



**South Kesteven District Council comments on the Barrowby Neighbourhood Plan**

**6<sup>th</sup> March 2025**

<b><u>Policy / Paragraph</u></b>	<b><u>Comment / Recommendation</u></b>
	Maintain consistency with the fonts used throughout so that is all under the same uniform font type, and ensure it is an accessible font.
<b>Paragraph 2.26</b>	Formatting of inserted image requires adjusting.
<b>Paragraph 2.27</b>	Reference made to NPPF (2014) requires updating to most recent NPPF (2024).
<b>Paragraph 2.42</b>	Formatting of inserted map should not cut through text.
<b>Paragraph 2.46</b>	Paragraph 2.46 statement that South Kesteven's adopted policy requires '30% on all new housing be affordable' is incorrect. The Local Plan requires all Major Sites, defined as 10 or more units or bigger than 0.5 hectares, to provide 30% affordable units.
<b>Paragraph 2.48</b>	Maintain consistency of proposed plan period, which is written as 2025 to 2040 in paragraph 1.9.
<b>Paragraph 2.49</b>	<p>Paragraph 2.49 states that the Housing Needs Assessment recommends an overall Housing Need Figure of 167 dwellings for Barrowby and considering the current allocation, there is little or no residual need for new housing beyond that already in the pipeline. It is important to note, taking into consideration policies within the adopted Local Plan, that the Housing Need Figure of 167 dwellings should be viewed as a minimum figure.</p> <p>It should also be taken into consideration that the Housing Needs Assessment was undertaken in February 2024 prior to the adoption of the NPPF (2024), which presented an updated Standard Method that would affect the Housing Need calculations within.</p> <p>Paragraph 70 of the NPPF (2024) states that the Local Planning Authority should provide an indicative figure if requested to do so by the neighbourhood planning body, and the LHNA acknowledges the final housing requirement will ultimately be provided by South Kesteven District Council.</p> <p>In addition, again, plan period is written as 2025 to 2040 in paragraph 1.9, and 2024 to 2041 in this paragraph.</p>
<b>Paragraph 2.54</b>	Avoid duplication of content of paragraph 2.48.
<b>Paragraph 4.2</b>	SKDC would suggest that this is now amended to reflect that a new consultation is taking place on a revised NPPF - <a href="#">Proposed reforms to the National Planning Policy Framework and other changes to the planning system - GOV.UK (www.gov.uk)</a> between the 30 July and 24 September.
<b>Policy 1</b>	<p>Criterion 1a of Policy 1 is not sufficiently precise policy wording to apply to development management and would be better suited to the explanatory text as a vision statement for Policy 1.</p> <p>Criterion 1d duplicates National Policy, in which Biodiversity Net Gain at a minimum of 10% is already mandated.</p>



<b>Policy 2</b>	<p>Criterion 3 writes that ‘Development proposals that vary from the Barrowby Design Codes and Guidance <b>may</b> be supported if...’ which could lead to inconsistent application at decision-making stages. Clarity on how proposals could be supported when departing from Design Codes and Guidance could prevent ambiguity.</p>
<b>Policy 3</b>	<p>Paragraph 13 of the NPPF requires that neighbourhood plans should support the delivery of strategic policies contained in local plans. The Barrowby Neighbourhood Plan will be examined against the current development plan in place (the adopted SKDC Local Plan). The Local Plan directs development to the district’s most sustainable settlements (towns and identified larger villages) through the allocation of land.</p> <p>Formatting wise, maintain consistency with numbering and lettering in criterion points.</p>
<b>Policy 3B</b>	<p>The textbox for Policy 3B has shifted into the text for Policy 4.</p> <p>The Council supports the objective of increasing the provision of self and custom build housing, meeting identified local demand. The strategic policies within the Local Plan, has a significantly lower proportion (2%) of self and custom build provision on larger sites (400 dwellings or more).</p> <p>The application of the requirement to smaller sites may raise viability and deliverability concerns. Insufficient evidence has been provided to justify the uplifted requirement from the Local Plan.</p>
<b>Policy 5</b>	<p>Wording of Policy is inconsistent with the National Planning Policy Framework and should be amended to take into account the assessment of harm in the submission of planning applications and weighing public benefits.</p> <p>Policy regarding archaeology is recommended. It is noted that no considerations have been made for archaeological sites or features, which given the long history of Barrowby as acknowledged in para 6.46 should be considered.</p> <p>A strengthening of Policy 5 would be recommended, making a differentiation between designated, non-designated, upstanding and below ground features, as well as the Barrowby Conservation Area. The policy should be in line with NPPF Chapter 16, which sets out levels of harm and planning requirements affecting heritage assets.</p>
<b>Policy 6</b>	<p>The inclusion of designated views can support the identified ‘Objective 8. Protection of our rural setting and distinctiveness’.</p> <p>Evidence of community consultation regarding the identified important views is unclear.</p> <p>To strengthen the policy, it is suggested that it recognises views of the surrounding countryside, and outward facing views from public rights of way which contribute to the perception of separation between Barrowby and</p>



	<p>Grantham, supported by clear evidence and consistent with the National Planning Policy Framework.</p> <p>It is recommended that the policy avoids conflict with strategic site allocations.</p>
<b>Paragraph 6.58</b>	<p>Text justification requires reformatting.</p>
<b>Policy 7</b>	<p>SKDC notes that the Barrowby Local Green Space Assessment has been prepared against the Local Green Space criteria in the National Planning Policy Framework (paragraphs 105–107) and therefore raises no substantive objection to the principle of the proposed Local Green Space designations, subject to the Examiner’s consideration.</p> <p>Map 4 identifying the Local Green Spaces should have improved clarity at a higher resolution and appropriate detail by labelling of the identified Local Green Space.</p> <p>Resistance to development that would ‘disrupt or otherwise harm that Green Infrastructure’ may conflict with the Local Plan, which allows for flexibility through suitable mitigation measures, and consideration of the weighting of the need for and benefits of the development.</p> <p>Similarly, criteria 3 states that any reduction in biodiversity ‘will not be supported.’ To ensure conformity, the policy should clarify that Biodiversity Net Gain should be delivered in accordance with National Policy.</p>
<b>Policy 8</b>	<p>Reference to ‘high quality agricultural land’ needs clarity, making reference to the Agricultural Land Classification as per the National Planning Policy Framework, which classifies ‘best and most versatile agricultural land’ as land in grades 1,2 and 3a.</p> <p>An ‘appropriate increase in biodiversity’ is required but is not quantified, and should be signposted to Policy 1 or 7, or National Policy.</p> <p>Criterion v. is not sufficiently precise with unquantifiable language such as an ‘outlook that residents are reasonably expected to enjoy’. Alternatively, this could be shifted to the explanatory text of the policy intentions.</p>