

BARNACK PARISH COUNCIL

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Mr. N. Harding
Head of Development and Construction
Peterborough City Council Planning Services
Town Hall
Bridge Street
Peterborough PE1 1HF

7 December 2015

Dear Mr. Harding

Planning application ref. 15/01840/OUT for outline permission for a housing development on land off Uffington Road, Barnack

Barnack Parish Council has considered the application submitted by Gladman Developments Ltd. to build up to 80 houses. We wish to make a number of observations and consequent objections.

The 2012 *National Planning Policy Framework (NPPF)* states that “a set of core land-use planning principles should underpin both plan-making and decision-taking.” One of these core principles is that planning should be “plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.” The *NPPF Planning Practice Guidance*, issued in 2014, recommends that local authorities should support sustainable rural communities by assessing housing need and allocating sites at a strategic level, using the Local Plan and/or neighbourhood plan process. The following points demonstrate that

- a) a range of current local housing policies and plans are in operation, covering the Peterborough area as a whole and Barnack in particular,
 - b) the addition of a large new housing estate to Barnack is contrary to these policies and plans, as well as to the wishes of the residents of Barnack,
 - c) there are ample grounds for refusing planning permission for this development
1. Peterborough City Council’s *Core Strategy Development Plan Document (DPD)*, adopted in 2011, covers the period to 2026 and beyond. **Policy CS1** says that decisions on the location and scale of new development will be taken on the basis of a Peterborough Settlement Hierarchy, as follows: the City of Peterborough, two Key Service Centres, eight Limited Growth Villages, and fifteen Small Villages. **Policy CS2**

says that the overall development strategy is to focus the majority of new residential development in and around the urban area of the City.

Barnack is designated as one of the eight Limited Growth Villages.

2. In accordance with **Policy CS2**, in the rural areas the strategy for planned growth is on Key Service Centres and, to a lesser extent, on Limited Growth Villages. In these two categories of settlement, in order to meet the housing targets set out in the *Core Strategy*, new residential development sites for ten or more dwellings are allocated in some or all of the settlements via the *Peterborough Site Allocations DPD* process, adopted in 2012. The Limited Growth villages are third tier settlements in the special strategy, reflecting their limited services and the fact that they are less sustainable than the higher order settlements.

The Site Allocations DPD, referred to in Policy CS1, identified:

SA6.5. Land West of Uffington Road, Barnack. 1.76 ha for 41 dwellings.

No other sites were allocated in the village. As such, Barnack was allocated its proportion of development within the Limited Growth Villages. The scale of development proposed in the application by Gladman Developments Ltd. significantly exceeds that envisaged by Policy CS1.

3. **Policy CS2** states that a minimum of approximately 25,500 additional dwellings are needed in the Peterborough City Council area in the period 2009 to 2026. In the Rural Area the target is approximately 1,050 new dwellings, with approximately 450 of these in the eight Limited Growth Villages.

In addition to the 41 houses on the brownfield site west of Uffington Road (Paynes Field) that have been completed as planned, two other new houses have been built and three more are currently under construction elsewhere in the village. The Parish Council maintains that Barnack, as one of the smallest Limited Growth Villages, has already contributed its fair share towards the housing target. Barnack is an inappropriate location for the scale of development in the proposal by Gladman Developments Ltd. The second tier Service Centres are much better placed to take this scale of development, given the comprehensive facilities and services they offer.

4. The most recent *Peterborough Sub-regional Strategic Housing Market Assessment*, published in October 2015, estimates that 1,006 additional dwellings per annum are needed in Peterborough, of which 620 should be affordable homes. This Objectively Assessed Need (OAN) assessment takes account of the 2011 census and it indicates a housing need that is considerably less than the previous estimate of 1,100 to 1,200 dwellings, produced in 2014.

The *NPPF* requires Local Planning Authorities to demonstrate a five-year land supply of deliverable sites for housing. Peterborough's *Five Year Land Supply Report for 2015 to 2020*, produced in July 2014 and based on the 2014 OAN, indicated a requirement for 8,880 dwellings and identified a land supply for 9,546. This demonstrated a supply for

5.38 years, including an additional 5% 'buffer'. However, in the *Five Year Land Supply Report for 2016 to 2021*, produced in November 2015 and based on the 2014 OAN, the Council was unable to demonstrate a five year supply of housing land, taking into account past under-delivery and a revised requirement for a 20% buffer.

The Council is currently working on a new Local Plan, the first draft of which will be available for public consultation in January 2016. It plans then to issue a new five year land supply report, using the revised (2015) OAN as the basis for its growth targets. It proposes to set new growth targets, with a housing requirement up to the year 2036 of 23,907 dwellings, only 5% of which are to be allocated to the rural areas of Peterborough. The *Five Year Land Supply Report for 2016 to 2021* states that the likely result is that the Council will then be in a position to demonstrate a five year supply of deliverable land.

Although in a different local authority area, Stamford provides employment and many of the services used by people in Barnack. Stamford is only three miles from Barnack, whereas Peterborough is ten miles away from the village. Stamford is expanding rapidly and will soon provide a large amount of new housing for the local area, which will reduce demand for housing in nearby villages.

There is no evidence of need for a large new housing estate in Barnack.

5. Peterborough's *Site Allocations DPD* states that the primary purpose of a village envelope is to prevent the spread of development into the countryside and to maintain the essential character of each settlement. **Policy SA4** states that land outside the village envelope is defined as countryside. The *Core Strategy DPD* says that development in the countryside will be restricted to that which is demonstrably essential to the effective operation of local agriculture, horticulture, forestry, outdoor recreation and access to natural greenspace, transport or utility services; and to residential development which satisfies the exception test set out in **Policy CS8**; and to minerals or waste development.

The *Barnack and Pilsgate Village Design Statement*, produced in 2001 by the Parish Council, states "It is most important that the village building envelopes for Barnack and Pilsgate are retained and not enlarged for any reason." Also, the 2005 *Barnack and Pilsgate Parish Plan* says "The village envelopes of both Pilsgate and Barnack must be respected".

The proposed development is outside the village envelope and therefore contravenes the principles laid down in the Core Strategy and Site Allocations DPDs, the Village Design Statement and the Parish Plan. In the opinion of the Parish Council, the development would have a significant adverse urbanising effect on the village of Barnack.

6. **Policy CS8** of *Peterborough City Council's Core Strategy DPD* states that the Council may release a site adjacent to a village envelope for the provision of affordable housing, as an exception to the normal policy of development restraint in the countryside,

provided that a specific local need for affordable housing has been demonstrated, over and above that which could be met through the operation of the affordable housing policy. The planning application by Gladman Developments Ltd. proposes that 30% (24) of the houses would be ‘affordable’.

There is no evidence of exceptional need for affordable housing in Barnack. Affordable housing has been incorporated in the Paynes Field development. The provision of a range of housing to meet local requirements is included in the Parish Action Plan, and this will be born in mind when the Parish Council is consulted on future applications for housing within the village envelope.

7. The *Cambridgeshire and Peterborough Minerals and Waste DPD*, which was adopted in 2011 and runs to 2026, aims to avoid mineral resources being unknowingly or unnecessarily sterilised. Proposals Map C shows the Minerals Safeguarding Area around Barnack. Most of the site of the proposed development overlies deposits of sand and gravel or of limestone.

The proposed development would unnecessarily sterilise mineral resources.

8. A Supplementary Planning Document (SPD) *Peterborough Local Development Framework: Peterborough Design and Development in Selected Villages* was published in 2011. It draws on the *Barnack and Pilsgate Village Design Statement* and the *Barnack and Pilsgate Parish Plan*, both of which were produced by the Parish Council to reflect the wishes of the residents. The *Village Design Statement* states “Individual or small groups of houses would be suitable for these village settlements. Larger housing estates would be entirely inappropriate.” The *Parish Plan* says “Growth and development must be gradual.” **SPD Policy B&P1 for Barnack and Pilsgate** states “Where new housing is proposed, these should be individual dwellings or small groups of dwellings. The creation of larger housing estates is inappropriate.”

The proposed development of up to 80 houses is contrary to the policy for single and small groups of dwellings, set out in the Village Design Statement, the Parish Plan and the Design and Development SPD for Barnack. It would increase the number of houses in Barnack village to approximately 480 and would represent a sudden increase in the number of dwellings of roughly 20%. This is over and above the 41 new houses in Payne's Field, which represented a previous increase of more than 10%. Growth would therefore be far from gradual if permission were to be granted for the proposed development.

9. Section 13 of the 2005 *Barnack and Pilsgate Parish Plan* states “It is most important that the village building envelopes for Barnack and for Pilsgate are retained and not enlarged for any reason.” Aims of the *Barnack and Pilsgate Parish Action Plan*, revised in late 2015, are to “Maintain the rural and historic character of the Parish” and “Prevent inappropriate development (e.g. by safeguarding Barnack’s designation as a Limited Growth Village ... and by maintaining the integrity of the village envelopes”.

These documents were produced by the Parish Council after full consultation with residents of the Parish.

It is evident that the proposed development is directly opposed to the considered wishes of the residents of Barnack because:

- a) it is outside the village envelope and***
- b) a 20% increase cannot be considered limited growth.***

10. One of the *Core Principles of the National Planning Policy Framework* is that planning should “take account of the different roles and character of different areas ... recognising the intrinsic character and beauty of the countryside.” This is supported by the *Barnack and Pilsgate Village Design Statement*, which says “Careful consideration should be given to landscaping. The overall aspect on the entrance to the villages is most important. The effect on (sic) any new developments on this is of vital importance. Builders or developers should ensure that this is not disturbed or destroyed in any way.” The 2011 SPD *Peterborough Local Development Framework: Peterborough Design and Development in Selected Villages* classifies the fields to the west of Uffington Road as part of an Area of Best Landscape.

The proposed development site is in a prominent, elevated position with high landscape value, in sloping land at the edge of the village. It comprises productive arable farmland¹. The site abuts the new Paynes Field development and is visible from both Uffington Road and Stamford Road. The approach from the west, along Stamford Road, lies within the village Conservation Area. The introduction of 80 more new houses, in addition to the existing 41 in Paynes Field, would greatly alter the appearance of the western and northern approaches to the Conservation Village of Barnack, and detract from its rural character.

11. At the heart of the NPPF is a presumption in favour of sustainable development. The facilities and services in Barnack are very limited: a church, primary school, pre-school, public house, post office and shop; a variety of societies and sports clubs; a small business park but few other opportunities for employment locally; a limited bus service; access to the village via narrow country roads.

Barnack is a thriving community with a recent injection of new residents, including young families, as a result of the Paynes Field development. However, in the opinion of the Parish Council, the village’s infrastructure, facilities and services are inadequate to support a further large increase in what will inevitably be a young population, so the proposed development is unsustainable. In particular, traffic on the Uffington and Bainton Roads has already increased significantly as a result of building the Paynes Field estate. Traffic congestion, especially at the junction of Uffington Road and the B1443, and danger to children walking to and from school,

¹ In the Ecological Appraisal report that forms part of the planning application documentation the field is erroneously described as improved grassland.

are already of great concern to the village and further extensive development would greatly exacerbate these problems.

12. The aim of the *Localism Act 2011* is to enable local authorities to make their own planning decisions and to adapt housing provision to local needs. Peterborough's *Rural Vision and Parish Charter*, approved by Council in November 2015, recognises that "the rural areas and villages of Peterborough are valued as an important asset now and for the future of Peterborough. They have strong independent local identities and sense of heritage and belonging, choosing to retain their rural way of life". This document also says "Conserving this unique heritage will be an important part of the future development of Peterborough, contributing to our wider ambitions to 'grow the right way' and be recognised as the national environment capital."

We contend that adding large developments to small villages undermines their sense of identity and heritage, and has a direct and adverse impact on village character. This is not the 'right way to grow'.

13. The *Peterborough Planning Policies DPD*, adopted in 2012, states in **PP16** that "The City Council is committed to the promotion and enhancement of biodiversity and that new development will be expected, where possible, to provide for the planned retention of existing habitats and wildlife features. Outside the formally designated statutory and non-statutory sites of nature conservation interest, the need to protect and promote biodiversity will be a material consideration in the determination of planning applications."

In the view of Natural England, given in the Environmental Impact Assessment Screening Opinion, the proposed development (subject to a satisfactory drainage strategy) would not have a significant adverse impact on the nearby Barnack Hills and Holes SSSI/Special Area of Conservation.

The *Ecological Appraisal* in the planning application documentation claims that the 1.7 ha of green infrastructure (1.125 ha of which is public open space)² provided in the development is "sufficient to accommodate any potential recreational pressure arising from the development".

The Parish Council is, however, of the opinion that residents of the new development would not find that the open space provided is adequate for their recreational needs. They would be drawn to the 22 ha of the nearby Barnack Hills and Holes National Nature Reserve, which is open to the public. It is obvious to people who know this nationally and internationally important grassland site that it is showing signs of over-use, especially by dog-walkers. A widening network of paths and soil enrichment, caused by dog-fouling, is leading to localised changes in the flora. The canine

² The large rectangular area of 'greenspace' beside the Bainton Road entrance, shown in the public consultation booklet, is omitted from maps in the Development Framework Plan and the Ecological Appraisal. This area is out with the Application Boundary.

population of Barnack is likely to increase by 20% if the development materialises, which would exacerbate the pressure on the site.

14. There is an extensive, active badger sett in the hedge on the western boundary of the proposed development site. Details of this, together with proposals to ameliorate the impact of the development on the animals, are given in a confidential section of the *Ecological Appraisal*.

The *Protection of Badgers Act 1992* makes it an offence to kill or take a badger, to cruelly ill-treat a badger, to interfere with a badger sett, or to disturb a badger while it is occupying a sett. Advice given at <http://www.planningportal.gov.uk/> states that licences to permit otherwise prohibited actions can be granted, including licences to close down setts or parts of setts prior to development, or to permit activities close to a badger sett that might result in disturbance. Licences are not normally issued unless full planning permission has been granted, and licensed closure of setts is normally only permitted during July to November inclusive. Licences to trap or kill badgers cannot be granted for the purpose of development.

Despite the various safeguards suggested in the Ecological Appraisal, the proposed development is very likely to have a severe and permanent adverse impact on the badger colony. Mitigation and compensation measures, aimed at reducing disturbance and providing sufficient habitat to accommodate the badgers on completion of the development, are unlikely to be effective. There will be disturbance both during the construction phase and afterwards, from occupied houses and from pedestrians and dogs using the proposed new footpath, which would run close to the sett.

Further to the fourteen points above, we enclose an Annex that is a detailed response to Appendix 6 of Gladman Developments Ltd.'s Planning Statement: Barnack Sustainability Matrix.

In October 2015, after Gladman Developments Ltd. had informed the village of its plan, the Parish Council held a public meeting to discuss the proposal. The residents were wholeheartedly against it, with only one of the hundred or so people attending the meeting in favour. (This person freely admitted that he has an interest in Gladman Developments Ltd.) The main objections concerned loss of village character, increase in traffic, inadequate infrastructure and facilities, and environmental damage. In the spirit of both the *Localism Act* and the *Rural Vision and Parish Charter*, it is vital that the Local Planning Authority takes the views of residents into account. Local opinion, as well as documented policy, is overwhelmingly against the development.

For all the reasons stated above, Barnack Parish Council wishes to lodge a strong objection to the planning application from Gladman Developments Ltd.

Given the level of local interest and resistance to the proposal, in the event that officers are minded to grant approval of this application, the Parish Council formally requests that the

application is referred to the Council's Planning and Environmental Committee for their consideration.

The Parish Council also reserves the right to make additional submissions in response to further information that may be provided by the applicants, or in relation to new information or other matters that come to their attention during the processing of the application.

Please acknowledge receipt of this letter.

Yours sincerely,

A handwritten signature in black ink that reads "Robin Morrison". The signature is written in a cursive style with a large initial 'R'.

Robin Morrison
Clerk to Barnack Parish Council

Cc. Miss A. McSherry
Peterborough City Council Planning Services

ANNEX

BARNACK PARISH COUNCIL’S RESPONSE TO PLANNING STATEMENT APPENDIX 6: BARNACK SUSTAINABILITY MATRIX

Sustainability criterion	Factor	Summary of Gladman’s commentary in Appendix 6	Barnack Parish Council commentary
Social			
1. Primary considerations	Contribution to 5-year housing land supply	PCC cannot currently demonstrate a 5-year housing land supply. Only a 3.6-year supply is available. [This figure is erroneously given as 5.38 years in the table.] The shortfall should be dealt with using the Sedgefield Method, and a 20% buffer should be applied.	Under the current Local Plan, PCC does have a shortfall in housing land. However, PCC is now drawing up a new Local Plan, to run up to 2036. The indication is that in this, a 5-year land supply (building in a 20% buffer) will be demonstrated. The Sedgefield Method of dealing with shortfall will be used. Given Peterborough’s revised requirement of 24,000 houses over 20 years, with 5% of this in the rural areas, we estimate that Barnack (as a Medium-sized Village) will only need to provide on average about 5 dwellings per annum to contribute its fair share of housing.
	Site is available, suitable and achievable.	Yes to all three.	The owner of the site wishes it to be developed. It is not suitable (see Barnack PC’s letter to PCC for numerous reasons). Development is only achievable if planning permission is granted.
	Accordance with PCC’s special strategy	Proposal does not detract from the policy objective to maximise the re-use of brownfield land. Development of greenfield land is necessary to deliver Peterborough’s housing growth.	PCC has proposed that the current 4-tier hierarchy of 1) City, 2) Service Centres, 3) Limited Growth (Medium-sized) Villages, 4) Small Villages be carried over into the new Local Plan, so most of the growth will take place in the larger centres. Only 5% will be in rural areas. There is brownfield land inside the village envelope that could be used for building in preference to greenfield sites.

2. Housing	Affordable housing	30% affordable housing (24 dwellings) is built into the scheme.	Affordable housing could be built into future smaller developments in the village that are consistent with the settlement hierarchy.
	Diversity of housing stock	Proposal promotes the highest quality sustainable design Which enhances quality of life	Quality cannot be judged at the outline planning stage.
	Meeting local needs	Provision of a choice of housing type, size and tenure to create a mixed community and meet local needs.	Variety of housing types could be built into future smaller developments in the village.
3. Quality of life: education, community	Safe route to school	The development would be within walking distance of the local school.	The footpath within the development would be safe, but other footpaths leading to the school are unsafe and there is a dangerous road (B1443) to cross. Also, the proposed development would lead to more traffic and increase the danger.
	Affordability of housing and a resulting younger demographic	Starter homes and intermediate affordable properties will be included to give young families and key workers greater opportunity to purchase a home.	We approve of affordable homes, but these could be built into any new development, regardless of size. More gradual growth would contribute better to community cohesion. Many young people are likely to prefer town to village life, and the large developments in Stamford and Peterborough, with good access to employment, services and facilities, are likely to suppress demand from younger buyers for village houses.
4. Sustainable settlement and location	Adjoining a sustainable settlement or growth area	Barnack is a limited growth village. Some housing is allocated to this tier in recognition of good transport links and local services available.	Allocating 'some housing' does not imply adding a large development. Traffic would increase on an already congested road system. Most people would travel out of the village to shop because Morrisons is less than 8 minutes' drive away. One bus an hour is inadequate provision.
	Access to facilities within c. 800m.	List of facilities includes ATM, shop, PO, school, bus stop, pub, sports facilities, village Hall, Hills and Holes etc, most within 800m of the development.	These facilities are available, with the exception of the RBS ATM 958m from the development, which does not exist.
	Access to district services	List of services includes many in Stamford, Arthur Mellows Village College and employment in Station Road Business Park.	These services exist. The number of jobs provided by Station Road Business Park is very limited.
	Educational & medical facilities	Barnack School and Arthur Mellows at capacity but CIL payments will provide the extra capacity	The Head Teacher tells us that there are unfilled places in Barnack School. However, Arthur Mellows Village College is at capacity and local medical facilities are stretched. The

		required. Existing medical facilities are accepting new patients.	provision of additional facilities is about more than funding through CIL, as there is no guarantee that the CIL funds would go where they may be needed to directly benefit the residents of Barnack.
	New facilities provided on site	An equipped play area and a significant area of public open space are included in the plan.	The Parish Council is already planning a new children's play area elsewhere in the village. In Gladman's Development Framework Plan, much of the public open space is simply narrow strips beside roads and footpaths. The large rectangular green space beside the Bainton Road entrance, shown in the public consultation document, is omitted.
Environmental			
1. Sustainable settlement and location	Flood zone	The site will be able to contain rainfall from 1 in 100 year rain events (Flood Zone 1).	Agreed.
	Ecological and geological interest	Natural England has said that subject to a satisfactory drainage strategy, the proposal offers sufficient public open space to mitigate any potential impact on Barnack Hills and Holes SSSI/SAC.	The Hills and Holes will be a magnet for residents of the new housing. Accessible open space on site is negligible compared with the Hills and Holes and would not mitigate the effects of 20% extra use by local people (and dogs) of the SSSI/SAC, which is already showing signs of over-use.
	Agricultural soils	The development will not result in loss of Best and Most Versatile agricultural soil.	The site is not top grade agricultural land but it has been arable for many years. (It is not improved grassland, as claimed in the Ecological Appraisal).
	Green belt, NP, AONB, etc.	Site is not covered by green belt, NP, AONB or other protected land designations.	SPD <i>Peterborough Local Development Framework: Peterborough Design and Development in Selected Villages</i> (2011) classifies the fields to the west of Uffington Road as an Area of Best Landscape.
	Effect on a wildlife sensitive area	Natural England's discretionary advice is that the development will not have an adverse effect on Barnack Hills and Holes SSSI.	The Parish Council and the Wildlife Trust are both firmly of the opinion that the development will have an adverse effect on the Hills and Holes. It will also have a permanent adverse effect on the badger sett in the boundary hedge, despite planned amelioration measures.
2. Sustainable transport	Proximity to public transport services	Hourly Stamford/Peterborough bus service within 400 m of site (requirement within 800m). Stamford rail station 5.4 km away (requirement within 5 km).	An hourly bus service (last bus 17.10 from Stamford and 17.50 from Peterborough) is inadequate for flexible working hours. City Link bus services have been axed. Most commuter rail

			travel will be from Peterborough (16 km away) not from Stamford.
	Foot and cycle access locally	Proposal includes two pedestrian access points, to Bainton and Uffington Roads.	There is a dangerous road (B1443) to cross to get to the main facilities in the village. Uffington Road is also very busy and congested at times. The section of the proposed footpath adjacent to Bainton Road lies outside the Application Boundary.
	Travel plan	A travel plan will be prepared for new residents to reduce car reliance and enable lift sharing.	Presenting people with a travel plan is patronising. A travel plan is of no use if public transport facilities are inadequate. The convenience of car travel gives it an advantage over public transport. Traffic is bound to increase.
3. Design and integration with local environment	Quality street design	A pedestrian friendly traffic calmed street environment will be incorporated.	Traffic calming inside the estate is desirable but the development would lead to more traffic, which will create increased risk elsewhere in the village.
	High quality built environment	Contemporary sustainable design solutions will effectively integrate into the existing fabric of Stroud (sic).	Only indicative design and layout are given in the outline planning application. How do these fit with SPD <i>Peterborough Local Development Framework: Peterborough Design and Development in Selected Villages</i> ? Note. This table is obviously based on a standard format used for Gladman proposals, which is recycled (e.g. from a case in Stroud).
	Multi-functional green space	The proposal includes 1.7 ha of green space, including a children's playground, a wetland area to accommodate surface drainage and informal open space. Existing hedgerows and trees will be kept where possible.	The play area duplicates what the Parish Council is proposing elsewhere. The wetland detention basin is a necessary compensation for creating extensive new hard surfaces but may not be publically accessible. The proposed creation of a planted area adjacent to the badger sett (see confidential section in the Ecological Appraisal) may not be effective in preventing disturbance of the animals and would be fenced off. In Gladman's Development Framework Plan, the large rectangular open green space beside the Bainton Road entrance, shown in the public consultation document, has been omitted. The green infrastructure may look extensive on the plan, but not all of it will be accessible to residents.

Economic			
1. Economic benefits	Planning for growth aims	The proposals are consistent with Planning for Growth. The Planning Statement claims that PCC's 2011 Core Strategy (2009-2026) is out-of-date and inconsistent with the NPPF and therefore can only be afforded limited weight. PCC cannot demonstrate the minimum requisite 5-year housing land supply. The presumption in favour of sustainable development is therefore invoked.	We assert that the proposals in the draft of the new Local Plan should be taken into account. If Gladman's application were approved, the new plan would be operational well before completion of the building work. We have learned that preliminary calculations, based on more up-to-date population forecasts than in the current plan, indicate that the 5-year land supply target will be achievable and that the broad principles of the previous plan will be adhered to. There are numerous material considerations that weigh against the development (see the first part of this letter).
	Benefits to LPA	80 new dwellings will generate New Homes Bonus, Council Tax receipts and a CIL contribution to support local infrastructure needs. Jobs will be created during building, also a number of further indirect jobs.	Barnack itself would see limited benefit economically. The need for upgrading the infrastructure would largely be a consequence of the new development and not an added bonus. The construction jobs created would be temporary.
	Local businesses and facilities	Increased trade would be brought to local shops and services and reduce the risk of closures.	Stamford is so close and convenient that the number of extra customers would be small and would make little difference to struggling local businesses. The increase in population resulting from the 41 new houses in Paynes Field has made very little difference to the amount of trade done by the village shop.
2. NPPF presumption in favour of sustainable development	Approval of compliant proposals	Proposals are in broad compliance with the overall objectives of national planning policy.	The 2014 NPPF Planning Practice Guidance (Paragraph: 009 Reference ID: 21b-009-20140306) states that planning decisions about material considerations should be <i>subject to the test of reasonableness</i> . If Gladman's premise that the current Local Plan is out-of-date is accepted, we assert that it would be unreasonable not to take into account the draft of the new Local Plan, which would be operational before the development is due for completion.
	Development plan out-of-date	The core Strategy is out-of-date because of changed national policy and increased development requirements.	On the other hand, the Localism Act 2011 aims to enable LPAs to make their own planning decisions and to adapt housing provision to local needs. Peterborough's <i>Rural Vision and Parish Charter</i> (2015) recognises that "rural areas and villages have strong independent local identities and sense of heritage and belonging, choosing to retain their rural way of

			life”. This document also emphasises the need for Peterborough to ‘grow the right way’.” Attention should be paid to the wishes of the present inhabitants of Barnack, who feel that adding a development of 80 dwellings to a village of 400 houses is not ‘growing the right way’.
	Adverse impacts	Any conflicts with the Local Plan should be afforded limited weight in determining the application.	The 2014 NPPF Planning Practice Guidance (Paragraph: 009 Reference ID: 21b-009-20140306) states that “Provided it has regard to all material considerations, it is for the decision maker to decide what weight is to be given to the material considerations in each case”.
	Specific policies that are restrictions	The site does not affect any landscape, ecology, heritage or any other specific designations that would conflict with any specific policies of the NPPF.	The Parish Council and the Wildlife Trust are of the opinion that the development will have an adverse effect on the Hills and Holes SSSI/SAC by intensifying its use for recreational activities, including dog walking. Also, the presence of the badger sett has not adequately been taken into account. The archaeological investigation has yet to be undertaken.