

Hough on the Hill Neighbourhood Plan Modifications

CONSULTATION STATEMENT

Prepared by OpenPlan

on behalf of

Hough on the Hill Parish Council

**March 2025
(updated November 2025)**



OpenPlan
The Terrace
Grantham Street
Lincoln
LN2 1BD
enquiries@thinkopenplan.com
01522 262829
www.thinkopenplan.com

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1. About this Statement

- 1.1 This Consultation Statement has been prepared, in accordance with the requirements of Section 15(2) of Part 5 of the Neighbourhood Planning Regulations 2012, to support the submission of the Hough on the Hill Neighbourhood Plan.
- 1.2 In accordance with the requirements of the Neighbourhood Planning Regulations this statement:
 - contains details of the persons and bodies who were consulted about the proposed changes to the Neighbourhood Plan;
 - explains how they were consulted;
 - summarises main issues and concerns raised by the persons consulted;
 - describes how these issues and concerns have been considered and, where relevant, addressed in the changes to the Neighbourhood Plan now being proposed.
- 1.3 The purpose of this statement is to provide information about the consultations and community engagement activities that have been carried out, the responses received and the actions taken in response to those responses.

2. Consultation and Engagement Activities

2.1 The Parish Council took the decision to review and modify the Neighbourhood Plan in 2022. Several activities and events were undertaken to engage members of the community in the review process and to consult them on the emerging modifications, as outline in Table 1, below.

Table 1: Summary of Consultation Events and Activities

Date(s)	Event / Activity	Comments
February 2022	Hough on the Hill, Gelston & Brandon Neighbourhood Planning Questionnaire. Please refer to Appendix 1 for details.	This survey/questionnaire was designed to invite the views of all residents (aged 16 and over) about living in the Parish and whether the objectives of the current (2015) Neighbourhood Plan were still in line with residents' wishes. Two paper copies of the survey, along with an accompanying leaflet explaining why the existing Neighbourhood Plan needs to be updated and setting out the process, were distributed to every household in the Parish. Where possible, the surveys were handed to residents and a verbal explanation given. A period of 5 weeks was given for completion.
March 2022	Survey analysis report. Please refer to Appendix 1 for details.	Analysis of responses to survey. A total of 113 responses were received (39 paper copies and 74 online). This represents just over one quarter of the population of the Parish. It is perhaps worth noting that this response was substantially higher than that achieved during any stage of the previous Plan's preparation.
Saturday 2nd April 2022	Public Consultation Workshop Report	This workshop session focused on initial proposals for defining what we consider to be the built-up areas of our 3 settlements. 30 people attended and were able to view large maps of each settlement, discussing together whether the proposals accurately reflected the existing pattern of development.
Saturday 16th July at 10am 2022	Public Consultation Workshop	All Saints Church was the venue for a first look at the proposed Design Guidance intended to guide future approaches to new-build properties or conversions within the Parish. This Workshop gave people a chance to see the types of requirements that being put forward, to discuss them together and comment before finalisation of the document.
8 Jul till 19 Aug 2024	Hough on the Hill Parish	The consultation was undertaken over a period of 6 weeks – 8 th July to 19 th Aug 2024.

Neighbourhood Plan Public Consultation	Hard copies of the Plan were available in All Saints Church in Hough on the Hill and it was also available on the website.
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3. Responses to the Pre-Submission Consultation

- 3.1 A total of 7 local residents / landowners responded to the consultation. Responses were also received from 8 organisations whose views were sought as “statutory consultees”. The latter included South Kesteven District Council, who submitted the greatest number of amendment suggestions and requests.

- 3.2 All responses are set out (either in full or in summary) in Tables 2 and 3, below. The tables also include summaries of the actions taken in relation to the responses.

Table 2: Consideration of Responses to Community Pre-Submission Consultation

Responses to the main community consultation on the Pre-submission Draft of the Neighbourhood Plan are detailed, together with actions taken, in the table below. Further information about this consultation and responses received is provided in Appendix 2.

Responses to Consultation	
Respondent 1	Action
<p>Summary: Permissive Access Ended in 2016: The permissive access route shown on page 14 is no longer valid. Funding for the access ceased in December 2016, marking the official end of the access rights. Historical Context: The Parish Council has already been informed of this at least twice, indicating this is a known issue. Request for Action: The neighbourhood plan must be amended to remove or correct the outdated reference to this permissive access route.</p>	<p>The change referred to in this response has been noted and a prominent explanatory note has been added to the maps.</p> <p>It is intended that the maps themselves will be amended, subject to consideration of this response and action by an independent examiner.</p>
<p>Respondent 2</p> <p>Responses in full:</p> <ul style="list-style-type: none"> • Para 3- The work of developing the “original” Plan • 4 & 5- Need a space inserted between these paragraphs • 9- A higher proportion of ??? delete? Or something is missing here. And needs a space added before the next paragraph. • 30 Should this read ‘2021 Census’? • Fig 3- I think this graphic relates to the previous Census and so should either be updated or removed (and subsequent Figures re-numbered). • 33 Add: (NB The speed limit through Brandon has since been reduced to 40mph following action by the Parish Council.) 	<p>All these requested changes have been agreed and made.</p>

- 38 The (NB It should be noted) should be entirely removed as the Permissive Footpaths have now indeed been cancelled (as notified to the PC by the two landowners concerned during more recent consultations). It will be probably too hard to amend the map at Figure 4, so I suggest this paragraph is amended to read: “(NB It should be noted that the Permissive Footpaths illustrated on the following map are no longer operational as the landowner has withdrawn public access permission following the ending of previous government funding for such paths.)”
- 49 Remove 1st sentence relating to Hough Community Project as this is now defunct. Also remove last 2 sentences and replace with: “The new community space is now used for Parish Council meetings and other events/gatherings.”
- 54 In the Table showing original questionnaire responses, all the ‘red’ additions (including those crossed out) in Section 5 should be removed as these comments relate to our 2022 questionnaire, whereas this Table is documenting the 2014 comments.
- 55 This paragraph is wholly inadequate. Suggest it is replaced with the following:
 - “In 2022 the Parish Council decided to update the Neighbourhood Plan and undertook a door-to-door Residents Survey to ascertain views and opinions and establish whether the objectives of the original Plan were still in line with residents’ wishes. A total of 113 responses were received (over half of all households), and 111 of these indicated continuing support for the Plan’s objectives (which therefore remain unchanged in these modifications). Further work, with the support of external consultants, was undertaken on assessing the suitability of additional areas for potential Local Green Space designation, and on improved Design Guidance. There was however a period of instability and disagreement in the Parish Council about how best to proceed. The Parish Council (elected in 2023) decided not to take either of these two issues forward at this time. A planning consultant was engaged to prepare Plan modifications and although local residents were not permitted to be involved in his work, the PC did initiate a 6-week

All these requested changes, to this point, have been agreed and made.

The comments regarding the description of the review and modifications process, and related consultations, have been noted but not fully agreed. Some changes have been made in response.

<p>consultation period (July/August 2024) for comments on the proposals (even though the PC believes that their minor non-material nature does not require Regulation 14 pre-submission consultation processes). Comments were received from xx residents and the final proposals take full account of these.” (I hope!!)</p> <ul style="list-style-type: none"> ● 71 Replace ‘SKDC Conservation Area Draft Review’ with ‘SKDC Conservation Area Appraisal and Management Plan’ ● 73 After ‘proposed expanded boundary of the Conservation Area’ add: “(subsequently approved)” ● 75 Add at the end of this paragraph: (NB “The Parish Council subsequently obtained Lottery and other funding for the installation of a small MUGA.”) ● 98 Add at the end of this paragraph; “(NB It should be noted that the Permissive Footpaths illustrated on the following map are no longer operational as the landowner has withdrawn public access permission following the ending of previous government funding for such paths.)” ● 106-Check the Figure number and the page number at the end (shown as Figure 6, page 31) as these may be different in your final version ● 107-Delete the underscore and replace with a hyphen Also, at the very end – after Rural Exception sites – you should insert [Local Plan Policy SP4] to be consistent (you have identified SP3 above). ● 108-Similarly, at the end you should insert [Local Plan Policy SP5] ● 109-Towards the end, where you list the SKDC policies, SP5 should be on its own line ● 112-I am a bit confused here. I certainly would welcome future revisions to our existing Design Guidelines, to strengthen them etc, but you seem to be saying that you can simply replace Annex 1, when the time comes, without submitting the Plan again as further modified? I would query whether you would be able to do that. Perhaps you might clarify this. 	<p>The comments regarding the description of the review and modifications process, and related consultations, have been noted but not fully agreed. Some changes have been made in response.</p> <p>Changes requested in these responses have mostly been agreed and made.</p> <p>Changes requested in these responses have mostly been agreed and made.</p> <p>The intention is to undertake further community consultation before any revised or additional design guidance is given effect through the Neighbourhood Plan.</p>
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- Annex 1 I am somewhat baffled by the reference to AECOM's draft Design Guidance Report here. This document was never finally approved by the PC, and is full of uncorrected errors and mistakes (some of which were identified by local residents as part of previous consultation), and contains a section delineating the area to be considered as 'the built-up area' of Hough on the Hill (for the purposes of SKDC policies SP3 & SP4) which is completely misleading. I think the reference to this Report should be entirely removed (I note it has been removed from the PC website). If you wish it to be included, the report should be properly finished and signed-off and included in the Appendices (or at the very least signposted as to where it can be found). If it were properly finished, you might also consider using it to replace Annex 1 altogether as originally intended!
- Just a couple of additional points.
 - Is your Consultant aware that Jake Horton (SKDC) originally advised that in his view (quoting from his email dated 4/10/2021):
 - HoH7 "It's a fine margin on this one but in my opinion I don't think it is in conformity with policy H2 of the adopted SKDC Local Plan nor does it take into account updated NPPF guidance in terms of Rural Housing (pages 21 & 22)." Of course your consultant may be of a different view
 - HoH8 "I don't believe this is in conformity with policy E7 of the SKDC Local Plan given its quite restrictive in terms of its criteria." Of course your consultant may be of a different view.
 - HoH15: He points out that this references paragraphs originally numbered 105 and 106 which are no longer applicable. The wording of this policy needs to be altered. I think original para 105 is now paras 107 & 108; original para 106 is now para 109?
 - Also, if you do accept my previously suggested wording that references the 2022 Residents Survey Analysis Report (which is on the PC Website),

The intention is to undertake further community consultation before any revised or additional design guidance is given effect through the Neighbourhood Plan.

These points have been addressed through amendments.

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<p>then this Report needs to be either included in your Evidence Base (which I assume your consultant is updating), or attached to the new Plan. Indeed, it would be helpful for you to do so as it supports your proposals and shows that the PC has undertaken consultation with residents.</p>	<p>The Residents' Survey Report is being included in the evidence base.</p>
<p>Respondent 3</p>	<p>Action</p>
<p>Summary: Page 23 – Paragraph 69: The Design Code should be made more specific to reflect the distinct character of Hough on the Hill.</p>	<p>Noted. It is intended that the Design Code and Guidance will be developed further, and further consultation will be carried out.</p>
<p>A New Hill sign near the crossroads is reported as damaged and fallen again. While not directly relevant to the Plan text, this could be logged as a non-planning issue or maintenance concern for the Parish Council.</p> <p>Incorrect material listed: The Old School House, Wayside Farm, and The Old Vicarage are described as having grey slate tiles, but they are actually grey clay. Note: This correction had already been made in a previous draft but appears to have been reintroduced or overlooked again — needs correcting in the current version.</p> <p>Additional formatting error: There are two separate pages numbered 23 — page numbering should be reviewed and corrected.</p>	<p>Noted.</p> <p>This error has been corrected.</p> <p>This error has been corrected.</p>
<p>Respondent 4</p>	<p>Action</p>
<p>Responses in full:</p> <ul style="list-style-type: none"> - I basically wish to concur with what [name] has said. There was a lot of work done regarding the original review of the made NP with much consultation and responses. However, I need to emphasise that this edit is not minor and I believe that Jake Horton has been in touch with you regarding this issue. It could have implications if people thought it was minor and therefore haven't engaged. 	<p>Overall, the proposed modifications are now considered to be material changes that do not alter the nature of the Plan.</p>

<ul style="list-style-type: none"> - I would also like to know what statistics have been updated since the original plan was made. - The absence of a Design Guidance document, much of which was done earlier for the original review, using grant money and consultants, is concerning. - The inclusion of the SKDC policies with regard to SP3, SP4 and SP5 is important, however, there is no detail on how the edit of the NP addresses the development implementations should they arise. - Other issues such as issues such as climate change and employment policies and the impact on the parish do not appear to have been addressed. - "We are facing much more development demands in the District since the general election. It is unknown at this time how that will impact the smaller villages but no doubt it will. It is important therefore that the NP is positive on accepting development but firm on how it is implemented taking the nature and character of the villages into account. For example: <ul style="list-style-type: none"> - New Homes: - Infrastructure Issues: Improve sewerage, roads, facilities; broadband – how? - Infill SP3 * Conservation Area – sensitive spaces – criteria. Setting/materials/open spaces/gardens (density) - Edge of Village SP4 * Impact on landscape/entrances to village - Different types of affordable housing - Density - Design" - Extensions – design criteria - Design considerations: harmful – imposing on street scene/overlooking/neighbours residential amenity; bulk; noise and disturbance 	<p>This point has been addressed through amendments.</p> <p>The intention is to undertake further community consultation before any revised or additional design guidance is given effect through the Neighbourhood Plan.</p> <p>Noted, but the review has not identified a need to change the related policies at this stage.</p> <p>Noted, but it is not considered that further changes are warranted at this stage.</p> <p>Noted, but it is not considered that further changes are warranted at this stage.</p>
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<ul style="list-style-type: none"> - New Expanding Businesses = access/traffic/parking - Farm Diversification - Biodiversity – hedgerows/trees - FP's – linking/ retaining - "Open Countryside SP5 - Noisy Sports = importance of tranquillity within parish and protect from effects from outside parish boundary 	
<p>Respondent 5</p> <p>Summary: The respondents support the proposed changes to the NP document Their comments focus particularly on development sensitivity, conservation, infrastructure capacity, and design standards. Strong emphasis that the Conservation Area should be clearly highlighted as an area of importance in the NP. Future development within this area should be sensitive to its surroundings. Development should only occur on a "needs must" basis, not speculative or excessive. Raises concerns about the actual necessity for further development Specific concern raised about sewerage capacity: The household has previously experienced flooding of their garden with sewage. Agreement that a Design Code is needed: Should provide clear guidance to ensure that all future development is context-sensitive and of appropriate quality.</p>	<p>Action</p> <p>Support and comments noted.</p> <p>Comments noted.</p> <p>Noted, but it is not considered that further changes are warranted at this stage.</p> <p>The intention is to undertake further community consultation before any revised or additional design guidance is given effect through the Neighbourhood Plan.</p>
<p>Respondent 6</p> <p>Summary: The revised version of the Neighbourhood Plan is described as: "Far more sensible and pragmatic" than the previous version. Better reflects community sentiment and local priorities. The earlier plan (produced by the previous Parish Council) is characterised as: Hastily drawn up; Poorly received and responsible for community division and unrest; Perceived as not representative of the views of most parishioners.</p>	<p>Action</p> <p>Support and comments noted.</p>

Fully supports the current revised version.	
<p>Respondent 7</p> <p>Responses in full:</p> <p>I support the principle of updating the Neighbourhood Plan but I have the following objections to two paragraphs (paragraphs 54 and 103) based upon that the proposed deletions or insertions:</p> <ul style="list-style-type: none"> - are not "minor" (contrary to the statement in Paragraph 6); and/or - do materially affect the Neighbourhood Plan (contrary to the statement in Paragraph 6); <p>and/or</p> <ul style="list-style-type: none"> - deviate significantly from, and ignore, the views of the parishioners following the most recent formal public consultations by the Parish Council in 2022; and/or - give precedence to the views of a specific interest group, without referencing the views of other parishioners. <p>Objection 1 – Paragraph 54, Table, Point 5, LGS list – I object to the proposed removal of the 7 "other areas also suggested" as Local Green Spaces without reference to the public consultation exercises in 2022 and the broad support for additional Local Green Spaces. Additionally, the deletion does not fit into the definition of this amendment being minor, and nor is it within the bullet points within Paragraph 6.</p> <p>Since the original Neighbourhood Plan was adopted there has been a public survey and other public consultation events conducted by the Parish Council in 2022 resulting in 18 Local Green Spaces being suggested by parishioners and reviewed by the previous Parish Council for inclusion in an updated Neighbourhood Plan. There is clear support, evidenced in the adoption of the original Neighbourhood Plan plus the 2022 consultation exercises and parishioner responses to the survey, for Local Green Spaces and concerns about loss of rural character and potential development, as evidenced below:</p> <ul style="list-style-type: none"> - In the 2022 Parish Council survey, 65 people responded to Q17 "Are there areas, important to you, that you would like to see designated as Green Spaces?" 	<p>Action</p> <p>These points have been addressed through amendments.</p> <p>Overall, the proposed modifications are now considered to be material changes that do not alter the nature of the Plan.</p> <p>The comments have been noted but not agreed.</p> <p>The comments have been noted but not agreed.</p> <p>Noted, but it is not considered that further changes are warranted at this stage.</p>

- o More Local Green Spaces than were in the original Neighbourhood Plan were proposed in the 2022 survey and at public consultation events, evidencing the importance of, and support for, Local Green Spaces within the parish.
- o In response to this clear support for Local Green Spaces (also evidenced in Q3, Q7, Q10 and Q11 detailed below) the previous Parish Council settled on 18 potential Local Green Spaces that may be included in an updated Neighbourhood Plan.
 - There were 10 for Hough on the Hill (references H1-H10), 4 for Brandon (references B1x2 + B3-B4) and 4 for Gelston (references G1-3 + G6)
 - Not only are the previous Local Green Spaces being proposed for deletion, but no mention of the proposed 18 new Local Green Spaces is included for parishioners to express their support for, or not, in this draft update.
- In the 2022 Parish Council survey, of the 8 objectives in Q3 ("Do you agree that the Plan Objectives should remain the same?"), the objective scoring the highest number of people agreeing, at 96% (106 of 111 people), was "Protecting green space, and supporting nature conservation and biodiversity"
- In the 2022 Parish Council survey, in answer to Q5 "Do you have any fears for the future of our settlements' tranquil, rural character over the next 20 years, or issues that could affect your future quality of life here?", 69% (59 out of 85 people) mentioned "concerns about development or insensitive development"
- In the 2022 Parish Council survey, in answer to Q7 "Please rate any concerns about the following types of development", 78% (86 of 110 people) said they had concerns about "Infill development on land within our settlements (SP3)"
- In the 2022 Parish Council survey, in answer to Q7 "Please rate any concerns about the following types of development", 82% (90 of 110 people) said they had concerns about "Development on the edge of our settlements (SP4)"
- In the 2022 Parish Council survey, in answer to Q7 "Please rate any concerns about the following types of development", 90% (101 of 112 people) said they had concerns about "Development in the open countryside (SP5)"
- In the 2022 Parish council survey, in relation to Q10 "Is the rural character of the parish important to you?", 100% of respondents agreed that they are either "very

Noted, but it is not considered that further changes are warranted at this stage.

The comments have been noted but not agreed.

important" or "somewhat important", with c.93% saying "very important". 100% of 113 people responded to this question

- In the 2022 Parish Council survey, in answer to Q11 "Are the countryside and views important to you?", 100% of respondents agreed that they are either "very important" or "somewhat important", with c.97% saying "very important". 100% of 113 people responded to this question

Objection 2 – Paragraph 54, Table, Point 5, second paragraph – I object to a specific inclusion of the NPPF paragraph relating to Local Green Spaces. The NPPF does not need to be quoted here and its inclusion appears to be an attempt to strengthen an argument against Local Green Spaces, and contrary to the express views of residents in formal consultation exercises conducted by the Parish Council in 2022, as detailed above in Objection 1. I propose that this paragraph is deleted.

Objection 3 – Paragraph 54, Table, Point 5, third paragraph – I object that a specific interest group's views have been included when the remainder of the parish have not had their views included. I have no objection to farmers, or anyone else, having a view, but the parish comprises 450 people and if views on Local Green Spaces are to be expressed in the Neighbourhood Plan it should be done formally, and openly, with everyone having the same opportunity to have their opinion included. As highlighted above in Objection 1, there is significant evidence to suggest that there is overall support for Local Green Spaces and I query why the current Parish Council has only consulted with a minority of parishioners and included their views, and excluded all others. I propose that this paragraph is deleted.

Summary (Objections 1-3), Paragraph 54 – based upon the above clear support for Local Green Spaces I object to the revisions proposed in the draft Updated Neighbourhood Plan and I propose:

- That the 2022 Parish Council survey results be included as an appendix to the Neighbourhood Plan
- That a factual paragraph is inserted in Paragraph 54, Table, Point 5, stating: "A range of parishioner views have been expressed for and against Local Green Spaces, with more in favour than against, in the 2022 consultation exercises. 18

Noted, but it is not considered that further changes are warranted at this stage.

Noted, but it is not considered that further changes are warranted at this stage.

potential Local Green Spaces (10 in Hough on the Hill, 4 in Brandon and 4 in Gelston) that were considered by the Parish Council have not been included in the 2024 iteration of the Neighbourhood Plan based upon concerns of some landowners. Loveden Hill will remain as a designated Local Green Space, with the support of the landowner.”

Objection 4 – Paragraph 103 – similar to Objection 2, I question why this specific reference has been extracted from the NPPF which appears to want to support development. A general reference to the NPPF could be made at the start (or end) of the updated Neighbourhood Plan, and the Neighbourhood Plan’s relationship to it, but I believe that to extract specific paragraphs as-presented is intended to skew the Neighbourhood Plan in favour of development which, as highlighted above in Objection 1, the majority of residents responding to the survey and consultation exercises are against and/or have significant concerns about. I propose that this paragraph is deleted.

Noted, but it is considered necessary to quote the relevant section of the NPPF at this point to explain that Local Green Space designation should only be made when the specific criteria set out in the NPPF are met. It is considered that most of the sites referred to do not meet the criteria.

Table 3: Consideration of Responses to Pre-Submission Consultation with “Statutory Bodies”

Responses to the consultation on the Pre-submission Draft of the Neighbourhood Plan with the bodies required to be consulted are detailed, together with actions taken (none required), in the table below. The bodies consulted were:

- South Kesteven District Council (SKDC)
- Avison Young-National Grid Electricity Transmission
- Natural England
- National Highways
- Environment Agency
- Historic England
- Anglican Water
- Upper Witham Internal Drainage Board

REF #	RESPONDENT	DATE	COMMENTS	ACTION
1	South Kesteven District Council (SKDC)		<p>Page 5 -Paragraph 5 - Bullet point 3 – SKDC would suggest that this is now amended to reflect that a new consultation is taking place on a revised NPPF - Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK (www.gov.uk) between the 30 July and 24 September.</p> <p>Additionally, this bullet point may need to be updated again once the new revised version of the NPPF is published later this year, if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes.</p> <p>Pages 5/6- Paragraph 6 - SKDC would strongly advise that the word ‘minor’ is removed when referencing the proposed modifications made to the Neighbourhood Plan document. This is as the proposed modifications would not meet the definition of ‘minor’ as set out in NPPF guidance, which states under Paragraph: 106 Reference ID: 41-106-20190509 that ‘Minor (non-material) modifications to a neighbourhood plan or order are those which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document and would not require examination or a referendum.’</p> <p>For context, the current Hough on the Hill Neighbourhood Plan (2015) was made and examined under the South Kesteven Core Strategy (2010) and Site Allocations DPD document (2014) which have now both been superseded by the currently adopted Local Plan (2020). Therefore, as the Hough on the Hill Neighbourhood</p>	<p>All recommendations made by SKDC have been accepted and the proposed Modified Neighbourhood Plan has been amended accordingly.</p> <p>All recommendations made by SKDC have been accepted and the proposed Modified Neighbourhood Plan has been amended accordingly.</p>

REF #	RESPONDENT	DATE	COMMENTS	ACTION
			<p>Plan was not examined against the currently adopted Local Plan (2020), it means that the proposed changes to the policies to reflect the Local Plan (2020) have substantially altered the requirements that the Hough on the Hill Neighbourhood Plan (2015) was originally examined and made under.</p> <p>SKDC would therefore advise that the modifications made to the Hough on the Hill Neighbourhood Plan review are 'material' and that the paragraph and its subsequent bullet points (i.e. bullet point 1) are updated to reflect this.</p> <p>SKDC would also advise that the Qualifying body / Neighbourhood Plan group prepare an additional statement in line with NPPG guidance Paragraph: 106 Reference ID: 41-106-20190509 outlining the proposed modifications and then explaining whether or not they are significant enough as to change the overall nature of the plan.</p> <p>Page 7 -Paragraph 9 – There is an abrupt end to the third sentence “A higher proportion of....” SKDC suggests that this is reviewed and completed.</p> <p>SKDC suggest a formatting space is added between paragraphs 9/10</p> <p>Page 8 Paragraph 16 – The Hough on Hill conservation area appraisal was completed in June 2014, therefore SKDC would suggest there may be scope to update this paragraph with the outcomes of the appraisal work.</p> <p>Page 11-Paragraph 28 – As an update to this paragraph SKDC can provide additional information that there has been the delivery of no new affordable houses in Hough-on-the-Hill, Gelston or Brandon.</p> <p>Additionally, there are currently no applicants on the SKDC Housing Register with a local connection to Hough-on-the-Hill, Gelston or Brandon. However, there are 20 people on the Housing Register that would like to be housed in Hough-on-the-Hill but don't live or have a local connection with the area.</p> <p>The 20 people on the Housing register is broken down as follows [table attached].</p> <p>Page 11-Paragraph 30 – SKDC would like to confirm if this information has been taken from the 2011 census or is updated from the 2021 census records? If it is the latter, then the paragraph should be updated to reflect this.</p> <p>Page 12-Paragraph 31 –Suggest that reference to “43.15” is changed to “43.15%” in the third sentence.</p> <p>Page 15-Paragraph 43 – SKDC suggest there may be scope to update this paragraph as the outcomes of broadband coverage/ speeds were looked at nearly 10 years ago for the Neighbourhood area. There is currently a Government target for gigabit broadband to be available to 85% of the UK by 2025 and</p>	<p>All recommendations made by SKDC have been accepted and the proposed Modified Neighbourhood Plan has been amended accordingly.</p>

REF #	RESPONDENT	DATE	COMMENTS	ACTION
			<p>nationwide by 2030, of which further information can be found in the linked parliamentary report - Gigabit broadband in the UK: Government targets, policy, and funding - House of Commons Library (parliament.uk)</p> <p>In addition, more current information relating to broadband speeds/ coverage can be found on the following webpage - Browse Maps and Check Broadband Performance and Coverage Across the UK (thinkbroadband.com)</p> <p>Page 15-Paragraph 44 –Within the third sentence, note that the accident and emergency facility at Grantham Hospital is now a 24-hour urgent treatment centre (UTC). SKDC suggest the text is updated to reflect this</p> <p>Page 16-Paragraph 49 – SKDC suggest there may be scope to update the paragraph with the outcomes of the fundraising for the phase two works to the All-Saints Church (for instance if any further conversions did take place ect ...)</p> <p>Section 3 - Pages 17,18,19 Section 3 provides a brief explanation and description into to how the current Hough on the Hill Neighbourhood Plan (2015) undertook local community consultation and what the key outcomes where from the 'statement of community consultation' document.</p> <p>As this is a review into the Hough on the Hill Neighbourhood Plan (2015) the Parish Council / Neighbourhood Plan group should be seeking to add information to this section and seek to explain with who/ where and when consultation has taken place, and how the outcomes have helped shaped the review (this is in addition to the mandatory statement of community consultation also being prepared which would give greater detail to this section.)</p> <p>Therefore,</p> <p>SKDC strongly advise reverting the changes made to the table on page 18 specifically around the removal of the LGS areas as this information is being changed from a consultation that has already taken place and been used in the making of the currently adopted Hough on the Hill Plan (2015). The text referencing the updated position regarding LGS and the outcomes of new consultations with local farmers should be referenced in an updated part of this section as previously mentioned. Note – This consultation with local farmers should also be evidenced within the updated statement of community consultation document.</p> <p>SKDC also strongly advise the deletion of paragraph 55 due to the use of the wording 'minor' which has been addressed by SKDCs earlier response on paragraph 6 of Neighbourhood Plan document. SKDC suggest that it is replaced</p>	<p>All recommendations made by SKDC have been accepted and the proposed Modified Neighbourhood Plan has been amended accordingly.</p> <p>All recommendations made by SKDC have been accepted and the proposed Modified Neighbourhood Plan has</p>

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			<p>by a paragraph outlining that the proposed modifications are 'material' and then explaining whether the Parish Council / Neighbourhood Plan group believe that they are significant enough as to change the overall nature of the plan.</p> <p>Page 23-Paragraph 71 - SKDC suggest that the text in the brackets at the end of the paragraph is updated to reflect that the 2014 Hough on the Hill Conservation Area appraisal is no longer 'draft' but is now an adopted document.</p> <p>SKDC also suggest that the bullet points in connection with paragraph 71 are reviewed in order to see if there have been any changes to the identified key features, structures and buildings between the draft and adopted 2014 Hough on the Hill Conservation Area appraisal. This is in addition to checking them on against Historic Environment records which can be found at the following - Historic Environment Records (HERs) Historic England</p> <p>Page 24-Paragraph 73 - SKDC suggest that the text in the brackets is updated to reflect the that the 2014 Hough on the Hill Conservation Area appraisal is no longer 'draft' but is now an adopted document</p> <p>Paragraph 81 – Note that “English Heritage” has now been renamed to “Historic England” – SKDC suggest therefore that this is referenced or updated in the text.</p> <p>Page 32-Paragraph 99 – SKDC suggest that additional text could be included within the paragraph to inform a user/ reader that these policies are proposed to be updated as part of a review, and that the outcomes of this community consultation will help shape the Hough on the Hill Neighbourhood plan policies moving forward.</p> <p>Page 32-Paragraph 101 / Footnote 1 – SKDC advise that the footnote is now modified to reflect that an updated 'Basic Conditions Statement' will be prepared as part of this review, and it will demonstrate how the modified policies within this Neighbourhood Plan have had regard to National Planning Policy and are in conformity with strategic policies of the current SKDC Local Plan (2020).</p> <p>Paragraph 102 – As set out in SKDCs previous comments this text may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes.</p> <p>Page 33-Paragraph 103 – As set out in SKDCs previous comments the text may need to be updated again once the new revised version of the NPPF is published</p>	<p>been amended accordingly.</p> <p>All recommendations made by SKDC have been accepted and the proposed Modified Neighbourhood Plan has been amended accordingly.</p>

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			<p>later this year if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes.</p> <p>Paragraph 104 – SKDC advise that the Plan period outlined in the last sentence is changed to “2024 – 2036”. This is as the updated plan period should reflect the year in which the review of the Neighbourhood Plan began to take place.</p> <p>Page 35-Paragraph 107 – SKDC advise that the word “adopted” is inserted before ‘Local Plan’ in the first sentence</p> <p>Pages 35/36 SKDC advise that the pages are reformatted in order to ensure legibility and clarity. Therefore, SKDC suggest the following changes;</p> <p>The text width between policies SP3 and SP4 varies and should be corrected</p> <p>There should be spaces between the criteria of SP3, similar to how the criteria of policies SP4 and SP5 have been set out</p> <p>Criteria F of policy SP4 is merged with the text regarding Rural Exception Schemes and therefore the two should be separated to avoid any confusion</p> <p>There should be a space between Criteria A and the wording of “The proposal must” in policy SP4</p> <p>There should be a space between criteria G and H of policy SP4</p> <p>The “is” at the end of paragraph 108 needs deleting</p> <p>General Comment on the HoH policies While SKDC acknowledges that the policies are set out in a different colour text compared to the rest of the Neighbourhood Plan document it would further improve clarity if they were also put into different coloured square text boxes.</p> <p>Policy HoH1-SKDC suggest that this policy should have a title after its code</p> <p>SKDC would still advise that reference to paragraph 109 is added in after the phrase ‘appropriate uses.’ While it is acknowledged the Neighbourhood Plan should be read as a whole, it would give a quick reference as to where the term ‘appropriate uses’ has been defined.</p> <p>Policy HoH1 “conformity with” section. SKDC suggest the following formatting modifications are made for clarity</p> <p>The word “the” at the start of the sentence should be capitalised</p> <p>Policy SP5 should have a formatting space so that it continues the list under policy SP4</p>	<p>All recommendations made by SKDC have been accepted and the proposed Modified Neighbourhood Plan has been amended accordingly.</p>

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			<p>Policy HoH1 “conformity with NPPF” section SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes</p> <p>Policy HoH2 SKDC suggest that this policy should have a title after its code Additionally, SKDC suggest there could be scope to add more detail to the second paragraph of the policy to encourage copying ‘good quality surrounding design’... This is as a proposed development could be next to a building or on a street with a mixed or neutral or negative character – then it could allow a developer to copy existing poor-quality design.</p> <p>SKDC would assume that the Parish/ Neighbourhood Plan group would want the predominant and most characterful and positive examples to be used as design cues for new development and would therefore suggest adding some text to this effect.</p> <p>Policy HoH2 “conformity with NPPF” section. SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes</p> <p>Page 39-Paragraph 114 – SKDC suggest that the text is formatted so that it is all under the same uniform font type.</p> <p>Policy HoH3 “conformity with” section. SKDC also suggest that policy ‘EN6: The Historic Environment’ is added to this section</p> <p>SKDC also suggest that section ‘16. Conserving and enhancing the historic environment’ is added to this section</p> <p>SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes</p> <p>Policy HoH4 -SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes</p> <p>Policy HoH5 “conformity with NPPF” section-SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is</p>	<p>All recommendations made by SKDC have been accepted and the proposed Modified Neighbourhood Plan has been amended accordingly.</p> <p>All recommendations made by SKDC have been accepted and the proposed Modified Neighbourhood Plan has been amended accordingly.</p>

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			<p>published later this year if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes</p> <p>Policy HoH6-First policy paragraph - SKDC advise that the wording "or the Conservation Area Appraisal 2014" is added at the end of the sentence after "Neighbourhood Plan". This is due to the fact that the Neighbourhood Plan itself only identifies a sample of 'non designated heritage assets' within paragraph 117 and therefore the policy is currently unclear in referencing all of the 'none designated heritage assets' that can be found within the Parish.</p> <p>Alternatively, the Parish may wish to keep the policy text as currently written, but list all of the 'non- designated heritage assets' in a separate paragraph or as an addition to paragraph 117.</p> <p>Page 41-Paragraph 120 – SKDC would want to seek clarification as to where these criteria have been obtained from?</p> <p>Additionally, these points have not been listed in a policy and would only be considered as supporting text, which would hold less weight for the purposes of determining a potential development application – SKDC would wish to seek clarification as to whether this is this is intention?</p> <p>HoH7 -SKDC has concerns that bullet points 2 and 3 are not in conformity with the currently adopted Local Plan policy SP4 and have not had regard for the NPPF (2023) paragraph 73. At present the bullet points are too restrictive as policy SP4 and the NPPF makes it clear that rural exception schemes for affordable housing can come forward on the 'edge of settlements' so long as they comply with policies and standards (which in the case of SP4 would be criteria b-j.)</p> <p>SKDC would suggest either removing these bullet points from the policy or replacing the bullet points with bullet point number one of paragraph 120, as this would ensure conformity.</p> <p>"Policy HoH7 "conformity with" section"-SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes</p> <p>Page 43-Paragraphs 124/125 – SKDC has noted that these two paragraphs are quoting the now outdated Site Allocations and Development Policies DPD (2014) which has been superseded by the SKDC Local Plan (2011-2036). Therefore, SKDC recommends that they are deleted.</p>	<p>All recommendations made by SKDC have been accepted and the proposed Modified Neighbourhood Plan has been amended accordingly.</p>

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			<p>As it is the intention to update the Hough on the Hill Neighbourhood plan to be in conformity with the currently adopted SKDC Local Plan (2011-2036), SKDC suggest that these paragraphs are replaced with the text from the adopted Local Plan ... This could include polices E7 / E8 and E9 which set out policies for rural employment/ economic proposals.</p> <p>Policy HoH8 -SKDC suggest that this policy should have a title after its code</p> <p>Policy HoH8 “conformity with” section. SKDC suggest that policy ‘SP5: Development in the Open Countryside’ is added to this section</p> <p>Policy HoH8 “conformity with NPPF” section -SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes</p> <p>Policy HoH9 -"SKDC suggest that this policy should have a title after its code</p> <p>Additionally, SKDC has concerns over the word ‘adjacent’ in the second paragraph. The reasoning behind allocating areas as Local Green Spaces is to prevent development specifically within the area itself, given it has a status the same as greenbelt and its demonstrably special qualities ensure its protection. It is not the intention of a Local Green Space designation to have an impact on potential developments outside of the designation area, even if they may be directly adjacent. Therefore, SKDC suggest the removal of the word."</p> <p>Policy HoH9 “conformity with NPPF” section-SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes</p> <p>Page 44-Paragraph 127 - SKDC has noted that this paragraph is quoting the now outdated Site Allocations and Development Policies DPD (2014) which has now been superseded by the SKDC Local Plan (2011-2036).</p> <p>As it is the intention to update the Hough on the Hill Neighbourhood plan to be in conformity with the currently adopted SKDC Local Plan (2011-2036), SKDC suggest that it is updated with text from the adopted Local Plan environmental polices EN2 / EN3 and open space policy OS1</p> <p>Policy HoH10-SKDC suggest that this policy should have a title after its code</p> <p>Policy HoH10 “conformity with NPPF” section SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is</p>	<p>All recommendations made by SKDC have been accepted and the proposed Modified Neighbourhood Plan has been amended accordingly.</p> <p>All recommendations made by SKDC have been accepted and the proposed Modified Neighbourhood Plan has</p>

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			<p>published later this year if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes</p> <p>Policy HoH11-SKDC suggest that this policy should have a title after its code Policy HoH11 “conformity with NPPF” section. SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes</p> <p>Policy HoH12 -SKDC suggest that this policy should have a title after its code Policy HoH12 “conformity with NPPF” section. SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes</p> <p>Page 47-Paragraph 130 - SKDC suggest that there is scope to update this paragraph with more relevant and up to date information.</p> <p>For instance the ‘Planning Practice Guidance for Renewable and Low Carbon Energy (para 17)’ has been withdrawn and replaced with NPPG guidance - Paragraph: 004 Reference ID: 5-004-20140306</p> <p>Additionally the Community Energy Strategy is now outdated and has since been (in part) replaced by a ‘Net Zero’ strategy which sets out further policy on community energy - Net Zero Strategy: Build Back Greener - GOV.UK (www.gov.uk)</p> <p>Policy HoH13 -SKDC suggest that this policy should have a title after its code Policy HoH13 “conformity with NPPF” section. SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes</p> <p>Policy HoH14 -SKDC suggest that this policy should have a title after its code Policy HoH14 “conformity with NPPF” section. SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes</p> <p>Page 49-Paragraph 134 – SKDC suggest that a formatting space is needed between the words “(October 2013)”</p> <p>Policy HoH15 -SKDC suggest that this policy should have a title after its code</p>	<p>been amended accordingly.</p> <p>All recommendations made by SKDC have been accepted and the proposed Modified Neighbourhood Plan has been amended accordingly.</p>

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			<p>Policy HoH15-"SKDC would like the Parish to note that since the Hough on the Hill Neighbourhood Plans adoption in 2015, there has not been the introduction of a CIL charging schedule across the district. Additionally, at this present time SKDC have no plans to introduce CIL charging. Therefore, SKDC advise that the following wording of the policy is deleted.</p> <p>"Or through the neighbourhood element of the Community Infrastructure Levy (CIL) adopted by South Kesteven District Council".</p> <p>If the proposed modification is made, then SKDC also suggest inserting the word "and" in-between "conditions" and "Section 106 agreements"."</p> <p>Policy HoH15 "conformity with NPPF" section. SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes</p> <p>Page 49-"Paragraph 135 – As referenced in relation to previous comments, there has not been the introduction of a CIL charging schedule across the district. SKDC therefore suggest the removal of the following text</p> <p>"The Parish Council may draw on the 'neighbourhood element' of CIL to provide funds towards those items identified in the Delivery Strategy, and "</p> <p>Policy HoH16 -"As referenced in relation to previous comments, there has not been the introduction of a CIL charging schedule across the district. SKDC therefore suggest the removal of the following text</p> <p>"or use of Community Infrastructure Levy (CIL)"</p> <p>If the proposed modification is made, then SKDC also suggest inserting the word "or" in-between "condition" and "Section 106 agreements"."</p> <p>Policy HoH16 "conformity with NPPF" section SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighbourhood Plan review has not been formally submitted before these changes</p> <p>Page 51-Paragraph 139 - As referenced in relation to previous comments, there has not been the introduction of a CIL charging schedule across the district. SKDC therefore suggest the removal of the following text "or through the 'neighbourhood element' of any the Community Infrastructure Levy (CIL) adopted by SKDC."</p> <p>Paragraph 140/ Identified need table – SKDC suggest that during this draft stage of review it is a good opportunity to update the table surrounding these 'Identified Needs' and to assess whether the priorities remain the same.</p>	<p>All recommendations made by SKDC have been accepted and the proposed Modified Neighbourhood Plan has been amended accordingly.</p>

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			<p>Page 52-Paragraph 141 / Non-Planning Issues – SKDC suggest that during this draft stage of review it is a good opportunity to update the table surrounding these wider non planning issues and set out if there have been any further updates since 2015.</p> <p>Page 55- "SKDC would question if it is the intention of the 'NOTE' regarding the AECOM design guidance to be at this point in the document, given its weight would be limited as it has not been referenced within a specific policy or throughout the document at any point.</p> <p>Additionally, it does not appear that the design guidance has been published to provide comment on and therefore SKDC would request a copy in order to review the information and make comment on its content."</p>	
2	Avison Young - National Grid Electricity Transmission	14/08/2024	<p>Proposed development sites crossed or in close proximity to NGET assets: An assessment has been carried out with respect to NGET's assets which include high voltage electricity assets and other electricity infrastructure.</p> <p>NGET has identified that it has no record of such assets within the Neighbourhood Plan area.</p> <p>NGET provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> • www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/ <p>Please also see attached information outlining guidance on development close to NGET infrastructure. Distribution Networks Information regarding the electricity distribution network is available at the website below:</p> <p>www.energynetworks.org.uk</p> <p>Further Advice Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:</p> <p>Matt Verlander, Director: nationalgrid.uk@avisonyoung.com</p> <p>Tiffany Bate, Development Liaison Officer: box.landandacquisitions@nationalgrid.com</p> <p>Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises</p>	Noted, no further action

REF #	RESPONDENT	DATE	COMMENTS	ACTION
			<p>that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.</p> <p>NGET's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgrid.com/document/130626/download</p> <p>The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed.</p> <p>National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. NGET's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: www.nationalgrid.com/network-and-assets/working-near-our-assets</p> <p>How to contact NGET. If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: https://lsbud.co.uk/</p> <p>For local planning policy queries, please contact: nationalgrid.uk@avisionyoung.com</p> <p>No Specific Comments</p>	
3	Natural England	16/08/2024	<p>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.</p> <p>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 .</p>	Noted. No further action required.

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			<p>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.</p> <p>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.</p>	
4	National Highways	10/07/2024	<p>Minor Amendments to the Hough on the Hill Parish Neighbourhood Plan- Public Consultation</p> <p>Thank you for providing National Highways with the opportunity to consult on the proposed amendments to the Neighbourhood Plan for Hough on the Hill, for the period 2024-2036.</p> <p>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.</p> <p>The SRN closest to the Neighbourhood Plan area is the A1 trunk road, approx. 6 miles distant, and is outside the boundary of the plan area.</p> <p>We have considered the contents of the draft amendments to the Neighbourhood Plan and as the plan does not introduce any new development sites or transport related policies that are likely to impact upon our network, we consider that the contents of the plan are for local determination, and we have no further comments to make at this stage.</p>	<p>Noted. No further action required.</p>

REF #	RESPONDENT	DATE	COMMENTS	ACTION
5	Environment Agency	31/07/2024	<p>"Environmental Constraints</p> <p>1. Flood risk</p> <p>Firstly, we would like to highlight that the Environment Agency is not the only consultee on flood risk and other Risk Management Authorities (RMAs) are also consulted to respond to planning applications. Therefore, the Plan should also note other RMAs. These include the Lead Local Flood Authority (LLFA) – Lincolnshire County Council (LCC) who lead on surface water, ground water and ordinary watercourses and the Internal Drainage Board (IDB), which is Upper Witham IDB. Although the majority of the Neighbourhood Plan boundary falls within Flood Zone 1, there are some regions of Flood Zone 2 and 3 present. The extent of this risk is shown by the associated Flood Zones. We therefore advise that the Hough on the Hill Neighbourhood Development Plan (NDP) recommends policies which advocate sequential planning by avoiding development within the floodplain and steers new development to areas with the lowest probability of flooding. Given the large areas of Flood Zone 1 available in the Hough on the Hill Parish boundary, this is achievable. If development must take place within the Flood Zones, then it should be in line with National Planning Policy Framework (NPPF) to ensure there is no increase in flood risk to development and to others as a result of the development, the NDP should state the importance of mitigation measures and flood resilience and resistance measures for new development, including an allowance for climate change. We would advise including a flood map to illustrate risk of fluvial flooding within the NDP boundary. Section 39 (page 15) states there are areas at risk of surface water flooding, dykes and watercourses under the jurisdiction of the Environment Agency within the Parish. This statement needs amending as surface water flooding is now the responsibility of LCC as the LLFA. The Environment Agency manages the risk from watercourses designated as a main river under their permissive powers. There are no watercourses designated as a main river within the parish boundary. Watercourses within the parish boundary are therefore likely to be managed by either LCC or the Upper Witham IDB. We would also recommend amending the wording 'control byelaws' to 'are responsible for byelaws', however the 'Anglian region flood defence and land drainage' byelaws for which the Environment Agency operate, except where otherwise stated only apply to the main rivers, the sea and tidal defences, therefore they may not all be applicable within the Parish boundary.</p>	All noted. Where relevant, the proposed Modified Neighbourhood Plan has been amended accordingly.

REF #	RESPONDENT	DATE	COMMENTS	ACTION
			<p>Development within the Parish boundary does not need to consider any flood risk activity permit under the Environmental Permitting Regulations 2016 due to no main rivers being present. Section 120 (page 41) refers to avoiding sites which are at risk of flooding or could increase the impact of flooding elsewhere. We would recommend this is more specifically defined as: avoid development wherever possible in Flood Zones 2 & 3, and where this is not possible due to existing development, suitable flood risk mitigation measures are proposed. This wording should be applied to all policies relating to housing development within the NDP. Given the statements made in section 39 (page 15) of the NDP regarding the risk of surface water flooding in the Parish, it may be prudent to include a specific Policy relating to development in areas at risk of surface water flooding. The LLFA (LCC) are now responsible for the management of surface water flood risk, therefore it is advised that LCC are consulted about the inclusion of this specific policy in the NDP. There are surface water flow paths across the Parish, development should be steered away from this natural flow path, and out of the flood extents to reduce increase of risk of flooding.</p> <p>For clarity, we would advise including a separate map of surface water flood risk in the NDP. Local knowledge could be applied to this map to show known areas that experience surface water flooding in the village."</p> <p>2. Water quality and foul drainage</p> <p>The NDP states in section 40 (page 15) "Hough on the Hill drains into the River Brant catchment, with the village being served by a small Anglian Water Sewage Treatment Works. The Upper Brant is failing good status due to elevated levels of phosphate. The lower River Brant is also at poor ecological status."</p> <p>"We can confirm that that the Hough on the Hill sewage treatment works does discharge to the Upper Brant (Water Framework Directive (WFD) waterbody ID GB105030056110) and that the failure is due to phosphate. One of the confirmed reasons for this is the continuous discharge from the water company sewage treatment works.</p> <p>Further details can be found here: Brant - Upper Catchment Data Explorer Catchment Data Explorer</p> <p>The NDP does not include a drainage strategy. We would expect, and recommend, one of these to be included to outline how new developments will ensure that the surface water and foul flows from their sites will not cause deterioration to any WFD waterbodies.</p>	

REF #	RESPONDENT	DATE	COMMENTS	ACTION
			<p>We would also advise you to consult and liaise with Anglian Water regarding the capacity of the Hough on the Hill sewage treatment works to take on additional flows from new developments without causing deterioration in the receiving watercourse. It should also be noted that there are two other WFD catchments in the Hough on the Hill Parish boundary: Honington Beck (GB105030056750) and Sand Beck (GB105030056160). How the Plan can protect these waterbodies should also be considered, particularly if development is proposed within them. Paragraph 42 (page 15) states that "The majority of properties (and all properties within Brandon and Gelston) are not on mains drainage". One of the Environment Agency's principle concerns regarding foul water management is to prevent the proliferation of non-mains treatment solutions wherever possible. We advise that the Plan should encourage developments to connect to the mains wherever practicable. We would suggest some wording is included in the Plan to advise of the following:</p> <p>Government guidance contained within the national Planning Practice Guidance (Water supply, wastewater and water quality – considerations for planning applications, paragraph 020) sets out a hierarchy of drainage options that must be considered and discounted in the following order:</p> <ol style="list-style-type: none"> 1. Connection to the public sewer 2. Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation) 3. Septic Tank <p>In addition, as useful background information for anyone considering developing in the Neighbourhood Plan area (but not to include in the Plan text), further guidance on the sewage hierarchy guidelines can be found here: Drainage and waste disposal: Approved Document H - GOV.UK (www.gov.uk)</p> <p>Any future developments should also look at including measures for improving and enhancing the water environment where possible."</p> <p>3. Water efficiency</p> <p>We note Annex 1: Neighbourhood Plan Design Guidance, criterion f, of the NDP states 'the incorporation of features which contribute to the efficient use of water (eg water butts) is encouraged'. We welcome this inclusion, however we would recommend that this is expanded to include reference to encouraging items such as more water efficient taps within dwellings.</p> <p>This will also help meet Policy SB1 (Sustainable Building) of the South Kesteven Local Plan.</p>	

REF #	RESPONDENT	DATE	COMMENTS	ACTION
			<p>Furthermore, if water efficiency measures are promoted by the NDP, this will help reduce the amount of foul drainage from developments within the NDP area and lessen any pressure on the Sewage Treatment Works serving Hough on the Hill and the foul drainage infrastructure for the remainder of the Plan area.</p> <p>4. Biodiversity</p> <p>We support the inclusion of the 'Green Spaces: Protecting Greenspace and Support Nature Conservation and Biodiversity' section and NDP objective.</p> <p>We note that Green Infrastructure is also mentioned in the plan. We would suggest that the water environment / blue infrastructure is also included as it is important to consider blue and green infrastructure together as water is vital to the health of greenspaces and biodiversity.</p> <p>5. Groundwater and contaminated land</p> <p>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). With this in mind we recommend adding the following to section 41 of the Plan on the topic of 'Flood Risk, Water Quality and Geology':</p> <p>The western part of the parish is also underlain by superficial geology comprising the Fulbeck Sand and Gravel Member, which is also classified as a secondary A aquifer. These aquifers can support local abstractions and baseflow to streams and rivers. The use (or potential use) of groundwater in the area makes parts of the area vulnerable to pollution from certain types of development. Best practice to ensure groundwater is protected from pollution and as a resource is contained within guidance document 'The Environment Agency's approach to groundwater protection' available at Groundwater protection position statements - GOV.UK (www.gov.uk).</p> <p>This publication sets out our position for a wide range of activities and developments, including:</p> <ul style="list-style-type: none"> • Waste management • Discharge of liquid effluents • Land contamination Ground source heat pumps 	

REF #	RESPONDENT	DATE	COMMENTS	ACTION
			<ul style="list-style-type: none"> • Cemetery developments • Drainage" <p>Within Annex A reference could be made to 'Land Contamination: risk management (LCRM) available at Land contamination risk management (LCRM) - GOV.UK (www.gov.uk)</p> <p>"6. Waste</p> <p>Whilst we are not asking for wording to be included in the Plan, we have the following general advice to offer for the information of anyone wishing to carry out development in the Neighbourhood Plan area:"</p> <p>Resource efficiency & the circular economy The circular economy is a concept designed to keep materials in use as long as possible, thus promoting resource efficient practice and deriving economic benefits. Adherence to the waste hierarchy and adoption of best practice in relation to site waste management planning will help you deliver against circular economy objectives. Observance of the waste hierarchy objectives and principles of the circular economy will depend upon the selection of the most sustainable option at every phase of a development project, from reduction through design and architecture, to the selection of the most efficient recovery process for the treatment and use of waste.</p>	
6	Historic England	17/07/2024	<p>The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.</p> <p>No specific comments</p>	<p>Noted, no further action required</p>
7	Anglian Water	16/07/2024	<p>The comments set out below are made, ensuring the making of the plan contributes to sustainable development and has regard to assets owned and managed by Anglian Water. Overall, we are supportive of the policy ambitions within the neighbourhood plan, subject to the proposed amendments.</p> <p>Policy HoH12 Renewable Energy - Encouraging energy efficiency and, where appropriate, energy production from renewable and low carbon sources</p> <p>The South Kesteven Local Plan Policy SB1: Sustainable Building requires development to mitigate against and adapt to climate change and includes measures regarding energy consumption and water resources. For the latter, new development should seek to achieve a 'water neutral position' and promote enhanced sustainability.</p>	<p>All noted. Where relevant, the proposed Modified Neighbourhood Plan has been amended accordingly.</p>

REF #	RESPONDENT	DATE	COMMENTS	ACTION
			<p>As the region is identified as seriously water stressed and we encourage neighbourhood plans to include measures to improve water efficiency of new development through a fixtures and fittings approach, including through rainwater/storm water harvesting and reuse, and greywater recycling.</p> <p>Anglian Water supports requiring new development to be served by sustainable infrastructure provision and that does not result in a detrimental impact on water infrastructure, including sewers and surface water and watercourse flooding. Our revised draft water resources management plan (WRMP) for 2025-2050 identifies key challenges of population growth, climate change, and the need to protect sensitive environments by reducing abstraction. Managing the demand for water is therefore an important aspect of maintaining future supplies. See Water resources management plan (anglianwater.co.uk)</p> <p>Such measures to improve water efficiency standards and include opportunities for water reuse and recycling also reduces the volume of wastewater needed to be treated by our water recycling centres. This will also help to reduce customer bills (including for other energy bills) as well as reduce carbon emissions in the supply and recycling of water.</p> <p>The Defra Integrated Plan for Water supports the need to improve water efficiency and the Government's Environment Improvement Plan sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress. Given the proposed national approach to water efficiency, Anglian Water encourages this approach.</p> <p>As a suggestion, there may be merit including on the management of water resources in new development proposals under Policy HoH12 and some further practical ways as of reducing water consumption could be covered in the design guidelines (Annex 1). Some mention is already made under criterion (f) "Similarly, the incorporation of features which contribute to the efficient use of water (eg water butts) is encouraged."</p> <p>Flood Risk Water Quality and Geology</p> <p>Paragraph 29 sets out that there are areas at risk of surface water flooding, most particularly around the Brandon area.</p> <p>In terms of flood risk management, it is important to address surface water run-off, including the preference for this to be managed using SuDS in accordance with the</p>	

REF #	RESPONDENT	DATE	COMMENTS	ACTION
			<p>drainage hierarchy. Such measures help to avoid surface water run-off from entering Anglian Water's foul drainage network, and connections to a surface water sewer should only be considered where all other options are demonstrated to be impracticable and as a last resort. Any requirements for a surface water connection to our surface water sewer network will require the developer to fund the cost of modelling and any upgrades required to accept the flows from the development.</p> <p>It is, therefore, suggested a cross reference could be added in this section that the relevant Local Plan policy is Policy EN5: Water Environment and Flood Risk Management.</p> <p>Anglian Water encourages the use of nature-based solutions for SuDS wherever possible, including retrofitting SuDS to existing urban areas to enhance amenity and biodiversity within the neighbourhood plan area and contribute to green and blue infrastructure. It has been the Government's intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England. We welcome an interim local policy approach to ensure SuDS measures are incorporated within new developments, until such time the Schedule is formally implemented, and the necessary measures are in place.</p> <p>Design Guidelines Criterion (g) (Annex 1) - Anglian Water recognises the need to manage vehicular access/ parking arrangements within the area. It is suggested that the neighbourhood plan could specify that permeable surfaces (pavements and other areas of hard standing such as vehicle parking areas) are used in the design of new developments to reduce surface water run-off from the introduction of hard-standing areas.</p>	
	Upper Witham Internal Drainage Board		<p>Thank you for the opportunity to comment on the Neighbourhood Plan.</p> <p>Some of the lower parts of the area of interest fall within the Upper Witham Internal Drainage Board's District, see the attached plan. More information about the Board can be found on the website 'upperwitham-idb.gov.uk'. Most of the existing property has been built on higher ground outside the District although there are several properties on Brandon Road that are within the Board's District in an area that can be considered at risk of flooding.</p>	<p>All noted. Where relevant, the proposed Modified Neighbourhood Plan has been amended accordingly.</p>

REF #	RESPONDENT	DATE	COMMENTS	ACTION
			<p>It should also be noted that there have been some flooding/ground water issues in the village of Brandon.</p> <p>The area of interest is situated in an area where the watercourses are unable to accept any increase in the rates of discharge; therefore, any development must prove the existence of a surface water drainage route and provide adequate proposals to make certain that flood risk is not increased elsewhere as a result of any proposed development.</p> <p>It is suggested that the Neighbourhood Plan should support the idea of sustainable drainage and that any proposed development should be in accordance with National and Regional Flood Risk assessments and Management plans.</p> <p>No new development should be allowed to be built within flood plain. The 'Flood Maps' on the Environment Agency website provides information on areas at risk, information can be found by searching 'EA flood maps'. Also risk from surface water flooding should also be considered, information can also be found on the Environment Agency website. It can be found by search using 'EA surface water flood map'</p> <p>Under the terms of the Land Drainage Act. 1991 and the Board's Byelaws, the prior written consent of the Board is required for any proposed works or structures in, under, over or within 9 metres of the top of the bank of any watercourse within the District. This is independent of the Planning Process. Also, under the provisions of the Flood and Water Management Act 2010, and the Land Drainage Act. 1991, the prior written consent of the Lead Local Flood Authority (Lincolnshire County Council) is required for any proposed works or structures in any watercourse outside those designated main rivers and Internal Drainage Districts. In this area the Board acts as Agents for the Lead Local Flood Authority and as such any works, permanent or temporary, in any ditch, dyke or other such watercourse will require consent from the Board.</p>	

APPENDIX 1: Notice of Public Consultation on the Pre-submission Draft of Proposed Amendments to the Hough on the Hill Parish Neighbourhood Plan -

To all Parishioners in Hough, Gelston and Brandon

Hough on the Hill Parish Neighbourhood Plan Public Consultation 8 Jul till 19 Aug 24.

Following advice from SKDC the Parish Council instructed a professional firm of Planners to make some minor amendments to the Neighbourhood Plan.

Whilst under normal circumstances these amendments would not require Public Consultation (Footnote1) the PC has decided that it would be appropriate for Parishioners to have sight of the Amendments before the modified Neighbourhood Plan is submitted to South Kesteven District Council.

The consultation will be for 6 weeks - 8 Jul–19 Aug 2024. Two hard copies of the Plan will be available in All Saints Church in Hough and a soft copy will be on the website.

Should Parishioners wish to comment then they are to e-mail the Hough, Brandon and Gelston

Parish Clerk - Donna Lang on houghpccclerk@gmail.com

Thank you

The Parish Council

Footnote1: It is considered that the amendments being proposed fall into the category of “minor (and non-material) modifications that do not materially affect the policies in the Neighbourhood Plan.

Government Guidance on Neighbourhood Planning advises that consultation, examination and referendum are not statutorily required when changes of this type are being made.

APPENDIX 2: Statutory Bodies' Consultation Responses

This appendix contains copies of responses received from “statutory bodies” consulted on the proposed modifications, in accordance with Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.

- South Kesteven District Council (SKDC)
- Avison Young-National Grid Electricity Transmission
- Natural England
- National Highways
- Environment Agency
- Historic England
- Anglian Water
- Upper Witham Internal Drainage Board



South Kesteven District Council comments on the Draft Version of the Hough on the Hill Neighbourhood Plan Review (2024)

Date: 19/08/24

<u>Policy / Paragraph</u>	<u>Comment / Recommendation</u>
Page 5	<p>Paragraph 5 - Bullet point 3 – SKDC would suggest that this is now amended to reflect that a new consultation is taking place on a revised NPPF - Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK (www.gov.uk) between the 30 July and 24 September.</p> <p>Additionally, this bullet point may need to be updated again once the new revised version of the NPPF is published later this year, if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes.</p>
Page 5/6	<p>Paragraph 6 - SKDC would strongly advise that the word '<i>minor</i>' is removed when referencing the proposed modifications made to the Neighbourhood Plan document. This is as the proposed modifications would not meet the definition of '<i>minor</i>' as set out in NPPG guidance, which states under Paragraph: 106 Reference ID: 41-106-20190509 that</p> <p>'Minor (non-material) modifications to a neighbourhood plan or order are those which would not materially affect the policies in the plan or permission granted by the order. These may include correcting errors, such as a reference to a supporting document and would not require examination or a referendum.'</p> <p>For context, the current Hough on the Hill Neighbourhood Plan (2015) was made and examined under the South Kesteven Core Strategy (2010) and Site Allocations DPD document (2014) which have now both been superseded by the currently adopted Local Plan (2020). Therefore, as the Hough on the Hill Neighbourhood Plan was not examined against the currently adopted Local Plan (2020), it means that the proposed changes to the policies to reflect the Local Plan (2020) have substantially altered the requirements that the Hough on the Hill Neighbourhood Plan (2015) was originally examined and made under.</p> <p>SKDC would therefore advise that the modifications made to the Hough on the Hill Neighborhood Plan review are '<i>material</i>' and that the paragraph and its subsequent bullet points (i.e. bullet point 1) are updated to reflect this.</p> <p>SKDC would also advise that the Qualifying body / Neighbourhood Plan group prepare an additional statement in line with NPPG guidance Paragraph: 106 Reference ID: 41-106-20190509 outlining the proposed modifications and then explaining whether or not they are significant enough as to change the overall nature of the plan.</p>
Page 7	<p>Paragraph 9 – There is an abrupt end to the third sentence "A <i>higher proportion of....</i>" SKDC suggests that this is reviewed and completed.</p>
Page 7	SKDC suggest a formatting space is added between paragraphs 9/10



Page 8	<p>Paragraph 16 – The Hough on Hill conservation area appraisal was completed in June 2014, therefore SKDC would suggest there may be scope to update this paragraph with the outcomes of the appraisal work.</p>												
Page 11	<p>Paragraph 28 – As an update to this paragraph SKDC can provide additional information that there has been the delivery of no new affordable houses in Hough-on-the-Hill, Gelston or Brandon.</p> <p>Additionally, there are currently no applicants on the SKDC Housing Register with a local connection to Hough-on-the-Hill, Gelston or Brandon. However, there are 20 people on the Housing Register that would like to be housed in Hough-on-the-Hill but don't live or have a local connection with the area.</p> <p>The 20 people on the Housing register is broken down as follows.</p> <table border="1"><thead><tr><th>Bed no.</th><th>1 bed</th><th>2 bed</th><th>3 bed</th><th>4 bed</th><th>Total</th></tr></thead><tbody><tr><td>Applicants</td><td>5</td><td>11</td><td>1</td><td>3</td><td>20</td></tr></tbody></table>	Bed no.	1 bed	2 bed	3 bed	4 bed	Total	Applicants	5	11	1	3	20
Bed no.	1 bed	2 bed	3 bed	4 bed	Total								
Applicants	5	11	1	3	20								
Page 11	<p>Paragraph 30 – SKDC would like to confirm if this information has been taken from the 2011 census or is updated from the 2021 census records? If it is the latter, then the paragraph should be updated to reflect this.</p>												
Page 12	<p>Paragraph 31 – Suggest that reference to "43.15" is changed to "43.15%" in the third sentence.</p>												
Page 15	<p>Paragraph 43 – SKDC suggest there may be scope to update this paragraph as the outcomes of broadband coverage/ speeds were looked at nearly 10 years ago for the Neighbourhood area. There is currently a Government target for gigabit broadband to be available to 85% of the UK by 2025 and nationwide by 2030, of which further information can be found in the linked parliamentary report - Gigabit broadband in the UK: Government targets, policy, and funding - House of Commons Library (parliament.uk)</p> <p>In addition, more current information relating to broadband speeds/ coverage can be found on the following webpage - Browse Maps and Check Broadband Performance and Coverage Across the UK (thinkbroadband.com)</p>												
Page 15	<p>Paragraph 44 – Within the third sentence, note that the accident and emergency facility at Grantham Hospital is now a 24-hour urgent treatment centre (UTC). SKDC suggest the text is updated to reflect this</p>												
Page 16	<p>Paragraph 49 – SKDC suggest there may be scope to update the paragraph with the outcomes of the fundraising for the phase two works to the All-Saints Church (for instance if any further conversions did take place ect ...)</p>												
Section 3 – Pages 17/18 /19	<p>Section 3 provides a brief explanation and description into to how the current Hough on the Hill Neighbourhood Plan (2015) undertook local community consultation and what the key outcomes where from the 'statement of community consultation' document.</p>												



	<p>As this is a review into the Hough on the Hill Neighbourhood Plan (2015) the Parish Council / Neighbourhood Plan group should be seeking to <u>add</u> information to this section and seek to explain with who/ where and when consultation has taken place, and how the outcomes have helped shaped the review (this is in addition to the mandatory statement of community consultation also being prepared which would give greater detail to this section.)</p> <p>Therefore,</p> <p>SKDC strongly advise reverting the changes made to the table on page 18 specifically around the removal of the LGS areas as this information is being changed from a consultation that has already taken place and been used in the making of the currently adopted Hough on the Hill Plan (2015). The text referencing the updated position regarding LGS and the outcomes of new consultations with local farmers should be referenced in an updated part of this section as previously mentioned. Note – This consultation with local farmers should also be evidenced within the updated statement of community consultation document.</p> <p>SKDC also strongly advise the deletion of paragraph 55 due to the use of the wording 'minor' which has been addressed by SKDCs earlier response on paragraph 6 of Neighbourhood Plan document. SKDC suggest that it is replaced by a paragraph outlining that the proposed modifications are 'material' and then explaining whether the Parish Council / Neighbourhood Plan group believe that they are significant enough as to change the overall nature of the plan.</p>
Page 23	<p>Paragraph 71 - SKDC suggest that the text in the brackets at the end of the paragraph is updated to reflect that the 2014 Hough on the Hill Conservation Area appraisal is no longer 'draft' but is now an adopted document.</p> <p>SKDC also suggest that the bullet points in connection with paragraph 71 are reviewed in order to see if there have been any changes to the identified key features, structures and buildings between the draft and adopted 2014 Hough on the Hill Conservation Area appraisal. This is in addition to checking them on against Historic Environment records which can be found at the following - Historic Environment Records (HERs) Historic England</p>
Page 24	<p>Paragraph 73 - SKDC suggest that the text in the brackets is updated to reflect the that the 2014 Hough on the Hill Conservation Area appraisal is no longer 'draft' but is now an adopted document</p> <p>Paragraph 81 – Note that "<i>English Heritage</i>" has now been renamed to "<i>Historic England</i>" – SKDC suggest therefore that this is referenced or updated in the text.</p>
Page 32	<p>Paragraph 99 – SKDC suggest that additional text could be included within the paragraph to inform a user/ reader that these policies are proposed to be updated as part of a review, and that the outcomes of this community consultation will help shape the Hough on the Hill Neighborhood plan polices moving forward.</p>



Page 32	<p>Paragraph 101 / Footnote 1 – SKDC advise that the footnote is now modified to reflect that an updated ‘Basic Conditions Statement’ will be prepared as part of this review, and it will demonstrate how the modified policies within this Neighbourhood Plan have had regard to National Planning Policy and are in conformity with strategic policies of the current SKDC Local Plan (2020).</p>
Page 32	<p>Paragraph 102 – As set out in SKDCs previous comments this text may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes.</p>
Page 33	<p>Paragraph 103 – As set out in SKDCs previous comments the text may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes.</p>
Page 33	<p>Paragraph 104 – SKDC advise that the Plan period outlined in the last sentence is changed to “2024 – 2036”. This is as the updated plan period should reflect the year in which the review of the Neighbourhood Plan began to take place.</p>
Page 35	<p>Paragraph 107 – SKDC advise that the word “<i>adopted</i>” is inserted before ‘<i>Local Plan</i>’ in the first sentence</p>
Page 35 /36	<p>SKDC advise that the pages are reformatted in order to ensure legibility and clarity. Therefore, SKDC suggest the following changes;</p> <ul style="list-style-type: none">• The text width between policies SP3 and SP4 varies and should be corrected• There should be spaces between the criteria of SP3, similar to how the criteria of policies SP4 and SP5 have been set out• Criteria F of policy SP4 is merged with the text regarding Rural Exception Schemes and therefore the two should be separated to avoid any confusion• There should be a space between Criteria A and the wording of “<i>The proposal must</i>” in policy SP4• There should be a space between criteria G and H of policy SP4• The “<i>is</i>” at the end of paragraph 108 needs deleting
General Comment on the HoH policies	<p>While SKDC acknowledges that the policies are set out in a different color text compared to the rest of the Neighbourhood Plan document it would further improve clarity if they were also put into different colored square text boxes.</p>
Policy HoH1	<p>SKDC suggest that this policy should have a title after its code</p> <p>SKDC would still advise that reference to paragraph 109 is added in after the phrase ‘<i>appropriate uses.</i>’ While it is acknowledged the Neighborhood Plan should be read as a whole, it would give a quick reference as to where the term ‘<i>appropriate uses</i>’ has been defined.</p>



Policy HoH1 “conformity with” section	SKDC suggest the following formatting modifications are made for clarity <ul style="list-style-type: none">• The word “the” at the start of the sentence should be capitalised• Policy SP5 should have a formatting space so that it continues the list under policy SP4
Policy HoH1 “conformity with NPPF” section	SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes
Policy HoH2	SKDC suggest that this policy should have a title after its code Additionally, SKDC suggest there could be scope to add more detail to the second paragraph of the policy to encourage copying ‘good quality surrounding design’... This is as a proposed development could be next to a building or on a street with a mixed or neutral or negative character – then it could allow a developer to copy existing poor-quality design. SKDC would assume that the Parish/ Neighbourhood Plan group would want the predominant and most characterful and positive examples to be used as design cues for new development and would therefore suggest adding some text to this effect.
Policy HoH2 “conformity with NPPF” section	SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes
Page 39	Paragraph 114 – SKDC suggest that the text is formatted so that it is all under the same uniform font type.
Policy HoH3 “conformity with” section	SKDC also suggest that policy ‘EN6: The Historic Environment’ is added to this section
Policy HoH3 “conformity with NPPF” section	SKDC also suggest that section ‘16. Conserving and enhancing the historic environment’ is added to this section SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes
Policy HoH4	SKDC suggest that this policy should have a title after its code
Policy HoH4 “conformity with NPPF” section	SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes
Policy HoH5 “conformity	SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes



with NPPF" section	
Policy HoH6	<p>First policy paragraph - SKDC advise that the wording "<i>or the Conservation Area Appraisal 2014</i>" is added at the end of the sentence after "<i>Neighbourhood Plan</i>". This is due to the fact that the Neighbourhood Plan itself only identifies a sample of 'non designated heritage assets' within paragraph 117 and therefore the policy is currently unclear in referencing all of the 'none designated heritage assets' that can be found within the Parish.</p> <p>Alternatively, the Parish may wish to keep the policy text as currently written, but list all of the 'non- designated heritage assets' in a separate paragraph or as an addition to paragraph 117.</p>
Page 41	<p>Paragraph 120 – SKDC would want to seek clarification as to where these criteria have been obtained from?</p> <p>Additionally, these points have not been listed in a policy and would only be considered as supporting text, which would hold less weight for the purposes of determining a potential development application – SKDC would wish to seek clarification as to whether this is this is intention?</p>
HoH7	<p>SKDC has concerns that bullet points 2 and 3 are not in conformity with the currently adopted Local Plan policy SP4 and have not had regard for the NPPF (2023) paragraph 73. At present the bullet points are too restrictive as policy SP4 and the NPPF makes it clear that rural exception schemes for affordable housing can come forward on the 'edge of settlements' so long as they comply with policies and standards (which in the case of SP4 would be criteria b-j.)</p> <p>SKDC would suggest either removing these bullet points from the policy or replacing the bullet points with bullet point number one of paragraph 120, as this would ensure conformity.</p>
Policy HoH7 "conformity with" section	SKDC suggest that policy 'SP4: Development on the edge of settlements' is added to this section (if the appropriate changes are made to policy HoH7)
Policy HoH7 "conformity with NPPF" section	SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes
Page 43	<p>Paragraphs 124/125 – SKDC has noted that these two paragraphs are quoting the now outdated Site Allocations and Development Policies DPD (2014) which has been superseded by the SKDC Local Plan (2011-2036). Therefore, SKDC recommends that they are deleted.</p> <p>As it is the intention to update the Hough on the Hill Neighbourhood plan to be in conformity with the currently adopted SKDC Local Plan (2011-2036), SKDC suggest that these paragraphs are replaced with the text from the adopted Local Plan ... This</p>



	could include polices E7 / E8 and E9 which set out policies for rural employment/ economic proposals.
Policy HoH8	SKDC suggest that this policy should have a title after its code
Policy HoH8 “conformity with” section	SKDC suggest that policy ‘SP5: Development in the Open Countryside’ is added to this section
Policy HoH8 “conformity with NPPF” section	SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes
Policy HoH9	SKDC suggest that this policy should have a title after its code Additionally, SKDC has concerns over the word ‘ <i>adjacent</i> ’ in the second paragraph. The reasoning behind allocating areas as Local Green Spaces is to prevent development specifically within the area itself, given it has a status the same as greenbelt and its demonstrably special qualities ensure its protection. It is not the intention of a Local Green Space designation to have an impact on potential developments outside of the designation area, even if they may be directly adjacent. Therefore, SKDC suggest the removal of the word.
Policy HoH9 “conformity with NPPF” section	SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes
Page 44	Paragraph 127 - SKDC has noted that this paragraph is quoting the now outdated Site Allocations and Development Policies DPD (2014) which has now been superseded by the SKDC Local Plan (2011-2036). As it is the intention to update the Hough on the Hill Neighbourhood plan to be in conformity with the currently adopted SKDC Local Plan (2011-2036), SKDC suggest that it is updated with text from the adopted Local Plan environmental polices EN2 / EN3 and open space policy OS1
Policy HoH10	SKDC suggest that this policy should have a title after its code
Policy HoH10 “conformity with NPPF” section	SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes
Policy HoH11	SKDC suggest that this policy should have a title after its code
Policy HoH11 “conformity with NPPF” section	SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes



Policy HoH12	SKDC suggest that this policy should have a title after its code
Policy HoH12 “conformity with NPPF” section	SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes
Page 47	<p>Paragraph 130 - SKDC suggest that there is scope to update this paragraph with more relevant and up to date information.</p> <p>For instance the ‘Planning Practice Guidance for Renewable and Low Carbon Energy (para 17)’ has been withdrawn and replaced with NPPG guidance - Paragraph: 004 Reference ID: 5-004-20140306</p> <p>Additionally the Community Energy Strategy is now outdated and has since been (in part) replaced by a ‘Net Zero’ strategy which sets out further policy on community energy - Net Zero Strategy: Build Back Greener - GOV.UK (www.gov.uk)</p>
Policy HoH13	SKDC suggest that this policy should have a title after its code
Policy HoH13 “conformity with NPPF” section	SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes
Policy HoH14	SKDC suggest that this policy should have a title after its code
Policy HoH14 “conformity with NPPF” section	SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes
Page 49	<p>Paragraph 134 – SKDC suggest that a formatting space is needed between the words “(October 2013)”</p>
Policy HoH15	SKDC suggest that this policy should have a title after its code
Policy HoH15	<p>SKDC would like the Parish to note that since the Hough on the Hill Neighbourhood Plans adoption in 2015, there has not been the introduction of a CIL charging schedule across the district. Additionally, at this present time SKDC have no plans to introduce CIL charging. Therefore, SKDC advise that the following wording of the policy is deleted.</p> <p><i>“Or through the neighbourhood element of the Community Infrastructure Levy (CIL) adopted by South Kesteven District Council”</i></p> <p>If the proposed modification is made, then SKDC also suggest inserting the word “and” in-between “conditions” and “Section 106 agreements”.</p>



Policy HoH15 “conformity with NPPF” section	SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes
Page 49	Paragraph 135 – As referenced in relation to previous comments, there has not been the introduction of a CIL charging schedule across the district. SKDC therefore suggest the removal of the following text <i>“The Parish Council may draw on the ‘neighbourhood element’ of CIL to provide funds towards those items identified in the Delivery Strategy, and”</i>
Policy HoH16	As referenced in relation to previous comments, there has not been the introduction of a CIL charging schedule across the district. SKDC therefore suggest the removal of the following text <i>“or use of Community Infrastructure Levy (CIL)”</i> If the proposed modification is made, then SKDC also suggest inserting the word “or” in-between “condition” and “Section 106 agreements”.
Policy HoH16 “conformity with NPPF” section	SKDC would advise that this section may need to be updated again once the new revised version of the NPPF is published later this year if the Hough on the Hill Neighborhood Plan review has not been formally submitted before these changes
Page 51	Paragraph 139 - As referenced in relation to previous comments, there has not been the introduction of a CIL charging schedule across the district. SKDC therefore suggest the removal of the following text <i>“or through the ‘neighbourhood element’ of any the Community Infrastructure Levy (CIL) adopted by SKDC.”</i>
Page 51	Paragraph 140/ Identified need table – SKDC suggest that during this draft stage of review it is a good opportunity to update the table surrounding these ‘Identified Needs’ and to assess whether the priorities remain the same.
Page 52	Paragraph 141/ Non-Planning Issues – SKDC suggest that during this draft stage of review it is a good opportunity to update the table surrounding these wider non planning issues and set out if there have been any further updates since 2015.
Page 55	SKDC would question if it is the intention of the ‘NOTE’ regarding the AECOM design guidance to be at this point in the document, given its weight would be limited as it has not been referenced within a specific policy or throughout the document at any point. Additionally, it does not appear that the design guidance has been published to provide comment on and therefore SKDC would request a copy in order to review the information and make comment on its content.

Our Ref: MV/ 15B901605

14 August 2024

Hough on the Hill Parish Council
houghpccclerk@gmail.com
via email only



Dear Sir / Madam

Hough on the Hill Neighbourhood Plan Regulation 14 Consultation

July - August 2024

Representations on behalf of National Grid Electricity Transmission

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets:

An assessment has been carried out with respect to NGET's assets which include high voltage electricity assets and other electricity infrastructure.

NGET has identified that it has no record of such assets within the Neighbourhood Plan area.

NGET provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to NGET infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below:
www.energynetworks.org.uk

Further Advice

Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

[REDACTED] Director

[REDACTED] Development Liaison Officer

Avison Young
Central Square
Forth Street
Newcastle upon Tyne
NE1 3PJ

National Grid Electricity Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

[REDACTED]

For and on behalf of Avison Young

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's '*Guidelines for Development near pylons and high voltage overhead power lines*' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgridet.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their '*Guidelines when working near National Grid Electricity Transmission assets*', which can be downloaded here: www.nationalgridet.com/network-and-assets/working-near-our-assets

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

Our Ref: MV/15B901605

14 August 2024

Hough on the Hill Parish Council
houghpcclerk@gmail.com
via email only



Dear Sir / Madam

Hough on the Hill Neighbourhood Plan Regulation 14 Consultation

July - August 2024

Representations on behalf of National Gas Transmission

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Gas Transmission

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

Proposed sites crossed by or in close proximity to National Gas Transmission Assets

Following a review of the above document we have identified the following National Gas Transmission assets as falling within the Neighbourhood area boundary:

Asset Description

Gas Transmission Pipeline, route: SILK WILLOUGHBY TO STAYTHORPE PS

A plan showing details of National Gas Transmission's assets is attached to this letter. Please note that this plan is illustrative only.

National Gas Transmission also provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Please see attached information outlining guidance on development close to National Gas Transmission infrastructure.

Distribution Networks

Information regarding the gas distribution network is available by contacting:
plantprotection@cadentgas.com

Further Advice

Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets.

We would be grateful if you could add our details shown below to your consultation database, if they are not already included:

[REDACTED], Director

[REDACTED], Asset Protection Lead

Avison Young
Central Square
Forth Street
Newcastle upon Tyne
NE1 3PJ

National Gas Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

[REDACTED]
[REDACTED]
[REDACTED]

For and on behalf of Avison Young

National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

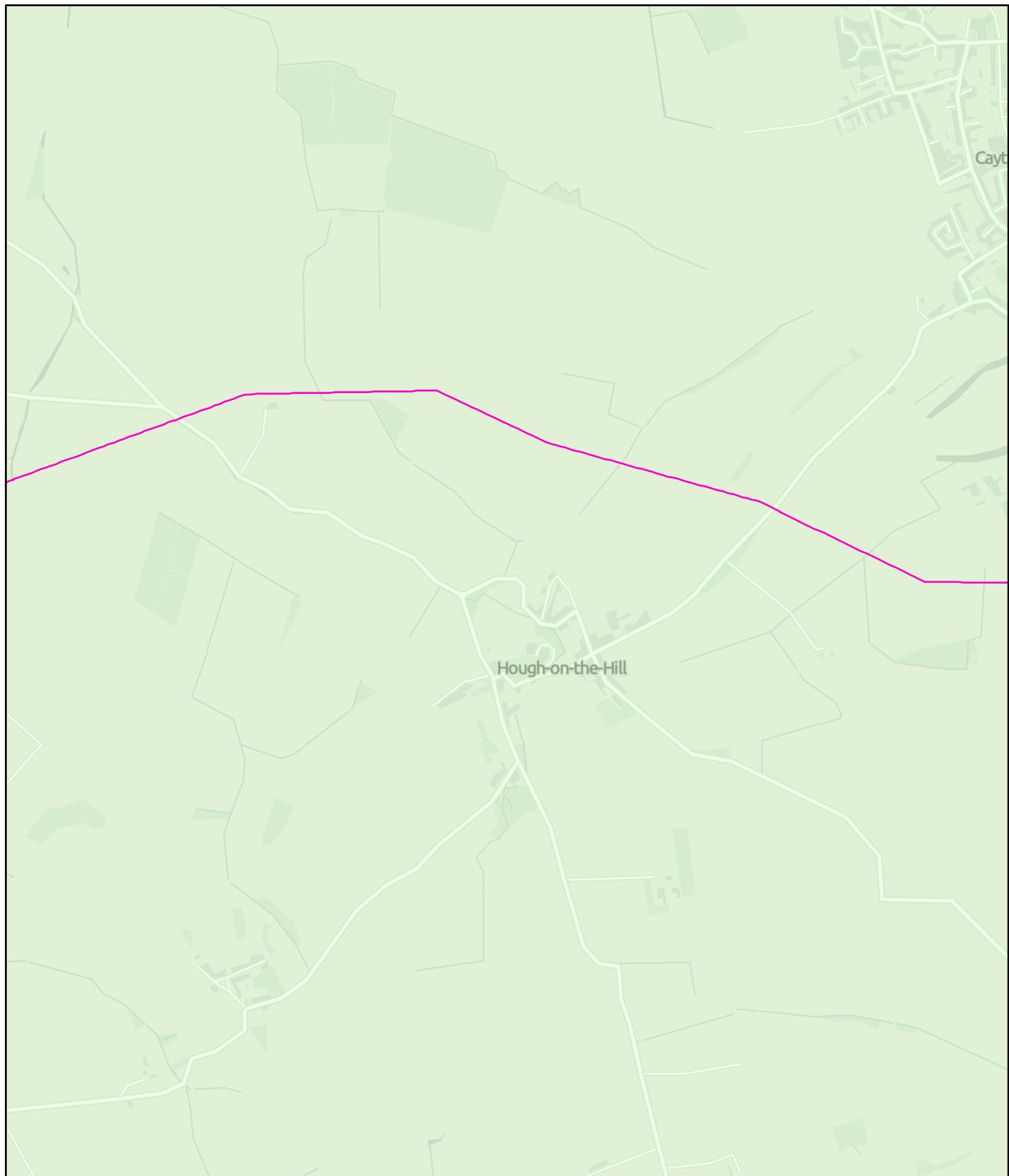
National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgas.uk@avisonyoung.com

Hough on the Hill Parish Council: National Gas Asset Map



14/08/2024, 11:48:09

1:18,017

0 0.15 0.3 0.6 mi
0 0.23 0.45 0.9 km

- Gas_Assets_6495
- Development_Plan_Monitoring_v2_977_5701
- Development_Plan_Monitoring_v2_977

Contains OS data © Crown Copyright and database right 2023
Contains data from OS Zoomstack



Ms Donna Lang
Hough on the Hill Parish Council

BY EMAIL ONLY
houghpcclerk@gmail.com

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

Dear Ms Lang

Hough on The Hill Neighbourhood Plan - updated Draft Neighbourhood Plan 2024-2036

Thank you for your consultation on the above dated 08 July 2024.

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](#) .

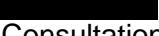
Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may 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 an 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


Consultations Team

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

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)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](http://associationlocalenvironmentalrecordscentres.org.uk/).

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](http://magic.defra.gov.uk/)⁴ website and also from the [LandIS website](http://landis.uk/)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](http://www.gov.uk/government/publications/national-planning-policy-framework)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://www.gov.uk/government/publications/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 [here⁸](#)), such as Sites of Special Scientific Interest or [Ancient woodland⁹](#). 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 [here¹⁰](#)) or protected species. To help you do this, Natural England has produced advice [here¹¹](#) 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 land¹²](#).

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.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

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 Guidance¹³](#)).
- 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).

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>

- 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 the statutory [Biodiversity Metric](#) and is available as a beta test version.

Your ref: N/A
Our ref: NH/24/07009

FAO: Donna Lang
Hough on the Hill Parish Council

[REDACTED]
Assistant Spatial Planner
The Cube
199 Wharfside Street
Birmingham
B1 1RN
[REDACTED]

10 July 2024

Via email: houghpcclerk@gmail.com

Dear Sir or Madam,

Minor Amendments to the Hough on the Hill Parish Neighbourhood Plan- Public Consultation

Thank you for providing National Highways with the opportunity to consult on the proposed amendments to the Neighbourhood Plan for Hough on the Hill, for the period 2024-2036.

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 Neighbourhood Plan area is the A1 trunk road, approx. 6 miles distant, and is outside the boundary of the plan area.

We have considered the contents of the draft amendments to the Neighbourhood Plan and as the plan does not introduce any new development sites or transport related policies that are likely to impact upon our network, we consider that the contents of the plan are for local determination, and we have no further comments to make at this stage.

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

Yours sincerely,

[REDACTED]

[REDACTED]
Midlands Operations Directorate

Email: [REDACTED]

FAO: Hough on the Hill Parish Council

Our ref: AN/2015/121128/OR-02/PO1-L01

By email: houghpcclerk@gmail.com

Date: 31 July 2024

Dear Sir/Madam

Hough on the Hill Draft Neighbourhood Plan 2024 - 2036

Thank you for consulting us the Hough on the Hill Neighbourhood Plan.

A key principle of the planning system is to promote sustainable development.

Sustainable development meets our needs for housing, employment and recreation while protecting the environment. It ensures that the right development, is built in the right place at the right time.

To assist in the preparation of any document towards achieving sustainable development we have identified the key environmental issues within our remit that are relevant to this area and have provided guidance on any actions you need to undertake.

We aim to reduce flood risk, while protecting and enhancing the water environment. Our comments on this matter are therefore made solely from these points of view.

We have provided hyperlinks to where you can obtain further information and advice to help support your Plan.

Environmental Constraints

1. Flood risk

Firstly, we would like to highlight that the Environment Agency is not the only consultee on flood risk and other Risk Management Authorities (RMAs) are also consulted to respond to planning applications. Therefore, the Plan should also note other RMAs. These include the Lead Local Flood Authority (LLFA) – Lincolnshire County Council (LCC) who lead on surface water, ground water and ordinary watercourses and the Internal Drainage Board (IDB), which is Upper Witham IDB.

Although the majority of the Neighbourhood Plan boundary falls within Flood Zone 1, there are some regions of Flood Zone 2 and 3 present. The extent of this risk is shown by the associated Flood Zones. We therefore advise that the Hough on the Hill Neighbourhood Development Plan (NDP) recommends policies which advocate sequential planning by avoiding development within the floodplain and steers new development to areas with the lowest probability of flooding. Given the large areas of Flood Zone 1 available in the Hough on the Hill Parish boundary, this is achievable.

Environment Agency

Ceres House, Searby Road, Lincoln, LN2 4DW
Email: LNplanning@environment-agency.gov.uk
www.gov.uk/environment-agency

Customer services line: 03708 506 506

Calls to 03 numbers cost the same as calls to standard geographic numbers (i.e. numbers beginning with 01 or 02).

Cont/d..

If development must take place within the Flood Zones, then it should be in line with National Planning Policy Framework (NPPF) to ensure there is no increase in flood risk to development and to others as a result of the development, the NDP should state the importance of mitigation measures and flood resilience and resistance measures for new development, including an allowance for climate change. We would advise including a flood map to illustrate risk of fluvial flooding within the NDP boundary.

Section 39 (page 15) states there are areas at risk of surface water flooding, dykes and watercourses under the jurisdiction of the Environment Agency within the Parish. This statement needs amending as surface water flooding is now the responsibility of LCC as the LLFA. The Environment Agency manages the risk from watercourses designated as a main river under their permissive powers. There are no watercourses designated as a main river within the parish boundary. Watercourses within the parish boundary are therefore likely to be managed by either LCC or the Upper Witham IDB.

We would also recommend amending the wording 'control byelaws' to 'are responsible for byelaws', however the 'Anglian region flood defence and land drainage' byelaws for which the Environment Agency operate, except where otherwise stated only apply to the main rivers, the sea and tidal defences, therefore they may not all be applicable within the Parish boundary.

Development within the Parish boundary does not need to consider any flood risk activity permit under the Environmental Permitting Regulations 2016 due to no main rivers being present.

Section 120 (page 41) refers to avoiding sites which are at risk of flooding or could increase the impact of flooding elsewhere. We would recommend this is more specifically defined as: avoid development wherever possible in Flood Zones 2 & 3, and where this is not possible due to existing development, suitable flood risk mitigation measures are proposed. This wording should be applied to all policies relating to housing development within the NDP.

Given the statements made in section 39 (page 15) of the NDP regarding the risk of surface water flooding in the Parish, it may be prudent to include a specific Policy relating to development in areas at risk of surface water flooding. The LLFA (LCC) are now responsible for the management of surface water flood risk, therefore it is advised that LCC are consulted about the inclusion of this specific policy in the NDP. There are surface water flow paths across the Parish, development should be steered away from this natural flow path, and out of the flood extents to reduce increase of risk of flooding.

For clarity, we would advise including a separate map of surface water flood risk in the NDP. Local knowledge could be applied to this map to show known areas that experience surface water flooding in the village.

2. Water quality and foul drainage

The NDP states in section 40 (page 15) "Hough on the Hill drains into the River Brant catchment, with the village being served by a small Anglian Water Sewage Treatment Works. The Upper Brant is failing good status due to elevated levels of phosphate. The lower River Brant is also at poor ecological status."

We can confirm that the Hough on the Hill sewage treatment works does discharge to the Upper Brant (Water Framework Directive (WFD) waterbody ID

GB105030056110) and that the failure is due to phosphate. One of the confirmed reasons for this is the continuous discharge from the water company sewage treatment works.

Further details can be found here: [Brant - Upper | Catchment Data Explorer | Catchment Data Explorer](#)

The NDP does not include a drainage strategy. We would expect, and recommend, one of these to be included to outline how new developments will ensure that the surface water and foul flows from their sites will not cause deterioration to any WFD waterbodies.

We would also advise you to consult and liaise with Anglian Water regarding the capacity of the Hough on the Hill sewage treatment works to take on additional flows from new developments without causing deterioration in the receiving watercourse.

It should also be noted that there are two other WFD catchments in the Hough on the Hill Parish boundary: Honington Beck (GB105030056750) and Sand Beck (GB105030056160). How the Plan can protect these waterbodies should also be considered, particularly if development is proposed within them.

Paragraph 42 (page 15) states that “The majority of properties (and all properties within Brandon and Gelston) are not on mains drainage”. One of the Environment Agency’s principle concerns regarding foul water management is to prevent the proliferation of non-mains treatment solutions wherever possible. We advise that the Plan should encourage developments to connect to the mains wherever practicable. We would suggest some wording is included in the Plan to advise of the following:

Government guidance contained within the national Planning Practice Guidance (Water supply, wastewater and water quality – considerations for planning applications, paragraph 020) sets out a hierarchy of drainage options that must be considered and discounted in the following order:

1. Connection to the public sewer
2. Package sewage treatment plant (adopted in due course by the sewerage company or owned and operated under a new appointment or variation)
3. Septic Tank

Foul drainage should be connected to the main sewer. Where this is not possible, under the Environmental Permitting Regulations 2016 any discharge of sewage or trade effluent made to either surface water or groundwater will need to be registered as an exempt discharge activity or hold a permit issued by the Environment Agency, additional to planning permission. This applies to any discharge to inland freshwaters, coastal waters or relevant territorial waters.

In addition, as useful background information for anyone considering developing in the Neighbourhood Plan area (but not to include in the Plan text), further guidance on the sewage hierarchy guidelines can be found here: [Drainage and waste disposal: Approved Document H - GOV.UK \(www.gov.uk\)](#)

Any future developments should also look at including measures for improving and enhancing the water environment where possible.

3. Water efficiency

We note Annex 1: Neighbourhood Plan Design Guidance, criterion f, of the NDP states 'the incorporation of features which contribute to the efficient use of water (eg water butts) is encouraged'. We welcome this inclusion, however we would recommend that this is expanded to include reference to encouraging items such as more water efficient taps within dwellings.

This will also help meet Policy SB1 (Sustainable Building) of the South Kesteven Local Plan.

Furthermore, if water efficiency measures are promoted by the NDP, this will help reduce the amount of foul drainage from developments within the NDP area and lessen any pressure on the Sewage Treatment Works serving Hough on the Hill and the foul drainage infrastructure for the remainder of the Plan area.

4. Biodiversity

We support the inclusion of the 'Green Spaces: Protecting Greenspace and Support Nature Conservation and Biodiversity' section and NDP objective.

We note that Green Infrastructure is also mentioned in the plan. We would suggest that the water environment / blue infrastructure is also included as it is important to consider blue and green infrastructure together as water is vital to the health of greenspaces and biodiversity.

5. Groundwater and contaminated land

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).

With this in mind we recommend adding the following to section 41 of the Plan on the topic of 'Flood Risk, Water Quality and Geology':

The western part of the parish is also underlain by superficial geology comprising the Fulbeck Sand and Gravel Member, which is also classified as a secondary A aquifer.

These aquifers can support local abstractions and baseflow to streams and rivers. The use (or potential use) of groundwater in the area makes parts of the area vulnerable to pollution from certain types of development. Best practice to ensure groundwater is protected from pollution and as a resource is contained within guidance document 'The Environment Agency's approach to groundwater protection' available at [Groundwater protection position statements - GOV.UK \(www.gov.uk\)](http://www.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

Within Annex A reference could be made to 'Land Contamination: risk management (LCRM) available at [Land contamination risk management \(LCRM\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm)

6. Waste

Whilst we are not asking for wording to be included in the Plan, we have the following general advice to offer for the information of anyone wishing to carry out development in the Neighbourhood Plan area:

Movement of waste off-site – Duty of Care & Carriers, Brokers and Dealers Regulations
The Environmental Protection (Duty of Care) Regulations 1991 for dealing with waste materials are applicable to any off-site movements of wastes.

The code of practice applies to you if you produce, carry, keep, dispose of, treat, import or have control of waste in England or Wales.

The law requires anyone dealing with waste to keep it safe and make sure it's dealt with responsibly and only given to businesses authorised to take it. The code of practice can be found here: <https://www.gov.uk/government/publications/waste-duty-of-care-code-of-practice>

If you need to register as a carrier of waste, please follow the instructions here:
<https://www.gov.uk/register-as-a-waste-carrier-broker-or-dealer-wales>

Use of waste on-site - authorisation or permit required

If materials that are potentially waste are to be used on-site, the applicant will need to ensure they can comply with the exclusion from the Waste Framework Directive (WFD) (article 2(1) (c)) for the use of, 'uncontaminated soil and other naturally occurring material excavated in the course of construction activities, etc...' in order for the material not to be considered as waste. Meeting these criteria will mean waste permitting requirements do not apply.

Where the applicant cannot meet the criteria, they will be required to obtain the appropriate waste permit or exemption from us.

A deposit of waste to land will either be a disposal or a recovery activity. The legal test for recovery is set out in Article 3(15) of WFD as:

- any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.
- We have produced guidance on the recovery test which can be viewed at <https://www.gov.uk/government/publications/deposit-for-recovery-operators-environmental-permits/waste-recovery-plans-and-deposit-for-recovery-permits#how-to-apply-for-an-environmental-permit-to-permanently-deposit-waste-on-land-as-a-recovery-activity>.

You can find more information on the Waste Framework Directive here:
<https://www.gov.uk/government/publications/environmental-permitting-guidance-the->

waste-framework-directive

Guidance on when a material is waste, is a by-product or meets 'end of waste' status can be found here:

<https://www.gov.uk/guidance/check-if-your-material-is-waste>

You can also get an opinion from the definition of waste service -

<https://www.gov.uk/government/publications/get-an-opinion-from-the-definition-of-waste-service>

More information on the use of waste in exempt activities can be found here:

<https://www.gov.uk/government/collections/waste-exemptions-using-waste>

Non-waste activities are not regulated by us (i.e. activities carried out under the CL:ARE Code of Practice), however you will need to decide if materials meet End of Waste or By-products criteria (as defined by the Waste Framework Directive).'

Resource efficiency & the circular economy

The circular economy is a concept designed to keep materials in use as long as possible, thus promoting resource efficient practice and deriving economic benefits. Adherence to the waste hierarchy and adoption of best practice in relation to site waste management planning will help you deliver against circular economy objectives. Observance of the waste hierarchy objectives and principles of the circular economy will depend upon the selection of the most sustainable option at every phase of a development project, from reduction through design and architecture, to the selection of the most efficient recovery process for the treatment and use of waste.

I hope the above advice is useful in progressing the Plan.

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

[REDACTED]

Planning Adviser

 Ceres House, Searby Rd, Lincoln, LN2 4DW



[REDACTED]



Sir/Madam - -
Hough on the Hill Parish Council
Hough on the Hill
Lincolnshire

Our ref: PL00796324
17 July 2024

Dear Sir/Madam -

Neighbourhood Plan for Hough on the Hill

Thank you for consulting Historic England about your revised Neighbourhood Plan.

The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.

If you have not already done so, we would recommend that you speak to the planning and conservation team at your local planning authority together with the staff at the county council archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk <<http://www.heritagegateway.org.uk>>). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.

Historic England has produced advice which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at:-

<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

You may also find the advice in "Planning for the Environment at the Neighbourhood Level" useful. This has been produced by Historic England, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information. This can be downloaded from:

<http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment->



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888
HistoricEngland.org.uk



Historic England

agency.gov.uk/LIT_6524_7da381.pdf>

If you envisage including new housing allocations in your plan, we refer you to our published advice available on our website, "Housing Allocations in Local Plans" as this relates equally to neighbourhood planning. This can be found at <https://content.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans.pdf>

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

[Redacted]

[Redacted]

Historic Places Adviser



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888

HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.

From: Donna Lang houghpcclerk@gmail.com 
Subject: Fwd: Hough on the Hill Draft Neighbourhood Plan (2024-2036) consultation - Anglian Water response 19-08-24
Date: 19 August 2024 at 16:16
To: [REDACTED]

DL

----- Forwarded message -----

Date: Mon, 19 Aug 2024 at 16:06
Subject: Hough on the Hill Draft Neighbourhood Plan (2024-2036) consultation - Anglian Water response 19-08-24
To: houghpcclerk@gmail.com <houghpcclerk@gmail.com>

Dear Sir/ Madam,

Thank you for consulting Anglian Water on the draft updated Hough on the Hill neighbourhood plan. Anglian Water is the statutory water and sewerage undertaker within the designated area.

Anglian Water is identified as a consultation body under the Neighbourhood Planning (General) Regulations 2012 and we support neighbourhood plans and their role in delivering environmental and social prosperity in the region.

Overall, Anglian Water is the water supply and water recycling provider for over 6 million customers. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea. Additionally, parts of the area have the highest rate of housing growth in England.

Anglian Water has amended its Articles of Association to legally enshrine public interest within the constitutional make up of our business – this is our pledge to deliver wider benefits to society, beyond the provision of clean, fresh drinking water and effective treatment of used water. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop.

Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources. Anglian Water has produced a specific guidance note on the preparation of NPs found using this link under our Strategic Growth and Infrastructure webpage - [Strategic Growth and Infrastructure \(anglianwater.co.uk\)](#). The guidance also has sign posting/ links to obtaining information on relevant assets and infrastructure in map form, where relevant.

The comments set out below are made, ensuring the making of the plan contributes to sustainable development and has regard to assets owned and managed by Anglian Water. Overall, we are supportive of the policy ambitions within the neighbourhood plan, subject to the proposed amendments.

Policy HoH12 Renewable Energy - Encouraging energy efficiency and, where appropriate, energy production from renewable and low carbon sources

The South Kesteven Local Plan Policy SB1: Sustainable Building requires development to mitigate against and adapt to climate change and includes measures regarding energy consumption and water resources. For the latter, new development should seek to achieve a 'water neutral position' and promote enhanced sustainability.

As the region is identified as seriously water stressed and we encourage neighbourhood plans to include measures to improve water efficiency of new development through a fixtures and fittings approach, including through rainwater/storm water harvesting and reuse, and greywater recycling.

Anglian Water supports requiring new development to be served by sustainable infrastructure provision and that does not result in a detrimental impact on water infrastructure, including sewers and surface water and watercourse flooding. Our revised draft water resources management plan (WRMP) for 2025-2050 identifies key challenges of population growth, climate change, and the need to protect sensitive environments by reducing abstraction. Managing the demand for water is therefore an important aspect of maintaining future supplies. See [Water resources management plan \(anglianwater.co.uk\)](http://Water resources management plan (anglianwater.co.uk))

Such measures to improve water efficiency standards and include opportunities for water reuse and recycling also reduces the volume of wastewater needed to be treated by our water recycling centres. This will also help to reduce customer bills (including for other energy bills) as well as reduce carbon emissions in the supply and recycling of water.

The Defra Integrated Plan for Water supports the need to improve water efficiency and the Government's [Environment Improvement Plan](#) sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress. Given the proposed national approach to water efficiency, Anglian Water encourages this approach.

As a suggestion, there may be merit including on the management of water resources in new development proposals under Policy HoH12 and some further practical ways as of reducing water consumption could be covered in the design guidelines (Annex 1). Some mention is already made under criterion (f) "*Similarly, the incorporation of features which contribute to the efficient use of water (eg water butts) is encouraged.*"

Flood Risk Water Quality and Geology

Paragraph 29 sets out that there are areas at risk of surface water flooding, most particularly around the Brandon area.

In terms of flood risk management, it is important to address surface water run-off, including the preference for this to be managed using SuDS in accordance with the drainage hierarchy. Such measures help to avoid surface water run-off from entering Anglian Water's foul drainage network, and connections to a surface water sewer should only be considered where all other options are demonstrated to be impracticable and as a last resort. Any requirements for a surface water connection to our surface water sewer network will require the developer to fund the cost of modelling and any upgrades required to accept the flows from the development

It is, therefore, suggested a cross reference could be added in this section that the relevant Local Plan policy is Policy EN5: Water Environment and Flood Risk Management.

Anglian Water encourages the use of nature-based solutions for SuDS wherever possible, including retrofitting SuDS to existing urban areas to enhance amenity and biodiversity within the neighbourhood plan area and contribute to green and blue infrastructure. It has been the Government's intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England. We welcome an interim local policy approach to ensure SuDS measures are incorporated within new developments, until such time the Schedule is formally implemented and the necessary measures are in place.

Design Guidelines Criterion (g) (Annex 1) - Anglian Water recognises the need to manage vehicular access/ parking arrangements within the area. It is suggested that the neighbourhood plan could specify that permeable surfaces (pavements and other areas of hard standing such as vehicle parking areas) are used in the design of new developments to reduce surface water run-off from the introduction of hard-standing areas.

If you have any questions about this response or wish to discuss anything I have raised, please do not hesitate to get in touch.

I should be grateful if you could please acknowledge receipt of this representation and save the current email address strategicgrowth@anglianwater.co.uk shown regarding sending future notifications on progress of the neighbourhood plan. Thank you.

Yours faithfully,

[REDACTED]
Chartered Town Planner - MRTPI
Spatial and Strategic Planning Manager – Sustainable Growth
Quality & Environment
[REDACTED]



Web: www.anglianwater.co.uk

Anglian Water Services Limited

Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire. PE29 6XU

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Anglian Water Services Limited

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Registered in England No 2366656

Please consider the environment before printing this email.

From: Donna Lang houghpcclerk@gmail.com 
Subject: Fwd: HOUGH ON THE HILL PARISH COUNCIL UPDATED DRAFT NEIGHBOURHOOD PLAN 2024-2036
Date: 7 August 2024 at 14:53
To: [REDACTED]

DL

----- Forwarded message -----

From: [REDACTED]
Date: Wed, 7 Aug 2024 at 14:01
Subject: HOUGH ON THE HILL PARISH COUNCIL UPDATED DRAFT NEIGHBOURHOOD PLAN 2024-2036
To: houghpcclerk@gmail.com <houghpcclerk@gmail.com>

UD-1365-2014-PLN

Dear Sir/Madam

HOUGH ON THE HILL PARISH COUNCIL UPDATED DRAFT NEIGHBOURHOOD PLAN 2024-2036

Thank you for the opportunity to comment on the Neighbourhood Plan.

Some of the lower parts of the area of interest fall within the Upper Witham Internal Drainage Board's District, see the attached plan. More information about the Board can be found on the website 'upperwitham-idb.gov.uk'. Most of the existing property has been built on higher ground outside the District although there are several properties on Brandon Road that are within the Board's District in an area that can be considered at risk of flooding.

It should also be noted that there have been some flooding/ground water issues in the village of Brandon.

The area of interest is situated in an area where the watercourses are unable to accept any increase in the rates of discharge; therefore, any development must prove the existence of a surface water drainage route and provide adequate proposals to make certain that flood risk is not increased elsewhere as a result of any proposed development.

It is suggested that the Neighbourhood Plan should support the idea of sustainable drainage and that any proposed development should be in accordance with National and Regional Flood Risk assessments and Management plans.

No new development should be allowed to be built within flood plain. The 'Flood Maps' on the Environment Agency website provides information on areas at risk, information can be found by searching 'EA flood maps'. Also risk from surface water flooding should also be considered, information can also be found on the Environment Agency website. It can be found by search using 'EA surface water flood map'

Under the terms of the Land Drainage Act. 1991 and the Board's Byelaws, the prior written consent of the Board is required for any proposed works or structures in, under, over or within 9 metres of the top of the bank of any watercourse within the District. This is independent of the Planning Process.

Also, under the provisions of the Flood and Water Management Act 2010, and the Land Drainage Act. 1991, the prior written consent of the Lead Local Flood Authority (Lincolnshire County Council) is required for any proposed works or structures in any watercourse outside those designated main rivers and Internal Drainage Districts. In this area the Board acts as Agents for the Lead Local Flood Authority and as such any works, permanent or temporary, in any ditch, dyke or other such watercourse will require consent from the Board.

Kind regards,

Technical and Operations Assistant



**WITHAM AND HUMBER
DRAINAGE BOARDS**

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,

LN6 9GJ

Office: +44 (0) 1522 697123

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Hough On The
Hill Parish.pdf

APPENDIX 3a: Publicity for Neighbourhood Planning Questionnaire - February 2022

HOUGH ON THE HILL PARISH COUNCIL

IMPORTANT INFORMATION FOR

ALL RESIDENTS OF

GELSTON, BRANDON & HOUGH ON THE HILL

this leaflet contains a

Public Consultation Questionnaire

please complete it

to get your views across

UPDATING OUR NEIGHBOURHOOD PLAN

Back in 2015 this Parish successfully made a Neighbourhood Plan and, following an 80% in favour Referendum, the Plan was adopted by South Kesteven District Council (SKDC) and became part of the statutory planning process for this area.

In 2020, SKDC produced a new Local Plan for the district, with which our Neighbourhood Plan must comply. As a result, some of our policies are no longer valid. To ensure that our local voice can still have weight in the planning system, the Parish Council has agreed to update the Neighbourhood Plan.

The updated Plan will, as before, set out a vision for the evolution and longterm sustainability of our heritage and historic built environment, protecting our rural landscape character and guiding appropriate and sensitive future development. We propose that it will cover the period 2022-2042.

HOW WILL THE NEIGHBOURHOOD PLAN BE UPDATED? only with your involvement!

Our process for updating has to follow statutory guidance, the most important part of which is to ensure that we properly consult and engage with everyone who lives in the Parish (and local businesses and landowners) and reflect local views and opinions.

The public consultation Questionnaire enclosed with this leaflet is the first step in doing that and it will help us to check that we have a full understanding of the issues people want the Plan to focus on and address, the extent to which these may have changed since 2015, and whether there are any substantially new issues and concerns.

Please note that our Plan must be in conformity with both national and SKDC planning policy and must promote the principle of sustainable development. It cannot reject or invalidate development which is permitted by national or SKDC planning policy.

The updating of the Plan will be ongoing for the next few months, and there will be many opportunities for consultation before the new Plan is sent to SKDC to begin the process of formal adoption.

Once approved, our updated Neighbourhood Plan will be used in determining planning applications here.

The questions we are asking therefore focus on matters that are addressed by planning policy, but any issues raised which are not within the scope of planning law will be notified to the Parish Council who will seek to address them in other ways if possible.

For example, when we consulted about the 2015 Plan, speeding on the C001 through Brandon was raised as a major concern and the Parish Council pursued the issue vigorously resulting in the new 40 mph speed limit.

Also, the Parish Council successfully raised funding for the installation the multi-games area in the Playing Field.

CHANGES IN SKDC PLANNING POLICY AFFECT DECISIONS HERE

Until SKDC adopted its new Local Plan in 2020, all 3 of our settlements (Brandon, Gelston and Hough on the Hill) were classified as unsuitable for development. Whilst this position remains unchanged for Brandon and Gelston, Hough on the Hill itself is now classified as a 'smaller village' appropriate for what is called 'infill development' and for 'edge of settlement development'. These new policies that affect us are:

SP3: Infill Development (applies to Hough on the Hill only) for small, sensitive schemes (up to 3 dwellings) on land within the existing curtilage of the village

SP4: Edge of Settlement (applies to Hough on the Hill only) development on land adjoining the village and well located to the existing built form

SP5: Development in the Open Countryside (applies to the whole Parish) covers agricultural, forestry, equine and rural diversification projects

If you want to read the detail of these policies, they are available on our website
www.hough-hill.parish.lincolnshire.gov.uk

THINGS TO THINK ABOUT:

In the previous consultations for the 2015 Neighbourhood Plan, the issues people prioritised included:

- our rural and tranquil setting and the character of our countryside
- our beautiful views both into and out from our settlements
- design in keeping with our existing built environment
- the unique setting of Loveden Hill
- the footpaths, hedgerows and trees
- paddocks and green spaces within our settlements
- opinions were divided on the importance of more affordable housing provision
- green energy and measures adapting to climate change

What about things people might not like?

- poor broadband connectivity
- lack of public transport
- condition of the roads & traffic speeds
- lack of affordable housing
- lack of affordable rented housing
- lack of local employment
- lack of shops and services

DID YOU KNOW?

- *approximately 400 people live in our Parish in nearly 170 dwellings*
- *all 3 settlements were fully established in Anglo-Saxon times and are listed in the Domesday Book*
- *we have an Augustinian Priory site here, several areas of historic ridge & furrow and 14 listed buildings*
- *one local farmer owns some 70% of the land here, and manages over 30 miles of hedges*

KEEP UP TO DATE ON OUR WEBSITE

The Parish Council website now contains a new, dedicated section for updating the Neighbourhood Plan where you can find all relevant documents, a link to an on-line version of the Questionnaire contained in this leaflet, minutes of meetings of the Neighbourhood Planning Sub-Committee, and - in time - emerging drafts of what is being proposed.

www.hough-hill.parish.lincolnshire.gov.uk

What Help are we Getting?

The Parish Council has been awarded a government grant to help cover the costs of updating our Plan, and also some free professional support to help with more technical issues like writing design guidance and defining our 'edges of settlement'.

WHAT DO YOU WANT?

- Everything to stay the same?
- Our population to grow?
- New homes the next generation might be able to afford?
- Protection for our enclosed paddocks & grazing areas
- Fewer cars?
- More sports/leisure facilities?
- More local jobs?

KEEP YOUR EYES OPEN FOR MORE CONSULTATION OVER THE COMING WEEKS!

the focus is likely to be on design, identifying loved green spaces and clarifying what the 'edges' of our settlements are

WHO IS INVOLVED?

The Parish Council has set up a **'Neighbourhood Planning Committee'** of local residents to take forward the work of updating the Plan. It has 7 members, including 3 Parish Councillors.

Meetings of the Committee are open to members of the public to attend and will be advertised on the village Noticeboards. Notes of proceedings will be available on our website.

All enquiries should be addressed to the Chair of the Committee:

Parish Councillor Alistair Knott

houghpcclrknott@hotmail.com

APPENDIX 3b: Neighbourhood Planning Questionnaire - February 2022 – Questions and Responses

**HOUGH ON THE HILL, GELSTON & BRANDON
NEIGHBOURHOOD PLANNING QUESTIONNAIRE
for all residents aged 16 and over**

February 2022

ANALYSIS OF RESPONSES

BACKGROUND

This survey/questionnaire was designed to assess residents' views about living in the Parish and whether the objectives of the existing 2015 Neighbourhood Plan were still in line with residents' wishes. Two paper copies of the survey, along with an accompanying leaflet explaining why the existing Neighbourhood Plan needs to be updated and setting out the process, were distributed to every household in the Parish. Where possible, the surveys were actually handed to residents and a verbal explanation given.

A period of 5 weeks was given for completion. Drop off addresses were available in each of the three settlements, and a sealed box was also made available in the porch of All Saints Church in Hough on the Hill.

The survey was also made available online (through the Parish Council website).

A 2nd leaflet drop was made to every household in the final two weeks reminding people of the closing date, and again giving the website link. A reminder about the Survey was also posted on the Nextdoor website group for Gelston, Hough on the Hill and Brandon.

WHO RESPONDED?

A total of **113 responses** were received (39 paper copies and 74 online). This represents just over **one quarter of the population** of the Parish. It is perhaps worth noting that this response was substantially higher than that achieved during any stage of the previous Plan's preparation.

Location/spread of responses across our three settlements was as follows:

Brandon: 26% Gelston: 21% Hough on the Hill: 53%

Just over 50% of respondents were aged between 45-64yrs, 30% over 65yrs and 15% 25-44yrs.

27 respondents had lived here for less than 2yrs, 18 for between 2-10yrs, 27 for between 10-20yrs, 16 for between 20-30yrs, 14 for between 30-40yrs, and 9 for over 40 yrs.

CONCLUSIONS

The survey results provide strong support for the updated Neighbourhood Plan to focus on strengthened design guidance, and the potential designation of more Green Spaces. They also of course raise many issues that are outside the purview of planning policy, but which can be brought to the attention of the Parish Council, and other relevant authorities and organisations, for further consideration.

ANALYSIS OF RESPONSES

1 What do you like most about living within Hough on the Hill Parish?

Everyone answered this question and there was broad similarity of responses, with people placing high value on living in a quiet, peaceful, rural location. There was much appreciation of the countryside, of the open green spaces both within and beyond the villages, and many people also mentioned the friendly community. Here is a 'word cloud' of the most used words.



2 What do you least like about living here?

93 people mentioned dislikes, of which by far the most negative comments were about the state of the roads (potholes, no gritting etc) or speeding on roads. Also many people mentioned the lack of a local shop within the parish, and the lack of any public transport.

It is an awkward fact that whilst people don't want development, change, or for the villages to grow bigger, without new homes and an expanded population, services like shops and bus routes are unlikely to be achievable.

3 Do you agree that the Plan Objectives should remain the same?

Everyone, bar 2, responded to this question. There was broad overall support for our original Plan objectives, but with the most support for “Protecting green space and supporting nature conservation and biodiversity”. A few were less supported - eg, energy efficiency, economic development, and recreational opportunities. The percentages are as follows:

Objectives that were in the 2015 Neighbourhood Plan	Agree
Promoting sensitive development which protects and enriches the landscape and built setting of the Parish	86.49%
Prioritising local distinctiveness in every element of change and growth	83.78%
Protecting jobs, supporting sustainable economic development and local business	75.68%
Protecting green space, and supporting nature conservation and biodiversity	95.50%
Encouraging energy efficiency and, where appropriate, energy production from renewable and low carbon sources	72.97%
Improving recreational opportunities for residents and visitors of all ages to enjoy	72.07%
Seeking improvements to transport, utility infrastructure and digital connectivity	88.29%
Involving local people in an ongoing process of plan-making, monitoring and delivery	90.09%

4 Are there any objectives missing, or that should be removed or prioritised?

There were 41 responses to this question (discounting those that wanted no change) but most were to stress the importance of particular issues. These were the issues highlighted more than 1 person:

- Ecological footprint of new buildings/climate change/ renewable energy - 9 people
- Public transport & road safety - 7 people
- Digital connectivity - 6 people
- Street lights reduction: 2 people
- Protection Wood: 2 people

It is perhaps also worth pulling out two comments that highlight the tension between those who do not support development of any kind, and those who believe change and growth are necessary:

- Retaining the traditional character of the village should be overriding objective and development severely limited. Once a certain number of new houses are built the character is lost and ever more new houses are allowed as there is then less to be spoilt.
- The village must be allowed to grow, otherwise it will decline and as such facilities will decline as people move away from the area.

This tension is perhaps balanced by this comment focusing on the role of the Parish Council and, in particular, the Neighbourhood Plan:

- Promoting sensitive development and protecting green space should be prioritised as these fundamentally are what makes the parish desirable to live in. Involving local people in an ongoing process of plan-making, monitoring and delivery will be key in achieving any of these objectives.

5 Do you have any fears for the future of our settlements' tranquil, rural character over the next 20 years, or issues that could affect your future quality of life here?

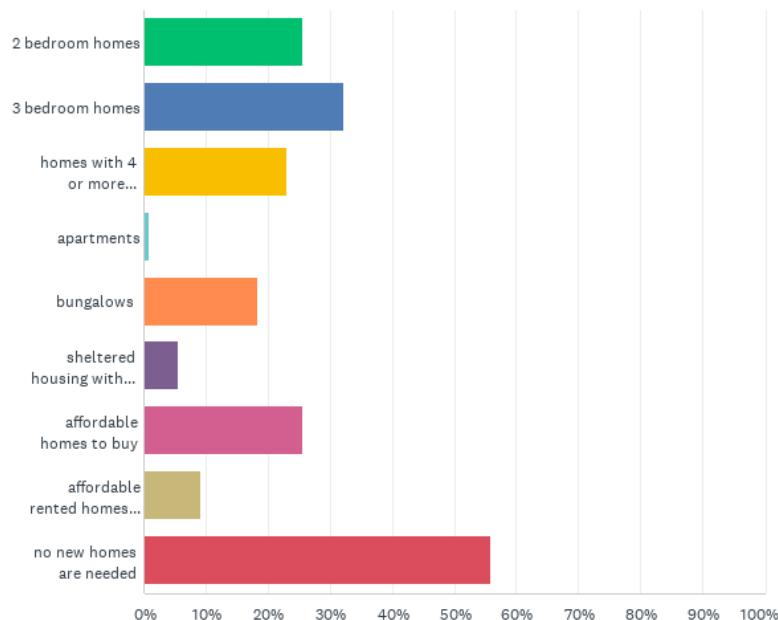
In all, 85 people said they have fears, and these were the most mentioned:

- 59 about development or insensitive development
- 12 about increased traffic
- 8 about loss of green space/countryside
- 7 about increased noise
- 4 about karting and/or shooting specifically
- 4 about sewage/infrastructure

6 What new homes are appropriate for our Parish?

Only one respondent didn't answer this question: the chart below shows responses:

Q6 What new homes are appropriate for our Parish over the next 20 years?



7 Please rate any concerns you have about the following types of development:

Only one respondent didn't answer this question: the chart below shows responses. The most concerns are about development in the open countryside (SP5) and development on the edges of our settlements (SP4), with slightly less concerns about infill development (SP3). There are far less concerns about conversions and extensions.

Concerns about Types of Development

–	1 = No Concerns	2 = Few Concerns	3 = Concerned –	4 = Very Concerned	5 = Many Concerns
– Infill Development on land within our settlements (SP3)	12.73% 14	9.09% 10	15.45% 17	19.09% 21	43.64% 48
– Development on the edges of our settlements (SP4)	11.82% 13	6.36% 7	9.09% 10	16.36% 18	56.36% 62
– Development in the open countryside (SP5)	4.46% 5	5.36% 6	4.46% 5	5.36% 6	80.36% 90
– Conversions (eg barns, outbuildings)	36.94% 41	24.32% 27	12.61% 14	18.02% 20	8.11% 9
– Extensions	44.86% 48	22.43% 24	16.82% 18	9.35% 10	6.54% 7

There were also some comments made about other concerns:

- Mobile homes and caravan sites
- Developments that do not require planning permissions, e.g walls/fences/hedges. The replacement of a stone wall with a brick wall is not in-keeping with the built setting of the parish, however despite it being an objective it is not monitored / enforced
- Unsuitable building materials being utilised
- Development of renewable energy schemes like wind turbines or solar panel fields
- Uncharacteristic constructs
- To avoid stagnation the villages must be allowed to develop

8 For the above types of development, should they follow design guidance in keeping with our landscape, historic environment and building styles?

Only one respondent didn't answer this question. **109 answered yes**, and only **3 did not agree** that design guidance should be followed. This shows strong support for the work we are doing to produce robust design guidance as part of the new Neighbourhood Plan.

9 Do you feel safe on our roads, streets and public spaces?

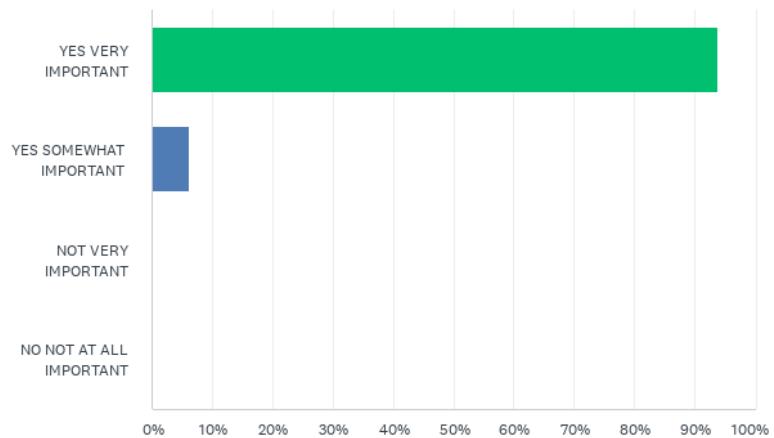
Everyone answered this question. Some **60% said they do feel safe**, but **40% said they don't**.

The reasons given for not feeling safe were predominantly to do with the state of the roads (potholes) or the speed of traffic (both along the roads and within the villages). People want lower speed limits and enforcement. The Parish Council is already discussing how best to approach the issue of our roads. A lot of people clearly feel very strongly that the situation is getting worse. The lack of gritting was also raised, as was the lack of pavements or poor state of pavements. One or two people were also concerned about dark areas without adequate streetlights.

10 Is the rural character of the parish important to you?

Everyone answered this question

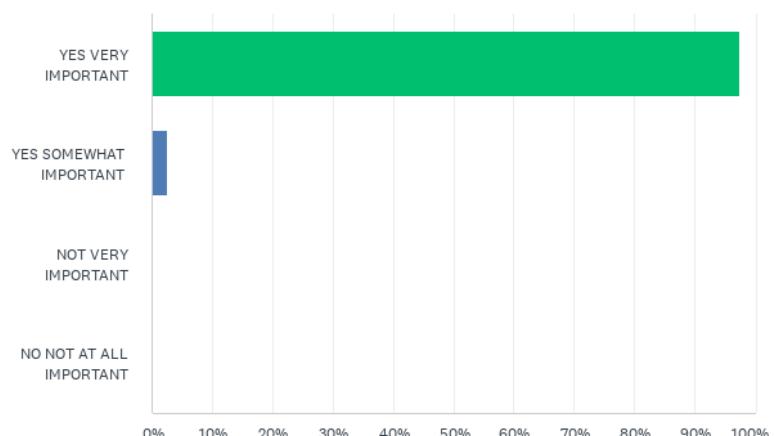
Q10 Is the rural character of the parish important to you?



11 Are the countryside and views important to you?

Everyone answered this question.

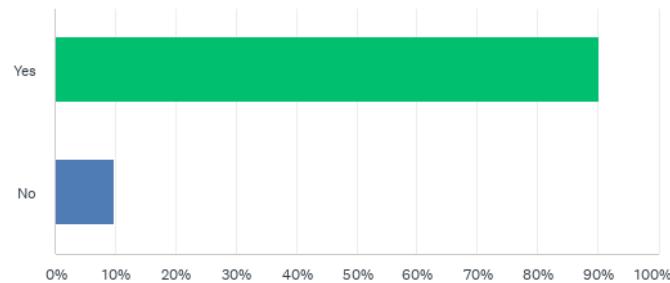
Q11 Are the countryside and views important to you?



12 Do you use local public footpaths?

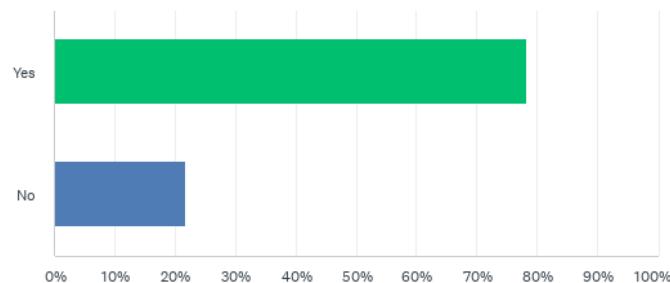
Everyone answered this question.

Q12 Do you use local public footpaths?



13 If yes, are the footpaths well-maintained/easy to walk

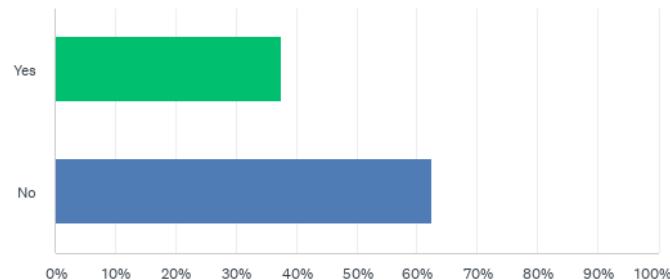
Q13 If yes above, are the footpaths well-maintained/easy to walk?



14 Are you bothered by noise from local sporting activities (including from those adjacent to our Parish boundary)?

Only one person did not answer this question.

Q14 Are you bothered by noise from local sporting activities (including from those adjacent to our Parish boundary)?



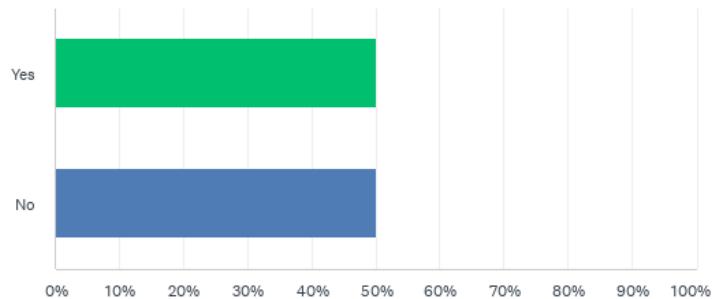
Examples of the bothersome local sporting activities were:

- Go-Karting
- Clay Shooting
- Shooting
- Race Tracks
- Quad Bikes

15 Do you believe that more could be done to support nature conservation, wildlife, or to improve biodiversity here?

106 people answered this question, and the responses are equally divided:

Q15 Do you believe that more could be done to support nature conservation, wildlife, or to improve biodiversity here?



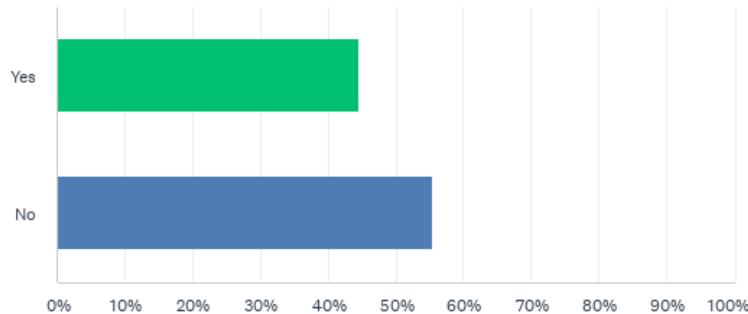
The comments/suggestions made on this question mainly raised the following:

- Concerns about the cutting of verges and the loss of wildflowers
- Less/no pheasant shooting
- Concerns about tree and wood removal/loss
- More trees and hedgerows planted
- More ponds
- More bird/owl boxes
- Less cutting of village greens to allow wildflowers
- Nature trails/walks
- Light pollution to be avoided
- A couple would like to see the Hunt stopped
- A couple mentioned the good work already done by our farmers

16 Do you believe that this Parish should be doing more to tackle climate change?

101 people answered this question.

Q16 Do you believe that this Parish should be doing more to tackle climate change?



In the 36 comments received on this question there is an undercurrent of frustration that we are not, as a community, doing more about this issue. Below are a selection of the types of suggestions put forward:

- New builds - insulation and solar or heat pumps.
- Relax listing restrictions for renewable energy/insulation.
- Encourage solar PV and air-source heat pumps.
- Make it easier for houses to be more efficient, particularly the older ones
- Sharing recommendations of what is available and how it works for different types of houses.
- Make it easier to go eco (solar, ASHP, etc) without planning hurdles.
- Protecting and developing green spaces.
- Avoid increasing light pollution.
- Maybe we could all get together and discuss what we can all do as individual households; we have great skilled and knowledgeable people in our parish that could help and advise, so let's pool resources.
- This is a massive question I recommend a meeting every 3 months.
- Increased carbon sequestration would arise from increased tree planting in the Parish.
- I think allowing solar panels on roofs will help especially with current fuel prices
- Education and information for the Parish.
- External lighting on public buildings and private housing is very often intrusive in our rural settings. Turning them off will help in the fight against global warming.
- Changes to farming methods, using renewable energy
- Highlight Govt initiatives and grants
- A community wind turbine or solar park

17 Are there areas, important to you, that you would like to see designated as Green Spaces?

65 people commented on this question, although several just answered yes, or the 'whole area' or all existing green spaces between houses, and all the fields. Several people also mentioned the need to protect views. Specific locations suggested included:

- The Wilderness
- Bosom Hill
- Gelston Green and Pinfold
- Brandon Green
- The Priory Field
- Fields to both sides of Hough Road and road leading to Gelston
- Protection Wood
- Loveden Hill
- Mott & Bailey/Castle Hill
- Hough Manor kitchen gardens
- Field to west of Gelston Green overlooking the vale
- Drake Yard
- The paddocks sloping down New Hill below Church Farm Barns
- The Playing Field
- All fields adjacent to Dike Furlong Lane
- Fields either side of Lower Road, New and Brandon Road
- OS Landranger map references SK915 482, SK936 477, SK913 466, SK931 460
- All escarpments and ridges

A great deal of further work is required to identify eligible and appropriate locations for potential Green Space designation and consultants from AECOM will be working with us on this during the coming months. There will, of course, be further consultation, especially with landowners.

18 How do you rate your broadband speed?

110 people answered this question:

	Gelston	Brandon	Hough	Parish
Excellent	0	10	7	15.45%
Usually good	7	9	30	42.73%
Sometimes poor	6	7	12	22.73%
Very poor	10	1	10	19.09%

Broadband issues are consistently raised as very important to residents, and increasingly so. Over 22% of all respondents across the Parish report sometimes poor, or very poor broadband services, especially in Gelston and parts of Hough on the Hill. This remains a critical issue, especially given responses to the following question.

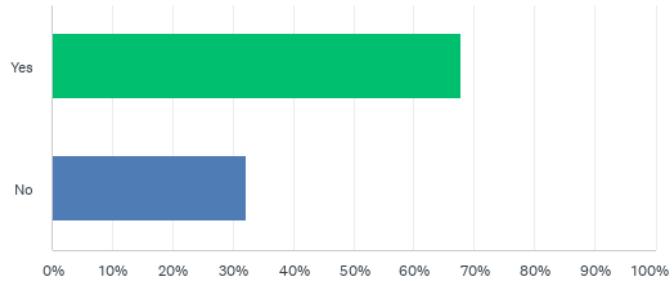
19 Do you rely on your internet for your work, or anticipate needing to do so in future?

All bar one person answered this question

67.86% (76 people) said YES

32.14% (36 people) said NO

Q19 Do you rely on your internet for your work, or anticipate needing to do so in future?



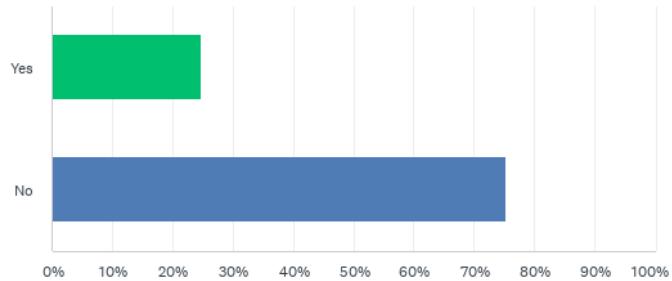
20 Do you think our Parish needs some allotment provision?

109 people answered this question

24.77% (27 people) said YES

75.23% (82 people) said NO

Q20 Do you think our Parish needs some allotment provision?



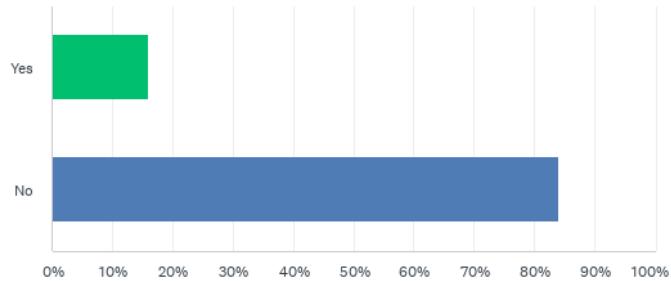
21 Do you think our Parish needs more recreational/sporting facilities?

106 people answered this question

16.04% (17 people) said YES

83.96% (89 people) said NO

Q21 Do you think our Parish needs more recreational/sporting facilities?



The types of new facilities mentioned in the comments include:

- Tennis Court
- Better use of Playing Field (Farmers Markets, Car Boot Sales, County Fairs & Shows)
- Cricket Pitch
- Skate Ramp
- Off-lead dog walking areas
- Improved Children's Play Area in Hough (or additional play areas in Brandon & Gelston)
- Village Hall/better use of church

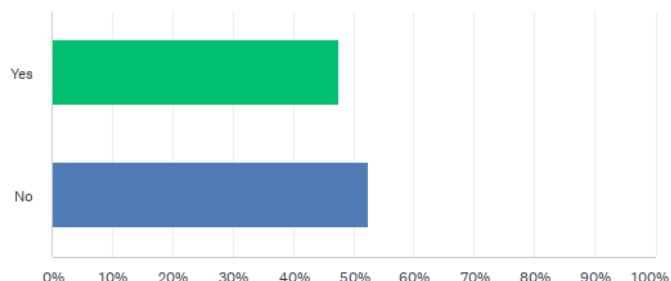
22 Do you think All Saints Church could be better used for wider community events?

103 people answered this question

47.57% (49 people) said YES

52.43% (54 people) said NO

Q22 Do you think All Saints Church could be better used for wider community events?



T

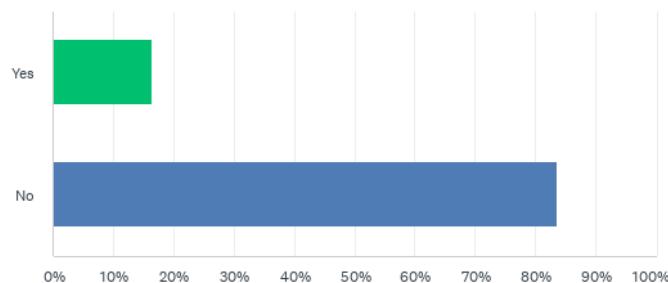
The responses indicate that approaching half of all respondents thought that better use could be made of the Church. 42 people commented on this question, and typical remarks include:

- I think they do a good job already
- Appeal to more age groups
- Publicity of any events that are on - I am not aware of any.
- Any use of our beautiful church to keep it relevant (not religious) would be very welcomed.
- Much has been done to try and encourage more use but to no avail.
- Depends on volunteers
- I enjoy going to church, think its a good place to interact.
- Ensuring community events are not just for a select group of people and involving the whole community Using digital platforms (eg Nextdoor) to notify the wider community as well as leafletting. Not everyone is aware of the Noticeboards/they may not pass it on foot.
- Could possibly be used, but lack of parking
- I think it already is practical and appealing, nobody thinks to use it
- More community events like films, live music
- Activities and groups for residents of all ages
- Construction of an inside space suitable for club meetings all year round.
- We don't have a community hall but the church has invested in space at the rear, and removable seats (or part of them) could make for a increased useful place.
- Current balance is about right, but concern this may drop as older residents become less involved.
- Being warmer in the evening may make evening classes/groups more comfortable.
- I think many people go to great efforts to make everyone welcome at the Church
- Take out the pews
- Can't hurt to have a ceilidh occasionally.
- Winter cinema nights, community gatherings
- Weekly exercise class eg yoga would be great.
- Is there a schedule of regular events?
- Improved access and external lighting. Online booking system. Comfy chairs.

23 Do you think we need more business premises in our Parish?

110 people answered this question. The majority answered NO (92 people).

Q23 Do you think we need more business premises in our Parish?



Most of the 20 comments on this question were to suggest a shop.

24 If you are in employment, do you work within the Parish?

75 people answered this question; those working from home and those working outside the Parish were evenly divided. Only 7 people answered that they work in the Parish.

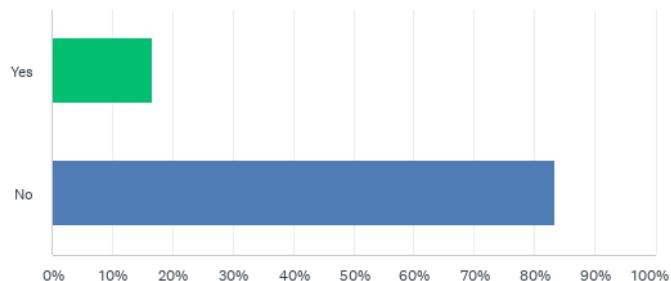
YES in the Parish but away from my home	9.33%	7
YES work from my home	45.33%	34
NO outside Parish	45.33%	34

25 Should we make improved provision to encourage tourism?

108 people answered this question (NB amended question number).

Most people (83.33%) answered NO. 18 people (16.67%) answered YES.

Q24 Should we make improved provision to encourage tourism?



Some typical suggestions to support tourism were:

- Make better use of the history of church, carvings, local history and historic assets.
- Small-scale diversification of rural businesses by the farm into holiday let/lodges should be encouraged to help support and keep local businesses economically viable.
- More interpretation boards/walking routes around the historic parts of our settlements

26 If there was ONE change you could make in the Parish, what would it be?

91 people had comments to make here, and not surprisingly there is strong correlation with the things people didn't like about living here. Issues that were mentioned by more than 1 person are:

- 12 said tackle speeding traffic (and a suggestion for Lower Rd to be 'No Through Rd')
- 10 said improve the roads/gritting
- 9 wanted more community spirit/social events/village hall/space in church
- 8 said a bus service

- 7 said no further development
- 6 said a shop
- 5 said improved sewage/drainage
- 3 said the Parish Council should be more ambitious or enable more involvement
- 3 said Fibre broadband
- 3 want the pub to be more of a pub
- 3 want improvements to footpaths/bridleways
- 2 mentioned street lights (white not orange/lower power)
- 2 want more residential and commercial development to be allowed
- 2 want improvements to pavements

27 Is there anything else you want to say to help guide the updating of the Neighbourhood Plan?

Peoples' comments are reproduced in full as follows:

- Every village should be allowed to evolve in a natural controlled way.
- More effort to ensure the roads are improved - maintenance. Also paths (roadside) cleared of leaves/mud - become slippery.
- No need for development or conversions.
- Involve the people in the village much more
- Please keep this beautiful area of our county and country as idyllic as it already is.
- Changes to the area should be of benefit to the majority and discreet.
- People choose to live in Hough specifically to seek the rural tranquility that it offers, and do not therefore need development or increased traffic. Protection of this ancient and rural village should be prioritised, prevent development in any green areas within and surrounding the village other than restricted changes to existing properties in the existing nature and style of the buildings. The small roads will not support further development.
- We live in a lovely place and while we have to move with the times, I hope we keep the special atmosphere Hough Parish offers, for many years
- I truly hope that no housing development will be allowed in this historical area
- Hough on the Hill is a special village, residents moved to live here for all that it offers. I would not want to see it expand with more housing other than a handful of infill properties that are in keeping with the neighbourhood.
- The lack of facilities, homes, footpaths, lack of transport and even poor connectivity are all part of its charm and need to be cherished and not destroyed for the sake of modernisation/so called improvement.
- Crime is a slight concern I have, after hearing of a few break-ins and a van being stolen, maybe something like a local next door neighbour group for Hough, Brandon, and Gelston.
- Do not agree with the "smaller village" status of Hough on the Hill. A pub should not mean that development should take place. If there were shops, on a bus route, doctors surgery, maybe, but not a pub. How does that equate to the village being suitable for development?
- We should not be designated a "smaller village" - we have virtually no services (which is nice actually), but this means we should not be subject to SP3, SP4, SP5
- Greater voluntary effort. For example the occasional emptying of the well to stop that hole appearing in the road on high road.
- Develop urban brownfield sites before housing developments in the rural green belt, we need space for crops and livestock.
- Please use whatever means are to hand to allow Hough to stay the way it is, villages like ours are becoming a rarity
- Keep rural villages distinct and not full of modern housing. Is a pub that is open 24 hours a week really a reason to designate Hough a sustainable village? Who will buy it as a public house when the current owners retire?

- Retain the tranquility of the village and if that is not possible, place as many barriers as possible to prevent a large building programs.
- For a village to create a thriving community it must be a place of wealth creation, enjoyable outside space, good communications and transport.
- Many miles from any source of employment, money for affordable housing should be spent in towns with jobs and transport links.
- Horses to be directed off the highway when defacating onto grass verge.
- Clearly defined village boundaries to stop extra/unnecessary building
- I think that most of the villages lack the capacity for expansion unless serious thought is put into how their amenities are developed.
- Involve the people in the village much more
- The Neighbourhood Plan needs to be clearly defined so that it is difficult to override and/or abuse.
- Everyone should be included and I doubt that this is the case.
- Whilst change and improvement is important for the parish, it is important to reflect on what makes the parish so desirable to live, and what therefore should not change. Care should be taken when making plans to achieve one objective whilst failing on another. Eg, building wind turbines for achieving more renewable energy production then is not in keeping with the local parish built setting and landscape.
- Protect this lovely area
- Development in this parish, where a car is necessary for the majority of journeys is not environmentally sensitive - it is not sustainable.
- SKDC planning enforcement need to ensure that residential development is actually in keeping with existing buildings. Too many times original features are either removed, masked or not sympathetically melded into the final development, regardless of conditions set when planning consent is given.
- Above all, resist the growth of 'affordable housing' which is great in theory but useless if the intended occupants have no local employment or transport to support their lifestyle. Unemployed reliant on benefits would be bored and as miserable as sin living here.
- It should not be created as a tool for NIMBYs. It should be remembered that a huge amount of housing stock in the parish has been built within living memory and we need to continue to allow careful expansion, not just slamming the door on all development outside the larger villages.
- Having lived in this parish for over 30 years I am bitterly disappointed that there has been static policy for a considerable time and there is no appetite for sensible growth. There is room to share!

(NB A longer written comment was also received, largely about the restoration/conversion of existing buildings and, for infill new builds, the critical nature of building materials.)

**THE PARISH COUNCIL AND
THE NEIGHBOURHOOD PLANNING COMMITTEE
ARE VERY GRATEFUL TO EVERYONE WHO MADE TIME
TO COMPLETE THE SURVEY,
AND FOR ALL THE THOUGHTFUL COMMENTS
AND VIEWS PUT FORWARD**

**APPENDIX 3c: Delivery Strategy for ‘Non-Planning’
Responses to Neighbourhood Planning Questionnaire -
February 2022**

6 DELIVERY STRATEGY

Development Management

133. The Neighbourhood Plan NP will be implemented through a combination of SKDC's consideration and determination of planning applications and through steering any additional funds into a series of infrastructure projects contained in the plan.

134. Whilst SKDC will be responsible for development management, the Parish Council will use the NP to frame their representations on submitted planning applications.

135. The majority of the policies in the Neighbourhood Plan will be delivered by land and property owners and developers responding to its planning policies. Care has been taken to ensure, as far as possible, that these policies are achievable.

Infrastructure Requirements

136. Policy HOH16 of the Neighbourhood Plan refers to the requirement for all new development to provide necessary and appropriate new facilities on site or contribute to off-site facilities to be secured by means of planning condition, s.106 where appropriate and feasible, or through the 'neighbourhood element' of any Community Infrastructure Levy (CIL) adopted by SKDC.

137. Although the Parish Council will consider any new plan or project put before them which would enhance the infrastructure or facilities of the Parish, the consultation process for the preparation of the Neighbourhood Plan identified a number of requirements. These are set out in the following table (noting that improvements to footpaths and bridleways are separately covered in Policy HOH15):

IDENTIFIED NEED	PRIORITY
Hard Surface Games Area on the Hough on the Hill Playing Field	High
Installation of flashing signs indicating driving hazards or speeds in the following locations in order of priority: - on the COO1 as it passes Brandon, in both directions - on the Frieston Road and Barkston Road entries into Hough on the Hill - on both approaches through Gelston	High
The Parish Council will continue to work with Lincolnshire County Council Highways Department to maintain and improve the safety of the roads within the Parish. However, should additional funding become available to the Parish, further safety improvements will be sought, eg by the creation of passing places on the roads connecting the three villages.	High
Community Renewable Energy Schemes (Reference Policy HOH13)	Medium
Interpretation Boards for local heritage sites: - at All Saints Churchyard (village features and history) - at Beacon Site (landscape, ecology and history of the ironstone workings) - on the Loveden Hill Byway (history and archaeology)	Low

Non-Planning Issues

138. The Parish Council has responded to the views and wishes of residents in compiling the policies of this Neighbourhood Plan, but a number of the concerns and ideas raised lie outside the scope of planning and require other actions to take them forward. The table below sets out suggestions for taking forward these wider issues, for further consideration:

Issue	Proposed Action
<p><u>1 Loveden Hill 'Byway Open to All Traffic'</u> Raised as a concern during consultation. Parish Council requested to seek a change to the current status of the track, returning it to Footpath and Byway status.</p>	<p>Parish Council could enquire about the necessary legal process through the Lincolnshire County Council's Footpaths Team. (An initial enquiry has already been raised, Reference 1253648.)</p>
<p><u>2 Multi-Use Games Area on the Playing Field</u> There was support from the consultation for improving the utilisation of the current Playing Field in Hough on the Hill, potentially by installing a Multi-Use Games Area (MUGA) or similar improved ball games facility.</p>	<p>The Parish Council will consider any new plan or project put before them to enhance the leisure facilities of the Parish. (NB: It is possible that installation of a MUGA, or similar facility, by the Parish Council on land owned by them could be pursued as a permitted development - ie, not require planning permission. However it is recommended that the views and advice of SKDC be obtained before any such initiative is taken forward.)</p>
<p><u>3 Permissive Paths and Byways</u> Government funding to support landowners and farmers to operate Permissive Paths is ending. These paths and byways, which are popular and well-used within the Parish, may be closed.</p>	<p>The Parish Council will liaise with local farmers and landowners about the future of the Permissive Paths within the Parish, supporting them wherever possible to keep Paths open to the public, and/or promoting new paths and access arrangements.</p>
<p><u>4 Condition of Local Roads and Speed Limits</u> Concerns about speeding vehicles on local roads, the lack of passing places and the poor condition of both roads and verges was consistently raised during consultations.</p>	<p>The Parish Council will continue to work with Lincolnshire County Council Highways Department to improve the safety and condition of the roads within the Parish.</p>
<p><u>5 Preparation of a Local List</u> There is currently no Local List of buildings of architectural or historic interest for Hough on the Hill Parish. The SKDC Conservation Officer has indicated that there would be support for such a list to be compiled through an evidenced process.</p>	<p>The Parish Council will explore, in partnership with the SKDC Conservation Officer, an appropriately evidenced process for compiling a Local List of buildings of architectural or historic interest, including within such consideration those 'positive unlisted buildings' identified within the Hough on the Hill Conservation Area (Draft Review 2014 or any subsequently approved document) and the features of interest identified by local people as listed in Section 4 of this Plan.</p>

Regular Review

139. The Parish Council will seek to develop its process of consultation with its parishioners.

140. The Parish Council will undertake a review of the Neighbourhood Plan every 5 years to ensure it remains compliant with both national and local planning policy, and that it is up to date and relevant to changing circumstances. The review process will include liaison with the owner of Loveden Hill Local Green Space if any aspects of this legislation or its impact have substantially altered in the intervening period such that they impact on the operation of his business. The review process will also ensure that the required infrastructure improvements (as listed above) remain relevant and appropriate.