

Central Lincolnshire Consultation Draft Local Plan: Report on Key Issues Raised

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1. Introduction

- 1.1. Consultation on the Draft Central Lincolnshire Local Plan took place between 30 June and 24 August 2021. This 8-week consultation was the first time that the new Local Plan was published for comment and formed one of the three key stages of consultation of the Local Plan review as is shown below.
 - Issues and Options Consultation – 6 June to 18 July 2019
 - Consultation Draft Local Plan – 30 June to 24 August 2021
 - Proposed Submission Draft Local Plan – Expected spring 2022
- 1.2. The Draft Local Plan Consultation received comments from more than 400 people, businesses and other organisations. The Central Lincolnshire Local Plan Team would like to thank all those who took the time to comment during the consultation.
- 1.3. All responses received during the consultation period have been read and will be given due consideration as we prepare the next, and final, draft of the Central Lincolnshire Local Plan.
- 1.4. This report identifies the key issues raised during the Consultation Draft Local Plan. All comments received during the consultation on the Draft Local Plan, including those submitted via post or email, are available to view in full on our online consultation hub: <https://central-lincs.inconsult.uk/consult.ti>.
- 1.5. All of the comments received in relation to the earlier Issues and Options Consultation are also available on the consultation hub. In addition, a consultation report was published for the Issues and Options Consultation and this is available to view at: <https://central-lincs.inconsult.uk/gf2.ti/f/1032418/108299077.1/PDF/-/Issues%20and%20Option%20Consultation%20Report.pdf>
- 1.6. The Central Lincolnshire Local Plan Team's response to each of the key issues highlighted is not included in this report: all issues raised have been and are being carefully considered together with other relevant considerations, such as changes to national planning policy. Evidence Reports will be published for each of the Final Draft 'Proposed Submission' Local Plan policies, which will be available on our website. These Evidence Reports will include detailed commentary on how we have considered representations in finalising the proposed Local Plan.

2. Summary of key issues raised during the consultation

- 2.1. The below tables provide a summary of the issues raised against each policy in the plan and other parts of the document, the evidence and the wider process. Quick links to issues raised on plan chapters or other material are provided below:

[Chapter 1: Introduction, Context, Vision and Objectives](#)

[Chapter 2: Spatial Strategy](#)

[Chapter 3: Energy, Climate Change and Flooding](#)

[Chapter 4: Housing](#)

[Chapter 5: Employment](#)

[Chapter 6: Retail: City and Town Centres, and District, Local and Village Centres](#)

[Chapter 7: Tourism and the Visitor Economy](#)

[Chapter 8: Transport and Infrastructure](#)

[Chapter 9: Design and Amenity](#)

[Chapter 10: Built Environment](#)

[Chapter 11: Natural Environment](#)

[Chapter 12: SUEs, Regeneration Areas and Opportunity Areas](#)

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[Chapter 15: Ministry of Defence Establishments](#)

[Appendices](#)

[Sustainability Appraisal](#)

[Habitats Regulations Assessment](#)

[Duty to Cooperate](#)

General comments

Summary of issues raised

- Support for the plan as a whole.
- Objections to the plan as a whole.
- Observation that the plan is well laid out and clear.
- Suggestion that the plan is too complicated for the general public.
- Suggestion that a stronger reference to air quality is needed in the plan.
- Suggestion that the plan needs to include policy or section to safeguard minerals resources.
- Suggestion that the Local Development Scheme should be updated.
- Suggestion that information about the change to numbering from the adopted plan would be useful.
- Suggestion that there should be a policy for live/work units.
- Suggestion that there should be a policy for micro homes – low cost housing primarily for young people.
- Suggestion that with all of the requirements in the plan there should be a check list for applicants.
- Suggestion that more is made of recycling and waste disposal and additional recycling centres provided to be more accessible for more people.
- Suggestion that the plan omits reference to the impact of development on level crossings.
- Concerns about viability of development from the policies in the plan.
- Observations that the publication of the draft plan pre-dated the revised NPPF and the revised plan will need to take account of this.
- Suggestions that there has been a lack of explanation of the plan to residents.
- Concerns about undertaking consultation during the Covid pandemic.
- Suggestion that there was insufficient time to digest the information published.
- Suggestion that the plan fails to acknowledge how clusters of village function as a joined up rural communities.
- Concerns raised about apparent lack of joint working through the Duty to Cooperate.
- Question as to why the plan needs updating in advance of substantial changes to the planning system.

Chapter 1: Introduction, Context, Vision and Objectives

Vision
Summary of issues raised
<ul style="list-style-type: none">• Various comments broadly supporting the vision• Concern that the vision is not in conformity with the NPPF.• Various comments suggesting the 29,150 new homes should be quoted as a minimum• Various suggestions, to improve clarity of wording in relation to natural and historic environments.

Objectives
Summary of issues raised
<ul style="list-style-type: none">• Various comments broadly supporting the objectives.• Suggestion that the objectives are too generic and do not relate to the context of Central Lincolnshire• Various comments suggesting objectives need some rewording. In particular objective numbers 4, 5, 7, 11, 12 and 13• Various suggestions for new objectives to be included

Chapter 2: Spatial Strategy

Policy S1: The Spatial Strategy and Settlement Hierarchy
Summary of issues raised
<ul style="list-style-type: none">• Various comments broadly supporting the policy.• Various comments supporting specific elements of the policy and positioning of settlements within the hierarchy, including Market Rasen, Branston, Nettleham, Saxilby, Dunholme, Welton, Keelby, RAF Cranwell, Coleby, RAF Scampton, 'Little Cherry', Glenthams, South Hykeham and Heighington.• Various comments objecting to the approach of the policy or specific elements of it.• Various concerns and queries about implications of positioning in the hierarchy and effects of growth for specific settlements including Saxilby, Branston, Riby, Torksey Lock, RAF Digby, Blankney, Glenthams, Blyton, Lea, Knaith Park, North Greetwell, Scothern, Kirkby Green, Fenton, Swinderby, Coleby, Carlton Le Moorland, Walesby, Newton on Trent and Bassingham.• Concerns raised about not taking into account the services and facilities available in the setting of the hierarchy tiers.• Concerns about lack of investment in infrastructure in villages with recent growth.• Objections to not including settlement boundaries.• Concerns about growing villages progressing to the tier above.• More clarity needed for defining what can occur in hamlets.• Some concerns that policy lacks flexibility and other concerns that it is too flexible.• Suggestions that development of a new settlement would be preferable and more sustainable.• Suggestion that more growth should be delivered to rural communities.• Suggestion for additional tier to split up the Large Villages.

Policy S2: Growth Levels and Distribution
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Summary of issues raised

- Various comments broadly supporting the policy and the evidence behind it.
- Various comments supporting the housing and job requirements proposed, including the range and the distribution.
- Suggestions that the housing target should be set at the lower end of the range, the upper end of the range, that the upper end should be the minimum, and other suggestions for higher or lower housing requirements.
- Various comments objecting to the approach of the policy or specific elements of it including the amount of growth, the distribution of growth and the use of a range.
- Concerns about growth above the minimum having implications for carbon emissions and will undo any efforts to reduce energy demand and carbon reduction and that it will not help affordability.
- Concerns raised about the impact of growth in specific settlements including Market Rasen, Middle Rasen, Branston, Nettleham, Sturton by Stow.
- Suggestions that more development should be located in Lincoln, Gainsborough and Sleaford.
- Suggestions that less growth should be located in the Main Towns with more delivered in rural areas.
- Suggestion that more villages near to the Main Towns or in the Lincoln Strategy Area should deliver housing growth to help meet the local requirements.
- There should be a greater focus on brownfield land and urban regeneration.
- Concerns about the lack of investment in infrastructure to support growth.
- Concerns about development not being phased.
- Suggestion that a specific buffer of additional housing should be included above the top end of the range.
- Suggestion that more housing should be delivered in an effort to deliver the affordable housing required.
- Concerns that the market and profit are being placed ahead of sustainability.
- Concerns that the amount being distributed to areas should not be a ceiling and that sufficient flexibility is needed.
- Concerns about over-reliance on SUEs.
- Observations that the pandemic and Brexit will impact on housing and job growth and different opinions on what these effects will be.
- Queries about what 'well-connected' means in the policy.

Policy S3: Housing in Urban Areas

Summary of issues raised

- Suggestion that the policy should be more supportive for intensification, infill and regeneration within the urban areas.
- Concerns about size of sites allowed on unallocated sites in the towns.
- Suggestion that the limit on size for windfall sites should be removed or substantially increased.
- Concerns about the lack of investment in facilities in urban areas.
- Suggestion that the policy should add the design criteria that should be applied to First Home Exception Sites.
- Suggestion that settlement boundaries are needed and 'developed footprint' is ambiguous.

Policy S4: Housing Development in or Adjacent to Villages

Summary of issues raised

- Various comments broadly supporting the policy.
- Various comments supporting specific elements of the policy.
- Various objections to the policy and specific areas of wording.
- Suggestions that the policy should be more or less flexible in various ways including in relation to type of locations, amounts of homes and delivery mechanisms for unallocated sites.
- Suggestion that any development being allowed should have the support of the local residents.
- Concerns about impact of additional growth in specific villages including Nettleham, Bassingham, Branston, Norton Disney, Swinderby, Nocton, Scothern, Glentham, Saxilby, Newton on Trent, Brant Broughton, Fenton, Walesby, Beckingham, and Stragglethorpe.
- Concerns about cumulative impacts of developments in villages without a cap in place.
- Suggestion that sometimes development at the edge of a village will be preferable over development within a village.
- Concerns about lack of investment in services and infrastructure.
- Concerns that thresholds will result in affordable housing not being delivered.
- Concerns about lack of control on development in this policy.
- Suggestion that the site size limit in the policy should be removed in some or all cases, or that it should be increased for Large Villages, or increased or reduced for Medium Villages, or reduced for Small Villages.
- Suggestion that the settlement increase percentage in part 3 of the policy relating to First Homes Exclusion Sites be removed or reduced.
- Suggestion that the policy should allow for rural affordable housing exception sites in hamlets.
- Suggestion that part 3 of the policy should be revised to allow for alternative sites to be delivered where an allocated site in the same village is not delivering.
- Both support and objection to providing flexibility for neighbourhood plans to deliver housing in villages.
- Objection to use of designated rural areas and AONB as limitations to First Homes Exceptions Sites.
- Objection to not using settlement boundaries.
- Objection to the exclusion of agricultural buildings from the 'developed footprint' of villages.

Policy 5: Development in the Countryside

Summary of issues raised

- Various comments broadly supporting the policy or specific parts of the policy.
- Suggestion that the policy should allow development of abandoned buildings in the countryside.
- Suggestion that Part G should go further to address the need for glass houses as an increasingly important part of agriculture and horticulture.
- Suggestion that the policy should include greater control for industrial development in the countryside even if it is associated with agriculture, potentially with a sequential test being applied favouring existing industrial sites and close to the road network.
- Objections to various parts of the policy including Parts A and G.
- Suggestion that the policy should allow for infill in open countryside.
- Suggestion that the policy should also allow for development where it is not suitable in an urban area.

Chapter 3: Energy, Climate Change and Flooding

Policy S6: Reducing Energy Consumption – Residential Development

Summary of issues raised

- Mixed response to this draft policy.
- **Responses in support** include:
 - Support for net zero Local Plan, and policies that will deliver this.
 - Support for introduction of policy: government Future Homes Standard may be delayed and may be watered down due to lobbying from building industry.
 - Environment Agency generally supports the climate change policies.
- **Various concerns, queries and objections**, include:
 - Support for intent of policy but suggestion detailed policy wording needs attention: deliverability, viability, enforceability concerns.
 - Objection to inclusion of exception clause for Gainsborough and Sleaford: retrofitting far more expensive than including measures at construction. Not in interest of householder to have homes that are more expensive to power and heat.
 - Concern about introduction of policies S6 to S20 ahead of Future Homes Standard. Highlighted that Future Homes Standard will have transitional arrangements.
 - Concern about cross over with building regulations and the practical implications of this: lack of planner's expertise could result in delays; and potential for conflict.
 - Suggestion that the evidence behind the policy is lacking. Concern that evidence supporting Local Plan focusses on 'technical feasibility' and not practicality of sourcing materials and equipment: potential for delay and uncertainty. Currently experiencing unprecedented inflation in building and labour costs as supply chains and the labour market struggle to keep up with the demand: true impact of these increases not fully felt yet.
 - Concerns that the policy is unsound and not in conformity with the NPPF.
 - Particular concern as to how small to medium developers and self-builders would be able to comprehend and deliver policy.
 - Suggestion that it undermines the Government's Hydrogen Strategy.
 - Concerns regarding the impact moving away from fossil fuels will have on electricity network in terms of demand, capacity, infrastructure provision and reinforcement.
 - Concerns about councils' resources, and abilities to effectively enforce and monitor such standards.
 - Suggestion of need for exemption clauses on technical and viability grounds, and in relation to lower value areas and important heritage assets.
 - Concern that policy wording unclear and difficult to implement.
 - Queries in relation to 5 year monitoring of major applications: resource implications; how will speculative employment units be dealt with; will Section 106 be used to secure monitoring reports?
 - Various suggestions that the policy needs more flexibility.
 - Concerns in relation to criteria '2': unrealistic given severe restraints on the availability of electric supplies in Central Lincs.
 - Criteria '3': policy should provide examples of methodologies that are considered to provide accurate predictions (example of PHPP given) and identify those which are not considered to be accurate (examples of SAP and EPCs given).
 - Criteria '4': once occupied there is little/ no control over occupant behaviour. Unfair to rank developers.
 - Concerns policy will adversely affect deliverability and consequently affordability.
 - Concerns that the policy is unsound and not in conformity with the NPPF.
 - Concerns about the impact this policy would have on the supply of housing in the Central Lincolnshire area: local housing market very sensitive and differential policy requirements may reduce economies of scale.
 - **Viability concerns:**
 - Unreasonable burdens on developers.

- Concerns regarding the policy viability evidence: evidence lacking in respect of viability of developing brownfield sites; and the policy goes against viability evidence in relation to certain types of development. Evidence contextual background and does not set out specific local circumstances that justify policy requirements. Further viability testing should be undertaken to include costs for 2021 Part L interim Uplift and 2025 Future Homes Standards.
- Viability concerns also on grounds that most development in Central Lincs is more marginal than other locations: developers would favour locations outside area and policy would have knock on effect on jobs and inward investment into area.
- Energy Statement and Action Plan required by policy are significant: professional fees detailed in Whole Plan Viability assessment need to be increased.
- From a viability perspective, Policy S6 contradicts with Policy S4.3 (considered that first homes cannot be built to the same standards with the energy provisions imposed).
- **Other suggestions and key comments** include:
 - Template and guidance deemed essential for implementation of policy.
 - Suggestions that a forum should be set up for Central Lincolnshire to engage with developers, agents and renewable energy professionals.
 - Missed opportunity- local plan could prioritise sites that are capable of providing both onsite energy generation and new housing together.
 - Suggested that consideration should be given to vacuum tube with heat pipe.

Policy S7: Reducing Energy Consumption – Non-Residential Buildings

Summary of issues raised

- Mixed response to this draft policy.
- **Responses in support** include:
 - Support for net zero Local Plan, and policies that will deliver this.
 - Support future proofing of infrastructure through onsite renewable energy generation.
 - Support for introduction of policy: government approach too slow.
- **Various concerns, queries and objections**, include:
 - Concern that policy could potentially stifle innovation and use of new technologies.
 - Concern about introduction of policies S6 to S20 ahead of Future Homes Standard.
 - Concern about cross over with building regulations and the practical implications of this: particular concerns include that non-residential development can be more complex than residential development; that lack of planner's expertise could result in delays; and that there is potential for conflict with building regulations.
 - Concern that evidence supporting Local Plan focusses on 'technical feasibility' and not practicality of sourcing materials and equipment: potential for delay and uncertainty.
 - Particular concern as to how small to medium developers and self-builders would be able to comprehend and deliver policy.
 - Queries in relation to 5 year monitoring of major applications: resource implications; how will speculative employment units be dealt with; will Section 106 be used to secure monitoring reports?
 - Concerns that the policy is unsound and not in conformity with the NPPF.
 - Various suggestions that the policy needs more flexibility.
 - Suggestion that policy is excessive in its application to all development and should instead apply only to new major development.
 - Some concern regarding exemption of projects which achieve BREEAM: deemed 'incredibly easy' for projects to obtain without having any measurable effect on climate change.
 - Criteria '2' not justified.

- Policy comparable to blanket ban on fossil fuels: not consistent with central government's agenda.
- **Viability concerns:**
 - Concern that enforcing policies S6 to S20 would result in restricted development overall and developers seeking opportunities in areas with less restrictive policy.
 - Unreasonable burdens on developers.
 - Concerns regarding the policy viability evidence: evidence lacking in respect of viability of developing brownfield sites; and the policy goes against viability evidence.
 - Viability concerns also on grounds that most development in Central Lincs is more marginal than other locations: policy would have knock on effect on jobs and inward investment into area.
- **Other suggestions and key comments** included:
 - Architecture is the most underutilised factor in reducing a building's operational energy demand and CO2 emissions.
 - Template and guidance deemed essential for implementation of policy.
 - Suggestion that it is made clear that underperforming buildings must be rectified at the cost of the developer and within a defined time period.
 - Suggested that the potential of solar thermal and deep geothermal energy should be explored. Suggestion that for non-domestic buildings, it would be worth including a limit on energy demand for space cooling loads also as in many non-domestic buildings, space cooling represents a higher energy demand than for space heating.
 - Reduced wintertime energy demand and onsite energy storage should be prioritised over solar PV installations. Should discourage buildings that rely on high summertime solar PV export in order to satisfy annual net energy demand targets. Inevitably, we will arrive at a point where further solar PV generation during periods of sunny weather is counter-productive and will trigger the requirement for higher levels of energy storage.
 - The methodology to predict a building's actual energy performance should be more tightly controlled and acceptable methods be defined (eg, ASHRAE 90.1, CIBSE TM54, PHPP etc).

Policy S8: Decentralised Energy Networks and Combined Heat and Power

Summary of issues raised

- Support for net zero Local Plan, and policies that will deliver this.
- Support: decentralised approach for energy generation offers the potential for a more resilient network.
- Query as to how applicants and decision makers will know if there is an existing decentralised energy network in the locality: need for accessible database that contains such information.
- Suggestion that the policy is too vague.
- Concern that the policy is not in conformity with the NPPF: considered to lack the flexibility prescribed by NPPF para 157.
- Policy needs to be strengthened: should not only support combined heat and power but also encourage the co-location of potential heat consumers and suppliers and allocate available, underutilised land for high energy users near heat suppliers.
- Policy should also cover associated infrastructure (e.g. pipework and other ancillary infrastructure).
- Concerns about introduction of policies S6 to S20 ahead of Future Homes Standard.
- Particular concern that evidence supporting Local Plan focusses on 'technical feasibility' and not practicality of sourcing materials and equipment: potential for delay and uncertainty.
- Suggested that the potential of deep geothermal energy should be explored.
- Concern that policy could encourage unsustainable production and use of wood fuels.

Policy S9: Supporting a Circular Economy

Summary of issues raised

- Various comments broadly supporting the policy.
- Support for net zero Local Plan, and policies that will deliver this.
- Concern that the policy is not in conformity with the NPPF (para 16b relating to need for plans to be positively prepared): needs flexibility in relation to feasibility or viability considerations.
- Concerns about introduction of policies S6 to S20 ahead of Future Homes Standard.
- Particular concern that evidence supporting Local Plan focusses on 'technical feasibility' and not practicality of sourcing materials and equipment: potential for delay and uncertainty.
- Viability concerns. Concern that enforcing policies S6 to S20 would result in restricted development overall and developers seeking opportunities in areas with less restrictive policy.
- Suggestion that the policy is too broad and vague.

Policy S10: Embodied Carbon

Summary of issues raised

- Some support for the policy.
- Concerns about introduction of policies S6 to S20 ahead of Future Homes Standard.
- Particular concern that evidence supporting Local Plan focusses on 'technical feasibility' and not practicality of sourcing materials and equipment: potential for delay and uncertainty.
- Viability concerns. Concern that enforcing policies S6 to S20 would result in restricted development overall and developers seeking opportunities in areas with less restrictive policy.
- Suggestion that the policy unjustified.
- The policy is too vague and lacks specific detail.
- Suggestion that the policy should go further.

Policy S11: Water Efficiency and Sustainable Water Management

Summary of issues raised

- Support for net zero Local Plan, and policies that will deliver this.
- Various comments broadly supporting the policy.
- House builder cited experience of installing Rainwater Harvesting systems in homes: cautioned that if occupier/ owner did not buy into the system and carry out servicing and maintenance the system becomes redundant and operates on backup (mains) supply.
- Support for progress towards greater water efficiency and improved water management.
- Concerns about policy overlaps with Building Regulations and how the implementation and monitoring of this policy will be managed on a practical level by the applicable Development Management Team.
- Suggestion that the evidence behind the policy is lacking / weak: justification for 110 litre requirement needed, in line with Planning Policy Guidance (PPG ID : 56-014-20150327 and 56-015-20150327 quoted)
- Support for 110 litre requirement: acknowledgement that this was carried forward from current Local Plan.
- Suggested that policy should introduce requirement for non-residential also: BREEAM Very Good given as example.
- Concern about introduction of policies S6 to S20 ahead of Future Homes Standard.

- Particular concern that evidence supporting Local Plan focusses on ‘technical feasibility’ and not practicality of sourcing materials and equipment: potential for delay and uncertainty.
- Suggested that policy needs to be more flexible.
- Water management best dealt with via flood risk policy/ policies.

Policy S12: Reducing Energy Consumption in Existing Buildings

Summary of issues raised

- Various comments broadly supporting the intent of the policy, though some objections.
- Support for net zero Local Plan, and policies that will deliver this.
- Various comments in support of the policy going further: suggestion that policy requirement for ‘Reducing Energy Consumption’ energy statement (as required by policies S6 and S7) should apply to all change of use and large extensions also.
- Historic England expressed strong support for the ‘note’ relating to heritage assets at the end of the policy.
- Concern about introduction of policies S6 to S20 ahead of Future Homes Standard.
- Particular concern that evidence supporting Local Plan focusses on ‘technical feasibility’ and not practicality of sourcing materials and equipment: potential for delay and uncertainty.

Policy S13: Renewable Energy

Summary of issues raised

- Mixed response to this draft policy.
- **Objections** on various grounds, including:
 - General objections:
 - Support for policy overall, but concern that there is too much scope to reject proposals.
 - Concern that 1 small-medium turbine permitted under ‘Additional matters for wind based energy proposals’ is restrictive.
 - Objections to element of policy relating to medium to large turbines:
 - Suggestion that 2km buffer should apply to all dwellings and places of work.
 - Concern that buffers have not been applied to settlements outside the Plan area.
 - Deliverability and output of turbines questioned.
 - Concern for impact on birds.
 - Concern for impact on landscape.
 - Not appropriate for flat landscape.
 - Exclusion zone around MOD/RAF sites questioned as not being sufficient.
 - Concern that policy wording does not accurately reflect national policy and guidance (specifically para 158b of the NPPF, and para 007 of the PPG for Renewable and Low Carbon Energy)
 - Deliverability of policy questioned- national policy renders applications for onshore wind too risky and costly to developers. Significant decrease in applications since 2015 Ministerial Statement.
 - Concern about the amount of fossil fuels used in construction of wind turbines.
 - Support for policy, but map 2 considered too restrictive: smaller buffers suggested.
- **Support** included:
 - Policy requirements are appropriate and proportionate.
 - Support for criteria-based assessment for all large-scale renewable development rather than allocation of sites.

- Support the policy for single small to medium wind turbines that serve a specific isolated business or dwelling with renewable energy.
 - Some expressed support for policy, except the policy requirements in relation to wind turbines.
 - Support for greater emphasis on solar development.
 - Consider opportunities around smaller, localised schemes that benefit community/local business as these are far more appropriate for Central Lincolnshire than large scale schemes.
 - The mitigation and reversal of climate related harm and the establishment of long-term sustainability is imperative and a priority for everyone. It is a shared duty not a choice.
- **General comments:**
 - Utility sites, such as water treatment works, are a suitable location for solar installations as they have existing low-level development. Such sites also have existing transmission infrastructure.
 - Suggested that policy should require solar panels on all new builds.
 - Suggestion that plan should include policy which gives housing developments capable of being delivered alongside large-scale renewable energy installations 'priority status'.
 - Suggestion that higher solar target of 70%, as recommended by consultant, should be used.
 - Some confusion over 'Map 2'.

Policy S14: Protecting Renewable Energy Infrastructure

Summary of issues raised

- Support highlighting potential for improved network resilience and flexible management of energy needs.
- Mostly generic comments in support or opposition to approach set out in Energy, Climate Change and Flooding section as a whole.

Policy S15: Wider Energy Infrastructure

Summary of issues raised

- Mixed response to draft policy.
- Objection to 'carte blanche' approach.
- Concerns regarding batteries and battery storage on grounds of hazards not being fully known.
- Support for small nuclear power development over the renewable and low carbon energy development supported in the Local Plan.

Policy S16: Carbon Sinks

Summary of issues raised

- Mixed response to draft policy.
- Support for the policy but specific concerns raised in relation to the 'Carbon Sequestration' part of the policy relating to tree cover; highlight that tree planting projects should consider the 'right trees in the right places' approach; and advise that greater emphasis should be placed on the concept of 'Nature-Based Solutions'.
- Various comments suggesting the policy needs substantial or significant rewording, especially in relation to:
 - Criteria a

- Need for distinction to be made between peat soils which were previously subject to agricultural usage, which are functioning peat-based habitats, and which relate to ancient woodland and veteran trees.
- Need for more guidance on carbon sequestration and the development of carbon sinks: suggestion that the Oxford Principles on carbon sequestration are used.
- Need to ensure tree planting or afforestation would not result in net carbon emissions; is in accordance with local nature recovery strategy; and is not at the expense of other habitats where other habitats may have biodiversity conservation priority.
- It was queried whether the Local Plan will identify and map peatland.

Policy S17: Electric Vehicle Charging

Summary of issues raised

- Mixed response to this draft policy.
- Suggestion that policy should be more flexible (e.g. addition of 'where technically feasible' to requirements).
- Policy deemed too stringent.
- Suggestion that policy should go further: higher provision needed given high car ownership and need for on street provision for visitors.
- Suggestion that additional viability work is needed.
- Concerns about the capacity of the existing electrical network in the UK.
- Concern that the evolution of automotive technology is moving quickly: suggestion that a passive cable and duct approach is a more sensible and future proofed solution, which negates the potential for obsolete technology.
- Concern that installation of active electric vehicle charging points ahead of introduction of changes to Part 5 of the Building Regulations is inappropriate: Building Regs will introduce standardised approach that will supersede the Local Plan's approach.

Policy S18: Fossil Fuel Exploration, Extraction, Production or Energy Generation

Summary of issues raised

- Various comments broadly supporting the policy.
- Some objection to inclusion of policy, stating responsibility lies with Lincolnshire County Council.
- Concern that the policy is not in conformity with the NPPF (chapter 17 and paragraphs 210 and 215 quoted).
- Concern about introduction of policies S6 to S20 ahead of Future Homes Standard.

Policy S19: Resilient and Adaptable Design

Summary of issues raised

- Mixed response to this draft policy.
- Support for net zero Local Plan, and policies that will deliver this.
- Several suggestions that policy could go further.
- Suggestion that an Energy / Climate Change 'check list document' is needed to aid developers and decision makers.
- Concern that the policy as written would add a further time and resource burden on local planning authorities, which could delay decisions.
- Suggestion that policy needs more flexibility.

- Concern about introduction of policies S6 to S20 ahead of Future Homes Standard.
- Particular concern that evidence supporting Local Plan focusses on 'technical feasibility' and not practicality of sourcing materials and equipment: potential for delay and uncertainty.

Policy S20: Flood Risk and Water Resources

Summary of issues raised

- Several comments supporting or broadly supporting the policy.
- Some support expressed for the policy subject to criteria being met and enforced.
- Some comments suggest that the policy wording is not strong enough and others that it is too strong and requires too much.
- Various detailed suggestions to improve clarity of policy and supporting text wording.
- Suggestion that the evidence behind the policy requires further work.

Chapter 4: Housing

Policy S21: Affordable Housing

Summary of issues raised

- Various comments broadly supporting the policy or supporting elements of the policy, specifically the use of value zones.
- Various objections stating concern that the policy as written would add a further cost burden on developers, which could make development unviable.
- Various detailed suggestions, to improve clarity of policy wording.
- Both concern and support for locally-set First Homes criteria.
- Suggestion that the plan is unsound as affordable housing targets are not justified, positively prepared or effective
- The evidence behind the policy is lacking / weak. Suggestion that the HNA should break need down into smaller geographic areas.
- Further specific viability testing needs to be undertaken.
- The policy should set higher standards/ deliver more overall housing to address needs.

Policy S22: Meeting Housing Needs

Summary of issues raised

- Various comments broadly supporting the policy.
- Suggestion that the policy is too vague / unclear
- Concern that the policy is too restrictive in relation to location for development
- Various comments suggesting the policy needs substantial or significant rewording, especially in relation to ensuring delivery of older persons housing.

Policy NS23: Custom and Self Build Housing

Summary of issues raised

- Various comments broadly supporting elements of the policy.
- Detailed suggestions provided to improve clarity of policy wording; the definition of custom & self-build needs to be defined more to ensure it is genuine self builds.
- Concern that the policy as written would add a further cost burden on developers, which could make development unviable as set out in part 3 (larger sites), no national

requirements in the NPPF to impose a percentage threshold, and concerns of logistics of build outs on sites.

- Suggestion that the Custom and Self Build register is relatively small in 2019 so does not justify the 5% requirement on landowner/developer in part 3.
- Suggestion that the marketing period is too long (36 months).

Policy S24: Sub-division and Multi-occupation of Dwellings within Lincoln

Summary of issues raised

- Comment suggesting text clarification for policy or supporting text.

Policy S25: Houseboat Moorings and Caravans

Summary of issues raised

- Various comments broadly supporting the policy.
- A detailed suggestion, to improve clarity of policy wording.
- Comment suggesting linking the park home element of the policy to affordable housing provision.

Policy NS26: Residential Annexes

Summary of issues raised

- Various comments broadly supporting the policy.
- Suggestions to provide clarity regarding detached annexes.

Chapter 5: Employment

Policy 27: Spatial Strategy for Employment

Summary of issues raised

- Various comments broadly supporting the policy or specific elements of the policy.
- Issues raised primarily relate to site allocations including:
 - Concerns that sites no longer deliverable should be replaced with alternatives.
 - Concerns have been raised that there are not enough large sites for warehousing B8/logistics allocated. Suggestion that global events support the view that supply chains will shift from operating 'just in time' to a 'just in case' model. Suggesting that demand for larger warehousing sites may increase.
 - Comments have asked for further clarity to the assessment relating to HELAA 2021 for the existing allocations.
 - Suggestions of alternative sites for allocation including:
 - 18Ha of land, located SE of the Pennells roundabout (A46), for B8 logistics (Rep ID 1039781)
 - 61Ha of land south of the A46 roundabout for B2/8 and ancillary Class E Offices. (Rep ID 1037633)
 - Land south of Whisby Road, West of Station Road (ref. NK/NHYK/008), for employment uses, North Hykeham
 - Site North of Kirk's Yard, Branston, NK/BRAN/004
- Aspirations for major infrastructure projects should be noted in the plan to help retain graduates.
- Further clarification sought on the policy map linking it to the new proposed policies.

Policy 28: Strategic Employment Sites (SES)

Summary of issues raised

- Various comments broadly supporting elements of the policy and specific allocations.
- One observation was there are no SESs that are closer to Market Rasen or Caistor than Hemswell Cliff within West Lindsey.
- Objection raised restricting the Class E functions on these sites. It should be left to be fluid in line with General permitted Development rights of Class E.
- Hemswell Cliff Business Park Extension, status update: Both Local Development Order and masterplan in place. The site is featured in Hemswell Cliff Neighbourhood Plan which is at draft regulation 14 consultation stage.
- General remarks made about the Strategic Road Network and the proposed allocations would have cumulative impacts on the highway network.
- Objection raised that there are not enough large scale warehousing sites. Suggestions that global events support the view that supply chains will shift from operating 'just in time' to a 'just in case' model; suggesting that demand for larger warehousing sites may increase both locally and nationally.
- Objections have been raised suggesting other SES allocations should be included.
- Suggestions of alternative sites for allocation including:
 - 18Ha of land, located SE of the Pennells roundabout (A46), for B8 logistics
 - 15 acres of land northeast of Holdingham roundabout, western end of NK/SLEA/003, uses proposed are for farming (agric food) or business related activity requiring connections to A15/A17.
 - Land along A607, Waddington, South of the Landings (Persimmon site).
- Flood risks have been noted by drainage boards for the following allocated sites: E2, E13, E23, E9, E14 and E17.

Policy 29: Employment Allocations on SUEs

Summary of issues raised

- Various comments broadly supporting elements of the policy.
- Concerns about the cumulative impacts expected as a result of the proposed site allocations that may severely affect highway operation on the Strategic Road Network.
- Wording suggestion has been suggested that employment on these sites should be expressed as a 'minimum'. As the size prescribed in the wording doesn't offer enough scope.

Policy 30: Important Established Employment Areas (IEEA)

Summary of issues raised

- Objection on the basis that the restriction of uses is unreasonable and would not meet the presumption of sustainable development as set out in the NPPF.
- Suggestion that The Great Northern Terrace, (identified as E9) and Waterside South, (Identified as E14) should be allocated as ‘regeneration and opportunity areas’ under policy NS71.
- Further IEEA site allocation suggestions have been made including:
 - A parcel of land is put forward to extend the existing E18 site to the south (Currently, brownfield land which includes a surface water lagoon, associated landfill infrastructure).
 - Incorporating Leafbridge within E18 (LN6 Industrial Area) so all 22 acres are included rather than just eastern 3 acres. (Or marking it on the policy map as a ‘further strategically significant opportunity site’)
- Flood risk areas identified include the following locations:
 - UWIDB – E2, E13, E23
 - W1DIDB – E9
 - W3DIDB – E14, E17

Policy 31: Local Employment Areas (LEAs)

Summary of issues raised

- Some comments raised supporting the view of protecting LEA sites through restrictive uses.
- Objection suggesting LEA sites should be specified within Tiers 1-6 of the settlement hierarchy for example Fen Road Ruskington.
- Alternative sites have been proposed including:
 - NK/BRAN/004, Kirk’s Yard, Branston proposed for mixed employment uses.
 - Additional land at Fen Road Ruskington (2.5 acres) positioned either side of the estate service road.
 - Sites for either housing or employment/ mixed use at the following sites; Beck Farm, North Kesley Road- 5.2 Ha; Highfield Farm, North Kelsey Road -22.1Ha; Far Farm, Caistor Road/North Kelsey Road -9.6Ha.
- Clarification is requested on designation of the Maltings site (Gainsborough) as this is not listed on the policies map.

Policy 32: Non-designated Employment Proposals within Identified Settlements.

Summary of issues raised

- Concerns are raised that part 1 of the policy expects a lot to be achieved whereas part 2 does not restrict the loss of an LEA site. Rebalance of wording is considered necessary.
- Suggestion to include live/work type employment opportunities position within this policy especially due to the rise of working from home.
- Concerns raised over Part 1 been too restrictive and it does not promote sustainable development outcomes set out in the NPPF. It should allow flexibility due to the type of business based on locational demands.
- Objections have been raised over alternative sites.
- Other sites have been suggested for employment uses:
 - Besthorpe Road, North Scarle.

Policy S33: Non-designated Employment Proposals in the Countryside

Summary of issues raised

- General comments of support for this policy have been received.

- Suggestion that the policy is unclear regarding derelict buildings as implies new builds are acceptable. (set out under letter g)
- Policy suggestion to include a robust business plan and a policy position on live/work type of employment uses that are acceptable.
- Objection as the policy is too restrictive and not flexible enough based on location specific requirements of business needs as set out in paragraph 83 of the NPPF.
- Objections based on employment land allocations.
- Proposed employment land allocations for outside settlements:
 - Land on Thorpe Grange Bungalow, & land adjoining Grange Farm, Lincoln Enterprise Park, Newark Road, Aibourn.
 - Besthorpe Road, North Scarle.
 - Sites for either housing or employment/ mixed use at the following sites; Beck Farm, North Kesley Road- 5.2 Ha; Highfield Farm, North Kelsey Road -22.1Ha; Far Farm, Caistor Road/North Kelsey Road -9.6Ha.

Chapter 6: Retail: City and Town Centres, and District, Local and Village Centres

Policy S34: Network and Hierarchy of Centres

Summary of issues raised

- Various comments supporting the policy.
- Comment suggesting that the policy needs rewording to specifically refer to Market Rasen and Caistor in the impact assessment other clarifications sought.

Policy 35: Lincoln's City Centre and Primary Shopping Area

Summary of issues raised

- Various comments supporting the policy.
- Concern that elements of the policy need to reflect the NPPF in relation to flood risk and residential uses.

Policy S36: Gainsborough Town Centre and Primary Shopping Area

Summary of issues raised

- Various comments supporting the policy.
- Suggestion to improve clarity of policy wording.

Policy S37: Sleaford Town Centre and Primary Shopping Area

Summary of issues raised

- Various comments supporting the policy.
- Suggestions for supporting text wording.

Policy S38: Market Rasen and Caistor Town Centres

Summary of issues raised

- Various comments broadly supporting the policy.

- Suggestion for additional supporting text.

Policy S39: District, Local and Village Centres

Summary of issues raised

- Various comments supporting the policy.

Policy NS40: City and Town Centre Frontages

Summary of issues raised

- Various comments broadly supporting the policy and strong support for elements.

Chapter 7: Tourism and the Visitor Economy

Policy S41: Sustainable Urban Tourism

Summary of issues raised

- Various comments broadly supporting the policy.

Policy S42: Sustainable Rural Tourism

Summary of issues raised

- Various comments broadly supporting the policy.
- Concern that the policy and supporting text could result in increased activity that will degrade wildlife habitat.
- Various comments suggesting amendments to supporting text references to the Lincolnshire Wolds and natural environment.

Policy S43: Lincolnshire Showground

Summary of issues raised

- Comments in support of the policy.
- Comment suggesting the policy needs substantial or significant rewording, especially in relation to size and range of permitted uses.

Chapter 8: Transport and Infrastructure

Policy S44: Strategic Infrastructure Requirements

Summary of issues raised

- Various comments broadly supporting elements of the policy.
- Concern that the policy is not in conformity with the NPPG.
- Various comments relating to lack of capacity of specific infrastructure types, including health, waste water education and highways.
- Suggestion that the evidence behind the policy is lacking / weak.
- Detailed suggestions, to improve robustness of policy wording.
- Various comments relating the timing and location of infrastructure provision

Policy S45: Safeguarded Land for Future Key Infrastructure

Summary of issues raised

- Various comments broadly supporting the policy.

Policy S46: Accessibility and Transport

Summary of issues raised

- Various comments broadly supporting elements of the policy.
- Various comments suggesting the policy needs some rewording, especially in relation to disabled access to public transport and HGV routing restrictions.
- Suggestion that the evidence behind the policy is lacking / weak.
- Various detailed suggestions, to improve clarity of policy wording.
- Concern that the policy is not in conformity with the NPPF.

Policy S47: Walking and Cycling Infrastructure

Summary of issues raised

- Various comments broadly supporting the policy.
- Various comments relating to fragmented nature of existing provision.
- Various comments suggesting the policy needs rewording, especially in relation to including equestrian users, connectivity with and between existing routes and specific reference to Public Rights of Way network.

Policy S48: Parking Provision

Summary of issues raised

- Various comments broadly supporting elements of the policy.
- Suggestion that the evidence behind the policy is lacking particularly in relation to EVCPs.
- Concern that the policy as written would add a further cost burden on developers, which could make development unviable.
- Suggestion that the policy is too vague / unclear.
- Various comments relating to specific elements of the parking standards themselves.

Policy S49: Community Facilities

Summary of issues raised

- Various comments broadly supporting elements of the policy
- Various detailed suggestions, to improve clarity of policy wording.
- Suggestion that the evidence behind the policy is lacking, particularly in relation to leisure facilities.
- Concern that the policy is not in conformity with the NPPF.
- Concern that the policy as written would prevent public sector organisations operating efficiently

Policy 50: Creation of New Open Space, Sports and Leisure Facilities

Summary of issues raised

- Various comments broadly supporting the policy or elements of the policy.
- Various detailed suggestions to improve the clarity of policy wording.
- Concern that the policy is too prescriptive.
- Various comments suggesting the policy needs rewording, especially in relation to: the preference for on-site open space creation, application of a 10 dwelling threshold and funding mechanisms.
- Concern that the policy is not in conformity with The Town and Country Planning (Local Planning) (England) Regulations 2012 or the NPPG.
- The evidence behind the policy is lacking/weak, especially in relation to: assessment of existing supply to understand need and up to date Playing Pitch Strategies for each Local Authority.
- Concern raised around policy implementation.

Policy S51: Universities and Colleges

Summary of issues raised

- Support provided for this policy.
- Suggestion that other college campuses may benefit from being referenced in this policy.

Chapter 9: Design and Amenity

Policy S52: Design and Amenity

Summary of issues raised

- Various comments broadly supporting the policy.
- Various comments suggesting the policy needs rewording, especially in relation to the amenity value of trees, and biodiversity and habitats.
- The evidence behind the policy is lacking / weak.
- Concern that the policy does not allow for flexibility where appropriate.
- Various comments stating the importance of design and quality.

Policy S53: Health and Wellbeing

Summary of issues raised

- Various comments broadly supporting the policy.
- Various detailed suggestions to strengthen policy.
- Suggestion that the evidence behind the policy is lacking / weak.
- Concern that the policy as written would add a further cost burden on developers, which could make development unviable.

Policy NS54: Advertisements

Summary of issues raised

- Comment supporting the policy

Policy S55: Development on Land Affected by Contamination

Summary of issues raised

- Various comments supporting the policy
- Detailed suggestions to improve clarity of policy and supporting text wording

Chapter 10: Built Environment

Policy 56: The Historic Environment

Summary of issues raised

- Various comments broadly supporting the policy or elements of the policy.
- Various comments suggesting the policy and/or supporting text needs rewording, especially in relation to: reference to the use of traditional materials and techniques, paragraph 4 and criteria j) to m), greater reference to settings, and encouragement of energy efficiency of historic buildings whilst conserving heritage significance.
- Suggestion that the evidence behind the policy is lacking/weak, especially in relation to: location of a comprehensive heritage evidence base to support the plan.

Policy S57: Protecting Lincoln, Gainsborough and Sleaford's Setting and Character

Summary of issues raised

- Various comments supporting the policy.

Chapter 11: Natural Environment

Policy 58: Green Infrastructure Network

Summary of issues raised

- Various comments broadly supporting the policy or elements of the policy.
- Various detailed suggestions to improve the clarity of policy wording.
- Various comments suggesting the policy needs rewording, especially in relation to: mitigation of adverse impacts to wildlife resulting from increased recreational disturbance.
- Concern that the policy is not in conformity with The Town and Country Planning (Local Planning) (England) Regulations 2012 or the NPPG.
- Suggestion that the evidence behind the policy is lacking/weak, especially in relation to: the age of the GI Strategy (2011)
- Concern raised around policy implementation.

Policy 59: Protecting Biodiversity and Geodiversity

Summary of issues raised

- Various comments broadly supporting the policy or elements of the policy.
- Various detailed suggestions to improve the clarity of supporting text and policy wording.

Policy 60: Biodiversity Opportunity and Delivering Measurable Net Gains

Summary of issues raised

- Various comments broadly supporting the policy or elements of the policy.
- Various detailed suggestions to improve the clarity of supporting text and policy wording.
- Various comments suggesting the policy needs rewording, especially in relation to paragraph 1, the requirement for a minimum 10% measurable biodiversity net gain and preference for on-site over off-site biodiversity net gain.
- Concern that the policy is premature - the Environment Bill has not been enacted. Policy should reflect the NPPF.
- Concern that the policy as written would add a further cost burden on developers, which could make development unviable.
- Suggestion that the evidence behind the policy is lacking / weak, in relation to viability.
- Concern around policy implementation.

Policy S61: Area of Outstanding Natural Beauty and Areas of Great Landscape Value

Summary of issues raised

- Support for strengthening of the policy in relation to AGLV and AONB.
- Suggestion that Sleaford and the Fenland landscapes should be included.
- Suggestion that interpretation and implementation can be challenging and create barriers.
- Suggestion that the policy is designation driven and not evidence based with no justification for the designation of AGLV's.
- Concern raised that no reference made to character, setting, views and cumulative impacts in areas that are outside designated areas.
- Suggestion that it should include reference to heritage/culture in point d & h).
- Suggestion that 'adverse impact' wording to be amended to allow for some mitigation.

Policy 62: Green Wedges

Summary of issues raised

- Various comments broadly supporting the policy or elements of the policy.
- Various detailed suggestions to improve the clarity of supporting text and policy wording.
- Various comments suggesting the policy needs rewording, especially in relation to: specific mention of essential and renewable energy infrastructure in paragraph 1, paragraph 2 parts a), b) and d), suggested merging with policy S61 and specific reference to potential development that is suitable within a Green Wedge.
- Suggestion that the evidence behind the policy is lacking / weak, in relation to the date of the Green Wedge and Settlement Breaks Review.
- Concern around policy implementation.
- Current Green Wedges were objected to in part at: Hykeham Pits (various locations).
- Suggested new Green Wedge suggested at: Branston and Branston Booths.

Policy S63: Local Green Space

Summary of issues raised

- Various comments broadly supporting the policy.
- A small number of locations suggested for removal.
- A small number of locations suggested for consideration.
- Various comments supporting the continued designation of locations as Local Green Space.

Policy S64: Important Open Spaces

Summary of issues raised

- Various comments broadly supporting the policy.
- A small number of locations suggested for removal.
- Various comments supporting the continued designation of locations as Local Green Space and Important Open Space.
- Suggestion that the evidence behind the policy is lacking / weak and questioning the process.

Policy S65: Trees, Woodland and Hedgerows

Summary of issues raised

- Various comments broadly supporting the policy.
- Various detailed suggestions, to improve clarity of policy wording.
- Various comments suggesting the policy needs rewording in relation to the inclusion of references to tree canopy cover, British Standards in relation to trees and construction and Hedgerows Regulations 1997.
- Various comments suggesting the policy needs rewording in relation to mitigation measures
- Concern that the policy is not in conformity with the NPPF.
- Various comments stress the importance of mature trees and the need for their retention.

Policy S66: Best and Most Versatile Agricultural Land

Summary of issues raised

- Various comments broadly supporting the policy.
- Concern that the policy is not robust enough, and should be strengthened.

Chapter 12: SUEs, Regeneration Areas and Opportunity Areas

Policy S67: Sustainable Urban Extensions (SUEs)

Summary of issues raised

- Various comments broadly supporting the policy.
- Suggestions for changing the policy include:
 - To prepare and adopt a design code for each SUE.
 - Green infrastructure should be considered at the earliest stage to support Biodiversity Net Gain.
 - Use Integrated Water Management schemes rather than traditional Sustainable Drainage Systems.
 - Additional requirements should be added to achieve biodiversity net gains and minimising impacts of the natural environment.
- Suggestion that further clarity required to ensure nature based policies within the plan also applies to all SUEs sites.
- Comments about needing accurate assessments of availability, suitability, deliverability, developability and viability for these sites taking into account delivery rates and lead times.
- Comments noting the NPPF clarifies that new urban extensions need to look for the longer time frame of at least 30 years rather than 15 to take into account delivery timescales.
- Concerns over the lead-in times of SUEs. Suggestions made that smaller non-strategic sites should be allocated to ensure housing supply in the short and medium term which will diversify the range.

- Objections raised on legal policy duties of NPPF paragraphs 8c, 174, 179 noting that SUEs will have evitable impacts on the natural environment and suggests there should be further requirements placed in the policy to minimise the impacts by protecting and enhancing the ecological networks. Net gains in biodiversity must be achieved within SUEs.
- Concerns that the housing supply does not meet the requirements of 10% of housing sites been on 1ha or less as set out in Para. 69a of the NPPF.

Policy S68: Lincoln Sustainable Urban Extensions

Summary of issues raised

- General comments of support for the policy.
- Suggestions that the policies for SUEs need to include more ambitious measures for low carbon homes as outlined in S6.
- General remarks made about the need for accurate assessments of availability, suitability, deliverability, developability and viability taking into account delivery rates and lead-in times.
- Concerns about the lack of range of sites noting 40% of housing land supply is derived from SUEs. Suggestions that a more diverse range of sites is needed.
- Further clarity is requested regarding the 10% of housing requirements on sites no larger than 1 hectare.
- Further clarity is requested whether the councils are going to provide details of a site-specific Housing Trajectory as set out in Para 74b of the NPPF. This will allow an informed view whether these assumptions are justified.
- Further clarity is requested regarding design quality aspirations and tools that will be used to achieve the expectations set out in Paragraph 73 of the NPPF.
- Query about evidence to support the requirement for indoor/outdoor sports/ recreation needs on site or offsite.
- Suggestion that sustainable drainage infrastructure should be included.
- Suggestion that railway infrastructure should be included.
- The Primary Access Road is supported and general requirements set out in the recent adopted Design Code to bring an attractive gateway in and out of the SUEs.
- Comments made regarding **South East Quadrant (SEQ)**:
 - First phase 132 dwellings on site
 - Planning decisions pending over two applications 1600 dwellings (c. 1300 on the SUE)
 - A design code and broad concept plan was adopted as SPD in December 2020.
 - A suggestion is made to use the term 'heritage assets' rather than 'historic assets' so that wording is closely related to the NPPF (2021).
 - Support for a Park and Ride facility/ mobility hub (Please see Broad Concept Plan by NKDC)
 - Outline planning for a large proportion of the site is active and subject to Planning Committee September 2021 (20/0057/OUT). This demonstrates that this is deliverable in the Plan Period.
 - Comments of support made and note the importance of all parties working together to ensure the site delivers the expected number of dwellings over the plan period. This is very important regarding associated infrastructure.
 - The broad concept plan is supported and it is important that Heighington Road and Lincoln Eastern Bypass promotes an attractive frontage on the approach to Lincoln.
- Comments made regarding the **South West Quadrant (SWQ)**:
 - Suggestion that it may need minor amendments to the policy in light of emerging program for delivery of the North Hykeham relief road.
 - Objections raised concerns that Green infrastructure aspirations should be seeking to deliver multiple benefits in line with NPPF Paragraphs 186, 92c & 175.
 - A concept plan has been worked to bring the first phase of 500 homes forward on the site.

- First phase could be delivered in advance of the North Hykeham Relief Road. Suggestion to amend the policy wording to allow existing infrastructure to be utilised for the first 500 homes. Then the remainder of the allocation would be deliverable after the delivery of the first phase of the Hykeham Relief Road.
- Approximately 5ha of additional employment land to expand Boundary Lane Enterprise Park.
- Community facilities with local centre including retail, new primary school, formal sport pitches and open space that complements and enhances the existing.
- An objection raised that the policy needs to be more flexible in the delivery of site due to delays in the delivery of the Hykeham Relief Road and A46/A15 connections. Policy needs to facilitate early delivery of parts without linking to the main access road.
- Further land is promoted to be included as part of the SWQ.
- Comments made on **North East Quadrant (NEQ)** as follows:
 - Further strengthening of wording in relation to archaeology is recommended.
 - Part of NEQ was granted outline permission for 500 homes (2015) with detailed permission for the first phase 200 in (2019) which has now commenced by Persimmon Homes (Commissioners overseeing delivery). A development partner has now be selected for the remainder which a reserved matters will be prepared soon.
 - Suggestion that further clarity requested regarding the location of the assessment for COL/ABB/001 within the Sustainability Appraisal is required.

Policy S69: Gainsborough Sustainable Urban Extensions

Summary of issues raised

- General comments of support for the policy.
- Suggestions Sustainable Drainage Systems be repeated within the policy.
- Concerns raised about the over-reliance on SUEs. Suggestions are made that housing supply needs to come from a more diverse range of sites.
- General remarks made about accurate assessments of availability, suitability, deliverability, developability and viability being needed for these sites taking into account delivery rates and lead-in times.
- Further clarity is requested regarding the 10% of housing requirements on sites no larger than 1 hectare.
- Further clarity is requested whether the councils are going to provide details of the Housing Trajectory which is site specific as set out in Para 74b of the NPPF (2021). This will allow an informed view whether these assumptions are justified.
- A comment raised that sustainable drainage infrastructure is not included within the section on SUEs only transport.
- Specific comment about **Gainsborough Southern Neighbourhood SUE**
 - Outline permission has been granted
 - First phase bought by Keepmoat. February 2020, 454 dwellings approved. Work has started on site 2021.Keepmoat have sold part of the land to Danum Homes to increase delivery rates.
 - Phase two is awaiting another house builder for the land.
- Specific comments about **Gainsborough Northern Neighbourhood SUE**
 - Comments raise the indicative numbers of 750 dwellings by 2040. Reassurances are sought so that the higher number of dwellings should be allowed if the site is in a position to deliver them.
 - Outline planning approval for 750 homes. Phase 1A has approximately 130 units and Phase 1B 620. Phase 1A is anticipated a reserved matters application in 2021.
 - The remaining 1,750 dwellings is anticipated to come forward beyond the local plan period.

Policy S70: Sleaford Sustainable Urban Extensions

Summary of issues raised

- Various support provided for this policy.
- Suggestion that more ambitious low carbon measures should be included for these sites.
- Statement that it is important that a clear picture of availability, suitability, deliverability, developability and viability is needed for all sites, including lead-in times and delivery rates.
- Suggestion that reference to sustainable drainage infrastructure should be included in the policy.

Policy NS71: Lincoln Regeneration and Opportunity Areas

Summary of issues raised

- Suggestion that these sites need accurate assessments of availability, suitability, deliverability, develop-ability and viability.
- The Councils' assumptions on lead-in times should be correct and supported by parties for delivery housing on the sites.
- A number of site allocations are within the Environment Agency Flood Zones. Sites need to be arranged so dwellings are outside these zones or finished floor levels at the appropriate amount. Industrial development should be flood resistant.
- Occupiers need to be aware of flood risks and the impact on climate change. The sites at include:
 - UWIDB – 2 (Firth Rd, ROA4), 4 (Spa Rd, ROA2), 12 (High St South ROA5)
 - W1DIDB – 5 (East of Canwick Rd ROA3), 7 (Tentercroft St ROA1)
 - W3DIDB - 4 (Spa Rd ROA2)
- Comments raised consistency should be provided across the sites within this policy to mitigation if the form off-site improvements that are proportionate to upgrading sustainable transport provision from the City Centre.

Policy NS72: Gainsborough Riverside Regeneration Area

Summary of issues raised

- Various support provided for this policy.
- Suggestion that these sites have accurate assessments of availability, suitability, deliverability, develop-ability and viability.
- The Councils' assumptions on lead-in times should be correct and supported by parties for delivery housing on the sites.
- Comments of support for enhanced public spaces and green infrastructure.
- Clarity requested regarding regeneration area reference numbers to be included on the policy map.
- Objection raised on the basis that the policy needs to provide clarity for existing industrial businesses and allow flexibility to grow without been undermined by noise sensitive users.

Policy NS73: Sleaford Regeneration and Opportunities Areas

Summary of issues raised

- Various support provided for this policy.
- Suggestion that these sites need accurate assessments of availability, suitability, deliverability, develop-ability and viability.

- The Councils' assumptions on lead-in times should be correct and supported by parties for delivery housing on the sites.
- Objection raised on site ROA9 (Greylees) as there is no minimum expectation for providing essential amenities such as a shop.
- Objection raised on site ROA7 (Avanta Seeds) suggesting the current wording will lead to viability issues.
 - The largest part of the current permission for the site are for comparison retailing and retirement apartments. Market conditions may be weak so flexibility is needed in the policy to allow for shifts from the extant permission.
 - More flexibility required for the delivery of sports provision and access road from Boston Road.
 - Letter b and c of the policy is supported however suggestions have been.

Policy 74: RAF Scampton

Summary of issues raised

- Various support for the policy.
- The 'whole forces community' should be central to the future of RAF Scampton.
- A number of suggestions to amend the policy in relation to biodiversity, heritage
- Suggestion that the policy should go further including a mix of uses including leisure, tourism, Dambuster Heritage, zero carbon buildings, an Eden-style development and should stipulate the uses that would not be suitable such as storage and logistics sheds.
- Confirmation the MOD is vacating the site in 2022 and of their willingness to work with the District and other partners to ensure a positive outcome for the site.
- Suggestion that point K of the policy is not needed as withdrawal from the site is confirmed.
- Suggestions that far more needs to be made of the site's heritage and importance to RAF history with the Listed Hangars to be retained as central to this.
- Suggestions that the site is well placed to support the manufacture and deployment of UAVs (unmanned aerial vehicles) and satellites, training and other airspace activities.
- Objection to this site being allocated for housing development.

Chapter 13: Site Allocations

Site Allocations – general comments

Summary of issues raised

- Housing supply doesn't have 10% of sites from 1ha or less
- More detailed trajectory required
- Broad locations should be included (from current plan – rep made in relation to Quarrington)
- Woodland Trust objection to GAIN/017 Gain Eastern Neighbourhood (previously a broad location)
- SUE's are likely to have a long lead in time, the HLS should be made up of a range of small, medium and large sites to provide flexibility and short to medium term HLS.
- Sport England comments – Plan should ensure enough land is retained in Gainsborough for expansion of WLDC Leisure Centre, Trent Valley Academy, Castlewood Academy and Roses Sports Facility.
- The plan doesn't provide for the inclusion of significant residential development in and around Large, Medium and Small Villages. More development for smaller villages.
- Housing requirement in 2.27 should not be a range but a single figure
- Reinstate the previous growth targets/caps for villages
- Up to 5 dwellings in small villages is too limited – some small villages want to grow to help protect their services

Policy 75: Development on Sustainable Urban Extensions

Summary of issues raised

General comments:

- Concern development could have impacts on Strategic Road Network in the Lincoln Strategy Area
- SUE's are likely to have a long lead in time, the HLS should be made up of a range of small, medium and large sites to provide flexibility and short to medium term HLS.
- Suggestion that SUEs should have a masterplan or clear direction in accordance with NPPF para 73.
- Development in Flood Risk Zones should include appropriate mitigation/avoidance layouts
- Should be more orientated towards SME builders

Site specific comments:

- ABB/001 – Church Commissioners support. First phase currently being developed by Persimmon should be in SA
- ABB/001 – GLNP: Should be included in the SA due to Greetwell Quarry LWS/SSSI
- CAN/003 – Church Commissioners support. Supportive of a park and ride facility.
- BOU/001 - Internal Drainage Board comments – objection to Western Growth Corridor
- BOU/001 – GLNP: noted Mormon Fields LWS not referenced in SA
- CAN/003 – Jesus College Oxford support. Objection from resident
- GAIN/001 – GLNP: The site overlaps an area of Ancient woodland, wording to be updated in SA
- NHYK/001 – Church Commissioners support. Opportunity to deliver first phase (500 homes) before Hykeham Relief Road.
- NHYK/001 – Pennells Holdings support.
- Objection to the omission of land east of Burton Road
- SLEA/014 & SLEA/015 – GLNP: Site should be included in the SA

Policy 76: Housing sites in the Lincoln urban area

Summary of issues raised

General comments:

- Suggestion that these sites should be added as allocations (NHAM/004 and AUB/005)
- More growth should be promoted in North Hykeham as a sustainable location close to Lincoln

Site specific comments:

- AUB/001A - Taylor Lindsey support.
- AUB/002 – GLNP: This site should be included in the SA
- BOU/003 – SA needs amending in relation to FZ
- CAN/002 – Objection from resident
- CAS/002 – Objection to loss of open space.
- GLE/001 - Taylor Lindsey support.
- MIN/001 - Taylor Lindsey support.
- MIN/003 - Taylor Lindsey support. Capacity to be 163 to reflect pp.
- MIN/005 – Lindum support. Alterations to policy wording around access. Objection from resident (Restoration scheme, SNCI designation and Local Green Space)
- NHYK/002 – Representative of the site should be allocated, not rely on SUE
- NHYK/008 – Confirmed available
- NHYK/009 and NHYK/002 should be considered additional to the SUE.
- NHAM/001 - Taylor Lindsey support. Capacity to be 121 to reflect pp.

- NHAM/033 - Taylor Lindsey support. Capacity to be 374 to reflect pp.
- RISE/001 - Taylor Lindsey support.
- WAD/004A – Landowner supported
- WAD/004A – Lindum supports

Policy S77: Housing sites in the Main Towns

Summary of issues raised

Site specific comments:

- Severn Trent Water – general comments
- Highways comments for GAIN/003, 005, 022, 023, 026 and SLEA/002, 016
- GAIN/014 – Landowner supports
- GAIN/021 – Include Pitt Hills Plantation LWS in SA
- Sleaford ROA – Sleaford Town Council support
- SLEA/003 – Should be considered for employment land
- SLEA/005 – Objection to omission of site from allocations
- SLEA/013 & 013A – Landowner confirmed availability
- SLEA/016 - Taylor Lindsey support, currently under construction

Policy S78: Housing sites in Market Towns

Summary of issues raised

General comments:

- Development in Market Rasen is excessive, without significant infrastructure being provided
- More ambitious, comprehensive growth plan could be devised for the market towns, to reinvigorate their potential and revival.
- Severn Trent Water providing general water/sewage advice

Site specific comments:

- CAI/001 - Lower no. from 135 for site at North Kelsey Road, Market Rasen
- Highways comments on CAI/008
- MARK/001 – Spawforths support
- WL/MARK/003 needs to take account of the Grade II Listed building and its setting – add site specific bullet point to policy wording.
- MARK/003 – Prospect Place Ltd support.
- MARK/009 – Chestnut Homes support
- MIDR/012 – Landowner objects to omission of site from allocations

Policy S79: Housing sites in Large Villages

Summary of issues raised

General comments:

- Objections to low numbers of new residential allocations in villages and rural areas. Split of growth between rural and urban areas is unbalanced – review of potential of the villages on the outskirts of Gainsborough, specifically Lea.
- Total numbers allocated for any community should not exceed those identified in the 2017 CLLP. No new site allocation should be made in villages where delivery is already being achieved.
- Not enough new housing allocations in Skellingthorpe.

- Concerns raised about new developments and provision of infrastructure/lack of in Skellingthorpe
- Highways comments on BIL/006A, BARD/012A, NHAM/024A
- Internal Drainage Board comments –Concerns raised over flood risk for Lincoln Strategy Area, Regeneration Zones. Comments in relation to flood zones on other sites: BOU/001, BOU/003, BR/001, CAR/002, BBS/006, SKEL/010, 011, 013, 014, WAD/001, 002, DIG/003, 005, LEAS/006, BUR/002, SAXI/003, 006A, 008, BARD/005, 010, 013, 015, 017, 018, 019, CW/009, DUNH/011, 002, REEP/002, SC/003
- EA comments on WRC capacity in relation to BRAN/007, COR/002A, DUNH/010, WELT/001A, WELT/007, WELT/008
- Support for growth at Branston and Saxilby as Large Villages

Site specific comments:

- BARD/008 – Object to being discounted
- BARD/012A – Bardney Parish Council supports
- BARD/021- Chestnut Homes support
- BBH/003 – Church Commissioners support
- BIL/003 – Representatives of the site Representatives of the site have confirmed the availability of the site and the advanced stage in bringing the site forward for development
- BIL/011 – Lindum supports, suggest amendment to assessment to take into account allocated BIL/012 which would reduce the openness of BIL/011.
- BIL/012 – Lindums supports
- BRAN/002 – Landowner objects to site being discounted
- BRAN/003 – Object to omission of site from allocations. Objection to site from resident
- BRAN/006 – Object to not being allocated
- BRAN/007 – Cyden Homes support
- BRAN/008 – Vistry Homes, objects to site being discounted
- BRAN/010 and BRAN/10B – Lindum objects to being discounted. Objection from resident to development in this location.
- BRAN/011 – Objection from resident to development
- CW/001 – Density figures require amendment. Taylor Lindsey support, planning application under consideration
- CW/002 – Taylor Lindsey support
- CW/003 – Taylor Lindsey support
- CW/009 – Historic England comments on setting of Willingham Fen
- DUNH/001 – Beal Homes, development of the site could address issues raised, utilising green wedge for open space within the development.
- DUNH/002 – Beal object to omission from site allocations
- DUNH/012 – Chestnut Homes support
- HEC/004 – Objection, other sites in Heckington closer to amenities/services
- HEC/004 – Objection to lack of allocations in Heckington. Should be more growth due to its status as a large village.
- HEI/003 – Smaller area put forwards within 003 by landowners
- HEI/004 – Late submission site put forwards. Landowner confirms availability
- KEE/003 – access should be via adjacent site, not Church Lane.
- KEE/001 – Support by Keelby Neighbourhood Steering Group
- NAV/002 – Lindum objects to site being discounted. Could provide affordable units.
- NAV/004 – Lindum objects to site being discounted
- NAV/008 – New site, should be allocated.
- Nettleham PC objects to NHAM/010 and NHAM/011 and NHAM/024a.
- NHAM/010 – Objection to encroachment into countryside and surface water flooding/sewage infrastructure. Support from landowner.
- NHAM/011 – Object, edge of village sensitive location, green corridor of the beck. Support from landowner.

- NHAM/018 – Support from landowner
- NHAM/011, 018, 010 – Support received from owner. Together represent a growth segment and comprehensive place-making opportunity
- NHAM/024 – Object.
- RUSK/001 – Confirmed availability, object to omission of site from allocations
- RUSK/002 – Landowner confirms availability
- RUSK/003 – Object to being discounted
- RUSK 008 – Multiple objections by residents: loss of open space, character, access and road safety, wildlife impacts, flooding.
- RUSK/012 – Confirmed availability, object to omission from allocations
- RUSK/013 – Confirmed availability, object to omission from allocations
- RUSK/018 – Landowner support
- SC0/012 – Request site is retained as an allocation, not withdrawn
- Skellingthorpe Parish Council raised concerns about level of growth in the village and the infrastructure of Skellingthorpe, including impacts from BOU/001 (Western Growth Corridor).
- SKEL/002 – Confirmed availability, object to omission of site from allocations
- SKEL/003 – Confirmed availability, object to omission of site from allocations
- SKEL/004 – Confirmed availability, object to omission of site from allocations
- SKEL/005 – Confirmed availability, object to omission of site from allocations
- SKEL/007 – Taylor Lindsey support. Policy wording request from Historic England to protect setting of GII listed Manor House
- SAXI/002 / 003 – Gladman objects to site(s) being discounted
- SAXI/004 – Landowner supports
- SAXI/004, 013, 014 – Object to number of dwellings and identified sites due to lack of infrastructure, flooding and drainage, impact on roads, lack of shops, impact on school and doctors.
- SAXI/014 & SKEL/007 & CW/009 – Policy wording request by Historic England
- WAD/001 – Lindum objects to omission of site from allocations
- WAD/015 – Landowner support
- WAD/018 – Landowner objection to omission of site from allocations
- WELT/001A – Landowner supports
- WELT/003 – Lindums supports
- WELT/007 & 011 – Comments from Beal Homes in relation to land safeguarded by Beal – issues between joining up of sites.
- WELT/008A – Landowner supports – request amendment to policy wording section
- New sites NAV/008 & WSH/003, Saxilby and HEC/011 & 012, Heighington, Harmston/Waddington boundary HAR/003

Policy S80: Sites in Medium villages

Summary of issues raised

General comments:

- Severn Trent general comments/advice
- Basingham: withdraw BAS/010 from CLLP and BNP and allocate BAS/007 along with 20no affordable dwellings south of Vasey Close, Torgate Lane.
- Large housing estates should not be tacked onto villages. Allocations should not be more than 10% increase of the village.
- The policy doesn't sufficiently provide for significant residential development in Large, Medium and small villages. Relies heavily on existing allocations and sites already with permission.
- Plan is orientated towards large developers and doesn't provide enough sites for SME builders.
- Do the site allocations have 10% on sites of less than 1ha.

- 2021 census data should be used, not 2011 which is out of date.
- Highway comments – WLB/006, WELL/002A, WELL/004, FISK/001A, HEMC/006, ING/006, ING/007, SC/004A

Site specific comments:

- Bassingham allocations – objections based on over development, traffic and parking issues, and flood risk
- BAS/005 – Gladman object to the omission of the site from site allocations
- BAS/007 – Lindum supports
- BAS/009 – Landowners object to omission of site from allocations
- BAS/010 – Bassingham PC support the removal of BAS/010 and allocation of BAS/007 alongside proposal for 20no affordable dwellings to the south of Vasey Close.
- BLYT/007 – (Late submission site) Confirmed availability, comments include being able to provide an access to 006 and additional dwellings/open space.
- BUR/002 – Landowner objects to omission of site.
- CW/005 - Object to not being included as an allocation
- DIG/002 – Landowner objects to omission of site.
- DIG/006 & DIG/001– Landowners support. Request policy wording updated.
- EAG/001 – Confirmed availability, object to omission of site from allocations
- EAG/002 – Confirmed availability, object to omission of site from allocations
- EAG/005 – Historic England comments
- EAG/007 – Confirmed availability, object to omission of site from allocations
- EAG/010 – new site submitted – Proposed additional land for extension to EAG/005
- FEN/005 – Objections to development by residents
- Fiskerton Parish Council – objection to the disproportionate level of growth expected (+27%) when loss of facilities (shop) has occurred recently. Recommend the growth level is reduced back to 10% (46 dwellings). Prefer FISK/002 as a re-use of derelict land.
- FISK/001A – Church Commissioners support. Support received from residents.
- GREY/001 – Sleaford Town Council support (providing the orchards are retained and enhanced)
- LEA/002 - Lea should be allocated more growth as allocated site is likely to deliver in next 2-3 years leaving Lea with no other planned growth. Landowner objects to omission of site from allocations. Flooding constraints are partial
- LEAS/001 – Check inclusion in Level 2 SFRA?
- MAR/016 – Objection from local resident
- NOC/001, 002, 003, 004,005, 006 – Resident objection.
- NOC/003 – Resident support for re-use of hospital buildings and land to eastern for parkland or low density housing. Object to development on northern or western aspects of 003.
- Nocton PC supports the rejection of new sites. Objections from residents to development in Nocton
- Netwon on Trent Parish Council objection – plan relies too much on large extensions and urban areas and neglects smaller villages. NoT value local facilities and object to removal of growth figure, as results in only being able to have reduced development on small sites of 5 dwellings in the developed footprint. Concerned impacts on village future. Comments on NOT/001 being excluded.
- REEP/003 – Landowners object to omission of site.
- SC/003 – Truelove Property supported, request policy wording altered. Objections from residents
- SC/004A – Lindum support. Request density re-considered.
- SC/005 – Objection from landowner to omission of site.
- SC/006 – Lindum objections to omission from allocations.
- SC/008 – New site, late submission in Scothern.
- SC/008 – Landowners object to omission of the site

- Scothern PC object to level of growth in village, issues such as flood risk, lack of facilities and infrastructure. When taken with existing growth in the village since 2015 the additional 94 dwellings would result in 50.1% increase since 2015. Objection from residents to all sites in Scothern, based on lack of facilities to support increased growth.
- STUR/004a – Parish Council object to the site
- STUR/006A – Landowner supports but question density used. Parish Council objection, agricultural use, surface water issues and proximity to Highways depot (noise).
- STUR/006 – Landowner objects to wider site not being allocated
- Sleaford/Greylees – welcome the plans for improved pedestrian/cycle ways and connections to Sleaford.
- WELL/002A – Historic England comments
- Welbourn, general comments in relation to flooding in the village and problems with the capacity of the sewage system to cope.

Policy S81: Sites in Small villages

Summary of issues raised

General comments:

- Severn Trent general comments/advice
- More development should be allocated within smaller villages. 10% of allocations should be on sites of less than 1ha
- Carlton le Moorland PC – Object to increase in development figure from last plan.
- North Greetwell should be raised within the settlement hierarchy
- Scopwick PC object to lack of allocations, should be considered a sustainable location

Site specific comments:

- FEN-005/004/003 – Objections from local residents
- GLH/002 – Landowner objects to omission of site from allocations
- GLH/003 & GLH/008 – Landowner support
- HAR/003 – Resident objection to 'reasonable alternative'
- KIRK/003 – Landowner support
- LEAD/001 - Historic England – Development to be sensitive to setting of Grade II listed Station House
- LEAD/001 – Support received
- MART/001 – Historic England – Development to be sensitive to setting of Conservation Area.
- Netwon on Trent PC – Too much focus on big urban areas at the expense of small villages who value local facilities. Up to 5 dwellings in small villages is too limited
- NKYM/003 – New site submitted NSCA/002 – Confirmed availability, object to omission of site from allocations
- NSCA/003 – Representatives have confirmed availability, object to omission of site from allocations
- Scopwick should be considered as more sustainable than Digby, Dunston and Kirkby la Thorpe
- SWI/001 – Representatives have confirmed availability, object to omission of site from allocations
- SCOP/008 and 007 – Objection to omission of the sites from allocations
- SCOP/010 – Objection to omission of site from allocations. RAF Digby should have sites allocated.
- SWI/003 – Confirmed availability, object to omission of site
- SWI/006 – Historic England – a site specific point should be included to protect views of Swinderby Church tower from Green Lane
- Thorpe on the Hill – should be allocated more growth as existing site has demonstrated demand for more units.

- SUD/002/003 – Landowner objects to omission of sites from allocations
- TOTH/006 – Landowner objects to omission of site from allocations, scope for Thorpe on the Hill to accommodate extra allocations as existing allocation is being built out. Smaller sites suggested within 006.
- WL/TOFT/001 and TOFT/002 – Landowner confirmed availability

Chapter 14: Gypsies and Travellers and Travelling Showpeople

Policy S82: Gypsies and Travellers and Travelling Showpeople Accommodation

Summary of issues raised

- Objections to the existing Gypsy and Traveller site at Marton on the following grounds:
 - Inadequate access;
 - Impact on neighbouring cemetery;
 - Flood risk on the only access road;
 - Proximity of other Gypsy and Traveller sites;
 - Incapable of sewage connection at site;
 - Impacts on historic environment and archaeology;
 - Limited facilities available locally including public transport;
 - Impact on open countryside; and
 - Strong local opposition which would preclude the opportunity of integrated co-existence.

Chapter 15: Ministry of Defence Establishments

Policy 83: Ministry of Defence Establishments

Summary of issues raised

- Support for the provisions of this policy.
- Some concern about the wording of part 3 of the policy and suggestions that reference is required to heritage assets, biodiversity and green infrastructure.

Appendices

Appendix 1

Summary of issues raised

- Some support for the contents of the Appendix.
- Various comments questioning what is included in the numbers for various villages and the resultant impacts including Fenton, Caistor, Keelby, Nettleton, North Kelsey, RAF Scampton and Scampton village, Middle Rasen, Welton, Branston, Skellingthorpe, Coleby, Scothern, Fiskerton, Scopwick, Welbourn, Brant Broughton and Stragglethorpe, Scotter, Scotton, North Willingham, and Carlton le Moorland.
- Some concerns raised about the clarity of the presentation of information.
- Suggestion that this appendix should have a policy link.

Appendix 2: Car Parking Standards

Summary of issues raised

- Comment suggesting that 'parking standards' be replaced with 'parking guidance'

Appendix 3: Open Space Standards

Summary of issues raised

- Various comments broadly supporting Appendix 3 or elements of Appendix 3.
- Suggestions to amend the definitions of the following Types of Open Space in Table A3.1: Amenity Greenspace and Natural and Semi-Natural Greenspace.

Appendix 4: Principles for Development within Biodiversity Opportunity Areas

Summary of issues raised

- Various comments broadly supporting Appendix 4 or elements of Appendix 4.

Sustainability Appraisal

Sustainability Appraisal

Summary of issues raised

- Various comments broadly supporting the SA or elements of the SA.
- Various comments suggesting information is missing from the SA or information is inaccurate, including the omission of options and sites from the SA.
- Concern raised regarding the SA methodology, especially in relation to: the assumptions and criteria used in the assessment of sites against SA objective 6 Built and Historic Environment, taking masterplans and other various site based evidence into account in the assessment scoring and commentary.

Habitats Regulations Assessment

Habitats Regulations Assessment

Summary of issues raised

- Natural England welcome the HRA and agree that a Stage 2 Appropriate Assessment is required to support the next version of the Local Plan.

Duty to Cooperate

Duty to Cooperate

Summary of issues raised

- Suggestions were received for areas of further discussion.
- View that there is insufficient evidence to demonstrate that the duty to cooperate has been met.