



Local Plan Proposed Submission consultation From 11th June to 23rd July

The Proposed Submission Local Plan sets out the strategic vision, objectives and spatial strategy for the District, as well as the planning policies which will guide future development. The Plan looks ahead to 2036 and identifies the main areas throughout South Kesteven where development should take place, along with areas of the District will be protected from change. It establishes policies and guidance, to ensure local development is built in accordance with the principles of sustainable development. The Plan has a number of allocations in which contribute towards the deliverability of the Plan's strategic vision.

This stage is the final representation stage before the Local Plan and all evidence based documents are submitted to the Secretary of State for an independent public examination. At this stage in the consultation process, comments should relate to issues of legal and procedural compliance, the "soundness" of the local Plan and the duty to co-operate. There is an accompanying FAQ regarding the regulation 19 consultation on the Council's webpage - www.southkesteven.gov.uk/newlocalplan

How to Respond.

Responses should be formed around the information set out within the consultation documents. These include the Proposed Submission Local Plan, Policies maps and other evidence based background documents which can be found on the Local Plan webpage.

You can respond to the Document in the following ways.

- Email this completed representation form to planningpolicy@southkesteven.gov.uk
- Post the completed representation form to the Planning Policy Team, South Kesteven District Council Offices, St Peters Hill, Grantham, NG31 6PZ

All representations will be made publicly available, and must be received by **5pm** on the **23rd of July**. Any responses received after then will not be considered.

This form has two parts. Please fill in a separate sheet for each representation you wish to make. **Part A** is for your personal details. **Part B** is your representation(s).

PART B – YOUR REPRESENTATION
 (Please use a separate sheet for each representation)

3) Which part of the Local Plan does this representation relate to?			
Document		Section	
Publication Local Plan	<input type="checkbox"/>	Page numbers (s)	32
		Paragraph Number (s)	1.48
		Policy	OS1 Open Space. Open space review
Local Plan Policies Map	<input type="checkbox"/>	Inset Number	
		Policy	
Other evidence based Document	<input type="checkbox"/>	Name of Document	

4) Do you consider the Proposed Submission Local Plan is:				
Legally Compliant	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Sound*	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Complies with Duty to Cooperate	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>

* The considerations relating to a development plan being sound are explained in the National Planning Policy Framework (paragraph 182) – these relate to the plan being positively prepared, justified, effective and consistent with national policy.

5) If you consider the Proposed Submission Local Plan is unsound, on which grounds do you consider the document to be unsound?	
Positively prepared	<input type="checkbox"/>
Justified	<input type="checkbox"/>
Effective	<input type="checkbox"/>
Consistent with National Policy	<input type="checkbox"/>

6) Please give details of why you consider the Proposed Submission Local Plan is not legally compliant is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If your response is more than 1000 words long then please provide a short summary at the start. (Continue on separate sheet/expand box if necessary)

SKDC Open Space, Sports and Recreation facilities Report 2017, Page 32, 1.48 - the evidence for this report is neither robust nor up to date.

According to Table 1, only 6 out of 84 towns and villages have any informal, accessible, natural open space and Market Deeping has none. Table 1 shows a woeful lack of open space throughout the district.

A general call from SKDC for information from local councils about open space did not generate a lot of information, because not all replied, so the evidence base is incomplete and SKDC have not done anything to remedy this.

NPPF 165 - Planning policies should be based on up to date information about the natural environment.

NPPF 73 - The Assessments should be robust and up to date.

SKDC's vision in this report (ref photograph on front cover and statement) makes provision of new open space the responsibility of developers which does not demonstrate a genuine commitment by SKDC to this absolutely crucial aspect of planning.

NPPF 73 - Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and wellbeing of communities.

There is no evidence of a call for the designation of Local Green Spaces across the district during the preparation of this Local Plan which could have made this policy meaningful and demonstrated a genuine commitment on the part of SKDC for this important policy which(NPPF) "can make an important contribution to the health and wellbeing of a community".

NPPF - 76 Local Green Spaces should only be designated when a Plan is prepared or renewed.

Page 91 EN3 Green Infrastructure purports to protect the green infrastructure across the district yet this is too generic..... there is only a detailed Green Infrastructure Policy for Grantham in this Plan. Each town and village should have a detailed, up to date green infrastructure too.

NPPF - 114 Local authorities should set out a strategic approach, planning positively for....green infrastructure.

Local Plan page 102, 2.115 - It is important to protect and increase the existing provision of open space.

Yet the Draft Local Plan planned to build on Mill Field, which has been used as informal, accessible, natural open space for many decades, and paragraph 3.47 of this Local Plan still allows for this to happen.

NPPF 74 - Existing open space ...should not be built on.

7) Please set out what changes (s) you consider necessary to make the

Proposed Submission Local Plan legally compliant or sound, having regard to the matter you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this modification will make the Proposed Submission Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text or changes to proposals. Please be as precise as possible.

(Continue on separate sheet/expand box if necessary)

SKDC should ensure that local councils provide an up-to-date list of open spaces in their town/village and each town/village should have its own Green Infrastructure with clearly marked and protected open spaces.

If new space is required the solution should not be to build a large housing development and then put some green in the middle i.e. handing responsibility to developers but to proactively engage with local councils, communities and neighbourhood planning groups to create a vision and plan of where new open space should be.

Local Green Space designation, in every town and village, should be included in the above and should have been a priority in the making of this new Plan - but has been completely omitted.

SKDC needs a vision of open space that transcends a small patch of green on a housing estate. Peterborough City Council excels at creating a magnificent vision of open space and delivering excellent, accessible country parks, lakes and woodland alongside their housing developments. Over the last 30 or so years thousands of new houses have been built in the Deepings and small pockets of green on the estates are the only evidence of open space that has been created with them. It is not enough for SKDC to acknowledge protected wildlife sites in the far corners of this enormous district ...people need country parks, woods, lakes and large open spaces where they live and planning is the creative exercise which is responsible for this. It should be one of the top priorities when drawing up a Local Plan and allocating land for development. It is so sadly lacking in SKDC's Local Plan (although some lip service has been paid to it) yet it is the blueprint for the quality of life and health of communities and our legacy for future generations.

Also lacking in the Plan, with regard to open spaces and natural environment, is any mention of green envelopes around towns and villages in South Kesteven to prohibit communities merging in urban sprawls and open countryside being developed. Peterborough City Councils has done this for their towns and villages and mapped out green wedges which are to be protected. This helps define the character of each settlement and allocate new housing accordingly.

Mill Field, Millfield Road, Market Deeping is an area of grassland and as such an area of informal, natural, open space. It has been used for informal recreation by local residents and also residents from neighbouring villages since the early 1900s with occasional community events (notably the Deepings Agricultural show) taking place annually on the site. This site holds special local significance for local residents and it should be protected as an existing, informal, open space. Paragraph 3.47 should be removed from the Local Plan and the site should be included on Table 1 of the Open Space report 2017 as an area of informal open space for Market Deeping.

Please note: your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8) If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No - I do not wish to participate in the oral examination

Yes I wish to participate in the oral examination

**If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:
(Continue on separate sheet/expand box if necessary)**

I would like to be able to amplify this important issue further to the Inspector

Please note: The inspector will determine the most appropriate procedure to adapt to hear those who have indicated that they wish to participate at part of the oral examination.

9) If You are not already on our consultation database and you respond to this consultation your details will be added to the consultation database. Your contact details will be shared with the programme officer and Inspector for the purposes of the public examination.

If you do not wish to be added to our database or you would like you're your details to be removed then please select the following box

10) If you wish to continue to be part of the Local Plan Process - Do you wish to be notified of any of the following?

That the Local Plan has been submitted for independent examination

The publication of the recommendation of any person appointed to carry out an independent examination of the Local Plan			<input type="checkbox"/>
The adoption of the Local Plan			<input type="checkbox"/>
Signature (Please type for an electronic response)	PSteel	<u>Date completed-</u>	<input type="text"/>