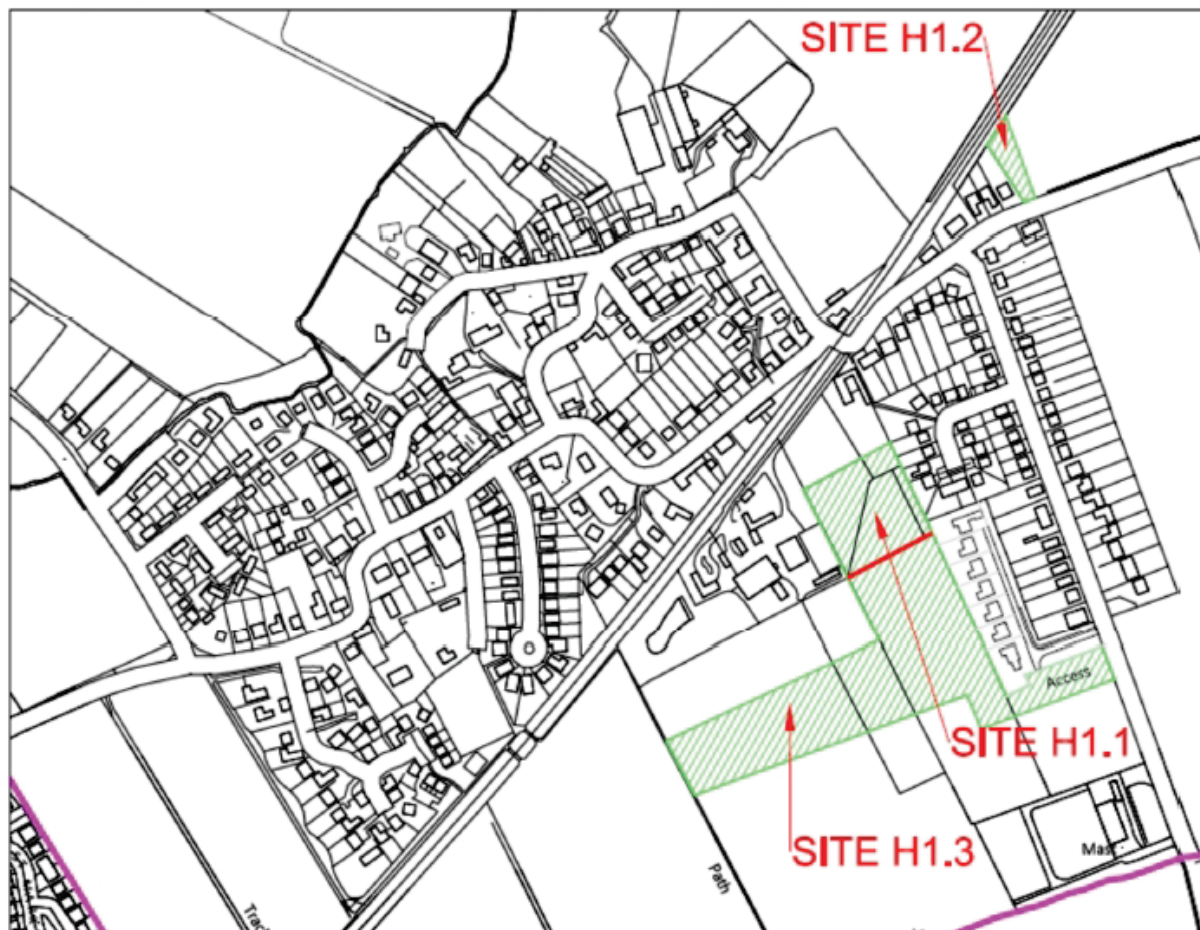


Figure 2: Map 5 of the NP Draft

Map 5 of the Draft NP appears to reaffirm this position, given the considerable undeveloped parcels of land to the north of draft allocations H1.1 and H1.3 which would be left physically vacant by the development of those allocations, it is considered that this would result in a disjointed and visually unpleasant edge to the village when viewed from both the west and south.

As is exemplified above, the proposed allocation of sites H1.1 and H1.3 runs entirely counterintuitive to the aspirations of both Policies LP2 and LP26, the latter of which seeks to achieve high-quality ‘place-making’ and requires development proposals to:

“Respect the existing topography, landscape character and identity, and relate well to the site and surroundings, particularly in relation to siting, height, scale, massing, form and plot widths”

Again, the seeming inaccuracy upon which the NP Draft is based is further questioned when it is noted that Appendix D – Draft Methodology for site selection confirms that the local community has, through

previous consultation processes, expressed “*prioritised level of support for development locations*”. The two development locations preferred the most by local residents were:

- *Conversion of agricultural buildings (79%)*
- *On brownfield sites (75%)*

Indeed, 69% of respondents also noted that “*sites within Reepham Village footprint*” would be preferred. Comparatively, only 41% of respondents stated they would wish to see future development “*On Greenfield sites outside the existing village*”. Both sites H.1.1 and H1.3 are both greenfield sites located outside of the existing village, and as such those proposed allocations can only be considered to be inconsistent with the majority of the respondent’s wishes for future sustainable growth of Reepham.

Rather concerningly, Appendix D notes, at Section 2.4, that “*All submitted sites are located outside the footprint of the village*”, and that no brownfield sites exist. This is fundamentally incorrect. My client’s farm yard site is widely accepted as being a previously developed brownfield site which, as per the conclusions reached by Inspector Chamberlain, is located within the built footprint of the village. Indeed, the AECOM Assessment which was prepared in support of the neighbourhood plan process confirms that:

“This is a brownfield site, which consist of a barn and several warehouses. Policy LP2 gives priority to development on brownfield sites over Greenfield sites. Additionally, Policy LP55 supports the re use and conversion of non residential buildings for residential use.”

The AECOM Assessment was effectively the pre-cursor to the site selection process carried out most recently and ascribed an ‘Amber’ score to the farm yard site (CL3084), noting that the “*site is suitable, available and achievable for residential development*”.

This has not prevented the NP Draft from ascribing the farm yard site the lowest possible score of ‘0’ in respect of its location. Once again, this is entirely inconsistent with the considerable suite of information which exists within the public domain and which was available for the Neighbourhood Plan group to consider during its formulation of the NP Draft. Such a fundamentally flawed assessment process can only call into question the validity and soundness of the NP Draft currently proposed.

Leading on from the above, the NP Draft’s *Mitigated site assessment* is also incorrect in stating that the farm yard site is “*Totally located within the conservation area*”. The site is, in fact, only partially located within the conservation area. Nevertheless, and whilst it is appreciated that the NP Draft does quite rightly seek to preserve and enhance wherever possible the inherent character and special qualities of the conservation area, it is not considered that the adopted approach of ‘marking-down’ any sites within the conservation area is appropriate. Indeed, this fails to recognise the NPPF’s desire to ensure that decisions relating to proposals which may impact upon the historic environment take into account “*the desirability of new development making a positive contribution to local character and distinctiveness*” (emphasis added). The approach adopted by the NF Draft runs counterintuitively to the position set out by the NPPF and, rather concerningly, implies that *any* development within the conservation area is inherently inappropriate. A different assessment process which is more consistent with the aspirations of central Government may have led to further ‘points’ being awarded to alternative sites which may well contribute far more positively to local place-making than the currently proposed allocated development sites appear to do.

The above also rings true in respect of NP Draft’s assessment of the land behind the cricket field (CL3083) which was also submitted for consideration as a potential allocation within the neighbourhood plan. Indeed, the comments received from West Lindsey District Council’s planning department with regard to this site states that:

“Part of the site lies in Reepham conservation area and the rest lies alongside it. Any development proposal on the site should conserve or enhance the character and appearance of the Reepham conservation area.”

It is relevant to note that whilst the access route to this site is located within the conservation area, the majority of this site is in fact located outside of the conservation area. Despite this, the NP Draft site assessment affords this site the lowest possible score of ‘0’ for not only its potential conservation area impact, but also its ‘Character Area impact’ and ‘Heritage impact’. Notwithstanding the fact that one could question quite why three naturally inter-related matters have been subdivided into three separate criteria against which sites are assessed, the conclusions reached on each of these topics (reproduced below) appear to be somewhat premature given the **indicative** nature of the material submitted for consideration. In turn, the NP Draft site assessment states:

<i>Criteria</i>	<i>Source</i>	<i>R/A/G</i>	<i>Justification</i>	<i>Score</i>
<i>Conservation area impact</i>	<i>Questionnaire/Statutory</i>	<i>R</i>	<i>Impact on NE quadrant of CA</i>	<i>0</i>
<i>Character area impact</i>	<i>Character area checklist</i>	<i>R</i>	<i>Character area and its connection with the countryside will be heavily impacted.</i>	<i>0</i>
<i>Heritage impact</i>	<i>Questionnaire/Statutory</i>	<i>R</i>	<i>Key part of the heritage and setting of landmark buildings and views. Located in the NE quadrant of conservation area.</i>	<i>0</i>

Table 1: NP Draft mitigated site assessment extract

No sustained justification of the extent of the ‘impact’ suggested above is provided by the NP Draft. Similarly, no such reasoning is provided to support the NP Draft site assessment’s commentary in respect of the ‘In/Out views impact’, which states that *“Views of the landmark buildings in the consideration area would also be lost”*. The NP Draft subsequently affords the land to the rear of the cricket field a score of ‘0’ in this category also.

Whilst the concerns previously set out within this representation with regard to the NP Draft’s implication that *‘any development within the conservation area is inherently inappropriate’* are once again relevant, and are stress with regard to the above, it is alarming that such a conclusion has been reached with regard to site CL8083 despite the indicative nature of the material submitted as part of the NP Draft assessment process. Any future development proposal for this site would of course be robustly prepared and justified through a sufficient assessment of any application’s likely impact upon the surrounding historic environment. Any assessment can only reasonably be made once formal development proposals

have been prepared, as any conclusions reached with regard to that *likely* impact beforehand could only be deemed to be premature. The same conclusion must be reached in respect of the assessment made by the NP Draft.

Similarly, my client would further call into question the NP Draft assessment's comments in terms of the 'In/Out views impact' which notes that "*Valued views across open countryside to the wolds and the Limewoods would be lost*". Again, such an assessment is premature and does in any case seem to disregard the fact that a 12ft high (approx.) hedgerow exists on site and currently prevents any such views in any case. Accordingly, it must be questioned quite why the NP Draft ascribes this site a score of '0', given that no such views would functionally be lost as a result of any future development of the site.

My client also has significant concern with regard to the means in which matters of highways, access and parking have also been utilised to further negatively score this submission. The Draft NP assessment offers the following comments on such matters:

"Questionable access. The site with poorest access."

And,

"The site location gained the most negatively commented by community".

It would appear that the entirety of the assessment made in this regard is based upon the subjective assessment(s) of local residents. Whilst it should be stressed that my client appreciates that such local knowledge and insight can be very useful in advising of any potential highways-related issues locally, the NP Draft's decision to cast judgment over such matters without the benefit of any quantitative data must be questioned. Any potential future development proposal would of course be supported by a detailed assessment of the likely impact of any such development on the local public highway network, as prepared by a suitably qualified consultant. To utilise the assumed highways impact as a means of determining which sites may be suitable for development does, once again, appear to be wholly premature. Accordingly, my client would suggest that a scoring matrix which is more appropriate for the initial nature of the potential development sites submitted for assessment may have resulted in this site being considered more favourably.

The prematurity of the NP Draft assessment can also be raised in respect of the 'Affordable/ mixed housing provision' against which potential development sites are considered. With regard to the land to the rear of the cricket field, the NP Draft site assessment simply states that there is "*None identifiable*" and as such a score of '0' is awarded. Again, the material submitted in support of this potential allocation was indicative only and would be refined and finalised should any future development be pursued for this site. Any such submission would be prepared in consistency with the relevant national and local planning policy requirements and so to suggest that any such development would fail to provide an affordable housing contribution is, at this stage, entirely inappropriate.

It is also relevant to note my client's concerns in respect of the assessment of the site adjacent to the Village Hall at Hawthorne Road (CL3082). That site is afforded a score of '0' in respect of any potential 'Community Benefit' associated with the development of this site. This seemingly fails to recognise the considerable provision of land (amounting to some 4.75 acres) which is identified on the plans submitted into the site assessment process as being gifted to the local community as Public Open Space should

any future development of that site progress. It is also worthy of note that the indicative material submitted in support of this site also indicated the potential for new community facilities and a beck side walk connecting residents to the countryside and the wider surrounding green wedge, further demonstrating the potential community benefit which would potentially be achieved through the development of this particular site. Once again, the seeming inaccuracy of the site assessment process would indicate that this site has been inaccurately 'scored' which, in turn, can only be deemed to harm its potential allocation within the NP Draft.

Finally, it is also relevant to note that Paragraph 11.15 of the NP Draft states that:

"A formalised Call for Sites process was therefore undertaken, to assess the optimal location for the approximately 54 new dwellings Reepham should accommodate over the next 20 years. Existing planning permissions has reduced the required number to 47."

Paragraph 11.16 goes on to note that proposed site allocations H1.1, H1.2 and H1.3 have been "agreed upon as priority allocations to accommodate the required remaining growth over the plan period". Sites H1.1, H1.2 and H1.3 are indicated as having a total residential development potential of 44 no. dwellings.

The Neighbourhood Plan group will however no doubt be aware that the CLLP Review Draft was submitted to the Secretary of State on 8th July 2022 for independent examination. That document has been published by the Central Lincolnshire Joint Strategic Planning Unit (CLJSPU), as is required by Regulation 19 of The Town and Country (Local Planning) (England) Regulations 2012 and is therefore a publicly available document. The CLLP Review Draft can consequently be afforded a level of weight during the determination process of any currently submitted planning application given that the CLLP Draft will, if approved and subsequently formally adopted, supersede the existing CLLP within the Local Development Framework.

This is particularly worthy of note as the CLLP Review Draft seeks to move away from the current policy position which, at Policies LP2 and LP4, establishes a 'growth allowance' for existing settlements within Central Lincolnshire. Indeed, Policy S4 of the CLLP Review Draft outlines that:

"Large, Medium and Small Villages, as defined in the Settlement Hierarchy in Policy S1, will experience limited growth to support their role and function through allocated sites of 10 or more dwellings in the Local Plan, sites allocated in neighbourhood plans, or on unallocated sites in appropriate locations within the developed footprint** of the village that are typically:*

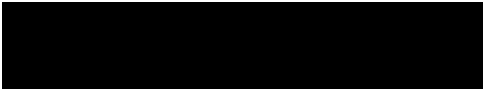
- *Up to 10 dwellings in Large Villages and Medium Villages"*

Reepham is confirmed by Policy S1 of the CLLP Review Draft to maintain its status as a 'medium village' and, as such, development proposals of up to 10 no. dwellings in appropriate locations within the developed footprint of the village will be supported in principle by the CLLP Review Draft. The approach adopted by the NP Draft to subsume the 'growth allowance' for Reepham within its residential allocations would consequently be rendered immediately 'out-of-date' should the CLLP Review Draft be adopted, as is anticipated. Consequently, so too would the wording of Policy 3 of the NP Draft, which is predicated on "additional residential development (beyond the 15% required through the Local Plan)".

It is on the basis of the above that my client wishes to place on record their significant concerns in respect of the published Reepham Neighbourhood Plan Draft. It is considered that the NP Draft is fundamentally flawed and is based upon an outdated or inaccurate understanding of many of the facts related to the

sites my client has submitted for consideration through the appropriate avenues. Those concerns are only heightened by the fact that the site assessments which led to the selection of the sites which have been allocated for development within the NP Draft have not been published into the public domain for review and comparison. My client would welcome the opportunity to discuss any of their representations further with the NP working group and, similarly, would respectfully suggest that the NP Draft is revised to properly and fully account for the evidence base to hand.

Yours sincerely

A solid black rectangular box used to redact the signature of the sender.

OLLIE CLAWSON MRTPI

**APPENDIX 2 – RNPSG RESPONSE TO REGULATION 14
CONSULTATION REPRESENTATIONS**

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15th September 2022

WLDC Planning
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Lincolnshire
DN21 2NA

FAO George Backovic

RE: 145047 - Knights Letter - Neighbourhood Plan Draft Representations

Dear Mr Backovic,

You will have recently received via the planning portal, a letter from Knights Legal & Professional Services which makes representations for their Client M Good & Sons in relation to the recently published Draft Neighbourhood Plan for Reepham. This letter has been lodged to support the current planning application ref 145047.

We, The Reepham Neighbourhood Plan Steering Group (RNPSG) wish to make our representations against this letter to ensure that a balance of information is available to those who are concerned with this planning application.

Context – The RNPSG acts as an extension of Reepham Parish Council (RPC) and works with information provided by the community and a range of external sources including WLDC who have been consultees in the wider process of preparing the Draft Reepham Neighbourhood Plan. Also, fundamental to the relevance of Draft Neighbourhood Plan and the current application, it must be recognised that the draft plan considers site CL3084 in its entirety which coincides with previous larger development plans submitted by M Good & Sons. The site in application ref 145047 and its detail was not submitted under the “RNP Call for sites” and has never been considered or assessed by RNPSG”

RNPSG considers that there are several inaccurate statements made within the Knights letter of 24th August 2022. This letter intends to serve as our statement of position in relation to these items. Our only intention is to ensure that a balanced view can be taken when considering the information provided.

The letter starts with stating that the Regulation 14 closing has not been advertised by RNPSG. Every household in the Parish have had, hand delivered, a flyer which publicised the Regulation 14 process, meeting dates and closing dates. I'm 100% certain that said flyer was delivered to M Good & Sons as I delivered it myself. A copy of this is attached in Appendix A of this letter. Furthermore, during our landowner meeting with M Good & Sons on 14th July at Reepham Parish Church, we advised of the closing date of 8th September.

The letter goes on to state that the Farmyard site (planning application 145047) is a brownfield site and as such becomes a selection priority. Reepham has no official brownfield sites as defined in the current CLLP which is backed up by the WLDC interactive mapping which shows designated brownfield sites. Extract included in Appendix B of this letter. RNPSG recognises that should the farmyard become unused, it would need to be re-used in a manner appropriate for the location.

The letter then goes on to make a point regarding the submission of sites CL3082, CL3083 & CL3084 being made under the Neighbourhood Plan call for sites process. For clarity, this is not the case. As I'm sure you are aware, sites referenced CL are sites that exist from the CLLP call for sites process and as such require consideration for allocation under the preparation process of a Neighbourhood Plan.

The third paragraph of page 2 refers to the application site as a “hugely constrained site” and the need to relocate. It should be noted here that the site is not constrained to the North and that the land to the North not only reaches an alternative access which is suitable for HGV (this road serves the nearby Oil Gathering Station) but is all in the ownership of M Good & Sons. RNPSG recognise the issues with the current access but do not accept that this is the only available option for access and do not recognise that the only option is to move the farmyard.

The letter draws heavily on parts of the planning inspectors report from case APP/N2535/W/19/3221725 & APP/N2535/W/19/3225861. The parts used, bolster the case for the current application site whilst the parts that highlight significant issues are conveniently not referenced presumably because the current application is for a smaller scale development. Comparing the current development with what RNPSG have assessed (a larger site area) is not comparing on a like for like basis. The report goes on:

28. Accordingly, the proposal would fail to retain the core shape and form of the village and would significantly harm the settlement's character and appearance and its rural edge. It therefore follows that the proposal would not be an 'appropriate location' under Policy LP4 of the LP.

This mirrors the RNPSG assessment and is based on like for like information i.e. a larger site.

The letter further quotes the inspectors report:

*“The existing farmyard at the appeal site reads as part of the line of development along the northern side of The Green and is **therefore physically part of the village**”*

However, RNPSG are constrained to comply with the current CLLP which states under policy LP2.

The term 'developed footprint' of a settlement is defined as the continuous built form of the settlement and excludes:

individual buildings or groups of dispersed buildings which are clearly detached from the continuous built-up area of the settlement;

gardens, paddocks and other undeveloped land within the curtilage of buildings on the edge of the settlement where land relates more to the surrounding countryside than to the built-up area of the settlement;

agricultural buildings and associated land on the edge of the settlement; and

outdoor sports and recreation facilities and other formal open spaces on the edge of the settlement

In terms of sequential testing of sites, at the time of RNPSG assessment, the result of the appeal was known, therefore the farmyard site was no longer available in terms of providing a larger development within the village. The RNPSG knew from public consultation that community benefits such as affordable housing and useable public open spaces were seen as an achievable target. Such benefits are only achievable with a larger scale development so one, larger development in a community supported location was seen to be the best option to deliver the benefits identified by the community. RNPSG looked towards other options given the result of the appeal decision.

On page 3, the letter describes the Northern Line as shown on the map as arbitrary. This line is not arbitrary and has been arrived at by taking the current line of building and applying the LP2 guidance as shown above. Our core shape and form review document explains how this line is arrived at and whilst M Good and Sons may not agree with the lines position, to suggest it is arbitrary is incorrect. Reading the whole of the inspectors' report would suggest some agreement but clearly this is opinion based depending on the readers pre-existing stance.

After the map on page 3, the letter challenges the “validity of evidence upon which the NP Draft is based” This appears to be based upon the fact that, in the words of the writer “the NP Draft differs so substantially from the conclusions reached by inspector Chamberlain” RNPSG have not supported site CL3084 in the Draft Plan. Inspector Chamberlain rejected the appeal for this site. How are these outcomes so substantially different? Again, it must be emphasised at this point – RNPSG have assessed a larger site NOT the current application for which information was not made available at the time of the assessment.

The last paragraph of page 3 turns attention to the proposed allocations of H1.1 & H1.3 in the Draft Plan. The point is argued that the plan now includes agricultural buildings and associated land, but this is not the case. The allocations do not include the buildings at Stuffins, nor the yard associated with this as these were not put forward as part of the call for sites submission by that landowner. RNPSG sought advice from WLDC in terms of development past the current core shape and form. The advice given was that if we needed to go beyond the core shape and form, there should be additional criteria taken into consideration including most appropriate location. This process has considered the many streams of information received including community consultation feedback. The sites in this particular location have received the greatest number of positive comments and continue the direction of the most recent multi-plot development in Reepham. Making the comparison between site H1.1/H1.3 and the farmyard site is not comparing like for like. The wholly different settings of the two locations result in wholly different impacts on the village. As pointed out previously, the appeal decision removed CL3084 from our options for allocating a larger development that would bring community benefit of affordable housing and usable public open space. Site H1.3 gives the community the opportunity to actually achieve these benefits. It is important to remember that a Neighbourhood Plan is not just about housing numbers & locations.

On page 4 – The concept of squaring off and allocations H1.1 & H1.3 are challenged. The process of squaring off would be achieved over the timescale of the next Neighbourhood Plan as and when the other areas become available. As stated previously, these areas are not part of the assessed call for sites submissions and as such cannot be allocated at this point in time. The Southern line created by site H1.3 provides a new line from which infill opportunities to the North, would be created for future development all in a location which we know, from sound consultation, has clear community support. Overall, the allocation provides a direction of travel for future plans and leaves open the option of a new location for the Primary School, which was a desire of the landowners at the time of the original call for sites submission. LCC have indicated that, at this point, this is not of interest. RNPSG recognise the impact of the school arrival and departure times on vehicle movement within and through the village (again, from sound public consultation) and wanted to ensure that this option was not made unachievable in the future. Again, a demonstration that the Draft Plan is about more than housing numbers and landowner gains. Appropriate location must take into account the needs of the community.

Towards the end of page 4 the letter reminds us of the need to:

“Respect the existing topography, landscape character and identity, and relate well to the site and surroundings, particularly in relation to siting, height, scale, massing, form and plot widths”

The above have been specifically addressed within the individual policies for sites H1.1 & H1.3 and leaves us questioning if the writer has properly read the Draft Plan? – Extracts from the Draft Plan included in Appendix C

On page 5 the letter turns attention to the conversion of agricultural buildings and re-use of brownfield sites. The assessed site (CL3084) would require the demolition of large steel framed, clad buildings which are unsuitable for conversion into domestic properties. It is interesting to note that whilst this letter highlights the conversion of agricultural buildings, the current application does not take advantage of the old barn located at site CL3084 which is a suitable agricultural building. Converting this building would secure its future and as such bring a community benefit of preserving and enhancing an identified heritage asset. The argument of brownfield site is brought to our attention again but as previously stated, the site is not an officially recognised brown field site. RNPSG recognise that it would be classed

as previously developed but as stated before, there are other options to secure a suitable future for the site as a working farmyard combined with a conversion of the barn at the front of the site.

Further down page 5:

The AECOM Assessment was effectively the pre-cursor to the site selection process carried out most recently and ascribed an 'Amber' score to the farmyard site (CL3084), noting that the "site is suitable, available and achievable for residential development".

We must remember that The AECOM Assessment of the call for sites submissions is NOT a pre-cursor to anything. It is part of the data gathering process for the formulation of a Neighbourhood Plan. There are many other streams of information used to arrive at a Draft Plan. It is concerning that the writer chooses to make this statement which only demonstrates a lack of understanding of the Neighbourhood Planning process. Much more is taken into account, and this should be recognised.

A further correction is required where the letter makes reference to the site "Being totally located within the conservation area" The letter misses its own point that this relates to the mitigated site score. As explained to M Good & Sons during the landowner meeting of 14th July, the mitigated assessment is based upon a reduced scheme scenario where RNPSG take the issues identified in the original assessment and look at ways to mitigate. In this instance, it was to look at a smaller site which did not extend so much to the North. This smaller site would be totally located in the conservation area.

RNPSG is not inherently against development in the conservation area but fully intend to protect the character and setting of it. This is a clear directive from the community which has been communicated through community questionnaire and stage feedback. Any development in, or adjacent, to the conservation area needs to be sensitive in terms of impact, scale, layout and style. A point relevant to the application currently being considered. The Regulation 14 response from LCC Historic Places commends the Draft Plan.

"This office is pleased to see the strength of community feeling in Reepham for protecting the village's historic environment, and desire to enhance it and preserve the village's character. It is also good to see preserving "historic buildings and spaces" mentioned within the Community Vision for future development and central to Community Objectives 1 & 2."

The following points relate to items raised against sites CL3083 & CL3082 respectively. The points raised in the letter are less relevant to the current application under consideration, but we feel serve to discredit the Draft Neighbourhood Plan document and the work undertaken to produce it.

Briefly:

- The letter argues that views across the CL3083 (cricket field) are not visible to the public passing on Smooting Lane. The view is available at the gate to the field, from the corner of Smooting Lane & The Green but also available at different times of the year due to the leaf cover of the hedge which varies seasonally.
- CL3083 - The statement that "Questionable access. The site with poorest access" and "The site location gained the most negatively commented by the community" is based upon subjective assessment. Subjective feedback from the community is central to the concept of Neighbourhood Planning. Again, disappointing to know the writer appears to lack an understanding the fundamental basis of this process or chooses to ignore it.
- CL3083 – The letter focuses on the highways feasibility of the access yet ignore issues such as loss of historic hollow, impact on protected trees and damage to the character of the area.
- CL3083 – The letter accuses the Draft Plan of prematurity in its assessment of no affordable housing in relation to this location. Our assessment was based on an artist's impression of the proposal which was supplied to RNPSG by M Good & Sons following the initial call for sites process. This shows medium to large executive homes.

- The site assessment matrix is questioned. The categories are directly linked to areas of interest / concern raised during our community questionnaire. Community led, being the key point here.
- CL3082 – Community benefit scoring will be looked at again for this site by RNPSG. This appears to be an error. It is not expected to change the outcome overall as the site has gained a negative comment from WLDC during consultation. “Site not suitable for allocation, would form more part of Cherry Willingham than Reepham”
- The reference to 47 vs 44 dwelling as the target is noted. The true figure at time of writing is 44 dwelling which reflects the allocations. The 47 is an old target number which was not updated following a recent approval relating to 3 dwellings.

RNPSG have worked hard to utilise a vast range of information which has been collected at all the stages of the Neighbourhood Plan process with community input and feedback being key indicators of what we should strive for as a whole. Taking a wider view across all of the suggested sites, matching opportunity with community need and protecting the character of the village and wider Parish has been our goal. We feel that our Draft Plan has a balance which reflects the above. The regulation 14 feedback will now be considered, and the Draft Plan updated where necessary to ensure we have a Neighbourhood Plan document which the community, on the whole, are happy to support.

RNPSG sought advice regarding the upcoming changes to the CLLP. Advice received was to work to the current CLLP but keep up to date with the potential changes that, when adopted, may call for an update to the Reepham Neighbourhood Plan.

RNPSG remain available for further consultation on any part of the Draft Plan and welcome requests from anyone who needs to start or continue a discussion.



Appendices

- A - Regulation 14 advertisement flyer.
- B - Brownfield site interactive mapping extract / screenshot.
- C - Draft plan extracts – Policy for H1.1 & H1.3 allocations.

A - Regulation 14 advertisement flyer.



PUBLIC OPEN MEETING

7.30pm on 14th July 2022

Reepham Parish Church

Communication of The Draft Neighbourhood Plan

Dear Resident,

The draft of The Reepham Neighbourhood Plan is now complete. It is time to communicate the contents of this draft document to the community and interested parties.

The above date will mark the commencement of a statutory consultation period known as Regulation 14 which will last for 8 weeks to conclude on 8th September 2022. During this period, the community, statutory authorities and Neighbouring Parish Councils will be able to review, seek explanations and make comments to provide feedback on the contents of the plan and the proposals within. This marks the final round of community consultation which will be used to inform any necessary changes before the final version of the Plan goes to West Lindsey District Council, statutory inspection and the public referendum.

The draft Neighbourhood Plan document will be available from 14th July on the Reepham Parish Council website along with accompanying documents such as The Reepham Character Assessment, Core Shape & Form Review, site review & site selection methodology to name but three!

Please read-on through this flyer to find out more. Thank you for your interest in the Reepham Neighbourhood Plan and I hope to see you at the Public Meeting.



Nigel Hewerdine – Chair, Reepham Neighbourhood Plan Steering Group

Regulation 14 Consultation – 14th July > 8th September 2022

8 Weeks consultation period with;

- Call for sites land-owners. (Stage 3)
- Reepham residents.
- The Parish Councils of Cherry Willingham, Nettleham, Sudbrooke, Fiskerton, Greetwell & Langworth.
- Statutory Authorities
 - West Lindsey District Council
 - Environment Agency
 - Natural England
 - Historic England
 - Anglian Water
 - Drainage Board
 - Lincolnshire County Council
 - Highways
 - Archaeology
 - Mineral & Waste
 - Education

COMMUNITY CONSULTATION & FEEDBACK

FINAL REVIEW OF THE DRAFT PLAN PRIOR TO SUBMISSION

WAYS TO CONTACT THE STEERING GROUP



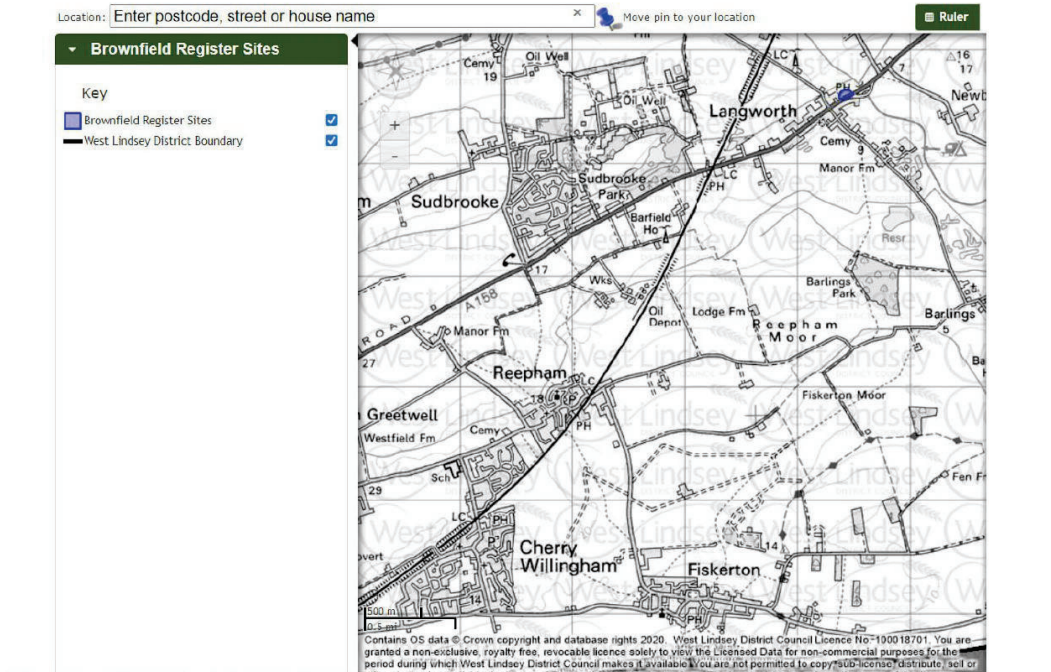
ReephamNDP@gmail.com



Telephone The Chairman, Nigel Hewardine



B - Brownfield site interactive mapping extract / screenshot.



C - Draft plan extracts – Policy for H1.1 & H1.3 allocations.



Policy 5: H1.1 Allocation of Land to the South of Leigh Farm

1. Land identified on Map 5 is allocated for up to nine dwellings. The development of this site is subject to the delivery of site H1.3 and all the following criteria being satisfactorily met.

Development should:

- a) provide a mix of two, three and four bedroomed properties;
- b) retain the hedgerows and trees on the external boundaries of the site and incorporate them into the wider design and layout of the site except where vehicular access is required into the site from site H1.3.
- c) respect those existing buildings that adjoin the site by not proposing higher building lines for the adjoining proposed dwellings thus demonstrating a design transition between existing and new buildings;
- d) produce an archaeological assessment;
- e) not have an unacceptable impact on amenity of residential properties at Leigh Farm or those new dwellings adjoining the site on site H1.3;
- f) be sensitive and responsive to the historic character and local distinctiveness of the surrounding local environment, with regard to nearby building on the local list and heritage assets, including their setting, including the Conservation Area to the North;
- g) provide an adequate, safe and accessible access from site H1.3;
- h) incorporate a footpath connection to the junction with site H1.3 and through to the existing footpath between Meadow Close & the railway level crossing.



Policy 7: H1.3 Allocation of Land West of Fiskerton Road

1. Land identified on Map 5 is allocated for 37 dwellings and Public Open Space. The development of this site is subject to the all the following criteria being satisfactorily met.

Development Should:

- a) provide a sensitive edge of village development by retaining existing hedgerows where possible and providing adequate landscaping to help create a suitable transition between the development and the surrounding countryside;
- b) provide a density of around 15 dwellings per hectare to retain its rural location;
- c) an appropriate quantity of useable public open space will be provided on site to support the health and wellbeing of the community;
- d) produce an archaeological assessment;
- e) respect those existing buildings that adjoin the site by not proposing higher building lines for the adjoining proposed dwellings thus demonstrating a design transition between existing and new buildings;
- f) provide a mix of 2, 3 and 4 bedroom properties;
- g) provide, at least, 20% of the units as affordable dwellings, unless otherwise specified by the District Council;
- h) use suitable and sustainable materials that promote energy efficiency, durability and contribute positively towards improving the character of the area;
- i) ensure new public realm and landscaping forms a well-defined, distinctive element of the street scene; enhances legibility, incorporates greenery appropriate to location, provides for the variety of activity expected to take place, and is designed to be durable, attractive, resilient to the impacts of climate change and positively contribute to the character of the locality;

- j) provide contextually appropriate boundary treatments to clearly define private and public space and their design, height, material(s) or species contribute positively towards the character of the area.
- k) ensure materials, colour, texture, quality, detailing, lighting, street furniture, signage, species, refuse, cycle storage and public art complement the street scene and respond positively to local context;
- l) provide an adequate, safe and accessible access on to Fiskerton Road;
- m) provide an access connection to site H1.1;
- n) provide safe, legible and well-connected movement for cyclists and pedestrians to and through the site to maximise connectivity to the village facilities and wider area; and
- o) be accompanied by a transport assessment and travel plan.

From: Brendan Gallagher <[REDACTED]>
Sent: 29 January 2024 15:13
To: WL - Neighbourhood Plans
Subject: FW: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

Apologies. Please see comments below

From: Brendan Gallagher
Sent: Monday, January 29, 2024 3:12 PM
To: Nev Brown <[REDACTED]>
Subject: RE: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

Good afternoon Nev

Please see our comments on the Reepham Neighbourhood Plan as below:

Our recommendations, at page 51 of the Lincolnshire Development Roads and Sustainable Drainage Design Approach (see link below), only require Transport Assessment and Travel Plan for sites of over 80 dwellings. Policy 7 relates to a site for 34 dwellings and says any application should be supported by these documents, we recommend the requirement for this site is removed. See the Design Approach by following this link:

www.lincolnshire.gov.uk/downloads/file/2061/lincolnshire-development-roads-and-sustainable-drainage-%09design-approach-november-2017

Policy 12 includes a reference to map XX, this appears to be an error and seems to refer to map 7.

We agree with the plan that rights of way are important and welcome the plan's findings that themes of accessibility and mobility are recorded frequently through the consultation process, however the plan can go further to address some of these needs, and at the moment seems to be lacking in proposals to build upon the PROW network at Reepham and deliver more off-road routes

There is mention of public rights of way (PROW) in 10. The Built Environment, but the corresponding Policy 2 does not contain any PROW related policies to improve or enhance the existing network. There is mention under Policy 9 for the upgrade of existing footpaths to shared use routes but these seem to then relate to the upgrade of *footways* to shared use. Under LTN 1/20 the upgrade of footways to shared use routes is generally discouraged, and instead specific off-road shared use routes are favoured.

Policy 15 seeks to enable and promote safer use of roads and footpaths for pedestrians and cyclists through reduction of traffic speeds and addressing parking, but despite the plan identifying needs to "improve local infrastructure through the creation, improvement and extension of footpaths and cycle routes to better connect our widening community" there does not appear to be any specific policies leading off from this discussion to create off-road pedestrian and shared route provision for the public.

There is discussion in the document regarding the creation of green corridors but this is in relation to turning rights of way into green corridors. One of these aims is to have less frequent cutting of trees and shrubs on field margins alongside footpaths, which has the potential to cause obstructions to rights of way and also be in conflict with the landowners' responsibilities under the Highways Act 1980, where they have a duty to prevent overgrowth onto a public right of way.

We recommend the following in relation to rights of way:

1. Inclusion of more specific rights of way policies within the plan. There is a lot of discussion of rights of way in the plan but this thread has not then made it through to the actual policies.
2. Consideration of off-road pedestrian, cycle and equestrian access and future needs of the same within Reepham, rather than focusing on predominately on upgrades of footways adjacent to highways.
3. Consideration of upgrades to existing network of rights of way to make it more accessible, or to build upon and extend the existing network. Other examples of neighbourhood plans locally do contain proposed new rights of way within their plans.
4. Revisit the policy regarding less vegetation management adjacent to rights of way as this may be in conflict within existing primary legislation and would not be workable as a result.

Regards
Brendan

Brendan Gallagher
Principal Planning Policy Officer – Infrastructure
Lincolnshire County Council
Lancaster House, 36 Orchard Street, Lincoln. LN1 1XX



From: Nev Brown <[REDACTED]>
Sent: Thursday, December 7, 2023 3:36 PM
Subject: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

Some people who received this message don't often get email from [REDACTED] [Learn why this is important](#)

Caution external: This email originated from outside of the council. Do not click on links or open attachments unless you are confident the email is legitimate

Dear Consultee,
Reepham Parish Council has submitted its Reepham Neighbourhood Plan (the Plan) and supporting documents to West Lindsey District Council (WLDC) in accordance with Regulations 15 and 16 of the Neighbourhood Planning (General) Regulations 2012.
WLDC is now inviting comments on the submitted Plan and you are being notified as a consultee.
The Plan and its supporting documents are available from:
[Reepham NP](#)

The consultation period is until 2 February 2024.
All comments on the Plan should be made in writing and sent to:
Email: [neighbourhoodplans@\[REDACTED\]](mailto:neighbourhoodplans@[REDACTED])
Post: Neighbourhood Planning, Guildhall, Marshall's Yard, Gainsborough, Lincs, DN21 2NA.
If you require assistance accessing the documents, please call WLDC's customer services on (01427) 676676.

When making your comments please indicate if you wish to be notified of WLDC's decision on the Plan under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.
If you would like to know more about how WLDC uses your data in respect of the Plan's consultation, what your rights are and how to contact us if you have any concerns, please read our privacy notice:
[Privacy Notice](#)

Regards

Nev Brown
Senior Neighbourhood Planning Policy Officer

OCR 2 to 50





From: Ellie Smith <[REDACTED]>
Sent: 13 December 2023 09:05
To: WL - Neighbourhood Plans
Cc: Nev Brown
Subject: National Highways Planning response - Reepham Neighbourhood Plan - Regulation 16 Submission Consultation
Attachments: National Highways response - Reepham Neighbourhood plan.pdf

CAUTION: External email, think before you click!

Dear Sir or Madam,

Please find National Highways response.

Kind Regards

Ellie Smith
Assistant Spatial Planner
Operations Directorate (Midlands) – Nottinghamshire, Derbyshire, Lincolnshire & Rutland



My working days are Monday and Wednesday to Friday.

From: Nev Brown <[REDACTED]>
Sent: Thursday, December 7, 2023 3:36 PM
Subject: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

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[Privacy Notice](#)

Regards

Nev Brown
Senior Neighbourhood Planning Policy Officer

ORC 51 to 99



Guildhall | Marshall's Yard | Gainsborough | Lincolnshire | DN21 2NA 01427 676676

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Our ref: NH/23/04079

FAO:
West Lindsey District Council

Ellie Smith
Assistant Spatial Planner
The Cube
199 Wharfside Street
Birmingham
B1 1RN

[REDACTED]
13th December 2023

Via email: [neighbourhoodplans@\[REDACTED\]](mailto:neighbourhoodplans@[REDACTED])

Dear Sir or Madam,

Reg 16 Consultation – Reepham Neighbourhood Plan

Thank you for providing National Highways with the opportunity to consult on the draft Neighbourhood Plan for Reepham 2023-2043.

National Highways (formally Highways England) has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

In responding to development plan consultations, we have regard to DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of plans and development management considerations. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

The SRN closest to the NDP area is the A46 trunk road, which is outside the boundary of the plan area.

We have considered the contents of the Neighbourhood Plan and as the plan does not introduce any new development sites or transport related policies that are likely to impact the safety and operation of the SRN, we have no other comments to make.

If I can be of any further assistance on this matter, please do not hesitate in contacting me.

Yours sincerely,



Ellie Smith
Midlands Operations Directorate



From: SM-NE-Consultations (NE) [REDACTED]
Sent: 30 January 2024 08:04
To: WL - Neighbourhood Plans
Subject: Consultations Response - FAO Nev Brown - Reepham Neighbourhood Plan 2023-2043 - Regulation 16 Consultation
Attachments: 461671 Reepham NP NE Response.pdf

For the attention of Nev Brown

Please find Natural England's response in relation to the above mentioned consultation attached.

Kind regards,

Sally Wintle

Adviser
Operations Delivery, Consultations Team
Natural England
County Hall
Spetchley Road
Worcester
WR5 2NP

[REDACTED]

www.gov.uk/natural-england



Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see [here](#)
For further information on the Pre-submission Screening Service see [here](#)

From: Nev Brown <[REDACTED]>
Sent: 07 December 2023 15:33
Subject: 2024-02-02 Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

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Dear Consultee,
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[Reepham NP](#)

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Post: Neighbourhood Planning, Guildhall, Marshall's Yard, Gainsborough, Lincs, DN21 2NA.

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[Privacy Notice](#)

Regards

Nev Brown

Senior Neighbourhood Planning Policy Officer

DM51 to 98



Guildhall | Marshall's Yard | Gainsborough | Lincolnshire | DN21 2NA 01427 676676

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Date: 30 January 2024
Our ref: 461671
Your ref: Reepham Neighbourhood Plan



Mr Nev Brown
West Lindsey District Council

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

[neighbourhoodplans@\[REDACTED\]](mailto:neighbourhoodplans@[REDACTED])

Dear Mr Brown

Reepham Neighbourhood Plan 2023-2043 - Regulation 16 Consultation

Thank you for your consultation on the above dated 07 December 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#).

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely
Sally Wintle
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#) .

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)³.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

[Defra's Biodiversity Metric](#) should be used to understand the baseline biodiversity value of proposed development sites and may be used to calculate biodiversity losses and gains where detailed site development proposals are known. For small development sites the [Small Sites Metric](#) may be used. This is a simplified version of [Defra's Biodiversity Metric](#) and is designed for use where certain criteria are met.

Where on site measures for biodiversity net gain are not possible, you should consider off site measures.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside [Defra's Biodiversity Metric](#) and is available as a beta test version.

From: Midlands ePlanning <[REDACTED]>
Sent: 27 March 2024 11:20
To: Nev Brown
Subject: RE: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

CAUTION: External email, think before you click!

Dear Nev,

Thank you very much for your email regarding consultation for the Reepham Neighbourhood Plan (Regulation 16 Submission). Historic England have no further comments to make on the Reepham Neighbourhood Plan at this time.

If you have any further questions, please get in contact.

Best wishes,
Chloe

Chloe Hutchinson
Business Officer | Midlands Region | Historic England
The Foundry, 82 Granville Street, Birmingham, B1 2LH



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From: Nev Brown <[REDACTED]>
Sent: 27 March 2024 09:18
To: Midlands ePlanning <e-midlands@HistoricEngland.org.uk>; Dean, Adam <Adam.Dean@HistoricEngland.org.uk>
Subject: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation
Importance: High

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

To Historic England
Just a polite reminder.
In December we invited your comments on the above neighbourhood plan. Please see the email below.
But it appears we have not received a response from you.
Your views are important to the consultation.
I look forward to hearing from you shortly.
Regards

Nev Brown
Senior Neighbourhood Planning Policy Officer



Guildhall | Marshall's Yard | Gainsborough | Lincolnshire | DN21 2NA 01427 676676

From: Nev Brown
Sent: Thursday, December 7, 2023 3:36 PM
Subject: Reepham Neighbourhood Plan - Regulation 16 Submission Consultation

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The consultation period is until 2 February 2024.
All comments on the Plan should be made in writing and sent to:
Email: [neighbourhoodplans@\[REDACTED\]](mailto:neighbourhoodplans@[REDACTED])
Post: Neighbourhood Planning, Guildhall, Marshall's Yard, Gainsborough, Lincs, DN21 2NA.
If you require assistance accessing the documents, please call WLDC's customer services on (01427) 676676.

When making your comments please indicate if you wish to be notified of WLDC's decision on the Plan under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.
If you would like to know more about how WLDC uses your data in respect of the Plan's consultation, what your rights are and how to contact us if you have any concerns, please read our privacy notice:
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Regards

Nev Brown







Reepham Neighbourhood Plan
West Lindsey District Council's comments

PART 1

Reepham Neighbourhood Plan

WLDC's comments on the Submission version Reg 16

These primarily focus on those changes made to the NP from the Pre-Submission Reg 14 version.

For WLDC's comments on the Pre-Submission Reg 14 of the NP– see PART 2. Several comments are also relevant to the Submission version.

Figure 4

The blank rows, should they contain those issues as identified in Figure 4 of Reg 14 NP?

Map 2A

Need to show that trees lines are green and grass verges pink.

Map 2B Reepham Heritage Assets

Heritage assets shown on map need numbering.

9.25

Tables for heritage assets are incomplete.

Assets need numbering too, same as should be given on Map 2B.

Policy 1: Historic Environment

The policy needs an introductory statement e.g. All development should etc.....:- then followed by criteria 1 to 8? See other policies for examples.

Policy 2: Design of New Development

2. b) i) as identified on relevant maps in NP.

Map 4

Better if boundary shown on a map base like other maps rather than as a layer on top of an aerial photograph. Difficult in places to determine the exact line of the settlement edge.

11.19

Last paragraph, no requirement given in policies 5 and 7.

Policy 3 Residential Development on Infill sites

Current settlement edge or proposed one? Map 4 or Map 5A? Unclear.

The CLLP currently considers up to 10 dwellings.

*Infill development - ... as defined by the CLLP.

Map 5A

Confusing as to which map, whether map 4 or map 5A, shows the definitive settlement edge to be used for planning purposes.

This map should be map based for the same reasons as given for Map 4.

The boundary shown for planning approval 145047 does not appear to correspond entirely with that for the application site.

The southern boundary of the settlement edge does not correspond entirely with proposed site allocations H1.1 and H1.3 shown on Map 5. For example, the gap between existing farm and H1.3's northern boundary appears smaller on Map5A than Map 5.

Policy 5: H1.1 Allocation of Land to the South of Leigh Farm

Support the provision of a footpath route from the existing footpath between Meadow Close and the railway level crossing through this site and to site H1.3.

Policy 7: H1.3 Allocation of Land West of Fiskerton Road

1.b) Can 15 dwellings per hectare be achieved given the requirement in f) for there to be a mix of properties?

Does this represent an effective and efficient use of land as required by the NPPF?

1.e) higher building lines? heights?

Support the provision of a footpath route from the existing footpath between Meadow Close and the railway level crossing through site H1.1 to this site.

Policies 5 and 7 H1.1 and H1.3 Residential Allocations

Has the impact of allocations H1.1 and H1.3 on the local school been taken into consideration?

Such developments could present significant capacity issues for the school. This needs to be addressed.

There is also the issue of children from the allocated sites having to walk across the level crossing. Is this acceptable?

The views of the Education Authority and Network Rail on the suitability of the allocations in terms of the above challenges need to be considered?

Policy 8: Parking Standards

2. The NP seeks higher parking standards for 1 and 5+bedroomed dwellings than the CLLP does. There needs to be justification given as to why NP seeks these higher standards.

4. check wording, is this an aspiration rather than a planning policy?

Policy 9 Accessibility – Pedestrian and Cycle Routes

Policy 5, residential allocation H1.1, says that site is suitable for up to 9 dwellings. This part of policy 9 would not apply if site H1.1 were developed for less dwellings. An opportunity could be lost to provide a footpath link from site H1.3 through site H1.1 to the village.

Map 6

Map could do with being shown at a larger scale. Difficult to use.

View 2.3, the text saysviews in from the south and east..... but the map arrow shows it looking out of the village.

Views 3.1 to 3.6 are not shown on Map 6. They are references to general views only. They need to be more specific and identified on the map.

Ideally, views should be taken from a public place eg road, right of way, or public open space. From the map, it is not clear if this can be achieved for some views.

Best if the view is described as having a focal point/landmark eg church tower, Lincoln Cathedral

Policy 11: Important Views and Vistas

The views listed in the text and policy and shown in photographs need to correspond with each other. There are instances where this is not the case such as there are no references in text and photos to view 4.5 in the policy.

Map 7

The tree lines and green verges need to replicate those shown earlier in Map 2A. There is no reference on map to green corridors. Where are they? What do they comprise?

Policy 12 Environmental Policies

Map XX? Should this be Map 7?

Where are the green areas and green corridors? It is vital to show these to assist the implementation of the policy eg Part 2.

Policy 13 Local Green Space and Important Open Space

The sites need the same referencing in policy and text as given to them in on Map 8.

Policy 15: Funding provision to meet the needs of our growing community.

Would this policy and supporting text be better as a community aspiration rather than a planning policy?

PART 2

Reepham Neighbourhood Plan

WLDC's comments on the Pre-Submission version Reg 14

Map 2A Trees and Treelines

Good to see trees identified on map and covered in Policy 2.

Map 2B Reepham Heritage Assets

Good to see non-designated assets shown on map. All assets shown should have a cross-reference to the Character Assessment in which details of each asset are given.

Does the map show all heritage assets or just those in Reepham village?

Policy 1: Historic Environment

The policy needs an introductory statement eg All development should etc.....:- then followed by criteria 1 to 7? See other policies for examples.

1. The term North East Quadrant is already used in the Local Plan to identify the sustainable urban extension in Lincoln. Suggest using a different name.

How about identifying key green verges on a map and designating them as Local Green Spaces too?

2. It appears that the key source of information about the non-designated heritage assets is provided by the Character Assessment. Yet there is no linkage to this in the policy.

What are the buildings on the local list? They are not shown on Map 2B or listed in the Character Assessment. Are they the same thing? Are they the Important Buildings in the CAA updated for the NP and renamed non-designated heritage assets?

Need to be consistent with heritage asset terms and what comes under each.

Suggest that the introductory statement to part 2 be reworded something like this:

Where development affects designated heritage assets (eg listed buildings) or non-designated heritage assets as identified in the Character Assessment and in Map 2B, development should:

4. Reference to where the important views and vistas are shown and described later in NP needs to be given here.

7. Infill is a term widely used by NP. The Local Plan defines it as the "development of a site between existing buildings". Is this what you mean? Or are you meaning something broader?

Map 3: Character Areas in Reepham

Would the Settlement Break area be better shown in the G- Open Countryside rather than in the A- Hawthorn Road Character Area?

Chris Bradley, Conservation Officer commented: The conservation area shown is not the existing approved one and as shown on Map 2.

I would steer away from altering the Conservation Area in the Character Area Assessment as it will not be changing at this time.

The other option would be to have the Conservation Area boundary shown as a separate image (eg Map 2) but then the Character Area Assessment does not need to follow it if you change the name from "Conservation Area" to "Historic Area" or something that will allude to the historic environment without it being the conservation area.

I would recommend adding a caveat to say to look for the Conservation Area Appraisal for additional information on the Conservation Area

Policy 2: Design of New Development

2. b) i) Could the green verges be also identified and shown on a map?

In terms of protecting trees, not covered by TPOs, from development you might like to consider having these policies in your NP.

Where appropriate, proposals must preserve the identified "Trees and Treelines" shown on Map 2A. Proposals that unduly remove, or would cause unnecessary harm, to these trees will not be supported unless there is clear public benefit to outweigh the loss or harm, and a suitable compensatory strategy is included in the proposals.

For existing trees and hedges around allocated housing sites you might like to consider a policy something along these lines:

The existing trees and hedges within and in proximity to Housing Allocations identified in the NP are important natural features which contribute positively to the amenity, biodiversity, screening, and historic setting of the sites and their surrounding landscape character. Development proposals that would result in the loss, damage, or deterioration of these natural features will be resisted.

Development proposals for the site impacting existing hedges and trees should be prepared in accordance with the requirements of Policy S66: Trees, Woodland and Hedgerows of the Central Lincolnshire Local Plan.

3. This part of the Policy is welcomed.

But how about Climate Change having its own section in the NP with its own policy? Like Nettleham NP's Review has done with Policy D5.

It would help users of the policy if the measures could be listed. Are there any others that could be included? Perhaps use Nettleham's policy as a checklist.

There needs to be an explanation in the supporting text as to why it is vital to address Climate Change in the NP and have a policy.

To help users of the policy the NP needs to provide references to examples/good practice/standards which would help demonstrate if the particular requirements of the policy have been met or not and therefore if the proposal can be supported. For instance building regulations/standard assessment procedures.

Para 11.1

The CLLP is currently being reviewed. It has now reached an advanced stage meaning that any NPs being prepared in WL need to consider its policies as well as those in the adopted CLLP.

Paras 11.2 and 11.3

On Map 4 the settlement edge boundary is tightly drawn around Reepham and for a medium village as defined by the Local Plan would not appear to offer the opportunities for development as required by the Local Plan eg up to 9 dwellings. Is it therefore contrary to the Local Plan requirements?

Policy 3 Residential Development on Infill sites

1. Infill development is defined by the Local Plan as development between existing buildings. Is this what the policy means by infill development or is it referring to something broader?

a) The Local Plan currently considers up to 9 dwellings. Is 1 or 2 units unduly restrictive and contrary to the Local Plan?

Policy 4: Housing Type, Mix and Affordability

2. Support for custom and self-build housing is welcomed which is in demand in the local area as identified by the current WLDC CSBH Register.

Justification for this support needs to be given in the supporting text to Policy 4. How about including something on these lines?

Self-build and custom housebuilding covers a wide spectrum, from projects where individuals are involved in building or managing the construction of their home from beginning to end, to projects where individuals commission their home, making key design and layout decisions, but the home is built-ready for occupation ('turnkey'). Custom and self-build housing can secure affordable homes for local people enabling them to access home ownership, live in homes designed to meet their needs, and stay in their local areas.

Central government guidance encourages the inclusion of self-build and custom housebuilding policies within neighbourhood plans, and local authorities are required to promote this alongside keeping a register of self-build housing demand. West Lindsey District Council's register indicates that there is a need for self-build and custom housebuilding within the Reepham area, and this will likely increase over time.

This NP encourages the provision of custom and self-build housing and including the provision of plots on allocated housing sites H1.1 and H1.3. The provision of at least 5% custom or self-build housing on these sites would be particularly welcomed (see policies 5 and 7). All custom and self-build housing proposals would be subject to complying with all design-related policies in the NP.

Policy 5: H1.1 Allocation of Land to the South of Leigh Farm

Has consideration been given to accessing the site from the existing lane/access to the north of the site? This would appear to offer better connectivity to the village.

Also, the site's deliverability would then not appear to be dependent on site H1.3 coming forward first.

Has consideration been given to developing the field to the north of the site and thereby filling the awkward gap left between it and the proposed settlement edge boundary?

Para 14.3

There is still a large field left between the housing site H1.3 and the proposed settlement edge boundary.

Has consideration been given to shifting the site northward to close this gap?

Currently, it appears that both site locations H1.1 and H1.3 have been dictated by ownership rather than good planning.

Policy 7: H1.3 Allocation of Land West of Fiskerton Road

1. Para 14.1 says the site is allocated for 32 dwellings but Policy 7 states 34.

a) Difficult to achieve a smooth transition if significant gap left between the site and the settlement edge.

b) Can 15 dwellings per hectare be achieved given the requirement in f) for there to be a mix of properties?

Does this represent an effective and efficient use of land as required by the NPPF?

e) higher building lines? heights?

Add a new part to the policy supporting provision of custom and self-build housing on site. Something along these lines.

2. The provision of custom and self-build housing on this site will be supported subject to compliance with relevant design policies. Proposals to deliver at least 5% of the total number of dwellings on this site as custom or self-build homes will be particularly welcomed.

Policies 5 and 7 H1.1 and H1.3 allocations

Has the impact of allocations H1.1 and H1.3 on the local school been taken into consideration?

Such developments could present significant capacity issues for the school. This needs to be addressed.

There is also the issue of children from the allocated sites having to walk across the level crossing. Is this acceptable?

Have the Education Authority and Network Rail been consulted about the suitability of the allocations in terms of the above challenges?

Sarah Elvin WLDC's Homes, Health, and Wellbeing Team Manager comments on the Reepham NP from a housing perspective are as follows:-

"Policy 7 g which requires the development "Land west of Fiskerton Road" to deliver 20% of the dwellings as affordable is in line with policy S22 of the new Central Lincolnshire Local Plan that will be going through examination shortly. Policy 7 in this way will be met through the CLLP once adopted and it is positive the Neighbourhood plan and the CLLP align in this way.

I like the fact they refer to a questionnaire from the community for support but also to advocate for the mix of housing (Policy 4) to be smaller, I would have liked to have seen the actual questionnaire and all results in one place to make it easier to refer to and analyse and I mean this from a housing perspective so it was obvious to see how they have come to some of the conclusions around housing need.

I think from a housing perspective it seems like a sensible level of growth and with the proposed allocated site there will be a small delivery of affordable housing, and with the tenure not specified it will revert to the CLLP which will require a proportion of low-cost home ownership options alongside affordable rented properties."

Policy 8: Parking Standards

2. The NP seeks higher parking standards for 1 and 5+bedroomed dwellings than the Local Plan Review does. There needs to be justification given as to why NP seeks these higher standards

Policy 9 Accessibility – Pedestrian and Cycle Routes

1. Is it reasonable to expect minor sites to meet this policy? Should this requirement be proportionate to the scale of development proposed?
2. It would be useful to have a map showing all pedestrian and cycle routes in the NP area both existing and proposed (eg Fiskerton Road) and referenced in policy.

Policy 10 Business Development Standards

1. ... provided they adhere.....and demonstrate the following:

17 Natural Environment

There appears to be something missing between para 17.14 and supporting text for Important Views. There is little connection between the two. Does Natural Environment need a policy and Important Views need a new chapter heading?

For the Natural Environment chapter how about identifying and protecting nature habitats (biodiversity)/ in the NP area such as woodlands and watercourses and showing these on a map and also encouraging biodiversity net gain? As in the Nettleham NP Review, the identification of green corridors in the NP would be welcomed.

Green corridors make a strong contribution to the character of an area and are important to the movement of local wildlife and people. The function, setting, and biodiversity, landscape, access and recreational value of green corridors can be protected and enhanced by the NP.

The NP should encourage biodiversity net gain (BNG) from windfall and allocated developments. A requirement should be included in relevant general policies and also in individual policies for each housing allocation (policies 5,6, and 7).

BNG can help mitigate climate change through the restoration and protection of nature. For example, additional woodland creation will help take more carbon dioxide out of the atmosphere. BNG delivery can be a way in which local communities can be directly involved in climate-related adaptation projects, including tree planting and maintenance. BNG can help communities adapt to climate change by increasing resilience to extremes of weather, including heat waves and flooding. For example, green and blue spaces, such as woodlands, parks, and rivers, can provide localised shading and cooling effects, whilst green roofs, street trees and other vegetated surfaces can help reduce flood risk in urban areas

Important Views

Does this need to be a separate chapter? Text and map are taken from the Character Assessment (CA). There is no introductory text provided. Why not borrow from that given in the CA for the Views chapter?

Map 6

View 4.1 has no arrow and view 4 is not mentioned in the supporting NP text.

Map could do with being shown at a larger scale. Difficult to use. The Character Assessment map is of better quality.

View 2.3 the text and CA sayviews in from the south and east..... but the map arrow shows it looking out of the village.

Views 3.1 to 3.6 are not shown on Map 6. They are references to general views only. They need to be more specific and identified on the map. The corresponding photo in CA needs to show that specific view too.

The photos in the CA must relate to the view's arrow shown on the map - taken from that spot and in the direction of the arrow.

Ideally, views should be taken from a public place eg road, right of way, or public open space. From the map, it is not clear if this can be achieved for some views.

View 2.4 shown on the map looks in the direction of the sewage works.

Best if the view is described as having a focal point/landmark eg church tower, Lincoln Cathedral

Policy 11: Important Views and Vistas

1.The following views are safeguarded.....

Not all of the views identified in supporting text appear to be taken forward in the policy.

The text and CA list 19 views and 4 categories of view. The policy has 10 views and 3 categories.

Moreover, a different referencing is used (letters rather than numbers) to that given in supporting text and on Map 6. Confusing. The referencing should be the same for all.

It is crucial that there is consistency running through the NP and its supporting documents regarding Important Views. The details need to be the same in the CA, on Map 6, NP supporting text, and Policy 11.

The CA includes photos of the views which is very useful. The policy should provide a cross-reference to these.

For the view description more needs to be said about the viewpoint and focal point of the view, such as landmarks.

Policy 12 Local Green Space and Important Open Space

The Hollow is identified in the supporting text but not shown on Map 7 nor mentioned in Policy 12.

2. The spaces listed here should be safeguarded as Local Green Spaces too. Cannot guarantee that they will remain in the Local Plan.

What about designating these areas as Local Green Spaces?

- allotments gardens (accessed from Althea gardens?)
- primary school playing field/football pitch at end of Dawsons Lane
- wildlife area, rear of Beck Hill

Para 19.4

Green Wedge not Green Gap

Map 8

The southwest tip of the proposed Settlement Break area forms part of a site the recent subject of a planning application for housing development – ref 142874. The application's housing layout and master plan appear to show the area in question as public open space/woodland.

Policy 13 Settlement Break

1.separation of the three settlements?... two?

Policy 14 Community facilities

1. Reepham and Cherry Willingham Village Hall not shown on Map 9.

What about including these community facilities also?

-restaurant, North Lane, Sudbrook which lies in the Reepham NP area

-tennis courts, Hawthorn Road

Appendix B Character Assessment

Chris Bradley, Conservation Officer made this general comment about the CA: The Character Assessment is very good. It details the buildings and gives their significance as properties and within their environments. I would advise this being a template for the other NPs in terms of the historic character assessment.

Non-Designated Heritage Assets: Properties

For non-designated properties, it should be explained that virtually all derive from the Reepham Conservation Area Appraisal in which they are called Important Buildings. Further, it should be noted what the differences are between the two lists. What buildings have been added and why and which buildings were not taken forward in the Character Assessment? There needs to be a backstory for the non-designated properties.

c. Non-Designated Heritage Assets: Features

These Features in the Character Assessment are currently presented in a general way. However, to be recognised as non-designated features they need to relate to a specific address and be identified on a map.

Appendix C Character Area Summaries and Design Codes

A bracketed note in the introduction suggests that the document is not complete.

How about including the design codes as policies within the NP under The Built Environment chapter which features character areas?