



Barrowby Neighbourhood Plan Regulation 16 Consultation Response – on behalf of William Davis Homes

Land off Casthorpe Road/Land west of Grange Paddock, Barrowby (Ref. SKPR-206)

Introduction

1. This submission has been prepared by Cerda Planning on behalf of William Davis Homes (hereafter referred to as WDH) in response to the Barrowby Neighbourhood Plan Regulation 16 Consultation.
2. For the avoidance of doubt, WDH has an interest in the land known as Land off Casthorpe Road/Land west of Grange Paddock, Barrowby. This site is otherwise referred to as SKPR-203 in the Local Planning Authority's Draft Site Assessment Report. It is highlighted that a planning application has been submitted and is pending consideration for Outline planning permission for up to 195 dwellings with open space, landscaping, drainage and other associated works (all matters reserved except for access). The planning application is accompanied by an illustrative proposal, as well as Parameter Plans, and a suite of supporting technical reports demonstrating the suitability and deliverability of the site for residential development.
3. Only a draft Neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be made. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are:
 - 'a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the Order (or neighbourhood plan).*
 - b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate*

to make the Order. (This Basic Condition applies only to Orders therefore is not applicable to this case)

c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. (This Basic Condition applies only to Orders therefore is not applicable to this case)

d. the making of the Order (or neighbourhood plan) contributes to the achievement of sustainable development.

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

f. the making of the Order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations¹.

g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the Order (or neighbourhood plan).'

4. In assessing compliance with basic conditions d) and e), regard should be had to guidance from the Planning Practice Guidance, as set out below.

5. In relation to d), the guidance sets out:

'What must a qualifying body do to demonstrate that a draft neighbourhood plan or Order contributes to sustainable development?

This basic condition is consistent with the planning principle that all plan-making and decision-making should help to achieve sustainable development. A qualifying body should demonstrate how its plan or Order will contribute to improvements in environmental, economic and social conditions or that consideration has been given to how any potential adverse effects arising from the proposals may be prevented, reduced or offset (referred to as mitigation measures).

In order to demonstrate that a draft neighbourhood plan or Order contributes to sustainable development, sufficient and proportionate evidence should be presented on how the draft neighbourhood plan or Order guides development to sustainable

solutions. There is no legal requirement for a neighbourhood plan to have a sustainability appraisal. However, qualifying bodies may find this a useful approach for demonstrating how their draft plan or order meets the basic condition. Material produced as part of the Sustainability Appraisal of the local plan may be relevant to a neighbourhood plan.'

Paragraph: 072 Reference ID: 41-072-20190509

Revision date: 09 05 2019 See previous version

6. In relation to e), the guidance sets out:

'What is meant by 'general conformity'?

When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider the following:

- whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with*
- the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy*
- whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy*
- the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach.'*

Paragraph: 074 Reference ID: 41-074-20140306

Revision date: 06 03 2014

7. These representations are submitted to identify significant concerns regarding compliance with the ability of the Neighbourhood Plan to meet the basic conditions, particularly in relation to achieving sustainable development and conformity with the strategic policies of the development plan. The response is focused on concerns regarding the delivery of residential development.

Local Plan Context

8. The Development Plan for the Local Planning Authority area comprises the South Kesteven District Council Local Plan 2011-2036 (Adopted January 2020) (SKDC LP), as well as Lincolnshire Minerals and Waste Local Plan: Core Strategy and Development Management DPD (Adopted June 2016).
9. The South Kesteven Local Plan (2011-2036) sets out the spatial strategy in Policy SP1. The objectively Assessed Need for the Development Plan is 16,125 dwellings across the period 2011 to 2036 (625 dwellings for the first five years of the plan before increasing to 650 dwellings for the remainder of the plan period), and policy seeks to secure this as a minimum.
10. In respect of Barrowby, no figure was provided for minimum provision over the plan period but Policy H1: Housing Allocations, made an allocation, LV-H3 at Low Road, Barrowby, for an indicative figure of 270 dwellings and GR3-HS at Rectory Farm Grantham (within the parish boundary) for an indicative figure of 404 dwellings, as well as, to be considered alongside policies SP2: Settlement Hierarchy, SP3: Infill Development and SP4: Development on the Edge of Settlements which facilitate some windfall development.
11. In setting out the strategy, Policy SP1 states that 'the focus for the majority of growth is in and around the four market towns, with Grantham being a particular focal point.' In addition to this, 'Larger villages will provide a supporting role in meeting the development needs of the District.' It is highlighted that, in considering development at Larger Villages, this is not restricted to meeting the need of the settlement alone, the spatial strategy applies a broader approach to meeting the needs of their rural hinterland and the District.
12. The supporting text for Policy SP1 sets out the following:

'2.9. "Beyond the four main towns – Grantham, Stamford, Bourne and The Deepings – the Larger Villages (as listed in Policy SP2) are considered to be the next most sustainable locations for growth within the District and therefore should positively contribute towards meeting the District's overall growth needs.'
13. The Local Plan anticipates Larger Villages would contribute 10% to the overall housing growth of the adopted Local Plan.

14. Notwithstanding the above, in light of updates to the National Planning Policy Framework in December 2024 and associated updates to the Standard Method for calculating Local Housing Need, SKDC's annual housing need increased from 701 dwellings per annum (dpa) to 895 dpa (increased from the adopted Local Plan housing requirement of 650 dpa). As such, the Local Plan is unable to deliver the current Local Housing Need and the LPA are currently in the process of preparing a Local Plan Review.
15. The LPA have consulted on a Regulation 18 – Proposed Housing and Mixed-Use Site Allocations Consultation from 3rd July to 28th August 2025.
16. To meet the above higher Local Housing Need and seek ensure a sufficient housing land supply for the entire plan period, SKDC used that consultation to identify additional housing sites beyond those previously consulted on.
17. In the Regulation 18 draft Local Plan, SKDC identify an allocation for circa 455 dwellings at Land east of The Drift and Land south of Low Road, Barrowby.
18. For clarity, WDH made representations to the above Regulation 18 consultation raising several concerns, noting that:
- It is positive to see the Council's pro-active approach to re-visit the Reg 18 Plan in seeking to meet the full local housing need as a result to changes in the NPPF 2024.
 - The emerging Plan indicates that there is a need of 886dpa, equating to 17,720. Using the Standard Method calculation, the figure is 894dpa, and therefore the requirement over the plan period should increase by 160, to a total of 17,880.
 - It would be advisable that the Council extend the Plan period over one or two years to anticipate delays in adopting the Local Plan. This would also result in an increase in the housing requirement by 894 units for one year, resulting in a total of 18,744 or 1,788 for two years to a total of 19,668.
 - The Adopted Plan contains a buffer of 18% to provide a greater choice of sites, as well as to provide contingency in case of lack of delivery. However, in the emerging Plan, the buffer is 11%. Given the trend in housing delivery at the current

rate, and reliance on a small number of large sites, it is suggested that a 20% buffer should be applied; if this was the case, this would increase the housing requirement to 21,264 across the Plan period (notwithstanding the updated LHN and consideration of extending the Plan period above).

- There is an over reliance on large strategic sites to deliver majority of the homes during the plan period; with particular concerns in relation to timescales for delivery of the Prince William of Gloucester Barracks and Spitalgate Heath, a lack of detail on the Council's detailed housing trajectory, particularly with regards to delivery rates and the effect of market saturation in Grantham itself.

19. The above overview comments are not specific to Barrowby, but the resultant effect is that WDH do not consider that the draft plan allocates sufficient housing, with the potential effect of further residential development being required in Barrowby beyond that already identified (or alternative sites in-lieu of the draft allocation in Barrowby for the reasons set out further in that Regulation 18 consultation response).

Setting Neighbourhood Plan Housing Requirements – National Policy and Guidance

20. In seeking to establish a housing requirement figure for Neighbourhood Plan areas, the National Planning Policy Framework sets out the following (underlining is our emphasis):

'69. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.

70. Where it is not possible to provide a requirement figure for a neighbourhood area³³, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.

Footnote 33: Because a neighbourhood area is designated at a late stage in the strategic policy-making process, or after strategic policies have been adopted; or in instances where strategic policies for housing are out of date.'

21. The Planning Practice Guidance provides further guidance on this matter as follows:

'Can a neighbourhood plan come forward before an up-to-date local plan or spatial development strategy is in place?

Neighbourhood plans, when brought into force, become part of the development plan for the neighbourhood area. They can be developed before or at the same time as the local planning authority is producing its local plan (or, where applicable, a spatial development strategy is being prepared by an elected Mayor or combined authority).

A draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing need evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development.

Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:

- *the emerging neighbourhood plan*
- *the emerging local plan (or spatial development strategy)*
- *the adopted development plan*

with appropriate regard to national policy and guidance.

The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.

The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.

Strategic policies should set out a housing requirement figure for designated neighbourhood areas from their overall housing requirement (paragraph 65 of the revised National Planning Policy Framework). Where this is not possible the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body, which will need to be tested at the neighbourhood plan examination. Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new local plan.'

Paragraph: 009 Reference ID: 41-009-20190509

Revision date: 09 05 2019 See previous version

22. And

'How should local planning authorities identify indicative housing requirement figures for designated neighbourhood areas, when these are needed?

Where an indicative housing requirement figure is requested by a neighbourhood planning body, the local planning authority can follow a similar process to that for providing a housing requirement figure. They can use the authority's local housing need as a starting point, taking into consideration relevant policies such as an existing or emerging spatial strategy, alongside the characteristics of the neighbourhood plan area.

Proactive engagement with neighbourhood plan-making bodies is important as part of this process, in order for them to understand how the figures are reached. This is important to avoid disagreements at neighbourhood plan or local plan examinations, and minimise the risk of neighbourhood plan figures being superseded when new strategic policies are adopted.'

Paragraph: 102 Reference ID: 41-102-20190509

Revision date: 09 05 2019

23. And

'What happens if the local planning authority does not provide a housing requirement figure for a designated neighbourhood area that wishes to plan for housing?

Where strategic policies do not already set out a requirement figure, the National Planning Policy Framework expects an indicative figure to be provided to neighbourhood planning bodies on request. However, if a local planning authority is unable to do this, then the neighbourhood planning body may exceptionally need to determine a housing requirement figure themselves, taking account of relevant policies, the existing and emerging spatial strategy, and characteristics of the neighbourhood area. The neighbourhood planning toolkit on housing needs assessment may be used for this purpose. Neighbourhood planning bodies will need to work proactively with the local planning authority through this process, and the figure will need to be tested at examination of the neighbourhood plan, as neighbourhood plans must be in general conformity with strategic policies of the development plan to meet the 'basic conditions.'

Paragraph: 105 Reference ID: 41-105-20190509

Revision date: 09 05 2019

24. And

'What evidence is needed to support a neighbourhood plan or Order?

While there are prescribed documents that must be submitted with a neighbourhood plan or Order there is no 'tick box' list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach

taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.

A local planning authority should share relevant evidence, including that gathered to support its own plan-making, with a qualifying body. Further details are set out in guidance of the type of evidence useful in supporting a local plan.

Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need.

In particular, where a qualifying body is attempting to identify and meet housing need, a local planning authority should share relevant evidence on housing need gathered to support its own plan-making.'

Paragraph: 040 Reference ID: 41-040-20160211

Revision date: 11 02 2016 See previous version

25. Having regards to the above policy and guidance, it is clear that:

- In respect of paragraph 66 and the lack of need to re-test figures once strategic policies are adopted unless there has been a significant change in circumstance that affects the requirement, there has been a significant change in circumstances since the adoption of the adopted Local Plan; being the increased Local Housing Need and the Local Plan being out-of-date.
- In respect of paragraph 70 and instances a housing figure for a Neighbourhood Plan area is not set out in adopted strategic policies, whether the figure is derived from the LPA or calculated by the Neighbourhood Plan Group, that figure must have regard to the latest evidence of local housing need as well as emerging policies/the most recently available planning strategy for the LPA.

Barrowby Neighbourhood Plan Housing Requirement and Policy

26. Delivery of the housing requirement is set out through Policies 1: Sustainable Development, and 3: Housing Development. The approach to housing strategy and need, resulting in the housing requirement to be delivered is set out in the supporting text at 2.44 – 2.49. These paragraphs set out that the starting (and seemingly finishing) point for the housing

requirement are derived from a Housing Needs Assessment undertaken by AECOM. Notable conclusions from the report as set out within the Neighbourhood Plan are as follows:

'2.45 The Housing Needs Assessment undertaken by AECOM to inform this Neighbourhood Plan is available separately online and on paper in specified locations. It has found that the South Kesteven Local Plan includes an allocation for 270 new homes in Barrowby, as well as around 1,500 on a site on the edge of Grantham which overlaps with the parish boundary. A number of further applications contribute further to a sense of development pressure in the parish, although the total number of new homes expected is not precisely known at present.

...

2.49 Based on the available evidence, the HNA recommends an overall Housing Need Figure (HNF) of 167 dwellings for Barrowby, which equates to 9.8 dwellings per year between 2024 and 2041. The precise number of homes on committed sites at this time is unknown but the current Local Plan allocation alone far exceeds the HNF of 167, meaning that there is little or no residual need for new housing beyond that already in the pipeline.'

27. It is notable from the supporting text that the Neighbourhood Plan Group do not appear to have requested a housing requirement figure from the Local Planning Authority, as optional at paragraph 70 of the NPPF, and have instead sought to produce and justify their own housing requirement figure. As set out within the Planning Practice Guidance, *'if a local planning authority is unable to provide a figure, then the neighbourhood planning body may exceptionally need to determine a housing requirement figure themselves. There is no commentary or reasoning set out within the supporting text to identify the exceptional circumstances applicable in this instance that justifies the Neighbourhood Plan Group determining the housing requirement rather than seeking a figure from the LPA.'*

28. Following the supporting text, the approach to housing is set out as follows:

- Policy 1: Sustainable Development at 2A sets out that development which is to be supported includes *'Housing that meets the local community's need'*.
- Policy 3: Housing Development reiterates that *'Development providing housing to meet the needs of the local community will be supported'*. The policy continues to

set out that infill sites within the Developed Footprint of Barrowby, land within the parish of Barrowby to the east of the A1 will be supported, and land on the edge of the village adjacent to the Developed Footprint may be considered suitable subject to meeting further criteria.

29. The Neighbourhood Plan approach therefore asserts that existing adopted Local Plan allocations, exceed the Housing Need Figure set out within the AECOM HNA and therefore does not seek to make any further allocations beyond those in the adopted (and out-of-date) Local Plan and as set out, only seeks to meet the '*local community's need*' and does not consider the needs of the District.
30. In understanding the approach, it is important to consider the Housing Need Assessment further, when it was undertaken and on what basis.
31. In the first instance, the HNA was published in February 2024; this is prior to the December 2024 updated National Planning Policy Framework and associated updates which resulted in a significant shift in the delivery of housing, including the change to the standard method for calculating Local Housing Need, which as set out above, saw the LPA's Local Plan become out-of-date as a result.
32. The HNA includes several housing-based topics but the focus in this instance is on quantity at section 4 which seeks to set out a starting point for the housing requirement to be considered for the Neighbourhood Plan. In doing so, the HNA undertakes a 3-step approach; the first of which sets out the Standard Method. The first step in the assessment is based on the old Standard Method, which as set out, results in a much lower Local Housing Need figure. As such, the first step in the process is fundamentally flawed in respect of being an appropriate and up-to-date evidence base.
33. The second step is to consider the LPA Planning Strategy, for which the assessment identifies there is no specific quantum identified in the settlement hierarchy to be delivered at Barrowby/within the Neighbourhood Plan area and therefore no assessment or uplift from Step 1 is applied. The report acknowledges at Paragraph 101 that it is possible to interpret the sum of allocations in the Local Plan as SKDC's expression of the preferred scale and distribution across its various settlements, but AECOM identify they do not favour using this method to determine future housing need. As such, no uplift is provided at Step 2 and

therefore no regard is had to the adopted (or emerging) spatial strategy – which seeks to ensure that Barrowby, as a Larger Village, assists in meeting the needs of the District.

34. The third step looks at past completions and future commitments. Whilst there is no significant comment in this respect, it should be noted that the Standard Method for calculating Local Housing Need does account for previous completions – albeit appreciating that that is not area specific.
35. Notwithstanding that it is clear and obvious that the HNA is not a reliable baseline for considering the housing requirement within the Neighbourhood Plan, some of the caveats from the introduction and conclusion of section 4 of the HNA as set out by AECOM are highly notable; extracts of these are set out below:

Introduction

77 – However, the indicative figure provided by AECOM has a lower status to one provided by an LPA and would be automatically superseded if an LPA-provided figure emerges in future. As well as having a different status to an LPA-provided housing figure, AECOM's indicative figure is more limited in how it can be calculated.

80 – AECOM's approach to HNAs is quite limited and simplistic for reasons of consistency and because certain judgements would require a wider scope and/or remain in the remit of the LPA. For example, LPA's can make their own determinations about the suitability of the NA for housing growth, noting for examples its infrastructure and environmental constraints, or the role it plays in the local area relative to other locations.

81 – For this reason, the number provided here is termed a Housing Need Figure (HNF) rather than sharing the terminology generally used by LPAs, which would speak of a Housing Requirement Figure (HRF) A need figure is a simpler expression of what might be needed, irrespective of the additional objectives, constraints and wider targets that might go into a more formal requirement or housing target. In short, a HRF can reflect the wider planning strategy in addition to local need.

Conclusion

'106. Based on the evidence above, this HNA recommends an overall HNF of 167 dwellings for Barrowby, which equates to 9.8 dwellings per year between 2024 and 2041.

The precise number of homes on committed sites at this time is unknown but the current Local Plan allocation alone far exceeds the HNF of 167, meaning that there is little or no residual need for new housing beyond that already in the pipeline.

107. It should be noted that this conclusion applies to the needs of Barrowby's current population. There may be an expectation for the Parish to grow beyond this level to meet a share of the wider District's needs and accommodate newly arriving households who may benefit the vitality and demographic profile of the Parish.

108. The housing figure for South Kesteven is derived from the Government's standard method and is likely to change annually as ONS publishes new affordability data each year and new household projections approximately every two years. This could impact on the number of homes required in South Kesteven and any indicative housing requirement figure provided by South Kesteven for neighbourhood areas.

...

110. At the time the final Neighbourhood Plan housing requirement figure is provided by South Kesteven, it can be considered to supersede the provisional calculation within this study. Consequently, there is a need for the neighbourhood group to continue to engage with the LPA to confirm the final housing figure for the Neighbourhood Plan.'

36. From the above, it is summarised that the HNA:

- was published in March 2024 following which there have been significant changes to the delivery of residential development;
- scope is limited and simplistic and does not have regard to many considerations that an LPA-provided figure would and therefore provides a Housing Need Figure, not a Housing Requirement Figure;
- Housing need figure would be immediately superseded should the LPA provide a housing requirement for the neighbourhood plan area;
- Step 1 of the approach is based on the old Standard Method and therefore is a fundamental flaw; acknowledged in the assessment that the need would change annually and that the Neighbourhood Plan Group should work closely with the LPA.

- Step 2 of the approach opted not to quantify any distribution to the Neighbourhood Plan area having regards to the adopted Local Plan.

37. In addition to the above, since the publication of the HNA, the LPA has undertaken a Regulation 18 consultation on the overall housing need based on the latest Local Housing Need evidence and further allocations which represents the most recently available planning strategy from the LPA. As set out further above, the Regulation 18 includes an allocation for circa 455 homes. Whilst WDH do not agree that allocation is the most appropriate allocation for Barrowby as a result of further technical work undertaken for their site, it nonetheless represents a housing requirement provided by the LPA that the Neighbourhood Plan cannot ignore, and identified in the HNA, would immediately supersede the figure provided within the HNA.

38. In summary, it is clear that the Neighbourhood Plan housing policies seek to meet the local needs of the community only (with those based on out-of-date evidence), no regard is had to the adopted spatial strategy in respect the role Barrowby plays in assisting to meet the needs of the District, or the emerging spatial strategy which identifies a significantly higher need to be met by allocations/the neighbourhood plan. In light of this, it is clear that the plan is not capable of achieving sustainable development and is not in general conformity with the strategic policies of the Local Plan that pertain to the spatial strategy and therefore fail basic conditions d) and e).

SEA/HRA Screening

39. The Neighbourhood Plan is accompanied by a Strategic Environmental Assessment and Habitat Regulations Assessment screening opinion. The opinion identifies that no assessments are required, essentially by virtue of not seeking to allocate any additional growth. However, as set out above, that approach is flawed and the Neighbourhood Plan Group will need to revisit this matter. When they do revisit this matter, they will be required to undertake a further screening opinion and should an SEA be required, this would need to be undertaken in advance of and to inform the assessment of potential sites for consideration. Until this occurs, it cannot be confirmed that the Neighbourhood Plan is capable of meeting basic condition f).

Concluding Remarks

40. This submission has been prepared by Cerda Planning on behalf of William Davis Homes in response to the Barrowby Neighbourhood Plan Regulation 16 Consultation. WDH has an interest in the land known as Land off Casthorpe Road/Land west of Grange Paddock, Barrowby, otherwise referred to as SKPR-203 in the Local Planning Authority's Draft Site Assessment Report.
41. It is clear that the Neighbourhood Plan housing policies seek to meet the local needs of the community only, with those based on out-of-date evidence, and no regard is had to the adopted spatial strategy in respect the role Barrowby plays in assisting to meet the needs of the District or the emerging spatial strategy which identifies a significantly higher need to be met by allocations/the neighbourhood plan.
42. In light of the above, the basis on which the SEA/HRA screening opinion undertaken is flawed and cannot be relied upon when revisiting the need to allocate further housing.

Only a draft Neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be made and it is WDH's view that the Neighbourhood does not meet the following basic conditions:

d. the making of the Order (or neighbourhood plan) contributes to the achievement of sustainable development.

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

f. the making of the Order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations¹.