

# Rutland County Council Officer response to Ketton & Tinwell Pre-Submission Neighbourhood Plan



Reference	Comment on Pre Submission NP
	<b>General comments</b>
Page 12	<ul style="list-style-type: none"> <li>Reference is made to the withdrawn local plan – <i>“A Local Plan review had been progressing and a document had been submitted for Inquiry, but the plan was withdrawn in September 2021.”</i> We would suggest replacing this with a reference to the development of the new Local plan that is progressing. The revised Local Development Scheme is going to Cabinet on 12<sup>th</sup> January 23.</li> </ul>
Page 14	<ul style="list-style-type: none"> <li>Remove reference to the withdrawn local plan.</li> </ul>
Page 17	<ul style="list-style-type: none"> <li>Plan states "... once it becomes part of the Development Plan it is expected that the Local Planning Authority will take Neighbourhood Plan policies into account in decision-making on minerals working, processing and site restoration. Neighbourhood Plan policies on landscape character and biodiversity will therefore be especially relevant " - not sure that this reflects national policy and guidance.</li> </ul>
Page 18- 20	<ul style="list-style-type: none"> <li>Remove reference to the withdrawn Local Plan Review policies in text and the table.</li> </ul>
P. 115 & Glossary	<p>The affordable housing definitions are shortened versions of the full definition of Annex 2 of the NPPF. The main issues are that:</p> <ul style="list-style-type: none"> <li>the word 'local' is omitted from the version in the Glossary, just in front of the phrase "essential workers"</li> <li>it would be better if the reference in the Glossary stated that the full definition in Annex 2 of the NPPF.</li> </ul>
	<b>Our Community</b>
<b>Policy KT1 - Overall Sustainable Development and Localism Principles</b>	<ul style="list-style-type: none"> <li>Last sentence of part B) – isn't required as this when 'made' the Ketton &amp; Tinwell neighbourhood plan will be part of the Rutland Development Plan and the policies contained within it will be used to determine planning applications in the neighbourhood plan area.</li> </ul>

# Rutland County Council Officer response to Ketton & Tinwell Pre-Submission Neighbourhood Plan



Reference	Comment on Pre Submission NP
	<b>Our Environment</b>
<b><i>Policy KT 2: Landscape character and important views</i></b>	<ul style="list-style-type: none"> <li>The inclusion of 75 views is a lot for Development Management Officers to consider in planning applications and this large number will make it more difficult for planning officers to implement this policy. We appreciate the evidence document 2 which provides the methodology of identification and justification of the view. Each policy needs to be strongly evidenced to show that is necessary to be included in the policy and we are unsure that all views identified are necessary to be included. Another suggestion has been to group some views in to one panorama.</li> </ul>
	<b>Our Heritage</b>
<b><i>Policy KT 4 – Local Green Infrastructure Corridors</i></b>	<ul style="list-style-type: none"> <li>In Part A, define what is meant by “close proximity”- does it mean adjacent to the LGIC?</li> <li>The policy should make clear what is meant by “compromise the existing integrity of that LGIC”</li> <li>(ii) The word “increase” is missing before “recreational value”</li> <li>It should be noted that the LGIC areas fall within Mineral Safeguarding Areas and so the policy should recognise that there is a potential for minerals development in the LGIC. Extension of the quarry of Ketton Quarry in the future would be “development”.</li> </ul>
<b><i>KT 5 Designated Heritage Assets in and around Ketton</i></b>	<ul style="list-style-type: none"> <li>Please note the Important Open Spaces referred to in the Conservation Area Appraisal 2020 for Ketton fall outside the scope of Core Strategy Policy SP21. The Important Open Space terminology only relates to the Conservation Area Appraisal and does not represent planning policy for the land identified as Important open space in the CAA. As such, this does not preclude development of the land. The purpose of the Conservation Area is not to control development but to ensure that development proposals take into account the contribution that a building/feature makes to the conservation area. The appraisal provides an up to date evidence base to help inform development proposals and to help development control officers and conservation officers make planning judgements giving regard to the heritage interest of the area.</li> <li>We suggest deleting references to the 2012 RCC Important open space/frontage from the Policy KT5. There may be sites identified in review for inclusion or removal that are not on the adopted proposal map. It would be appropriate to only refer to Important open space sites identified in the adopted Local Plan proposals map and subject to Local Plan adopted Policy SP21.</li> </ul>

# Rutland County Council Officer response to Ketton & Tinwell Pre-Submission Neighbourhood Plan



Reference	Comment on Pre Submission NP
<p><b>KT 6 - Designated Heritage Assets in and around Tinwell</b></p>	<ul style="list-style-type: none"> <li>We suggest deleting references to the 2012 RCC Important open space/frontage from the Policy KT6. There may be sites identified in review for inclusion or removal that are not on the adopted proposal map. It would be appropriate to only refer to Important open space sites identified in the adopted Local Plan proposals map and subject to Local Plan adopted Policy SP21.</li> </ul>
<p><b>KT 7 - Protecting and enhancing archaeological sites</b></p>	<ul style="list-style-type: none"> <li>This is usually subject to a conditional requirement for the work to be undertaken, much as we agree with the principle of getting information in early/alongside an application we are not confident we could use this to refuse an application if the information wasn't provided concurrently.</li> <li>Policy SP20 – The historic environment – has a policy within it that covers archaeology. KT7 doesn't add additional protection and so policy KT 7 we suggest that it's not required in the neighbourhood plan.</li> <li>Part b) of the policy- we not sure how this would be implemented/enforced.</li> </ul>
<p><b>KT 8 - Existing open space and recreation facilities</b></p>	<ul style="list-style-type: none"> <li>Page 80 – remove reference to withdrawn local plan.</li> <li>Paragraph 5.18 on page 57 of the Rutland Core Strategy provides a definition of Green Infrastructure. Some of the spaces and recreational facilities listed in this policy are covered by the definition and so they are protected from development by policy CS23. KT 8 doesn't add any further protection and so we suggest it's not necessary to include.</li> </ul>
<p><b>KT 9 - Open space provision within new housing developments</b></p>	<ul style="list-style-type: none"> <li>Consider if this policy adds further to policies CS21 – The Natural Environment and CS23 Green Infrastructure, Open Space, sport and recreation.</li> <li>“The level of provision should be in accordance with the standards....” repeats policy SP22 and so it is not necessary to include.</li> <li>Page 81 sets out NP standards for open space for both Tinwell &amp; Ketton however in the last paragraph before ‘Open Space Policies’ on page 82 states “these calculations are based on a basic review” and that there is a “need for improvement to formal open spaces and for new provision should be based on a clear and up-to-date assessment of current provision and future needs. RCC will be requested to support an</li> </ul>

# Rutland County Council Officer response to Ketton & Tinwell Pre-Submission Neighbourhood Plan



Reference	Comment on Pre Submission NP
	<p>assessment in parallel with the preparation of this Neighbourhood Plan.” Does this need to be included, not sure what this section will add?</p>
<p><b>Policy KT 10 - Proposed Local Green Spaces</b></p>	<ul style="list-style-type: none"> <li>• When deciding whether to designate a Local Green Space, it is important to start with thinking about what level of protection do these spaces require? Is this the most appropriate policy to protect them? Some of these spaces will be protected by other policies and will be unlikely to be developed anyway and so it isn't appropriate to designate them as Local Green Space</li> <li>• Need to ensure that the sites identified are not already safeguarded by policy CS23 as they fall under the definition of green infrastructure on page 57 Para. 5.18) eg. The green burial ground, windmill woodland If so, they won't meet the definition for local green space (LGS).</li> <li>• The table shows where it is believed they meet the qualities to match the requirements for LGS as set out in the NPPF. Whilst it is recognised that information has been provided supporting the designation of all sites, it should be noted that this must be robust and will be expected to demonstrate that all sites are 'demonstrably special to the local community' to justify their designation.</li> <li>• We also believe that some sites shouldn't be designated as they are extensive tracts of land and are not 'local' to Ketton.</li> <li>• In the first paragraph of the explanation on page 89, it suggests protection is afforded to the defined Important open spaces in the Conservation Areas, however they fall outside the scope of Policy SP21 and do not preclude development – see comment for Policy KT5.</li> </ul>
<p><b>Policy KT 11 – Other Important open Spaces</b></p>	<ul style="list-style-type: none"> <li>• We question the purpose of this policy when important open space and frontages within the planned limits of development are protected by the Local Plan policies and NP policies KT8 and KT10 and these “other important open spaces” haven't been considered special enough to designate as Local Green Space. Is there a need to have two policies?</li> <li>• See Comment for KT5. Is this policy necessary as repeats policy KT5. It seems to be additional sites that have not been identified as Local Green Space. Policy SP21 applies to Important open space/frontages within the PLD.</li> <li>• Delete Proviso b). Minerals and Quarrying is a County matter, whilst the quarry is operational it is defined as 'Excluded Development and should not be included in the Neighbourhood Plan to meet the Basic</li> </ul>

# Rutland County Council Officer response to Ketton & Tinwell Pre-Submission Neighbourhood Plan



Reference	Comment on Pre Submission NP
	<p>Conditions. The supporting text refers to ‘always exclude commercial or residential development’ the quarry will be subject to a Restoration Scheme.</p>
<p><b>Policy KT 12- Allotments</b></p>	<ul style="list-style-type: none"> <li>We believe this is a community aspiration rather than a planning policy. It is included in the community aspirations of the Neighbourhood plan. Could be put in a CIL spend plan or if the Parish Council has an idea where they want it to go, they should think about allocating it.</li> </ul>
	<p><b>Our Housing</b></p>
<p><b>KT 13 Location and scale of new housing (Ketton)</b></p>	<ul style="list-style-type: none"> <li>B) is not required in the policy. The planning application would be considered against all neighbourhood plan policies in their own right. “ <i>....should be located outside of Planned Limits of Development... subject to the RCC Rural Exceptions policy.</i>” Is not required as this is repetitive of Local Plan policy.</li> <li>Replace “Individual Larger Village” with “Local Service Centre”</li> <li>(ii) needs to be reworded as the indicative housing requirement is a minimum. Eg. “<i>In order to provide proportionate and controlled growth for Ketton in line with government and local housing targets, the neighbourhood area will provide a minimum of 52 dwellings within the Plan period</i>”. The explanation then demonstrates that the indicative supply has been met by planning permissions.</li> </ul>
<p><b>KT 14 - Location and scale of new housing (Tinwell)</b></p>	<ul style="list-style-type: none"> <li>B) is not required in the policy. The planning application would be considered against all neighbourhood plan policies in their own right. “ <i>....should be located outside of Planned Limits of Development... subject to the RCC Rural Exceptions policy.</i>” Is not required as this is repetitive of Local Plan policy.</li> <li>(ii) replace “Smaller village” with “smaller service centres”</li> <li>(iii) is unnecessary because the explanation of this policy reiterates the reason for the principles of this policy.</li> </ul>
<p><b>KT 15 - Infrastructure requirements associated with new housing</b></p>	<ul style="list-style-type: none"> <li>This may not fit easily with current arrangements for s106 and CIL and on-site open space not always practicable.</li> <li>1) - We suggest that this may fit better in a Sustainable Urban Drainage policy</li> <li>2) is covered by Local Plan policies and other policies within this plan and so we suggest that this is not necessary.</li> </ul>

# Rutland County Council Officer response to Ketton & Tinwell Pre-Submission Neighbourhood Plan



Reference	Comment on Pre Submission NP
	<ul style="list-style-type: none"> <li>3) –This is not in the scope planning of planning policy because it is covered by CIL. CIL is a levy on all eligible development which provides a sum of money to the County Council dependant on new floor space created. RCC collect this levy and then determines how, when and what infrastructure the money will be spent on. It cannot be a separate NP requirement on developments. – perhaps the NP should consider how it would spend the parish share of CIL. We have mentioned earlier that we would be happy to discuss the development of a CIL Spending List.</li> </ul>
<b>Policy KT 16 - Design requirements for new housing</b>	<ul style="list-style-type: none"> <li>Change references to “Rutland and South Kesteven Design Code to “The Rutland Design Guide SPD (May 2022)”</li> <li>Where reference is made to National Planning Policy Framework – add “(2021)”</li> </ul>
<b>Policy KT 17 - housing mix for new developments</b>	<ul style="list-style-type: none"> <li>(ii) - We would be cautious about how reasonable it might be to refuse something on this basis.</li> <li>You need to have evidence other than the village survey to require ii). Also need to know what the baseline is that the assessment will be made against.</li> <li>Reference the Strategic Housing Market Assessment Update 2019, available on the Council's website as this will provide housing mix information.</li> <li>In the Housing mix introduction text, it makes reference to 'Starter homes'. They are not regarded as affordable housing. The definition of affordable housing is abbreviated and omits key criteria. The NP should state that the full definition is in Annex 2 of the NPPF</li> </ul>
<b>Policy KT 18 - Extensions and conversions</b>	<ul style="list-style-type: none"> <li>Change references to “Rutland and South Kesteven Design Code to “The Rutland Design guide SPD (May 2022)” in the explanation.</li> </ul>
<b>Policy KT 19 – Commercial developmen</b>	<ul style="list-style-type: none"> <li>Proviso d) is not a planning consideration that can be implemented.</li> <li>Proviso e) relates to d) above so falls outside the scope of planning policy too.</li> </ul>

# Rutland County Council Officer response to Ketton & Tinwell Pre-Submission Neighbourhood Plan



Reference	Comment on Pre Submission NP
<i>t, including agricultural</i>	
	<b>Travel and Active Transport</b>
<b>Policy KT 21 – Impact of A1 development</b>	<ul style="list-style-type: none"> <li>• Part a) Is not appropriate for a NP policy as it is a matter set out in National Planning Policy.</li> <li>• Paragraph 111 of the National Planning Policy Framework sets out that “all developments which generate significant amounts of transport movement should be required to provide a Travel Plan”. It also sets out what should be included in a TA. It is therefore for the highway authority to determine when a TA is required on a case by case basis.</li> </ul>
	<b>Employment and Business</b>
<b>Policy KT 22 - Encouraging new businesses</b>	<ul style="list-style-type: none"> <li>• Does this policy mean it only supports businesses within the PLD and only tourism or rural diversification outside in the countryside? What does the NP consider to be rural diversification?</li> </ul>
<b>Policy KT23 – Working From Home</b>	<ul style="list-style-type: none"> <li>• Section C of policy SP15 in Site allocations and policies DPD (amenity) also protects the amenity of the wider environment surrounding planning proposals. Does this policy add anything extra to policy SP15 to help determine a planning application?</li> </ul>
<b>KT24 - Fibre broadband:</b>	<ul style="list-style-type: none"> <li>• The Building regs state “Requirement R1 is to provide the in-building physical infrastructure so that, in future, copper or fibre-optic cables or wireless devices capable of delivering broadband speeds greater than 30 Mbps can be installed.” Does this policy add anything additionally to this?</li> </ul>
	<b>Services and Facilities</b>
<b>Policies KT 25: The protection of community facilities</b>	<ul style="list-style-type: none"> <li>• Does this add anything extra to CS23?</li> </ul>

# Rutland County Council Officer response to Ketton & Tinwell Pre-Submission Neighbourhood Plan



Reference	Comment on Pre Submission NP
<b><i>Policy KT 26 - The provision of new community facilities</i></b>	<ul style="list-style-type: none"><li data-bbox="479 292 2056 363">• Given the tone of KT26, should this be a positively worded policy? Eg. such development will be supported <b>unless</b> i/ii/iii etc</li></ul>