

STA020

Central Lincolnshire Local Plan Summary of Main Issues from Regulation 19 Consultation

July 2022



About this document

This report provides a summary of the main issues being raised in the Regulation 19 Consultation on the Central Lincolnshire Local Plan which was held between 16 March and 9 May 2022.

It also provides a brief and preliminary response from the Central Lincolnshire Joint Strategic Planning Committee to the issues being raised where we think helpful – this preliminary response has been provided in an effort to assist the Local Plan Inspector to understand the issues being raised, and to highlight specific parts of the evidence that are relevant. The Committee reserves the right to provide more comprehensive responses to any future questions from the Local Plan Inspector as the examination proceeds. It is important to note that this list does not necessarily cover every single issue that has been raised.

The report is presented in plan order with general and procedural issues at the start.

During the regulation 19 consultation there were 214 respondents submitting a total of 888 representations (although a number of these were also relating to a number of policies resulting in 1,091 comments against policies, or supporting information.

The full representations received have now been published and are available on the consultation database at <https://central-lincs.inconsult.uk/CLLP.Proposed.Submission./consultationHome>.

To assist accessibility the representations have also been extracted into separate documents available in the Local Plan library as documents STA022 and STA023.

Please click on the topics/policies in the contents below to jump a specific policy or topic. At the bottom of each page you can click on the link to return to this list of policies.

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Local Plan – general comments and comments on process

Issue	Response
Support for the plan and agreement that it has been produced satisfying the Duty to Co-operate and meeting the Tests of Soundness.	Noted.
The process of identifying land for development has not been transparent or accessible. People have only found out by chance about the plan.	<p>The Local Plan has been subject to three formal consultations. These consultations have been held in accordance with the Statement of Community Involvement (doc ref STA003) which was adopted in 2018.</p> <p>The site allocations evidence report (ref HOU002a) provided the proposed approach to assessing sites and included the assessment of sites that had been put forward for consideration. The methodology for this assessment was also specifically consulted upon alongside the Issues and Options Consultation.</p> <p>All Parish Councils in the CL area were consulted on each stage of consultation and prior to the Regulation 18 consultation (which started on 30 June 2021), they were given more than 2 weeks prior notice which included early sight of the draft plan to help ensure that they could arrange meetings and comment on the plan.</p> <p>In addition, all individuals and organisations who had requested to be entered onto the consultation database, or who had responded to earlier stages of consultation were also consulted at each stage.</p> <p>All of these steps meet or exceed legislative requirements.</p>
The Central Lincolnshire Local Plan is a demonstration of collaborative working between Lincoln City Council, North Kesteven District Council, West Lindsey District Council and Lincolnshire County Council.	Noted. The submission plan is accompanied by a Draft SoCG dated March 2022 (Document STA007.1), which sets out co-operation between the partner authorities and with neighbouring authorities and other statutory consultees.
The Duty to Cooperate Statement does not address the most important cross boundary impacts and issues affecting the CLLP area resulting from the influence of surrounding districts, primarily North Lincolnshire and districts to the west in Nottinghamshire, particularly Bassetlaw District Council. Matters on interrelationship of housing with nearby	There has been ongoing and productive engagement with neighbouring authorities throughout the process as is detailed in the Statement of Compliance with the Duty to Cooperate (ref STA018) and the Statement of Common Ground (ref. STA007.1). The evidence base, including the Housing Need Assessment (ref. HOU001) has identified and assessed the strategic and cross-boundary issues, such as housing market

authorities have not been dealt with through ongoing co-operation as is required.	information, and this has then informed discussions on Duty to Cooperate.
The plan fails to meet the housing requirement and has a skewed distribution of growth towards the southern/North Kesteven part of the plan area. It should consider alternative sites in the A57 corridor in West Lindsey aligned to the emerging Bassetlaw Local Plan.	The plan and its strategy has been chosen to deliver a sustainable future for Central Lincolnshire and it will meet the housing requirement of the plan. The Sustainability Appraisal has tested the chosen options for distribution and it is justified, effective and deliverable.
Concerns about the accessibility of the plan both in terms of the number of documents, length of documents and absence of plain English. There are hundreds of documents provided, a plain English guide of where to look for relevant information to a parish should be provided. This would make the process of locating information of interest much easier and would be a welcome customer-centric approach.	The Local Plan is a statutory document covering a lot of technical matters and which needs to be supported by a large amount of evidence. It is accepted that sometimes this can result in the process being challenging for non-specialists to engage with. However, every effort has been made to use plain English wherever possible and to make the documents as accessible as possible. Prior to Regulation 18 consultation in summer 2021 a page for parish information was published on the website to host all of the key documents likely to be of interest to parish councils, with links provided to this page on the main consultation page and homepage and details provided in communications to parish councils to notify them of the consultation and these key pieces of information.
Corringham Parish has not been directly invited to take part in any consultation on the CLLP review, despite Corringham PC having consulted with the Local Plan Team at all stages of our neighbourhood plan site allocations and made them aware of our work at the point of the local plan call for sites.	Corringham PC, along with all parish councils, were consulted on all stages of consultation.
There should be a policy on drive throughs given the increase in applications and the traffic, pollution and litter they create.	The suite of the policies in the Local Plan provide adequate coverage to allow for proper assessment of proposals of drive throughs.
Issues with the online form for the pre-submission consultation – including that it is too technical.	The questions in the Regulation 19 Consultation are set in legislation.
The meetings of the Central Lincolnshire Joint Strategic Planning Committee were only advertised on the North Kesteven District Council webpage.	Whilst North Kesteven District Council are the host organisation and so the administrative function and main pages are hosted on their web pages, the Central Lincolnshire homepage and each of the Central Lincolnshire District websites include details of the Committee and links to the main Committee pages. Press notices were also published on District websites at formal stages of consultation.
Following the Regulation 18 Consultation, there were no printed responses to comments and this raises concerns about whether matters have been taken into account.	A summary list of issues was published following the Regulation 18 consultation (ref. STA103) and these were incorporated in the evidence reports for each policy. These evidence reports detail the process and

	justification for reaching the proposed submission version of each policy including commentary why policies have or have not changed as a result of findings of the consultation.
The Local Plan Submission Draft does not meet its responsibility to safeguard minerals and mineral infrastructure from unnecessary sterilisation as required by the NPPF. More explicit reference to minerals should be included within the local plan policy; the following section suggests policy to be included within the development plan including a reproduction of Figures 1, 2, 3 and 5 of the Minerals and Waste Local Plan. Reference to the requirement for a 'Minerals Assessment' would be sufficient to cover the requirements of the Local Authority and the Plan should direct the user/prospective developer to the requirements of Policy M11 and M12 if they fall within a Mineral Safeguarding Area.	The Minerals and Waste Local Plan sets the minerals safeguarding areas for Central Lincolnshire which cover substantial parts of the area. This forms part of the development plan for the area and as such safeguarding of minerals does not need repeating in the Central Lincolnshire Local Plan. All site allocations in the plan have been consulted upon with the minerals authority and any policies in the safeguarding areas are identified as such to ensure that consultation on specific proposals on these sites are included to ensure sites are not sterilised. The interactive map has the Minerals and Waste Local Plan areas provided. Specific cross-references to the Minerals and Waste Local Plan are not considered to be necessary, but equally there is no objection to this in principle.
Concerns about the Local Plan process with residents near to site allocations not them becoming aware of the plan review.	The process has followed the Statement of Community Involvement. Efforts have been made to bring the development of the plan to the attention of local communities and other interested parties through engagement with parish councils, issuing press notices, and publicising on the web sites of each of the councils.

Chapter 1 – Introduction, Context, Vision and Objectives

Issue	Response
Support for various parts of this chapter including the strategic priorities, vision and objectives.	Noted
A greater balance needs to be struck between the Local Plan's role in supporting sustainable economic growth whilst safeguarding and conserving the natural environment. The plan should refer to the important role that Central Lincolnshire has with regards to both renewable and non-renewable energy and acknowledge the importance of having a mix of energy sources within Central Lincolnshire.	Delivering a net zero carbon Central Lincolnshire is a central goal of the local plan which seeks to take its responsibility in relation to climate change seriously, which includes the need to start relying on renewable energy.
In section 1.2, it recognises that it costs more per household to serve rural communities with water infrastructure, therefore locating growth in	The plan seeks to focus development in the main urban areas to reduce the need to deliver additional infrastructure and reduce travel and therefore reduce carbon. However, it is also important to allow some of

more rural locations has cost implications for providers, including carbon costs of building new or upgraded infrastructure.	the rural areas to receive some development, but again this has been focused on locations with a good level of services and/or good access to other services. Furthermore, it is likely that the development industry would deliver all of the housing requirements solely within and adjacent to the main urban areas.
The increased focus on water within the plan in section 1.2 is welcomed. A new issue which will impact on the pressure of water resources is the reduction in groundwater abstraction. This may for example reduce the capacity for growth in Central Lincolnshire Water Resource Zone (CL WRZ).	Noted. A significant proportion of the growth being allocated is already allocated in the Adopted Local Plan. We will continue to liaise with water providers in future reviews of the Plan as this issue develops.
Suggest amending reference to RAF Scampton in section 1.2, as this is no longer an active RAF base.	At the time of drafting the Plan the base had not been decommissioned.
1.2.10 Recommend adding “nationally protected” Lincolnshire Wolds Area of Outstanding Natural Beauty in this context setting paragraph	The term Area of Outstanding Natural Beauty is a national protection in itself.
Section 1.2 does not acknowledge how clusters of small rural settlements work together to support each other by providing their own essential services and thereby forming sustainable communities.	It is acknowledged that smaller settlements do often function as clusters and this relationship was considered in the site allocations process with details set out in the Site Allocations Settlement Analysis (ref. STA008). This is already referenced in paragraph 1.2.6.
The Plan needs to ensure that ‘Sequential Tests’ are approached on a local basis rather than district wide, so that settlements such as ‘Newton on Trent’ that can provide safe development acceptable to the EA and are compliant with this approach (Adjacent to A57 & A1133 trunk roads) are not excluded.	The suitability of development at each settlement, and then the specific sites being promoted at each settlement has been considered. Neighbourhood plans may also seek to deliver growth at a local basis or windfall planning applications can also be made with the policy suite as a whole being applied.
The National Planning Policy Framework requires broad locations for development to be located on a key diagram. The Plan does not include a key diagram. A key diagram should be included in section 1.2 as it is a useful tool for providing a visual and spatial expression.	There are no broad locations for development included within this plan. The policies map and interactive policies map presents information on constraints and the geographic representation of policies in the plan.
In the Vision it is not evident that growth is being directed to locations which have existing water infrastructure or capacity.	The Vision provides an overarching view of how Central Lincolnshire will grow rather than providing detail. The water infrastructure providers have been consulted throughout the plan review.
Vision should be for less excessive growth and the need to concentrate new development in more sustainable locations than sparsely populated Lincolnshire. Growth must be denser reducing the demand on agricultural land.	National policy requires local plans to deliver growth. There is not an adequate supply of brownfield land to meet the identified need and the quality of agricultural land has been factored into decisions on allocations in this plan.
Vision and Objectives are somewhat generic and “any place”, and have obviously been carried forward from the adopted 2017 CLLP without review.	The Vision and Objectives are high level and provide the strategic framework for the detailed policies of the Plan. They are based on the

	2017 Local Plan Vision and Objectives, but have been reviewed and updated where needed.
The wording of the Vision needs to be amended to state 'Central Lincolnshire will grow by a minimum of 29,150 homes' to ensure that sufficient housing is delivered.	The plan makes sufficient allocations to deliver for the housing requirement and it is not considered that amending the vision is necessary to enable more – this is provided for in the policies in the plan.
Lincolnshire is at too high a risk of flooding resulting from climate change to accommodate more housing. Put a hold on development to observe any changes over 20 years, if none, then consider development.	Local planning authorities are required to have an up to date plan and to make appropriate provision for development, as such, this would not be a sound, or legally compliant approach.
The plan does not meet its own objectives. The plan should preserve agricultural land to minimise dependence on imports and reduce energy consumption to meet climate change targets and reduce imports of fossil fuels.	The Plan does meet its own objectives. The Plan seeks to balance the need for land to meet the development needs with protection of agricultural land and other assets and contains a suite of policies to address climate change.

Chapter 2 – Spatial Strategy

Policy S1: The Spatial Strategy and Settlement Hierarchy

Issue	Response
Support for policy and component parts of the hierarchy and specific settlements considering the policy meets the tests of soundness.	Noted and agreed.
Does not acknowledge the phasing out of petrol and Diesel vehicles over the life of the plan in paragraph 2.1.3. The advent of hybrid and more agile working practices and people's attraction to a less urban life has significantly reduced the need to travel to work.	Minimising the need to travel is still important even if trips are reduced due to changes in working patterns and whatever the fuel is used to power a vehicle.
Paragraph 2.1.3 should include a requirement for all new dwellings developed beyond the main urban areas to be built to Passivhaus, or similar standards, have external charge points (not just wired for future capability) and significant renewable energy.	Policies in this plan are seeking to deliver energy efficient homes (S6 and S7) and vehicular charging points (NS18) taking into account viability, national policy, and building regulations, all of which somewhat limit what can be achieved in a local plan in this area.
In point 3 of paragraph 2.1.5, it is important that scale of growth is not considered solely on the basis of the current size of settlement. There are villages that are capable of greater growth than that currently allocated and are well connected, e.g. Newton on Trent.	The ability of villages to grow has been considered in the Site Allocations Settlement Analysis (ref STA008). Neighbourhood plans have the opportunity to undertake local detailed assessments to deliver additional growth too.
Sturton by Stow and Stow act as single settlement with single sense of place. Combined they are of a size which meets the threshold for a Large Village to where more growth should be directed.	Connectivity of settlements has been considered as part of the process and is included in the Site Allocations Settlement Assessment (ref STA008).

<p>S1 states that development will be focused on the major urban areas with limited development in the large villages. The reality shows massive growth in the large villages surrounding Lincoln, especially when combined with growth achieved in the past 5 years.</p>	<p>The majority of development in Central Lincolnshire is on the Sustainable Urban Extensions (nearly 50% of the housing requirement), with nearly 15% then identified in the urban area of Lincoln city and the towns in the area. Whilst there is still a significant amount of the growth in villages, this is spread across a larger number of settlements.</p>
<p>Policy supports proportionate growth in the rural areas, however these would be through a combination of allocated sites and windfall sites in the emerging plan. This approach risks restricting growth of settlements outside the main urban areas and market towns as there are suitable and sustainable sites in settlements specifically large and medium villages that have not been allocated. Additional allocations should be considered beyond those currently proposed (various specific suggestions of villages provided).</p>	<p>Policy S4 provides a framework for the consideration of windfall developments in villages. Furthermore neighbourhood plans can deliver additional growth should they wish. The Government requires local plans to be reviewed every 5 years and so there will be opportunities to consider the need and appropriateness for additional sites.</p>
<p>Important the emerging plan does not solely rely on the existing number of dwellings to determine the Tier of settlement. Fundamentally, this should be determined by attributes such as proximity to local services and facilities and towns to ensure it meets the current and future needs of local people in a sustainable manner.</p>	<p>Proximity to services has been used to inform decisions on where to allocate sites.</p>
<p>Hamlet policy wording too restrictive as the term clustered together is a relative term and open to too much interpretation. 1 dwelling within 22 years is not sufficient to ensure the continued vitality of hamlets.</p>	<p>The wording in relation to hamlets was inserted by the inspector of the 2017 Local Plan to allow some growth to take place in these very small settlements. This has been operating well since the plan was adopted.</p>
<p>Policy S1 should specify that the Lincoln Urban Area, Main Towns, Market Towns and Large Villages located within the Lincoln Strategy Area will be prioritised for growth.</p>	<p>The combination of Policy S1 and S2 clarify the focus and no change is necessary to further clarify this point.</p>
<p>With dwelling numbers in settlements defining the hierarchy, the position in the hierarchy should be regularly reviewed.</p>	<p>With the requirement to review plans every five years it will be possible to keep this under review on a regular basis.</p>
<p>Combination of S1 and S4 fails to place sufficient emphasis on the demand for affordable housing. A strategy is needed to free up land that can be sold below market value, in order to make the provision of affordable housing a realist prospect.</p>	<p>Policy S22 makes provision for affordable housing. Opportunities will continue to be sought for funding or for the direct delivery of affordable housing by the Central Lincolnshire authorities.</p>
<p>There is inconsistency between the settlement hierarchy which designates Scampton (RAF) as a Medium Village, where 'some limited growth' is supported through allocations in the plan, subject to the village being well connected or well served and Policy S75 which defines the RAF Scampton site as a significant large-scale 'opportunity area' which clearly offers potential for more than just the 'limited growth' supported by Policy S1. S1 should be re-worded to include an</p>	<p>RAF Scampton meets the requirements to be defined as a Medium Village and so has been included in the Settlement Hierarchy – failure to do so would leave it with a lack of clarity for any relevant applications that may be received. Policy S75 provides a framework for the development at the site once it is disposed of by the MOD. It is accepted that this is an unusual case, but it is not result in inconsistencies as the plan should be applied as a whole, not just individual policies.</p>

<p>exception/greater flexibility concerning the RAF Scampton site to allow more than 'limited growth' in the eventuality that this is supported by Policy S75 and the associated Masterplan.</p>	
<p>Settlement hierarchy is somewhat restrictive and as is the growth targets to be met in that hierarchy. There are a number of villages where there are a reasonable number of houses whilst not necessarily 50 and which clearly are not hamlets which is generally regarded as being a small cluster of houses in open countryside. The threshold for small villages should be decreased to 20 dwellings.</p>	<p>Disagree, the use of 50 dwellings as a threshold ensures there is a critical mass that can potentially accommodate some development. This threshold has been working well in the adopted local plan and neighbourhood plans are able to deliver additional development in these areas if the local need justifies it.</p>
<p>No effort has been made within the plan, however, to define what an "appropriate" level of growth may be.</p>	<p>The wording is actually "accommodating an appropriate level of growth via sites allocated in this plan". Therefore this is defined by the sites being allocated in this plan which has been considered in detail when making decisions on which sites to allocate.</p>
<p>The derivation of settlement targets for different settlements should be based on an assessment of demand and the role of the individual settlements. This target should then be used to inform the choice of allocations. If no further target is identified to be met through a Neighbourhood Plan process this position should be clarified, and guidance provided for any potential Neighbourhood Planning Group.</p>	<p>Appendix 1 clarifies the approach for the growth levels in different parishes. The capacity of settlements to accommodate development has been considered as part of the allocations process. This is a strategic plan and neighbourhood plans are able to look at local demand in much greater detail.</p>
<p>The process of allocations in large villages, as identified in policy S1, should be informed by the growth target. The draft plan appears to set the target based on past consents, previous development and allocations already identified.</p>	<p>This is a plan review, with many sites allocated in the adopted plan still delivering a significant proportion of the growth required. Additional allocations have been made where suitable to ensure housing requirements will be met.</p>
<p>In tier 8 (countryside), it is proposed to permit development for all outdoor recreation which will result in increased travel compared to a locating these in the SUEs. Outdoor recreation should be limited to that which can take place only in the countryside for reasons of amenity, health or safety (e.g. hot air ballooning).</p>	<p>Outdoor recreation is a key part of rural life and can also provide a welcome escape for people living in urban areas. Part E of Policy S5 also provides additional tests to ensure that any outdoor recreation would be appropriate for the countryside.</p>
<p>Development essential to the effective operation of the existing onshore oil and gas minerals industry should be specifically listed as an exception to the general restriction on development in the countryside. Policy M9 of the adopted Lincolnshire Core Strategy and Development Management Policies document should be included under the wording of Policy S1 as it states that planning permission will be granted for the exploration, appraisal and/or production of conventional and unconventional hydrocarbons provided that proposals accord with all relevant development management policies set out in the adopted Plan.</p>	<p>Disagree. The Committee wishes to see renewable and clean energy prioritised in Central Lincolnshire and as such, a reference such as this would be contrary to the goals of the plan. These are minerals matters typically reserved for the Minerals and Waste Local Plan.</p>

<p>Decisions on investment in services and facilities, and on the location and scale of development, will be assisted by the Central Lincolnshire Settlement Hierarchy.” The plan is opaque in terms of how a facilities audit of existing community infrastructure (including transport) provision has been undertaken. The draft plan fails to address decline in rural public transport provision, a significant barrier to maintaining and achieving thriving and resilient rural settlements.</p>	<p>The plan is supported by the Infrastructure Delivery Plan (ref INF001a) which has reviewed the capacity and investment needs of infrastructure to inform the plan. Opportunities to utilise the existing network of public transport has been prioritised to minimise the need to travel by private car. The Central Lincolnshire authorities will continue to maintain their ongoing relationship with public transport providers to investigate opportunities that may arise in this very rural region.</p>
<p>There is no apparent evidence of consultation (as required in para 25 of the Framework) with infrastructure providers (including utilities, NHS Trust, Education and others) to identify strategic issues for community infrastructure provision over the plan period that might effect both the future role and function of existing settlements to 2040.</p>	<p>Please see the Infrastructure Delivery Plan (ref INF001a) which details the outcomes of engagement. Infrastructure providers were also consulted on the sites being proposed through the process.</p>
<p>The Large Villages tier includes a significant variation in the size of settlements, in which the largest settlements (including Branston) are in excess of 2,000 dwellings and comparable to (or in some cases larger than) the Market Towns of Caistor and Market Rasen in the tier above. Split the tier so that the larger settlements join Market Rasen and Caistor in a new tier, ‘Market Towns and Key Centres’.</p>	<p>Market Rasen and Caistor are in a separate tier because historically they have developed differently to the villages, typically with a more consolidated retail centre.</p>
<p>S1 of the Proposed Submission Draft identifies 20 Large Villages. Heighington is the only Large Village not to have any allocation. It is considered difficult for Heighington to provide sufficient growth via only non-allocated sites. Not allocating any growth to one of the higher tiered settlements in the spatial hierarchy does not promote sustainable growth or development.</p>	<p>Decisions were made based on not only the settlement but the specific sites which had been submitted for consideration. Site allocations are not required at every settlement in order for the plan to be sound and growth can still occur in neighbourhood plans or through the provisions of Policy S4.</p>
<p>Welcome the inclusion within part 8 of the policy that development in the countryside will be restricted to four criteria which includes minerals or waste development. However, we question the need to include the words “in accordance with separate Minerals and Waste Local Development Documents”. There is no explanation in the supporting text as to what this means. It is recommended that the fourth criteria of Policy S1 (8) be amended to “Minerals and waste development.”</p>	<p>There is no intention to allow for any and all minerals and waste development to occur in countryside area. The Minerals and Waste Local Plan sets out the policy framework for such development and so the wording is correct.</p>
<p>Support identification of Market Rasen as a settlement which can accommodate significant growth. Consider a clearer strategy for the Market Towns should be provided, differentiating between the role of Market Rasen and Caistor having regard to the differences in connectivity, reflecting Market Rasen’s excellent links to Lincoln. Policy should be amended to establish a positive framework for the growth of</p>	<p>The policy and the allocations made reflect the role of Market Rasen adequately.</p>

Market Rasen, recognising it's potential to have a greater role in supporting the growth of Lincoln and the wider Plan area.	
S1 does not fully reflect the spatial growth intentions of the Preferred Growth Option that is set out in the Central Lincolnshire Local Plan Review Growth Options Paper (June 2021) which states that "Option 5: Balanced combination of options 1-3 is arguably the best performing and is amongst the most deliverable options. Accordingly, it is considered that the spatial strategy and settlement hierarchy should be amended to clearly differentiate and prioritise development at those Large Villages that are well connected along transport corridors.	The outcome of the growth options paper is not delivered solely through this policy, but by this policy, policies S2-S5, the policies relating to regeneration area and opportunity areas (S68-S75) and site allocations (S76-S82).
Further flexibility is required to allow for sustainable growth opportunities to come forward in lower settlement tiers capable of accommodating more growth with S1 and S4 being too restrictive. Bassingham would be designated in a higher tier of the settlement hierarchy. It should therefore be classified as a Large Village, with a level of growth commensurate to its status. Some suggestions of changes to the hierarchy for specific villages.	The settlement hierarchy retains the general approach in the 2017 Local Plan. Villages have been categorised according to this approach with sustainability criteria used to decide on allocations to occur. Communities can also deliver additional development through neighbourhood plans.
Welton and Dunholme should be considered together as any further development at one of the two village directly impacts on the other.	Relationship with nearby settlements has been considered as part of the site allocations process as is detailed in the Site Allocations Settlement Analysis (ref STA008).

Policy S2: Growth Levels and Distribution

Issue	Response
Support for policy and component parts considering it meets the tests of soundness.	Noted and agreed.
No justification for building on greenfield land which is prime agricultural land when there is an abundance of brownfield sites.	Opportunities on brownfield land have been sought to be included in the site allocations of this plan and the plan as a whole provides a positive policy framework for brownfield sites. Site allocations have sought to avoid best and most versatile agricultural land where possible and Policy S67 provides protection for this.
The percentage of development proposed for the LSA should be reduced, or the LSA boundary extended to incorporate highly sustainable settlements, such as Sturton and Sturton by Stow, so that they may better contribute to the sustainable support and growth of Lincoln.	The LSA is based on travel to work data. It has been carried over from the adopted local plan as an effective and justified means to distribute growth to reflect the importance of Lincoln and the supporting role of the nearby settlements.
The identification of the requirement as a range is not supported. A single figure should be used. The PPG (paragraph 027 reference ID 68-	The PPG does not suggest this should be applied exceptionally but it says "Where strategic policy-makers have successfully argued through

<p>027) suggests that expressing housing requirement as a range can be done only exceptionally. Para 66 NPPF requires authorities to establish a housing requirement figure (singular rather than plural).</p>	<p>plan-making and examination for a requirement set out as a range...” The growth aspirations of the Central Lincolnshire Authorities and the findings of the Housing Needs Assessment (ref HOU001) and Economic Needs Assessment (ref ECO001) suggest that delivering more than the nationally derived Local Housing Need figure would be beneficial for the area. However, given that the PPG allows for the nationally derived Local Housing Need to be used in calculating 5 year housing land supply it is important to allow this to be used in such calculations to ensure that any national downturns do not impact on the ongoing effectiveness of the plan, whilst helping to ensure that Central Lincolnshire’s ‘share’ of the national targets is being delivered.</p>
<p>The lower end of the range is based on the 2020 Local Housing Need Figure applying the Standard Method. This calculation is now two years out of date, and the most recent 2022 figure is 1,102 dwellings per annum.</p>	<p>Disagree. The 1,060 dwelling figure was the latest published at the time of drafting the plan for the Regulation 19 Consultation as 2022’s affordability ratios had not been published at that time. It is agreed that, following the publication of this data, the figure for Central Lincolnshire is 1,102 in 2022.</p>
<p>HOU001 concludes a figure of 1,325 dwelling per annum is representative of the higher housing need. However, that figure itself is not considered sound. The Government’s Housing Delivery Test confirms completions of 1,586 dwellings in 2018/19, 1,807 dwellings in 2019/20 and 1,532 dwellings in 2020/21. Housing delivery has therefore been consistently and significantly above 1,325 dwellings per annum (circa 20 to 30%) which suggests a higher figure is required.</p>	<p>Whilst there has been higher delivery in some recent years, this has been based primarily on the allocations in the 2017 Adopted Local Plan, an increase in student accommodation being delivered in Lincoln and a strong national housing market. Whilst this strong delivery is expected to continue in the short term, based on the evidence behind the Five Year Land Supply Report (ref HOU009), there is no evidence to suggest that this is sustainable across a 20 year period of the plan.</p>
<p>The upper end of the requirement is considered insufficient to meet needs. The modelling upon which the assessment is based utilises the 2016-based SNPP as its basis, rather than the more up to date 2018-based SNPP. Whilst the impact of this has not been modelled it is notable that the 2018-based SNPP suggest a greater population in 2018 and 2040 compared to their 2016-based counterparts.</p>	<p>The modelling in the Housing Needs Assessment (HOU001) is sufficiently robust to inform this plan.</p>
<p>Housing requirement will fail to meet the affordable housing need within the area. HOU001 demonstrates a need for 592 affordable homes per annum. This is some 45% of the overall requirement of 1,325 dwellings per annum. As the proportion of affordable homes sought on sites of 10 or more dwellings will be between 10 and 25%, there is a clear shortfall between need and what will be delivered by the Plan. Consideration should be given to an uplift.</p>	<p>This matter is addressed in paragraphs 2.4-2.6 of the Growth Options Paper (STA011). This concludes that attempts to inflate the overall housing supply to increase the delivery of affordable housing would require significant more dwellings per year than has been delivered in this area (2,827 dwellings per year). It also clarifies that this would risk flooding the local housing market, impeding delivery on sites as it reduces certainty. Instead it is preferred to utilise other methods for</p>

	delivering affordable housing in addition to that being delivered on development sites.
The housing requirement of 1,325 dwellings per annum should be expressed as a minimum and it should state that a minimum of 29,150 homes will be delivered during the Plan period.	The policy does not place any limit on overall growth and the policies in the plan provide a positive framework for the delivery of sites above those allocated to meet the identified needs. As such, it is not considered that any change is needed.
The Housing Trajectory is not site-specific, which provides insufficient detail to check the realism of the Councils delivery assumptions. A 5 YHLS (Year Housing Land Supply) Statement has not been provided. Before submission for examination, further clarity on the deliverability of the HLS should be provided including confirmation that 10% of the housing requirement will be accommodated on sites of less than one hectare. A detailed housing trajectory and 5 YHLS Statement should also be provided. A detailed housing trajectory and 5 YHLS Statement should also be provided.	The 2021 Five Year Housing Land Supply Report (ref HOU009) sets out the latest available detail on the short term delivery of sites. The 2021/22 monitoring is currently being finalised and a revised document for 2022 will be published as soon as possible and inserted into the local plan library. A detailed trajectory and details of anticipated delivery is included in Appendix 1 of the Housing Delivery Paper (HOU008) .
In the Lincoln Strategy Area, as across the wider plan area, there is a reliance on the SUEs. The Local Plan should allocate a broad range of sites within the Strategy Area, including sites of differing scales and in different locations, reflecting the demand for different housing types in different locations across the Plan area.	The Local Plan does allocate a range of site types and sizes and in numerous locations. Details of this are set out in the Housing Delivery Paper (ref HOU008)
The Plan should incorporate a mechanism to allow for alternative development sites to come forward to provide for any housing not delivered at the anticipated rate.	Should there be any significant non-delivery this would be a trigger for a plan review. In any event, the Government requires local plans to be updated every five years and so such a review will be triggered anyway.
Whilst the principle of allocating the greatest number of dwellings to the Lincoln Strategy Area is sound it is unclear why only 64% has been allocated to this area. Lincoln is the economic centre of the area with the most potential to grow. It also has by far the most services and facilities.	The 64% figure has been retained from the adopted Local Plan and is based on population figures across the geography. Paragraphs 1.23-1.42 of the Growth Options Paper (ref STA011) sets out the justification for this.
The focus on three towns and their hinterland villages with the remainder of homes (some 12% elsewhere) enables Anglian Water to plan for growth and investment in fewer locations.	Noted.
Flexibility should be retained to increase the growth distributed to Gainsborough should circumstances dictate.	There is adequate flexibility provided for Gainsborough and Sleaford, particularly when considered alongside policies S3 and S4.
The Local Housing Need figure should be used as the housing requirement in the plan given the context of the area.	The Economic Needs Assessment (ref ECO001) identifies that using a figure in the region of the Local Housing Need figure would potentially result in an imbalance between the housing being delivered and the jobs being created.

<p>There is a planned surplus of 2,665 dwellings, or 9%. We would argue that this is not a sufficient buffer to take account of deliverability issues within the plan period. Consideration should be given to a 20% buffer in the overall housing supply against the requirement.</p>	<p>There is no requirement in national policy for a specific buffer to be included. The additional dwellings included on proposed allocated sites and through a very conservative estimate of windfall as detailed in the trajectory provide adequate flexibility. Furthermore, the requirement for local plans to be reviewed every five years mean that supply will be kept under review.</p>
<p>Developers should have to demonstrate that no land is available in a higher tier before permission is granted for development (e.g. no land in the SUE before building estates in other settlements).</p>	<p>This type of phasing would risk annual delivery of housing and could result in values becoming over-inflated within the SUEs. The approach taken in the plan provides a balanced and sustainable pattern of growth.</p>
<p>The distribution of growth focuses a disproportionate majority of growth in North Kesteven District and the North Kesteven parts of the Lincoln Strategy Area. The requirement should be divided into the individual authority areas.</p>	<p>The plan and the strategy has been worked up in partnership with the three districts to create a sustainable pattern of growth. The decisions on distribution are joint and there is no justification for breaking down the distribution into an authority-area basis.</p>
<p>Concerns about too much focus on housing growth and not enough on infrastructure to support new development.</p>	<p>Policy S45 deals with strategic infrastructure requirements and the plan is also underpinned by the Infrastructure Delivery Plan (INF001a) which sets out the infrastructure highlighted as being needed. In support of the new plan an updated Developer Contributions Supplementary Planning Document is also being developed to provide more detail about how infrastructure will be delivered.</p>
<p>12% is too small an amount for the settlements in the elsewhere category.</p>	<p>There are relatively few large settlements in these areas or settlements that are well-connected or have a good range of facilities available. However, as is demonstrated in Table 1 of page 169 of the local plan, through the allocations proposed in the plan and other sources of housing development it is anticipated that this figure will be exceeded in the plan period.</p>
<p>Gainsborough is expected to provide 12% (3,498 dwellings), however the trajectory shows a shortfall of 395 dwellings over the plan period. Suggest a similar approach to the Lincoln Strategy Area and adopt a 'Gainsborough Area' rather than just the town itself to meet level of growth. A proportionate amount of growth from smaller settlements which serve and are serviced by the Gainsborough Area (such as Blyton) could be supported to ensure the housing requirement in this area is met.</p>	<p>The Lincoln Strategy Area is based on travel to work patterns and Gainsborough does not have the same level of draw as Lincoln, making the definition of such an area challenging. As is detailed in the Growth Options Paper (ref STA011) proximity to the main towns has been factored in when considering allocations in satellite villages. Paragraph 5.3 confirms that this approach has been followed and details of this relationship is also provided in the Site Allocations Settlement Analysis (ref STA008).</p>
<p>Refine the strategy for distribution to ensure that it is effective in directing allocations and windfall development. Provide a clear strategy for distribution to the Market Towns, including Market Rasen, ensuring that the distribution reflects its position within the settlement hierarchy</p>	<p>Caistor and Market Rasen are the two market towns in the 'elsewhere' area. Their importance has been reflected through the consideration of allocations. No change is needed to this policy to reflect this.</p>

and its sustainability credentials, including the high level of service provision and connectivity by a range of public transport modes to Lincoln and the Humber, with ongoing connections to London, the Midlands and the North.	
Concern that Policy S2 does not set out how growth will be apportioned within each of these areas that is aligned with the Preferred Growth Option that underpins the spatial strategy.	Each bullet contains a brief explanation of what type of sites will make up the delivery in each area.
Concern that if urban regeneration and sustainable urban extension sites are delayed it will undermine forecast rates of housing delivery. The distribution strategy should be amended to afford equal rather than sequential priority to the delivery of homes - affording scope for greater growth in those Large Villages that are in proximity to Lincoln.	The prioritisation in the Lincoln Strategy Area in part a of Policy S2 has informed the site allocations process rather than affecting the timing of delivery. The plan offers opportunities for additional sites to come forward where they are suitable in villages under policy S4.
Paragraph 2.4.1 of the draft Local Plan clearly indicates that a total 142,000 residents representing 47% of the district's population reside in the smaller settlements. However, only 12% growth is directed towards smaller settlements.	The reference in paragraph 2.4.1 relates to all villages, including those within the Lincoln Strategy Area.

Policy S3: Housing in the Lincoln Urban Area, Main Towns and Market Towns

Issue	Response
Policy S3 should be reworded to more positively welcome development adjacent to the developed footprint of Sleaford, rather than the current approach which will only allow development in exceptional circumstances.	Disagree. The policy provides in-principle support for sites within the towns and then clarifies that sites outside of the settlements will be considered on their merits against the policies of the plan. Care is needed to ensure certainty at the allocations in these towns.
General support expressed, including for flexibility allowing opportunities to be brought forward in the most sustainable locations; and the inclusion of provision for First Homes exception sites.	Noted.
It is unclear how the council would determine market saturation and how they could act upon it. Remove of commentary relating to market saturation.	The districts will not necessarily measure market saturation but the proximity to allocated sites, the products on offer and delivery timeframe on sites may be indicators of concern. Sites not allocated should not undermine delivery on those being allocated – if the flexibility afforded to unallocated sites is to remain in the plan then this requirement is important to retain in the event that issues may arise.
Developed footprint should be defined on the proposals map.	The developed footprint is defined in the glossary – there is no need to draw boundaries which will then change with future iterations of the plan. This has been operating well since the adoption of the Local Plan in 2017.

Policy S4: Housing Development in or Adjacent to Villages

Issue	Response
<p>Neither the cap of 10 dwellings or sites having to be within the developed foot print of a settlement are justified. They may lead to either inefficient use of land, or 'town cramming'. Alternatively, this approach may prejudice developments, all or part of which may need to be outside the footprint - this could include new accesses, drainage attenuation, open space, landscaping and not just new dwellings or commercial properties. The criteria for windfall sites should be amended to remove the arbitrary cap on the capacity of windfall sites and restriction on development outside the settlement footprint.</p>	<p>Sites have been considered for allocation in this local plan. There is no need or justification for allowing lots of development in all villages as this would be contrary to the strategy of the plan. This policy allows the balanced consideration of small-scales sites in villages where suitable opportunities may arise. Neighbourhood plans may also seek to deliver additional growth in their village to meet local needs.</p>
<p>The simplistic approach to sustainable development by the concentration of new development in the towns and larger villages has resulted in the neglect of smaller, rural settlements. Lack of development in smaller communities inevitably results in fewer young families moving to or staying in those areas and under occupation of existing properties and the knock on of the loss of small businesses, such as shops and pubs, and infrastructure such as schools and community facilities.</p>	<p>An adequate amount of growth has been identified in smaller settlements to meet the needs of the plan and provide a sustainable pattern of growth. Neighbourhood plans may seek to deliver additional growth to address localised needs or issues.</p>
<p>Re-introduce into the draft policy S4 the ability to develop over and above a quantum of 5 with local community support, to cover situations such as this (Specific site in Carlton Le Moorland) and make good use of land that has been partially developed, is an eyesore and has support for development of more than 5, but requires a sensitive approach due to local interest.</p>	<p>The community support approach in the adopted local plan worked well in some instances but less so in others. Neighbourhood plans can be used as a vehicle to allocate additional sites where there is community support or to reintroduce community support as a means to deliver additional sites where this would be appropriate for the community.</p>
<p>This policy should apply a 10% cap on growth in villages.</p>	<p>This policy provides for the appropriate assessment of sites in village locations at a strategic level. This will result in only fully sustainable sites being improved. Through neighbourhood plans, communities have an opportunity to manage growth further based on the local circumstances.</p>
<p>The thresholds should be increased to 20 dwellings in large villages and medium villages and up to 10 dwellings in small villages (for example, but other generic opposition to the thresholds provided). Other existing policy criteria would make sure that they are reasonable and this change will facilitate flexibility and the opportunity for additional levels of</p>	<p>Sites of 10 or more have been assessed in villages and, whilst it is acknowledged that there will be sites that had not been proposed for allocation, this policy is intended to apply to smaller sites with allocations (either in neighbourhood plans or in future local plan reviews) being the more appropriate method for dealing with larger sites.</p>

growth to be achieved and to provide choice which is important in the current market place.	
Restrictive criteria in policy S4 requiring that proposal sites be within “the developed footprint” of settlements and requires that they “retain the core shape and form of the settlement”, are too subjective.	When read alongside the definitions contained in the glossary, the terminology is clear and has been applied successfully since the adoption of the 2017 Local Plan.
It is ambivalent as to whether the criterion in S4 limit Neighbourhood Plans to the same restrictions as applicants for unallocated sites.	The wording in part 1 of the policy makes it clear that neighbourhood plans can allocate sites. This allows the ability to identify sites which are suitable for the local community.
Concerns about consistency between this policy and Policy S75 which defines the RAF Scampton site as a significant and large-scale ‘opportunity area’ which clearly offers potential for more than just the ‘limited growth’ supported by Policy S4.	This policy will be applied to RAF Scampton as it is defined as a Medium Village – failure to do so would leave it with a lack of clarity for any relevant applications that may be received. Policy S75 provides a framework for the development at the site once it is disposed of by the MOD for the regeneration of the wider site. It is accepted that this is an unusual case, but it is not result in inconsistencies as the plan should be applied as a whole, not just individual policies.
The restrictions in this policy limits the ability to deliver affordable housing.	Site allocations over the 10 dwelling threshold will be expected to deliver affordable housing. The policy allows for rural affordable housing exception sites and first home sites to be delivered and neighbourhood plans will have the ability to deliver additional sites where affordable housing need arises.
A degree of market housing should also be allowed in first home developments.	The wording of the policy seeks to align the policy to the government policy on first homes exception sites (or entry-level housing exceptions sites).
Policy S4 does not allow for unallocated sites adjacent to large villages to be brought forward for open market or retirement housing where there is a demonstrable demand.	No evidence has been provided for the need to deliver such sites in such locations. The policies in this plan as a whole provide a framework by which proposals may be considered or sites may be promoted through neighbourhood plans.
Concerns about the thresholds resulting in land not being used efficiently.	Proposals will be considered against all relevant policies in the local plan and so poorly designed schemes will be contrary to policy.
Policy S4 was objected to by 11 Parish Councils and supported by just 1 and received 64 objections and was supported by only 12 respondents, yet no significant changes were made to reflect the concerns expressed. It is unreasonable to increase new housing by a further 10% in large villages when the overall housing requirement is reducing by 14%. Housing growth in the large villages should be set at the level established as appropriate in the 2017 CLLP to ensure that the new housing pressure on our large villages does not destroy their	All sites and villages were assessed for their suitability for residential development resulting in the proposed approach in the Local Plan. Large Villages are considered suitable for a degree of development, although this varies depending on the context of each village. Decisions on what policies were included are based on planning and sustainability considerations, rather than popularity. Many of the objections to the policy had opposite views of the issues. The policy was amended to take

character and make them unsustainable by placing undue pressure on local resources.	account of some concerns raised at the Regulation 18 Consultation and this is detailed in the policy evidence report (ref EVR004).
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Policy S5: Development in the Countryside

Issue	Response
Expressions of support, including in respect of: criteria b) and c).	Noted
It is unclear as to how elements of Policy S5 fits with Permitted Development Rights e.g. for Agricultural Buildings converted to dwellings.	Policy S5 will apply to relevant schemes where permission is required. It can have no impact on permitted development rights.
Objection to Part A as it is not in line with the NPPF and the national policy support for conversion of buildings in the countryside. For draft Policy S5 to be positively prepared and in accordance with national policy it should provide additional flexibility that supports the reuse of existing buildings without the need for extensive marketing procedures or significantly limiting new openings and / or additional features that could actually enhance the building and its future use.	This part of the policy has been carried across from the adopted 2017 Local Plan. The principle of this policy is to minimise isolated dwellings in the countryside at the cost of rural enterprise and to avoid an unsustainable pattern of development. It provides adequate flexibility to allow for the occasions where such a change would be appropriate and is not inconsistent with national policy.
The criteria are too restrictive and effectively impose a ban on many types of potentially suitable commercial / economic development that could make a significant contribution to the rural economy. In order to make the policy sound and consistent with national policy, a further criterion should be added to Policy S5 which could allow the development of sites that are close to strategic road networks/proposed new relief roads and other acceptable locations for development where a site specific need can be demonstrated.	The proposal provides adequate flexibility for proposals in the countryside. If a specific need arises in a specific location this can either be progressed as a departure from policy with the need forming the material consideration or through future plan reviews. Providing more flexibility could result in an unsustainable pattern of growth.
Policy S5 should be expanded to include uses suitable for locations in the countryside but near to settlements.	This policy, along with policies S3 and S4 and other policies in this plan, provide an adequate framework for schemes adjacent to settlements to be considered.
Part E of the policy should include utilities as an example of non-residential development which satisfies the criteria in section a).	Should permission for essential infrastructure in the countryside be necessary this policy would not be a barrier to it.
Part F (Agricultural diversification) should be amended so development would be allowed only when it can be undertaken only in a rural area (e.g. farm holidays) and demonstrate it does not run counter to other policies (e.g. retail).	Disagree. The development of a farm shop, for example, or small scale business units might not only be appropriate in rural areas, but can be important diversification for farms to assist in remaining viable operations.
Criteria a) of Part E and Part G of Policy S5 is not consistent with Part 8 of Policy S1. Part E states that the type of development that would be	The policies in the development plan should be considered as a whole, not in isolation. Presence of minerals proposed to be worked in a given

allowed in the countryside is restricted to either one that maintains or enhances the rural economy or in proximity to existing established businesses or natural features. Part 8 of policy S1 refers to mineral and waste development as being acceptable in the countryside. Applications for minerals and waste may not necessarily fit with these criteria.	location can be justified in terms of policy S1, this policy and the minerals and waste local plan.
Bullet point (e) of NPPF Paragraph 80 allows for the design of exceptional quality to be considered. No such provision is allowed for with the current or draft CLLP. A similarly worded paragraph to bullet point (e) should be added to policy S5.	There is no requirement to copy national policy in a local plan and there is considered to be no need to in this case. National policy is to be taken into account in plan-making and is a material consideration in making planning decisions.

Chapter 3 – Energy, Climate Change and Flooding

Issue	Response
It is not clear in paragraph 3.1.6 what development “fit for a zero-carbon future” is and this is not consistent with national policy.	Development that accords with the climate change policies of the Local Plan will be development fit for a zero carbon future.
Given efforts being made by infrastructure providers to reduce carbon an additional bullet point should be added to paragraph 3.1.9 as follows: “The need to maximise the use of existing infrastructure capacity and efficiently manage demand to minimise the resource use and generate carbon in building new infrastructure”	This is a key part of the strategy of this plan, and has been applied in site selection and the creation of policies. It was also highlighted in the evidence as being an important component of achieving a net zero carbon Central Lincolnshire.

Policy S6: Design Principles for Efficient Buildings

Issue	Response
Support for policy and component parts considering it meets the tests of soundness	Noted and agreed.
Policy not justified or consistent with national policy and will not be feasible or viable, particularly in relation to heat supply and renewable energy generation.	The evidence on climate change (document references CLC001-CLC012) demonstrates the importance of reducing heat and energy demands and moving to renewables urgently and the whole plan viability evidence (reference INF002a) demonstrates that it is viable. The whole plan viability assessment has also been checked against the rising costs and also increases in property values in the Addendum Report March 2022 (reference INF003) which echoes the findings of the main report and also sets out specifically how the costs associated with climate change policies have been factored into the work

The requirement of all heat and energy to be delivered from renewable energy is not reasonable.	The evidence on climate change demonstrates the importance of moving to renewables urgently and the whole plan viability evidence demonstrates that it is viable.
The requirements of this policy will increase the cost of new dwellings making home ownership harder for people.	The delivery of energy efficient homes will make them cheaper to run which will improve affordability. Furthermore, at the present time there are mortgages with favourable terms and reduced interest rates for energy efficient homes.
The policy should include a point to address site constraints including utilities situated within the site.	This policy relates to making new homes efficient rather than looking at holistic design considerations. Policy S53 relates to design and amenity and part 1 refers to site context and the need for development proposals to respond positively to context and constraints which would include (but does not specifically state) utilities.
Visual and other sensory impacts, especially around conservation areas should also be considered.	These issues are addressed in Policy S53: Design and Amenity and Policy S57: The Historic Environment.
Part 5 of the policy cannot be applied to minerals and waste developments and will be reliant on the wider decarbonisation of the grid. These uses should be specifically excluded.	The policy title is Design Principles for Efficient Buildings and as such it is not expected to be applied to all uses of land and activities such as minerals and waste extraction.
The requirements of this policy should be left to building regulations.	This policy focuses on design and other criteria that are key to ensuring energy efficiency in new development. The built form and orientation of buildings cannot be reasonably covered by building regulations and they should be incorporated at the start of the design process and taken into account as a key planning consideration.
Part 1 of the policy (orientation) is duplication of Policy S20: Resilient and Adaptable Design.	There is overlap between these two policies, but they complement each other. Orientation of development is key for a number of reasons including resilience to overheating, but also to reduce the energy needed to heat a building and to maximise the renewable energy that can be generated from solar PV panels. As such, these are key energy efficiency considerations that need to be built into the design process.
The policy is equivalent to a blanket ban on fossil fuels in all new built development and is not consistent with the Government's agenda of promoting low-emission alternatives to fossil fuels by 2025.	Moving away from fossil fuels is a key element of not only the local strategy, but also nationally. Fossil fuels will not be available within the lifespan of homes being built now and as such connection to these services should not be permitted where sustainable alternatives are available elsewhere.
Policy needs to be clearer as to whether it applies only to new builds or also to retrofit.	The policy is aimed at new build properties although some of the principles can equally be applied to developments being retrofit, extended or otherwise altered.

Policy goes beyond the nationally prescribed technical standards.	The Planning and Energy Act 2008 allows development plan policies to make reasonable requirements for a proportion of energy used in development in the area to be from renewable or low carbon sources and to require energy efficiency standards which exceed those in the building regulations.
Policy should make clear that proposals for minor buildings or structures (such as kiosks) will be treated proportionately, potentially by applying a threshold.	Small buildings can also be designed and located to maximise their efficiency (and it is important that adequate consideration is given to these requirements), and it is not considered that this policy would unduly restrict such proposals. Clearly there may be some examples where the full standards may not be achievable, but this can be demonstrated through the applications and the exception clauses in Policy S7 or S8 allows for those few occasions where the full standards of these policies may not be achievable.
Other zero carbon forms of energy should also be allowed for (such as green hydrogen) so infrastructure such as gas pipes should be allowed.	It is important to restrict connections to the gas network now to remove reliance on fossil fuels. Proposals in the future which include connections to hydrogen for heating will be considered on their merits as a renewable heat source.

Policy S7: Reducing Energy Consumption – Residential Development

Issue	Response
Support for policy and component parts considering it meets the tests of soundness	Noted and agreed.
Policy not justified or consistent with national policy and should be left for building regulations and the future homes standards.	The evidence on climate change demonstrates the importance of moving towards and delivering net zero carbon homes before the future homes standards are released in 2025 (if at all).
The Policy cannot require full renewables to heat and power development and cannot require it be on site as it does not comply with the PPG.	The requirements are considered to be reasonable and in accordance with national policy (NPPF paras 152-155) and legislation, particularly in the Planning and Energy Act 2008.
Visual and other sensory impacts, especially around conservation areas should also be considered.	These issues are primarily addressed in Policy S53: Design and Amenity and Policy S57: The Historic Environment. However, the exception clause 1 in the policy itself also acknowledges the point raised.
This policy will undermine areas that require funding for infrastructure from new development.	The whole plan viability evidence demonstrates that in most locations this policy can be delivered alongside other policies and infrastructure requirements.
Energy efficiency should be for developers to determine.	National legislation and policy dictates that energy efficiency should not be a matter left for developers to determine.

<p>Clause 3 of the policy discriminates against those living in areas with lower value homes and the standards should be applied in all locations. Many developments in these locations are more viable than suggested.</p>	<p>It would be preferable to deliver these standards in all locations on all developments, however, the whole plan viability evidence has shown that in Sleaford and Gainsborough development might struggle to be viable with these policy requirements and wider policy requirements. As such, it has been necessary, in accordance with national policy, to apply a proportionate approach to ensure development remains viable in these locations. If development is viable in such locations, then the full policy requirements are still expected.</p>
<p>This policy will lead to less affordable housing being delivered.</p>	<p>The delivery of energy efficient homes and on-site renewable energy generation is essential to delivering a net zero carbon Central Lincolnshire. The whole plan viability assessment has informed the affordable housing levels and, whilst this will be reduced in some of the lower value areas, this is considered a pragmatic approach which will help to deliver both affordable housing and energy efficient homes.</p>
<p>The climate change evidence does not provide evidence of the local circumstances to justify requirements to go beyond building regulations.</p>	<p>The climate change evidence does provide clarity over the need for urgent action in new buildings being built in order to meet the targets being set in the declared climate emergency. The position statement on page 39 of document CLC002 sets out why these standards are needed to achieve a net zero carbon region, linked to the wider climate change evidence.</p>
<p>The whole plan viability assessment excludes costs associated with Policies S6 and S7 and shows that certain typologies are unviable in all areas whilst surpluses in higher value zones are insufficient to cover additional costs and infrastructure requirements. Rising building costs have not been factored in.</p>	<p>It is accepted that there are viability challenges with brownfield sites and in particular areas in Central Lincolnshire, but development does continue to occur on brownfield sites and in the lower value areas. In the recommendations of the whole plan viability assessment (document INF002a from page 107) a breakdown of the surplus is provided for different development types in the medium and higher value zones. It also sets out the challenges in the lower value zones and on brownfield sites in all but the higher value zones and it shows how development in these areas can come forward in principle. As has occurred in other sites, the Central Lincolnshire authorities will continue to work closely with developers of sites where viability is challenging to seek funding opportunities to unlock these sites where it is necessary. The costs associated with development are set out in chapter 6 of the Whole Plan Viability document, initial assessment of viability is in chapter 7 and sensitivity testing is provided at chapter 8 to show how sites can be delivered even in the lower value areas. The whole plan viability assessment has also been checked against the rising costs and</p>

	increases in property values in the Addendum Report March 2022 (reference INF003) which echoes the findings of the initial report and also sets out specifically how the costs associated with climate change policies have been factored into the work.
The policy should be amended to allow RAF Scampton to also be allowed to deliver on relaxed energy and sustainability requirements due to the likely high costs associated with delivering the site.	RAF Scampton is a potentially significant site for redevelopment but where there are a large number of unknowns. Policy S75 contains detailed requirements for how this site should be progressed. There is no evidence available at this time that suggests that a different approach to applying climate related policies is required on this site.
The technology is not in place to provide the level of energy required by this policy with insufficient roof space and difficulties with wind turbines.	The climate change evidence task G document (reference CLC006) sets out how simple alterations to design and in particular the roof design allows for adequate roof space to be made available for solar PV panels to meet the energy needs of different housing types.
The policy requirement for no new homes to have an energy demand in excess of 60 kWh/m2/yr is not achievable.	Chapter 4 of the Task G report of the climate change evidence (reference CLC006) demonstrates how the standards are achievable in a variety of building types and through different measures.
No evidence to show how these requirements will be assessed through a planning applications and whether there are technical capabilities to make judgements on this policy.	It is acknowledged that this policy will require technical assessment both by applicants and the local planning authorities. To assist with this, supporting guidance is being developed and appropriate technical support will be secured for this policy to be implemented.
No evidence to justify the contribution of £5,000-£15,000 per dwelling in point b of the policy for off-site delivery.	Table 6-6 of the whole plan viability report (reference INF002a) sets out costs which includes Future Homes Standard interim uplift (£4,857 per house) and zero regulated carbon which can cost around £14,500 per home for regulated and unregulated carbon according to the <i>Cost of Carbon Reduction in New Buildings</i> report by Currie and Brown in 2018.
The requirement in exception clause 2 for house types to be accredited to demonstrate to Passivhaus Plus, Premium or Classic is not required and is a duplication of NHBC/ Building Regulation requirements where such approvals need to be given for each individual house type.	This exception clause is intended for any development where it is proposed that such accredited standards would be achieved, thus effectively achieving the standards of this policy and streamlining the process for developers.
There should be no requirement for any standards to be met in value zones C and D as these are shown to be unviable in the whole plan viability report.	The sensitivity testing in chapter 8 of the whole plan viability report (document INF002a) provides evidence to show that surpluses can be achieved in the lower value zones, such as where less is paid for land, where materials costs are reduced or where higher sales values are achieved.
The policy is equivalent to a blanket ban on fossil fuels in all new built development and is not consistent with the Government's agenda of promoting low-emission alternatives to fossil fuels by 2025.	Moving away from fossil fuels is a key element of not only the local strategy, but also nationally. Fossil fuels will not be available within the lifespan of homes being built now and as such connection to these

	services should not be permitted where sustainable alternatives are available elsewhere.
Clause 3, relating to viability should be extended to all areas to allow for circumstances which might affect viability on a site.	Sites within the higher value zones should be able to achieve the requirements in most scenarios. There will potentially be sites where specific constraints mean that they cannot be achieved and if this is the case it will then be necessary to consider whether the material considerations on the site indicate that an exception to this policy should be made or whether not achieving the standards results in the site not being suitable for development given the context.
The timescale for delivering this policy may impact on delivery in the short term, particularly with a prevalence of SME builders in the area.	It is accepted that bringing these requirements in will require adjustment, which is why guidance for this and other climate change policies is being developed. In the short term, many sites have permission already or will have secured this before the plan is adopted and as such, the short term delivery will not be impacted too greatly, if at all.

Policy S8: Reducing Energy Consumption – Non-Residential Buildings

Issue	Response
Support for policy and component parts considering it meets the tests of soundness	Noted and agreed.
Visual and other sensory impacts, especially around conservation areas should also be considered.	These issues are primarily addressed in Policy S53: Design and Amenity and Policy S57: The Historic Environment. However, the exception clause 1 in the policy itself also acknowledges the point raised.
Policy should make clear that proposals for minor buildings or structures (such as kiosks or buildings of less than 1,000sqm) will be treated proportionately, potentially by applying a threshold. It should also exclude temporary buildings.	Small buildings can also be designed and located to maximise their efficiency (and it is important that adequate consideration is given to these requirements) and it is not considered that this policy would unduly restrict such proposals. Clearly there may be some examples where the full standards may not be achievable, but this can be demonstrated through the applications and the exception clauses allows for those few occasions where the full standards may not be achievable.
This policy places burdens on businesses at a time where there are many challenges.	The requirements of this policy should be achievable in the majority of cases and achieving it will reduce running costs for businesses. Exception clause 1 allow for a case to be made where the burden is undeliverable given the circumstances on or proposed use of the site.
This policy cannot be applied to all development, particularly minerals and waste developments and will be reliant on the wider decarbonisation of the grid. These uses should be specifically excluded.	The policy title is Reducing Energy Consumption – Non-Residential Buildings and as such it is not expected to be applied to all uses of land and activities such as minerals and waste extraction.

Policy should be allowed for sustainability requirements to be negotiated on a site-by-site basis when viability justifies it.	The requirements of this policy should be achievable in the majority of cases and achieving it will reduce running costs for businesses. Should a specific site have specific reasons for why these requirements cannot be delivered it will then be down to the applicant to demonstrate why the material considerations at the site indicate that this policy need not apply in full, and this can then be weighed up by the decision taker.
The policy is equivalent to a blanket ban on fossil fuels in all new built development and is not consistent with the Government's agenda of promoting low-emission alternatives to fossil fuels by 2025.	Moving away from fossil fuels is a key element of not only the local strategy, but also nationally. Fossil fuels will not be available within the lifespan of buildings being built now and as such connection to these services should not be permitted where sustainable alternatives are available elsewhere.

Policy S9: Decentralised Energy Networks and Combined Heat and Power

Issue	Response
Support for policy and component parts considering it meets the tests of soundness	Noted and agreed.
This policy excludes combined heat and power generation which relies upon fossil fuels, and this is contrary to national policy and the definition of decentralised energy.	The move away from fossil fuels is essential and there are ample alternative sources available. The policy allows for existing combined heat and power plants to be used where there is spare or wasted capacity. The NPPF does not require fossil fuels to be allowed.

Policy S10: Supporting a Circular Economy

Issue	Response
Support for policy and component parts considering it meets the tests of soundness	Noted and agreed.
Unclear why any policies in the Minerals and Waste Plan are referenced in the policy.	A key part of the circular economy principles is minimising waste and then reusing what waste there is.
The bullet points in paragraph 3.2.22 should be included in the policy to judge proposals coming forward.	Whilst the bullet points in paragraph 3.2.22 should, arguably, be incorporated in all schemes it was felt that, on balance and taking into account the other policies in the plan, requiring all proposals to achieve these would be unreasonable to require at this time.

Policy S11: Embodied Carbon

Issue	Response
Support for policy and component parts considering it meets the tests of soundness	Noted and agreed.
There are no benefits to undertaking a study, at cost to the developers, if it is not required in the process and will not help the process or decision making.	The policy does not require the use of materials with lower embodied carbon before 2025. What it does do is require developers to consider the options and set out in support of their application what choices have been made. This will have two benefits: 1. It should lead to reduced embodied carbon being delivered in some schemes where developers act upon their findings to source lower embodied carbon materials where viable to do so; and 2. Will help developers to adjust to such methods before they become requirements. If a developer considers the options but consequently reject materials with lower embodied carbon then this will not result in a permission not being issued (before 2025). However, if such decisions to reject low carbon materials can be detailed it can start to build a picture of barriers that exist and potentially assist with future policy decisions. The alternative would be to have a 'cliff edge' style policy, with no consideration up to 31/12/24, but then full requirements from 01/01/25. This is not supported.
This policy has not been included in the whole plan viability assessment.	The costs of this policy will be limited and there is no requirement at this time to use materials with a lower embodied carbon. From 2025, the policy makes it clear that 'reasonable opportunities' are taken. By implication, 'reasonable' will mean 'viable'.
This policy should not be applied to minerals and waste development.	This policy clearly is not aimed at minerals and waste development. The supporting text frequently references buildings and the policy itself where it references major development proposals also references buildings. For minerals and waste development, the only areas of relevance will be any structures being erected alongside the workings.
The Councils should confirm that brownfield sites included in the housing land supply are not subject to the presumption against demolition and rebuilding or provide the evidence that the opportunities and viability on these sites have been reviewed on this basis.	This policy is aimed at preventing proposals to demolish existing properties where they could be reasonably retained to reduce the embodied carbon being lost. It is not intended to prevent (for example) the redevelopment of existing poor quality structures where their retention is not sustainable. The policy provides a range of criteria to allow applicants to demonstrate why the demolition is preferable to retention where this is proposed. Sites allocated in the plan without permission will be expected to satisfy this requirement. There are very few sites where this would apply (NK/KIRK/004, WL/GAIN/014,

	WL/GAIN/020, WL/NHAM/032, WL/SAXI/007, and WL/STUR/003) and in these cases it is anticipated that, unless stipulated in the site allocation specifically, any structures will be demolished and justified through the policy. There are additional strategic sites (SUEs) where there are some isolated buildings within the site. The future of these buildings should be considered through the masterplanning approach with such buildings retained where possible.
The policy is not flexible enough and should be amended to encourage the retention of buildings rather than a presumption against their loss, particularly in masterplanned sites.	The policy has been written to prevent unnecessary demolition of buildings which can be re-purposed, extended or otherwise retained in some shape or form. Masterplanning exercises which demonstrate that the loss is necessary for the wider delivery of the site would be captured under point 4 in the policy, but first it should be investigated if structures can be reasonably retained.
The policy not in accordance with national policy as there is no presumption against demolition in the NPPF or the PPG.	Absence of coverage in national policy and guidance does not mean that adding it locally means it is inconsistent with national policy.
Demolition of buildings is permitted development under parts 10 and 17 of the GPDO.	Where there is permitted development for the demolition of a building on a specific site then this policy will not, of course, be applied.

Policy S12: Water Efficiency and Sustainable Water Management

Issue	Response
Support for policy and component parts considering it meets the tests of soundness, including from the water and wastewater utilities providers.	Noted and agreed.
The policy should be extended to include either swales or permeable paving with the use of swales improving water quality.	The policy provides flexibility for where there are technical reasons that permeable paving is not appropriate.
The policy should provide some flexibility to take account of practicality and viability.	The cost of delivering water efficiency standards has been factored into the whole plan viability work. Where there are practical reasons for not meeting the standards this should be dealt with as an exception to the policy rather than building in flexibility.
There will be occasions when it is impractical for small areas of flat roofs to be green roofs.	Occasions where the delivery of green roofs may not be appropriate should be dealt with through exception. There are no known minimum size thresholds, based on evidence, that can be applied.
The achievement of green roofs may not be achievable in minerals and waste developments.	This policy clearly relates to the development of new buildings not minerals or waste developments. Any buildings associated with minerals and waste should, in the first instance, seek to meet the requirements, and this is considered to be a reasonable approach.

The policy should go further and limit water use to 85 litres per person per day.	There is justification due to the severe water stress area, within which Central Lincolnshire is located, to limit water use to the optional requirement of 110 litres/person/day. Whilst we do not disagree with the principle of reducing this further there is little information available about the justification, the viability impacts, or the feasibility of achieving a further lower standard.
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Policy S13: Reducing Energy Consumption in Existing Buildings

Issue	Response
Support for policy and component parts considering it meets the tests of soundness	Noted and agreed.
The note at the end of the policy should be amended to allow for suitable energy efficiency improvements that ought to be considered as a public benefit and weighed up in the balance. Alternative wording suggested by the National Trust.	This note was provided in discussion with Historic England. The aim of the policy and the note is to promote energy efficiency retrofitting wherever possible, but not at the cost of heritage assets. It is not intended to detract from efforts to make older buildings more energy efficient where this can be achieved without harm to the significance of the asset.

Policy S14: Renewable Energy

Issue	Response
Support for policy and component parts considering it meets the tests of soundness	Noted and agreed.
Additional areas should be mapped including The Wolds AONB, Nocton Fen, areas around Legsby, historic landscape along the River Witham, and specific sites near Caistor, Holton Le Moor and Willingham Woods. Long range views of Lincoln cathedral should also be protected including those to Tattershall Castle and Boston Tump.	The Wolds AONB is already mapped as an excluded area. As for other assets, it was considered whether additional buffers should be set up around heritage assets, locally significant landscapes and more, but given the unique attributes of such assets and their settings, it was decided that such assessment should take place in detail upon a specific proposal being made. The mapping exercise for the Local Plan is only the first stage of the process and should not be viewed as the entire process of assessment for any schemes that may come forward.
The first bullet point in paragraph 3.3.12 should be amended to reflect that equivalent settlements outside of Central Lincolnshire have also been used as a constraint.	This addition of nearby settlements was made after the Regulation 18 consultation and it is agreed that this bullet point should be amended to reflect this change, and this will be suggested to the Inspector as a potential modification in due course.

Constraints omit private air strips such as Temple Bruer.	Temple Bruer, and other known air strips, have been included as a constraint. But it is noted that Temple Bruer has been omitted from the list of airfields in paragraph 3.3.12. This will be suggested to the Inspector as a potential modification in due course.
Constraints omit RAF Barkston Heath which is an active RAF airfield.	RAF Barkston Heath was not raised as an active airfield in discussions with MOD during the production of the plan. Following receipt of this comment we have consulted MOD who have confirmed that this base is active and, as such, should be included in the mapped constraints. This will be suggested to the Inspector as a potential modification in due course. It should not have a significant material effect on achieving the principles aims of the policy.
Glint is not included as a potential harm.	The list in the policy is not exhaustive but provides examples of the issues that may need to be considered in schemes. It is agreed that glint is an issue that may also need to be considered in certain schemes, but does not necessarily require listing in the plan.
Solar PV farms should be subject to receiving clear local community support.	The requirements of the policy as drafted allows for adequate planning matters to be taken into account and local communities will be consulted as part of applications for solar PV farms.
The restriction to best and most versatile agricultural land should be extended to grade 3B.	The approach of the policy only supporting solar PV farms on land that is not the best and most versatile agricultural land is appropriate and consistent with national policy.
The reference in the policy to local community support should be amended to match that in the NPPF.	It is considered that the additional wording helps to clarify how the community support will be considered in practice.
The policy is not deliverable as only 16 new turbines were built between 2016 and 2020 in England.	More councils are now mapping areas that are suitable in principle for wind turbines to adjust to the written ministerial statement of 2015 and the national policy change in relation to this. As such there is every possibility that the decline in on-shore wind provision will reverse and given that the evidence demonstrates the importance of having energy from a variety of sources, and the benefits of renewable energy being generated close to the user, wind power is an important element for the plan. On-shore wind is generally recognised as the cheapest form of renewable energy to produce.
Concerns over local support being obtained despite impacts of turbines existing over a wider geography.	The requirement for local community support comes from the NPPF.
The policy should include a buffer to the Lincolnshire Wolds AONB.	The approach to having a criteria-based policy applied to any turbines coming forward in areas deemed suitable in principle for wind turbines

	will ensure that impacts on the AONB and other designations are taken into account properly.
There is no reference in the mapped constraints to listed buildings and their settings.	Paragraph 6.31 of the Evidence report for Policy S14 (reference EVR014) sets out why listed buildings have not been included. Essentially the setting of a heritage asset will be different for every asset depending on topography, built and natural features, the type of asset and more. It is therefore more appropriate to have this assessed on a site by site basis. If a scheme would result in unacceptable impacts on a heritage asset this is covered by point i of the policy.
The policy should not use best and most versatile agricultural land as a constraint to solar PV farms, but instead should reference to the how the issue should be considered in an assessment of clear and demonstrable harm.	Lincolnshire is a predominantly agricultural area and it is important that agricultural land continues to provide food for the nation as a key part of our food security.
The policy should clarify what is considered to be 'areas that have been designated for their national importance.'	These are presented in footnote 7 of the NPPF.
The reference to community support should be applied to all wind turbines not just medium and large scale to be consistent with footnote 54 of the NPPF.	The visual and other impacts of small wind turbines will be far reduced from the larger ones and will often not impact on any local communities. Point iii of this policy will help ensure that impacts on communities are resolved or avoided.
2km buffer should also be applied to all dwellings.	The impact on dwellings in the countryside outside of settlements will be considered on a proposal-by-proposal basis, so that any impacts can be understood in detail rather than just ruling out turbines in principle.
Policy should include a requirement for renewables to be connected to the grid through unobtrusive cables.	This will be a matter that is covered in planning applications.
Part i of the policy should include consideration of impacts on rail safety.	Agreed. Part (i) of the policy should also refer to rail safety. This will be suggested to the Inspector as a potential modification in due course
Proposals for solar PV farms should be accompanied by an assessment on the impact on local food production.	The approach of the policy only supporting solar PV farms on land that is not the best and most versatile agricultural land will help ensure that the impacts of development will be limited.

Policy S15: Protecting Renewable Energy Infrastructure

Issue	Response
Support for policy and component parts considering it meets the tests of soundness	Noted and agreed.

Policy S16: Wider Energy Infrastructure

Issue	Response
Support for policy and component parts considering it meets the tests of soundness	Noted and agreed.

Policy S17: Carbon Sinks

Issue	Response
Support for policy and component parts considering it meets the tests of soundness	Noted and agreed.
Paragraph 3.4.2 should be amended to allow for restoration and therefore sequestration of carbon in peat soils as well as protecting it from loss.	Policy S17 does seek this and so amending the paragraph slightly would bring the supporting text more in line with the policy. Agreed. Part (i) of the policy should also refer to rail safety. This will be suggested to the Inspector as a potential modification in due course.
The policy should be amended to clarify that irreplaceable habitats (such as lowland fen) should not be developed.	This element is covered in Policy S60 Part One, bullet 3.

Policy NS18: Electric Vehicle Charging

Issue	Response
Support for policy and component parts considering it meets the tests of soundness	Noted and agreed.
The policy ignores problems such as running cables out across pavements and charging for visiting cars.	There are many properties where delivering charging points will be challenging. There are a variety of solutions being developed including curb-side charging points, charging points in lamppost columns and more. Most of these issues relate to retrofit of existing properties which this policy does not apply to.

Policy S19: Fossil Fuel Exploration, Extraction, Production or Energy Generation

Issue	Response
Support for policy and component parts considering it meets the tests of soundness.	Noted and agreed.

<p>This policy and its supporting text are not consistent with national policy as fossil fuel extraction is part of the government's energy strategy and the NPPF requires policies to provide for the extraction of minerals resources, which includes oil and gas.</p>	<p>Clearly there is a tension between the goals of fuel security and climate change. The climate change evidence for this plan (and wider climate change evidence) identifies how vital it is to move away from fossil fuels as quickly as possible. This policy makes the Committee's view clear on how any applications that will not be for the determination of the minerals planning authority will be considered within the context of the strategy and the declared climate emergency.</p>
<p>This policy should not be included as it is under the jurisdiction of the Minerals Planning Authority.</p>	<p>It is recognised that the minerals planning authority will deal with the vast majority (or possibly all) of the applications for minerals workings in the area, but, in the event that an application was to be determined by a Central Lincolnshire District, it was felt important to clarify the position that would be taken.</p>

Policy S20: Resilient and Adaptable Design

Issue	Response
<p>Support for policy and component parts considering it meets the tests of soundness.</p>	<p>Noted and agreed.</p>
<p>The use of the term 'homeworking' in the policy is subjective and the needs for such space can vary, dependent on the job.</p>	<p>Homeworking for many is now a permanent fixture of our day to day lives. It is accepted that the precise needs of individuals and indeed the number of people who may work from home varies by household. This policy will require applicants to demonstrate how new dwellings are adaptable to needs by including enough space that can be used (should it be needed) for working at home through providing enough space and a usable layout. For clarity, this is related to desk-based and computer based activities and so there is no suggestion that any more specific activities should be considered. As such, an adjustment to point 4 of the policy to make it clear that it relates only to household-only homeworking, of a nature causing no disturbance to neighbours, might be helpful. This will be suggested to the Inspector as a potential modification in due course, either in the policy or in the supporting text.</p>
<p>Paragraph 3.6.3. should be amended to include green infrastructure to make it more consistent with national policy.</p>	<p>Green infrastructure is an important part of adapting to climate change. The policy itself does refer to green infrastructure. It is not considered strictly necessary for 3.6.3 to also make this point.</p>
<p>Point 6 of the policy is unrealistic where public transport is not a viable option for many people in many locations.</p>	<p>It is recognised that many of the rural parts of Central Lincolnshire are not well served by public transport and therefore private cars will be required. However, the policy requires applicants to undertake "where</p>

	applicable...infrastructure that supports car free development and lifestyles". This does not place an unrealistic expectation for delivering car free developments in rural areas.
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Policy S21: Flood Risk and Water Resources

Issue	Response
Support for the policy and its individual points, including from various statutory undertakes and water providers.	Noted
Suggestion from the EA that what has been undertaken is not a full Level 1 and 2 SFRA, contrary to what is stated in paragraph 3.7.2. But not of the view that a full level 2 SFRA is needed or that the plan is unsound as a result.	Updates to the Level 1 and Level 2 SFRA have been provided and this has been approved in discussion with the Environment Agency and other relevant bodies through the Duty to Cooperate.
In applying the sequential risk based approach consider that if developments are able to demonstrate that they are intrinsically safe, do not increase risk to others, and are compliant with all Flood safety measures required by the Environment Agency, such developments should be supported, particularly when they demonstrate benefits to the community and the environment. Consider that 'Sequential Tests' should be approached on a local basis rather than district wide, so that settlements such as 'Newton on Trent' that can provide safe development acceptable to the EA and are compliant with this approach (Adjacent to A57 & A1133 trunk roads) are not excluded.	The policy provides the framework for considering flood risk in accordance with the NPPF and supporting technical guidance and in liaison with the Environment Agency (EA), Lead Local Flood Authority (LLFA), Internal Drainage Boards (IDBs) and water companies.
A planning policy that requires a developer to demonstrate that a water company will fulfil its duty is not appropriate.	The policy requires developers to demonstrate to the LPA that they have engaged with the appropriate water company as early in the development process as possible to either confirm whether capacity exists or to allow for upgrades to be considered, designed and planned by the water company, as advised by the water company.
Reference to the sequential approach to development layout within a site would make the policy more effective, by highlighting this requirement to developers.	Policies for allocated sites which contain areas of flood risk require developers to locate development outside of the flood risk area or address drainage within the site. Policy S21 provides flood risk requirements for any windfall sites.
The policy would be strengthened by an additional criterion to deliver nature-based solutions to mitigation flood risk, including enhancements to the green and blue infrastructure network, where possible.	The policy provides the framework to allow for various solutions to be considered. Policies elsewhere in the Local Plan provide greater detail on biodiversity net gain and green and blue infrastructure.
Support of the use of SuDS within developments for surface water run-off to ensure development does not increase flood risk. It is not	The policy states that proposals should demonstrate how they have 'considered the potential' to contribute towards solutions for the wider

appropriate to include solutions to the 'wider area' due to the implications of working on third part land outside of the applicant's control.	area. This provides developers with the option to negotiate solutions with others that may benefit their site or acknowledge that their site may provide wider benefits. Flood risk is rarely confined to one site and the policy seeks to encourage developers to take a more holistic view.
The final paragraph should be dictated by IDB bylaws and is not appropriate within planning policy.	There is not total coverage of the CL area by the IDBs. The final paragraph is intended to assist developers and was included as a result of discussions with the EA.
The 2015 SFRA should be added to the current Library. Amended text suggested for the SFRA Level 1 and Level 2 documents.	Agreed, the 2015 SFRA has been added to the main Planning Policy Library. The Level 1 and 2 SFRA documents have been produced in liaison with the EA
The policy correctly sets out the drainage hierarchy. As acknowledged in the Policy there are likely to be instances where surface water connections to the combined or surface water system are necessary where it can be demonstrated that there are no feasible alternatives. This contradicts with another bullet point in the Policy which states that no surface water connections are made to the foul system.	The policy has been developed in discussion with the water companies, EA, LLFA and IDBs.
AWs focus is on reducing and removing surface water from entering the public sewer network for which the use of SuDS is supported.	Support welcomed and comments noted

Chapter 4 – Housing

Policy S22: Affordable Housing

Issue	Response
Expression of support for policy and clarity it seeks to provide, including in relation to First Homes exception sites, reference to viability, the value zones, level of contribution, and tenure mix.	Support is noted.
Paragraph 4.1.5 needs updating in relation to the Rural Designation as WLDC were successful in securing rural designation for the villages applied for.	Agreed that this paragraph should be updated.
The reduced cap of £140,000 for First Homes would result in homes with a market value up to £200,000 being applicable. Current market values in much of Central Lincolnshire are such that only 1 or 2 bed dwellings would fit into the £200,000 cap.	Paragraphs 4.1.11 and 4.1.12 (including footnote 15) clearly set out the justification for the reduced price cap for First Homes. Using average household incomes, the cap of £250,000, even with the 30% discount would not be affordable for in excess of 75% of households in Central Lincolnshire.

Question why market housing being used to cross subsidise on exceptions sites should be limited to helping the provision of Affordable rent properties rather than to assist the delivery of First Homes.	First homes exception sites are being applied consistently with national policy. Rural exception sites are a different tool for delivering affordable housing and as such should not be applied to first homes.
This policy could be innovative in securing small eco housing clusters. The Council might wish to consider an additional policy to this effect.	A specific policy is not required on this, as the range of policies within the plan would not preclude it. Should a scheme be brought forward it will be considered on its merit against the policies of the Plan.
The viability evidence suggests that there should also be a differentiation between greenfield and brownfield sites. Further viability testing is required as the impacts of First Homes on viability have not been fully considered. The proposed tenure mix will increase marketing costs and increase risk as developers will not be able to sell First Homes in bulk to a Registered Provider.	The policy is in accordance with the NPPF and PPG in relation to First Homes. The Local Plan has been subject to viability testing, which has included Policy S22.
It is possible, following discussions regarding costs, that RAF Scampton may need to be moved into Value Area C or D, or have the affordable housing provision agreed through the masterplanning process.	The policy includes sufficient flexibility that should this be the case, rather than amending the Value Area, the applicant can justify why site abnormalities mean a lower proportion of affordable housing is being proposed as part of the masterplanning process.
Policy should allow a level of flexibility within Policy S22 in respect of affordable housing percentages and specific tenure splits.	The policy already includes sufficient flexibility of this nature.
Single dwelling developments should be allowed if they are for the applicant or a family connection of the applicant to help individuals and families who can assist each other get on the property ladder.	The Custom and Self Build policy (NS24) provides for this eventuality, with adequate support provided to proposals. No amendments to the policy are necessary.
The Viability Assessment may have overplayed the viability of older persons' housing. Specialist older persons' housing could not support an Affordable Housing contribution in the lower and mid-lower value area. Mid and high value areas could support an affordable housing contribution, but it was finely balanced. The policy should make clear that no affordable housing contribution will be sought in proposals for specialist older persons' housing.	The policy states that for specialist older persons' housing an affordable housing contribution will be sought in line with the requirements set out above. This may include a discussion on the potential to reduce affordable housing requirements where viability requires it. No evidence has been provided to demonstrate that no affordable housing can be delivered in all cases.
Affordable housing levels need to be higher to match local demand, closer to the 50% of calculated need and in all locations where it is needed.	Given the viability in the area and the likely ceiling for annual delivery of housing, it is not possible to deliver all of the identified affordable dwellings that are needed through this policy. Therefore the policy seeks to secure as much affordable housing as is reasonably possible to meet needs, whilst following national policy and without becoming unviable or otherwise undeliverable.
A policy should be included to prevent developers paying too much and then requiring the Council to reduce their infrastructure contributions.	The policies make the position clear and the whole plan viability assessment provides suitable assumptions for land values to ensure that costs are built in to the price being paid for land.

Proportionate contributions should be made by all new dwellings, not a ten new dwelling threshold. For smaller contributions, it should be a commuted sum paid to the District or City Council.	This threshold is set in national policy.
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Policy S23: Meeting Accommodation Needs

Issue	Response
Expression of support, as helps to create mixed, balanced and inclusive communities	Noted.
Too much development is made up of under occupied executive homes. There is an undersupply of small homes (for single people not needing gardens), which is driving up the demand for subdivision and multi-occupation. This policy should also include a view on the mix between small and large homes.	The policy seeks a housing mix that contributes to meeting the housing needs of the area. Therefore, developments should provide a mix of housing tenures, types and sizes to achieve this. Through neighbourhood plans, local communities may be able to evidence locally-specific needs and set more detailed requirements.
Requiring a mix of homes must be considered against the viability of schemes to ensure they can be deliverable.	The policy is not prescriptive about mix.
There is no need to restrict residential care accommodation to only tier 1-4. This should be extended to within 100m of a shop and a pub. Residential care can very usefully be placed in lower tier villages as long as they have a shop and a pub. It is important for people who need care not to be extracted from their existing support networks.	The Policy does not restrict residential care accommodation to only tiers 1-4 of the hierarchy. Whilst it is stated in the policy that development should be located in settlements within the top 4 tiers, there is flexibility to allow for development to take place in other settlements if it can be demonstrated that there is appropriate access to services.
The policy is undermined by inconsistencies in the viability assessment older persons' housing typologies. Paragraph 4.2.9 should be amended to remove the requirement to demonstrate the need for specialist housing and that the inability of older persons' housing typologies to deliver affordable housing is referenced.	The Whole Plan Viability Assessment (ref INF002) provides a robust assessment of these uses in chapter 7. This highlights the sensitivities of these uses to fluctuations and the importance of assessing on a site-by-site basis. This does not undermine such uses, but provides for discussion with the local planning authority at and before applications stage. The delivery of affordable housing in specialist accommodation is important to ensure that needs are being met.

Policy NS24: Custom and Self-build Housing

Issue	Response
A number of comments of support.	Noted.
Part 1 of the policy needs a stronger view on self-builders building on land they own for their own purposes/family.	The policy provides adequate support for such proposals provided they will not result in unacceptable impacts and are generally consistent with the plan.

<p>In part 3 of the policy, the site threshold of 100 or more dwellings and the 5% provision are unjustified based on the current evidence. There is no legislative or national policy basis for imposing an obligation on landowners or developers of sites of more than 100 dwellings to set aside at least 5 serviced plots for self & custom build housing. Under the Self Build & Custom Housebuilding Act 2015 and 2021 NPPF (para 62). There is minimal demand for custom and self-build homes based on the evidence from Custom and Self Build data EVR024 (Tables 2-4)</p>	<p>Custom and Self Build homes is a key government initiative to increase different forms of tenure onto the housing market. The Government has recently responded to the Independent Review and scaling up self-build and custom housebuilding remains a key ambition of government policy development. Whilst there is no requirement in national policy to deliver 5% custom or self-build plots it is required to meet the needs identified in Central Lincolnshire. This requirement will only impact sites of 100 or more which is approximately 20 sites (page 10 of EVR024). There will be more people adding themselves onto the registers throughout the plan period. The inclusion of a fall-back position to allow sites to revert to market housing if they are not sold provides adequate flexibility.</p>
<p>The proposed marketing period of at least 36 months is too long. Could cause eyesores on development sights</p>	<p>Marketing of plots could begin as soon as planning has been approved. On a site of 100+homes, whilst the build out rates vary and often will be completed in phases, 36 months is considered adequate to allow ample opportunity for plots to be acquired and to revert to the developer if unsold before the site is completed.</p>
<p>Part 3 of the policy, the wording “thorough and proportionate” is too vague.</p>	<p>The terminology “thorough and proportionate” allows developers and local planning authorities to ensure reasonable opportunities have been given for the uptake of the sites as custom and self-build plots before reverting back to the fallback position of market housing.</p>
<p>Part 3 of the policy is very restrictive and could impact viability where developers already have to provide affordable housing circa. 10-25%.</p>	<p>Custom and self-build plots need not impact viability as they can assist with cash flow and can be factored into viability assessments to inform the price paid for land. These plots can also help to open up sites and diversify the offer.</p>
<p>Plot passports are too prescriptive for outline and permission in principle applications and therefore unjustified compared to a market housing application.</p>	<p>The purpose of plot passports is to make the process simple for custom and self-builders and to ensure that challenging matters on the site can be resolved early. As such the requirements for plot passports are considered to be wholly appropriate.</p>
<p>The definition of self-build needs to be clearly defined to ensure it is genuinely a self-build.</p>	<p>The definition is provided in the Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) and this is provided in paragraph 4.3.2.</p>
<p>The self-build sites on a development should be made available in a phased manner.</p>	<p>The phasing of any development will be subject to the individual development proposal.</p>
<p>These sites need to be subject to the same sustainable locations and design constraints as other new dwellings.</p>	<p>All relevant policies in the local plan will apply to proposals for custom and self build housing, consistent with other developments.</p>

Policy S25: Sub-division and Multi-occupation of Dwellings within Lincoln

Issue	Response
<p>The approach within Lincoln’s Article 4 direction is not referred to. Paragraph 4.4.5 has been amended from Regulation 18 to highlight that ‘not putting occupants at risk’ includes development of residential accommodation or bedrooms at ground floor level in an area at risk of flooding. We consider that the advice and position could still be stronger and clearer.</p> <p>Suggest an additional criterion f) “that no ground floor bedrooms in new HMOs in Flood Zones 2 or 3 are acceptable unless a site-specific flood risk assessment has demonstrated that finished floor levels are above the relevant flood level.”</p>	<p>The position is clear in the policy and the supporting text.</p>
<p>Expression of support</p>	<p>Noted</p>

Policy S26: Houseboat Moorings and Caravans

Issue	Response
<p>Park homes should be subject to the same requirements as other dwellings, such as for affordable housing and energy efficiency</p>	<p>This policy should not be read in isolation, and the policy wording specifically sets out that any proposed development should satisfy the policies in the Local Plan.</p>
<p>Caravan pitches or park homes supported if acceptable for permanent dwellings</p>	<p>Noted</p>

Policy NS27: Residential Annexes

Issue	Response
<p>Various expressions of support for the policy</p>	<p>Noted</p>
<p>Within rural areas of Lincolnshire, it would make more aesthetic sense and provide more meaningful space for the resident to allow detached annexes.</p>	<p>The policy as written allows for suitable flexibility to allow for detached annexes where they are the most appropriate option within the location.</p>

Chapter 5 – Employment

Policy S28: Spatial Strategy for Employment

Issue	Response
Comments of support for the Policy.	Noted.
Anglian Water Services note then when new developments require network or treatment capacity improvements business will be charged for that.	Noted.
Greater flexibility/exception should be included in the policy concerning the RAF Scampton site which would allow greater growth beyond its current 'Medium Village' classification.	The RAF Scampton site has a separate policy S75 (RAF Scampton). The provisions set out in this policy state that any future redevelopment will be through a master plan. Therefore, on this basis no amendments to Policy S33 policy are required.
Policy concentrates on 'strategic' economic development sectors and does not reflect localised issues affecting the local economy inconsistent with Paragraph 82 of the NPPF. The policy does not positively respond to evidence demand in terms of job type and geographic location particularly away from settlements.	Whilst the focus of new sites is at a strategic level, the employment policies are set out in a hierarchical approach. This enables different scales of economic development to occur at the different tiers to maintain and enhance their importance, whether it is strategic or local. These policies is consistent with Paragraph 82 of the NPPF. Policy S34 provides for non-designated employment proposals in the countryside, and this appreciates the rural nature of Central Lincolnshire and the need for agri-food sector growth and other land based rural businesses to be able to thrive and innovate. Non-rural based employment proposals should be sought on allocated land or other appropriate locations that are set out within the suite of policies S29- S33.
Dispersed employment sites generate excessive car traffic. Should be prioritisation of employment expansion in areas well served by public transport.	Noted. The strategy reflects this.
A hybrid approach of Option 2 (SA) to the employment strategy is considered to be more appropriate and greater aligned to Paragraph 35 of the NPPF (2021). This would allow a more evenly distributed economic growth model.	The evidence notes that there is a substantial supply of employment remaining for the plan period. The proposed plan offers a balance of certainty and flexibility of varying sized across the employment hierarchy which promotes sustainable locations across Central Lincolnshire. The range of sites are justified and will bring about the strategic aims of the plan. The strategic focus being, one of centre around main settlements, steers development in places where greatest impact on sustainability.
A site is proposed at Old Haddington Lane for a strategic employment site.	Noted. The existing allocations retained from the adopted 2017 plan provide choice and certainty. There has been no intention to call for new sites for employment throughout the whole Local Plan review process.

Policy S29: Strategic Employment Sites (SES)

Issue	Response
Policy is not positively prepared. Option 2 in Sustainability Appraisal (SA) should be used as the proposed approach. This offers more variety and scale of SES employment sites and is more justified against the NPPF Paragraphs 81 and 82. Questions raised over delivery rates of SESs of the plan period to date and that using option 2 would increase supply of employment land.	The existing allocations have been adopted since 2017 and have planning permission. Whilst market conditions will dictate the delivery of employment sites to a degree the permissions outstrip the anticipated need for sites. The approach in the plan offers a balance of certainty and flexibility of varying sized sites across the employment hierarchy and in a variety of sustainable locations.
There should be increased flexibility for employment sites within the countryside where adjacent to existing employment sites. (e.g. Old Haddington Lane)	Noted. S34 Non-Designated Employment Proposals in the Countryside offers adequate flexibility for the expansion of existing sites.
Caenby Corner site proposed.	Noted. The existing allocations retained from the adopted 2017 plan provide choice and certainty. Allocating additional sites might undermine the existing permissions.

Policy S30: Employment Allocations on Sustainable Urban Extensions (SUEs)

Issue	Response
Comments of support.	Noted.

Policy S31: Important Established Employment Areas (IEEA)

Issue	Response
Newtoft has a thriving business park and should be considered as an IEEA.	This site is not within tiers 1-4 of the settlement hierarchy. This site would therefore fit within the scope of policy S32 Local Employment Areas (LEA) as set out on page 22, Table 4 of EVR0028-034 Policy S28-S34.
Former Bardney Syrup Factory based on the longstanding planning history; it should be allocated as IEEA within policy S31. Currently, sits within the definition of LEA though the total site is around 58ha but only has two businesses operating from the site. Objection that proposed policy is not consistent with NPPF.	Having reviewed the site, this site falls within most of the definition but not all as set out in Table 4 of EVR0028-034 Policy S28-S34 Employment Policies. Therefore, Policy S33 is the most appropriate policy within the employment suite of policies that would be applied to this site.
S31 unreasonably restricts the development to set uses. Sites E9 and E14 both offer potential other uses which would be more sustainable for alternative uses.	These sites have been allocated in the 2017 adopted plan and there has been no suggestion that change is required. E9 and E14 hold significant

	value for employment generating uses due to their strategic locations and are within close proximity to the City Centre.
Comments raised that Ruskington Fen industrial site should be recognised as IEEA site not LEA. Around 1ha of employment land is put forward for further development from the existing service road into this site.	The Ruskington Fen site falls short of the expected 2ha of the site to be allocated as an IEEA. This site will therefore be classified as an LEA under Policy S32 which makes provision to allow for expansion of these sites under Part 1 letters e-g. The LPA therefore considers that there is sufficient scope for development proposals under provisions of S32.
Objection raised that the policy map 45 (<i>Lincoln Urban Area and Neighbouring villages A0 v2.</i>) E18 does not recognise the whole site that has permission granted through 17/0351/OUT.	This suggestion was reviewed following the regulation 18 consultation and it was agreed that the wider site should be included. This is a mapping error and is proposed to be amended.

Policy S32: Local Employment Areas (LEA)

Issue	Response
Local Employment Areas are linked to the settlement hierarchy and therefore sites such as Old Haddington Lane do not fall within the scope of LEAs or IEEA due to their location.	Noted. S34 Non-Designated Employment Proposals in the Countryside offers a degree of expansion of existing sites.

Policy S33: Non-designated Employment Proposals within Identified Settlements

Issue	Response
The policy is inconsistent with the GLLEP identifying the Agri-good sector being a growth sector. The Maltings site (Malthouse Gainsborough) is considered to be not appropriately protected by the employment policies by not recognising this within the employment hierarchy. The criteria used under letter e, “there is no significant adverse impact on the viability of delivering any allocated employment site” the growth of the Maltings would be hindered through this policy which is inconsistent with Chapter 6 of the NPPF.	Whilst this site does not fall within the definitions set out in S31 (IEEA) or S32 (LEA), Policy S33 offers adequate flexibility for the Maltings site and any reasonable expansion of the site.
Concerns that in part 1 a) of the policy 5km is excessive and 2km should be considered instead.	The wording within Part 1 a) allows sufficient scope for other sites to be considered first within the employment hierarchy. The distance of 5km has been tested on settlements to see the span this would include. This is reasonable given the rural character of Central Lincolnshire.
Concerns raised that S33 should be more flexible for RAF Scampton site.	The RAF Scampton site has a separate policy S75 (RAF Scampton). The provisions set out in this policy state that any future redevelopment

	will be through a master plan. Therefore, on this basis no amendments to the current S33 policy are required.
Employment land at Besthorpe Road, North Scarle, has been suggested and was in Housing & Economic Land Availability Assessment February 2019 for allocation as an employment site outside of established settlements.	No sites have been requested throughout the Local Plan Review. The Economic Needs Assessment projects the economic land required for the plan period and the current allocations provide enough employment land allocations offering certainty and flexibility of varying locations throughout the employment hierarchy. The HELAA did not propose any sites for allocation, but instead provided a high level assessment of land that had been put forward.

Policy S34: Non-designated Employment Proposals in the Countryside

Issue	Response
Policy S34 should be adapted to include the caveat “With the exceptions of those developments associated with minerals.”	The development plan, which includes the Minerals and Waste Local Plan should be read as a whole. It is clear that this policy does not apply to minerals working and therefore no change is needed.

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

Policy S35: Network and Hierarchy of Centres

Issue	Response
Whilst governed by the NPPF, the way people shop has changed and the current policy is outdated in expecting people to go to the city of Lincoln as the premier shopping destination in Lincolnshire. In reality this no longer happens and people will either go further afield to a much larger shopping centre or simply use online shopping services like amazon etc..	The policy takes into account changing retail patterns including increased use of online shopping. Mapped retail/ centre boundaries in the City and Town centres have been focussed into more concentrated multi-experience centres. Lincoln City remains a thriving centre offering services and facilities beyond the traditional retail focus. Local and village centres meet valuable local needs sustainably, reducing the need to travel.
Suggesting rewording to include an exception/ greater flexibility for the RAF Scampton site to allow for small scale retail (such as a local centre) to come forward there if agreed with WLDC through a comprehensive masterplanning process	RAF Scampton has its own dedicated policy (S75) which identifies it as an opportunity area and the need for a masterplan to be approved prior to a planning application being submitted. A masterplan could include the identification of a new centre, if required and allows for sufficient flexibility for the future use of the site. Policy S35 lists existing centres and does not include RAF Scampton at this time. RAF Scampton may be identified in future Local Plan reviews if, when and where identified,

	as required through any masterplan. Reference to RAF Scampton in the policy as an exception is therefore not considered to be necessary.
Reference should be made to the need to engage at an early stage with the local NHS with regard to the health care needs/ opportunities as part of these centres. Not only GP/ Primary Care services but also dental, pharmacy and optometry services. The NHS are currently working with District Council partners on the integration of community assets including our role as an anchor partner in the high street. There are no references to pharmacy, optometry, dental provision. One example of this is the planning underway regarding the potential GP Practice within the Lincoln Carlton Centre. Practices are working together within Primary Care Networks and developing integrated community based care through Neighbourhood Integrated Teams.	The need to provide adequate infrastructure to meet needs in a timely manner is provided by policy S45. The expediency of including health care facilities within centres is acknowledged. Such uses would be considered suitable in such centres under policy wording but it is agreed that these uses could be specifically referenced throughout the policies and supporting text to make this clearer.

Policy S36: Lincoln's City Centre and Primary Shopping Area

Issue	Response
Support expressed for this policy	Noted

Policy S37: Gainsborough Town Centre and Primary Shopping Area

Issue	Response
No objection although feel that shopping habits have changed	Noted. This had been taken into account
Feel that the policy represents an opportunity to promote the principles of Retro-fitting SuDS, and surface water separation	This is noted but it is felt that other policies in the Local Plan cover this or it is more appropriately covered in greater detail in future versions of the Gainsborough Masterplan and Gainsborough Neighbourhood Plan.

Policy S38: Sleaford Town Centre and Primary Shopping Area

Issue	Response
Support expressed for this policy	Noted

Policy S39: Market Rasen and Caistor Town Centres

Issue	Response
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Broad support expressed with shops and pubs protected in village centres	Noted
Policy welcomed which deals exclusively with Market Rasen and Caistor town centres recognising the important role that the towns play	Noted

Policy S40: District, Local and Village Centres

Issue	Response
Policy welcomed or supported	Noted
Concern expressed about how the policy relates to the recent changes to the permitted development rights with suggestion that this should be clarified	We share concerns regarding the recent changes to permitted development rights and how this may impact on the vitality and viability of the various centres. The policy seeks to take the recent changes to the use classes order and permitted development rights into account whilst protecting local services and facilities and allowing for flexibility.
Consider that the policy should be reworded to include an exception/ greater flexibility for the RAF Scampton site to allow for town centre uses floorspace to come forward there if agreed with WLDC through a comprehensive masterplanning process in due course	RAF Scampton has its own dedicated policy (S75) which identifies it as an opportunity area and the need for a masterplan to be approved prior to a planning application being submitted. A masterplan could include the identification of a new centre, if required and allows for sufficient flexibility for the future use of the site. Policy S40 refers to the centres defined on the Policies Map (also listed in S35) and does not include RAF Scampton. Reference to RAF Scampton in the policy as an exception is therefore not considered to be necessary.

Policy NS41: City and Town Centre Frontages

Issue	Response
Either strong support, specifically welcoming criteria b) or fully supporting the policy	Noted

Chapter 7 – Tourism and Visitor Economy

Policy S42: Sustainable Urban Tourism

Issue	Response
Various expressions of support for the policy	Noted

Policy S43: Sustainable Rural Tourism

Issue	Response
General expressions of support	Noted
Caution advised that a number of tourism development proposals within or adjacent to villages/hamlets may often lead to potential conflicts and perceived concerns in term of local traffic problems, and general late-night noise. In terms of development in the wider countryside, such proposals may well be better placed as a sustainable farm diversification project enabling the enhancement of the wider visitor infrastructure through eco-tourism, glamping or similar facility, where it is deemed to be sympathetic and appropriate to the local landscape character and can clearly demonstrate that it enhances rather than detracts from the wider countryside.	The points raised are noted, however, it is considered that the policy as drafted provides appropriate protection for the rural area, whilst being flexible enough to allow suitable tourism related development to come forward.

Policy S44: Lincolnshire Showground

Issue	Response
Various expressions of support.	Noted
The Showground site is still not connected to the mains sewerage network, which is unfortunate given plans for its continued growth.	General comment is noted, however, no additional growth beyond that included within the Adopted Local Plan is provided for.
Policy in its current form unnecessarily restricts growth of existing uses and the potential for other types of sustainable development being delivered in this location that could help sustain and support the wider function of the showground. Specifically, continued growth of the Agricultural College, inclusion of a roadside services facility inclusion of education and training facilities (F1(a) use class) and amendments to Policies Map 47 to expand the boundary of the showground area.	With the exception of the reference to a Local Development Order, which has not been progressed, the wording of this policy has been carried forward from the adopted Local Plan 2017. The policy as worded makes provision for an appropriate level of growth on the site, which is in a rural location. The suggested increase in permitted uses and size thresholds are at odds with the vision for the site and could result in problems given the rural location.

Chapter 8 – Transport and Infrastructure

Policy S45: Strategic Infrastructure Requirements

Issue	Response
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Expressions of support	Noted
Paragraph 8.09 of the supporting text states that “The level of healthcare provision within Central Lincolnshire is currently adequate to serve the existing population of the area” this is considered to be untrue. Level of growth will have a significant impact upon local health services, therefore on-going dialogues regarding development will be key.	NHS Lincolnshire have been consulted at all consultation stages of the Plan preparation and have not raised objections to this statement. NHS England will continue to be consulted on applications as a statutory consultee.
Policy should make reference to secondary healthcare, and be specific that developers will be expected to pump prime new services where necessary.	The policy does not refer to specific types of healthcare, rather it refers to ‘new health care facilities’ which covers the range of facilities covered by primary and secondary healthcare services.
Concerns that securing of appropriate infrastructure will not materialise and reservations about impact on range of infrastructure resulting from housing development, particularly along ridge villages.	The policies of this plan, supported by the Infrastructure Delivery Plan and Developer Contributions SPD should see the provision of adequate infrastructure to support growth. It will continue to be necessary for developments to be approved in accordance with policies in the Local Plan, including delivering infrastructure.
It is noted that the infrastructure required to support the Plan growth is considered in the 2020 Infrastructure Delivery Plan and Whole Plan Viability Study. Water and water recycling are discussed under that Study’s Utilities section.	Noted.
Policy should be amended to ensure that there is appropriate reference to the role of economic viability.	Local Plan has been tested for viability in the Whole Plan Viability Assessment (ref INF002) to ensure that the requirements of the plan can be met. Development specific viability issues will be considered at application stage.

Policy S46: Safeguarded Land for Future Key Infrastructure

Issue	Response
The policy should be expended to include all areas where infrastructure provision could be undermined by development.	The policy relates to strategic infrastructure provision. Lincolnshire County Council and other strategic infrastructure providers have been engaged in the development of this plan with no other safeguarding identified as being needed at this time.
Engagement should be continued in relation to the progression of the North Hykeham Relief Road.	Noted. Lincolnshire County Council, as highways authority, will continue to engage the district councils and other relevant parties.

Policy S47: Accessibility and Transport

Issue	Response
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Expressions of support, including for specific reference to the emerging LTP5 and its 6 key themes	Noted.
The Plan does not appear to recognise or support the need for improvements to the A15 north of Lincoln to improve journey time and remove barriers to future growth.	Unless for safeguarding purposes, reference to specific road schemes are not identified in this plan, but would be addressed in the Local Transport Plan. However, there is a strong theme within the policy relating to the improvement of strategic routes, including the increase in capacity where appropriate. This links into the Local Transport Plan.
Clarification is required for point (c) and whether this equates to making allowance for electric car charging points and would this be on all dwellings or a percentage of the dwellings.	Policy NS18 specifically addresses electric vehicle charging points and is also cross referenced from Policy S49: Parking Provision. It is therefore not necessary to repeat the detail within this policy.
It is recommended that Central Lincolnshire notes that the Greater Lincoln Traffic Model is not sufficiently extensive and detailed for testing the Local Plan impacts on the A46 between the A1 and A46 Hykeham roundabout given that this link of the Strategic Road Network falls within the buffer zone of the model. It is recommended that suitable procedures are established, including a potential need for assessment on the A46 junctions between the A1 and Lincoln, if this part of the network shows stress due to forthcoming growth. Engagement on the A46 corridor study would be welcomed.	The detail of this comment does not require any amendments to the policy. The Highways Authority will continue to engage with National Highways on this stretch of road and any other strategic road matters.
Concerns regarding how the development of the satellite villages will contribute positively to a transport capacity that is already at full capacity. How are people to get from the villages into Lincoln? Public transport and roads are inadequate and no pedestrian or cycle facilities. The Eastern By-pass has simply relocated the traffic bottleneck from south-east of the city to the north.	This policy has been written and included in the Local Plan to ensure that issues such as these raised are addressed. The policy seeks to ensure that development contributes towards efficient and safe transport networks, which includes public transport, walking and cycling networks as well as roads.

Policy S48: Walking and Cycling Infrastructure

Issue	Response
Various expression of support, including specifically in relation to safe interconnections between villages; closing gaps in the network and wider benefits	Noted
Reference to routes connecting communities and facilities should be included within point 'b' or 'c'.	Agree with this suggestion, but it might fit better in point a.

Policy S49: Parking Provision

Issue	Response
Expression of support, in particular for emphasis on 'on plot' parking, and the clear requirements set out	Noted
The restriction of parking court provision not associated with flatted development is not justified. Paragraph making reference to parking courts should be removed.	The policy allows sufficient flexibility that if parking court provision is the most appropriate option for a development it can be provided. However, the current wording sets out the <u>preference</u> for 'on plot' parking, wherever possible.
Developers should be required to set out how their design will prevent pavement parking by residents and visitors	By ensuring that appropriate parking provision is made within new developments and appropriately incorporated into the design of the scheme, inappropriate parking will be reduced.
Adopted Neighbourhood Plans should be listed.	As additional Neighbourhood Plans are produced and adopted, any list included within the Local Plan would quickly become out of date. The District Council websites have details of all the neighbourhood plans.
Stated standard of provision for Category II sheltered housing and Extra care housing would result in a significant over provision and make delivery of developments difficult in the most sustainable locations. A good example of parking standards for the elderly would be: 1 space per every 4 dwellings for Extra Care accommodation 1 space per every 3 dwellings for Sheltered Housing.	This policy has been drafted with input from the District Councils. The standards and benchmarking exercise have been re-visited following similar comments at the regulation 18 consultation and further consultation/discussions had with the District Councils regarding the appropriateness of the proposed parking standards for older people's accommodation. Section 9 of the Residential Parking Standards Evidence Paper (ref TRA005) sets out the work undertaken and reasoning for keeping the proposed parking standards in the Proposed Submission Local Plan.
The standards for 3 bedroom homes and larger should allow for 1 space per bedroom, where practically possible.	The standards set out are minimum parking standards, therefore they do not prevent developers providing a higher level of parking if considered appropriate.

Policy S50: Community Facilities

Issue	Response
Various expressions of support, including with regard to its application to cultural facilities.	Noted
Retention of community facilities are crucially important to the continued sustainability of communities. Can the policy address the Permitted Development Rights for Class E premises to further protect community facilities?	The Local Plan cannot override permitted development rights, but concerns are shared about the national approach to Use Class E and permitted development rights.

There is a need to understand the impact of growth on existing facilities in terms of future planning.	Agreed. However, the impacts on facilities will be varied across the region, depending on the local circumstances. As such, it is more appropriate that this is considered at application stages, informed by the Infrastructure Delivery Plan (ref INF001).
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Policy S51: Creation of New Open Space, Sports and Leisure Facilities

Issue	Response
Support for policy and component parts considering it meets the tests of soundness.	Noted and agreed.
The policy refers to very prescriptive requirements in Appendix 3. It is recommended that additional flexibility be built into the policy.	This policy is suitably flexible with a preference for on-site provision, but allowing for off-site provision where criteria i) and/or j) can be demonstrated. Appendix 3 sets out the process by which applicants can determine the open space, sport and leisure requirements of their development and this level of detail is required for clarity as to what is expected from the applicant.
Support this policy as open spaces are vital for our health and that of natural world. This should be proportionate to all new development, not just making up a shortfall as in a) in Policy S50.	Addressing existing deficiencies in open space provision is one of but not the only aims of this policy. It also seeks to ensure new development provides an appropriate amount of new open space to meet need and to improve the quality of and access to existing open spaces.
Funding mechanisms should include a proportionate contribution from all dwellings, not just when in batches of ten.	The ability to require contributions from sites of fewer than 10 dwellings is restricted nationally.
The open space requirement was higher in the previous plan. This should be reinstated. Need for open space is increasing with more people working from home.	<p>The approach to standards has been amended from the adopted Local Plan, with standards set out by open space type as opposed to being grouped together as 'Local Useable Greenspace'. The standards set out in Appendix 3 of the Local Plan are based on extensive work on open space provision across Central Lincolnshire (SOS003a Open Space Audit Update June 2021 and SOS003b Public Open Space Supply June 2021).</p> <p>The old standards were 1.8ha/1,000 population in the urban settlements and 1.5ha/1,000 population in the market towns and villages. The standard across the whole of Central Lincolnshire is now 3.56ha/1,000 population. The new recommended standards include allotments and parks and gardens, which were not included in the adopted standards. However, it is important to note that standards should not be simply added together to generate a total requirement for open space. This is</p>

	because it may be possible to provide some open space types within the boundary of another. For example, a neighbourhood park may be multi-functional and contain one or a number of the other open space types.
Open space, sport and leisure facilities could be suitable for multifunctional use such as SuDS. Consider multifunctional benefits such as SuDS and biodiversity in design of new areas.	Multifunctionality benefits such as SuDS and biodiversity are covered by the policy under bullet point f) of Part A and para 8.6.2 of the supporting text.
The wording “in compliance with the latest Developer Contributions SPD” gives DPD status to a document which is not part of the Local Plan, and which has not been subject to examination. Modify policy to remove inappropriate reference to the SPD.	This wording has not changed from the adopted Central Lincolnshire Local Plan 2017 and is considered to be appropriate as it provides clarity to the applicant as to how the policy and standards will be applied. The Developer Contributions SPD is currently being updated in alignment to the submitted Local Plan to allow full examination if needed.
All of the appendix items for the Sports Facility Assessments, which includes the Master Lists, to be publicly shared and form part of the published evidence base for the Central Lincolnshire Local Plan.	The Master List of Sites for each district were published alongside the Proposed Submission Local Plan and were available to view in the Local Plan Consultation Library (SOS006a, SOS007a and SOS008a).
Policy S51 Evidence Report (March 2022) includes reference (at paragraph 2.9) to Sport England’s strategy “Towards an Active Nation 2016-2021”. This strategy has now been replaced with Sport England’s strategy “Uniting the Movement: A 10-Year Vision to Transform Lives and Communities through Sport and Physical Activity.”	Noted.
The reference to the need for open space and the links to physical and mental health. Significant levels of inactivity in our residents leading to both physical and mental health issues, emphasised by Covid 19.	Noted and support welcomed.
Pleasing to see that for on-site provision there is an emphasis on ‘maximising the green infrastructure network’ and delivering ‘biodiversity net gain’. Provision of linked open spaces will contribute to the overall function and benefits of the green space.	Noted and support welcomed.

Policy S52: Universities and Colleges

Issue	Response
Riseholme Campus is not shown on the policies map as stated in the policy.	This policy and the mapped area of the Riseholme Campus has been carried forward from the adopted local plan without the need for change. It was mistakenly omitted from the policies map.
Expressions of support	Noted

Riseholme should be given a stronger tone of support, as per the level given to University of Lincoln, currently it appears one is getting more support than the other.	It is not the intention of the policy to provide more support for one campus over another, but the wording reflects the fact that Riseholme campus is in a rural area rather than the city centre.
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Chapter 9 – Design and Amenity

Policy S53: Design and Amenity

Issue	Response
Various expressions of support in relation to various points in the policy	Noted.
Reservations on how certain aspects of it could be interpreted especially the issue of the design codes, we don't have zonal planning and the design code should not try to bring this about by stealth that said that is matter for the planning process to determine.	Design codes are being introduced nationally aimed at ensuring that the requirement for good design is embedded in planning policy and ultimately is delivered through the development being built and the places being created.
SuDS, Drainage Hierarchy and water efficiency are key design considerations and should be in this policy.	Local Plan policies should not be applied in isolation and this topic is covered under Policy S21 which will be applied.
The policy needs to provide flexibility, where appropriate, and not be too prescriptive to avoid restricting innovation.	The policy does provide adequate flexibility, providing a framework under which the design of a scheme can be considered, presented and assessed. This will not restrict innovation.

Policy S54: Health and Wellbeing

Issue	Response
Expressions of support for the policy.	Noted
Policy extends beyond parameters of national planning policy. No justification of thresholds, and is unduly restrictive, in practice may not be feasible to comply. Physical and mental health points will not be viable in remote locations. Policy should include 'where appropriate' in relation to mental and physical health outcomes.	This policy is largely carried over from the Adopted Local Plan (2017). The threshold for the preparation of a HIA has been increased from 25 dwellings in the adopted plan to 150 dwellings in order to reduce the burden on developers of small and medium size sites.
Local Authorities have a similar duty with regard to reducing crime and disorder which does not seem to receive much coverage in the draft proposed Plan.	A number of elements relating to safety are covered in Policy S53.
The role of specialist older persons' housing in improving the health and wellbeing of elderly residents should be included in the supporting text.	The supporting text provides appropriate detail in support of the policy.

Urge caution that in supporting sites with multi use functionality that such uses do not undermine the primary purpose as a health facility.	The point is noted. No changes are required to the policy.
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Policy NS55: Advertisements

Issue	Response
Criteria a) welcomed	Noted

Policy S56: Development on Land Affected by Contamination

Issue	Response
Broad support for the policy or stating that the common sense and proportionate policy is supported	Noted

Chapter 10 – Built Environment

Policy S57: The Historic Environment

Issue	Response
Support for policy and component parts considering it meets the tests of soundness.	Noted and agreed.
Provision of an Historic Environment section and policy and the detail provided within is strongly welcomed. Reference to heritage assets and their settings within 10.0.3 is particularly welcomed, together with reference to non-designated heritage assets and the provision of a Local List.	Noted and support welcomed.
With particular reference to the known constraints and opportunities at RAF Scampton, it will be important for any development proposals to respect and reflect the unique history of the former RAF base and ensure they sit comfortably with the sensitive local landscape. As such, Policies S57 (The Historic Environment) and Policy S62 (Areas of Great Landscape Value) are supported whereby proposals are required to protect, conserve and enhance the historic and natural environment.	Noted and agreed.
Paragraph 4 of the policy may result in issues of interpretation. It is introduced as relating to both change of use and proposals that would	It is agreed that this part of the policy would benefit from removing reference to the setting so it only applies to change of use.

affect the setting of an asset, however the following bullet points g) to i) mainly relate to change of use.	
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Policy S58: Protecting Lincoln, Gainsborough and Sleaford's Setting and Character

Issue	Response
Policy supported	Noted
Reference to the significant view of Lincoln Cathedral from Tattershall Castle, particularly as it relates to renewable energy, and the suggestion that part a) be amended to read: a) Protect the dominance, and approach views <u>and other significant views</u> of Lincoln Cathedral, Lincoln Castle and uphill Lincoln on the skyline.	It is considered that the policy as worded sufficiently protects the dominance, approach views, setting and relationship with surrounding villages. Other significant views have not been defined or identified. Policy S14 and supporting evidence refer to heritage assets and their settings, the impacts of which would be considered on a case by case basis subject to the nature of the asset and the proposal.

Chapter 11 – Natural Environment

Policy S59: Green and Blue Infrastructure Network

Issue	Response
Support for policy and component parts considering it meets the tests of soundness.	Noted and agreed.
Supportive of the principles outlined, particularly the incorporation of blue infrastructure through green corridors making space for water and enhancing biodiversity and amenity.	Noted and support welcomed.
Welcomes the inclusion of SuDs and flood storage areas in the range of green and blue infrastructure given their ability to reduce the environmental costs of managing surface water and wellbeing/ place making benefits. Developer contributions reduce the cost to the environment and customers of managing surface water if it were instead channelled to the public sewer network.	Noted and support welcomed.
The wording “in accordance with the Developer Contributions SPD” gives DPD status to a document which is not part of the Local Plan, and which has not been subject to examination.	The wording is considered appropriate and as it provides clarity to the applicant as to how the policy will be applied. The Developer Contributions SPD is currently being updated in alignment to the submitted Local Plan to allow full examination if needed.

Policy S60: Protecting Biodiversity and Geodiversity

Issue	Response
The policy does not account for potential 'imperative reasons of overriding public interest (IROPI)' with associated compensatory measures.	It is considered that the policy covers IROPI in the first paragraph of 1. International Sites under exceptional circumstances.
The inclusion of policies specifically relating to Biodiversity and Geodiversity are supported and the approach very much aligns with the vision and objectives of the Council's recently adopted Climate Change, Sustainability and Environment Strategy.	Noted and support welcomed.
The absence of Natura 2000 sites in Central Lincolnshire is noted and would therefore observe that development is unlikely to be constrained by nutrient neutrality or water neutrality directions by Natural England.	Noted.
Support the policy; it has been improved in response to comments from the Environment Agency and other relevant organisations at the Regulation 18 stage, and afterwards collaboratively via the Greater Lincolnshire Nature Partnership.	Noted and support welcomed.
The improved emphasis on 'delivering' net gains in biodiversity rather than merely 'seeking' to deliver these net gains is a positive change.	Noted and agreed.

Policy S61: Biodiversity Opportunity and Delivering Measurable Net Gains

Issue	Response
Support for policy and component parts considering it meets the tests of soundness.	Noted.
The inclusion of policies specifically relating to Biodiversity and Geodiversity are supported and the approach very much aligns with the vision and objectives of the Council's recently adopted Climate Change, Sustainability and Environment Strategy.	Noted and support welcomed.
Support Policy S61 and consider that it is imperative that emerging national guidance provides for the continued biodiversity gain to be managed to enable a landscape scale recovery of nature through enhancements supported by new development.	Noted and support welcomed.
Support the policy; it has been improved in response to comments from the Environment Agency and other relevant organisations at the Regulation 18 stage, and afterwards collaboratively via the Greater Lincolnshire Nature Partnership.	Noted and support welcomed.

The Council recognises that with the Environment Act 2021 there is significant change in how biodiversity will be assessed and will inform individual planning decisions. Whilst the Act proposes that Biodiversity Net Gain will come in to effect in November 2023, the policy in the plan is a welcome and necessary step that will ensure the CLLP will be ready to address in full the new biodiversity requirements.	Noted and agreed.
The inclusion of minimum standards for net gains in biodiversity is welcomed.	Noted and support welcomed.
The policy refers to offsetting schemes only being used in exceptional circumstances - this should be deleted. Deterring the offsetting contribution could encourage poor net gain contributions onsite where the management of them cannot be guaranteed over the 30-year timeframe. Credits should be encouraged where it cannot be provided in a sustainable manner on site.	Policy S61 requires biodiversity net gains to be delivered on-site, to ensure that net gain is delivered in a way that is consistent with the mitigation hierarchy set out in the NPPF, para 180a. The purchase of statutory biodiversity credits is considered to be a last resort by the UK Government. Off-site net gain or purchase of credits should only be explored after avoiding or reducing biodiversity impacts through site selection and layout and enhancing and restoring biodiversity on-site. The wording “where possible” provides developers with the necessary flexibility should off-site options need to be explored.
The policy should recognise the 2-year transition period for implementation of the Environment Bill.	This is not considered necessary in the policy itself but could be highlighted in the supporting text.
‘Wider environmental net gains’ is too subjective and should be removed from the policy.	The Local Plan glossary provides a clear definition of this term and it is consistent with national policy.
‘Ongoing management’ needs further clarity as to what is expected.	Noted. Natural England are preparing guidance. There is also likely to be further guidance from the Government on this issue.
‘30 years after completion’ should be in line with the Environment Act and therefore removed from policy.	It is considered that this requirement is consistent with the Environment Act. Indeed, this is the minimum period. The Government have stated they will encourage and enable developers and landowners to secure sites for a longer period where possible (Page 57 of Consultation on Biodiversity Net Gain Regulations, DEFRA, January 2022)

Policy S62: Area of Outstanding Natural Beauty and Areas of Great Landscape Value

Issue	Response
Support for policy and component parts considering it meets the tests of soundness.	Noted.

Ensure that all landscapes are given protection, commensurate with their value and special features.	Landscapes outside of the AONB or and AGLV are covered by policy S53 Design and Amenity and more generally by Policy S1 and S5 and other policies relating to development in the countryside.
Add “high” or “special” before regard under The Lincolnshire Wolds Area of Outstanding Natural Beauty, bullet point a).	The policy is consistent with the NPPF, PPG and the statutory duties of local planning authorities as set out in Section 11A(2) of the National Parks and Access to the Countryside Act 1949 and section 85 of the Countryside and Rights of Way Act 2000. The policy wording under is sufficient to ensure that high regard is had to conserving and enhancing the special quality and scenic beauty of the landscape within the AONB.
With particular reference to the known constraints and opportunities at RAF Scampton, it will be important for any future development proposals to respect and reflect the unique history of the former RAF base and ensure development proposals sit comfortably with the sensitive local landscape context. As such, Policies S57 (The Historic Environment) and Policy S62 (Areas of Great Landscape Value) are supported whereby proposals are required to protect, conserve and enhance the historic and natural environment, consistent with national planning policy.	Noted and agreed.
It is the views from the Cliff Edge that give it its quality and need protection, as well as views of the Cliff Edge.	Noted. The policy provides adequate protection.

Policy S63: Green Wedges

Issue	Response
Support for policy and component parts considering it meets the tests of soundness.	Noted.
Support the policy as it is a vital tool in protecting the unique character of settlements that have boundaries close to one and other.	Noted and support welcomed.
Supportive of the approach to consider multifunctional spaces within green wedges such that SuDS can be incorporated where possible or other multifunctional benefits.	Noted and support welcomed.
Part b) allows for utility development in a Green Wedge. We welcome this as renewable energy supports the ‘green lung’ objectives of the policy and part b) will support associated renewable energy generation when an application is put forward to the County Council.	Noted and support welcomed.
Support recognition of the land and water protection.	Noted and support welcomed.

<p>Hykeham Pits Green Wedge boundary is inappropriate, unjustified and ineffective. Boundary should be withdrawn to exclude land east of Station Road.</p>	<p>The Central Lincolnshire Green Wedge and Settlement Breaks Review (EVR003) sets out the process that was followed to inform the identification of the Green Wedges shown on the Central Lincolnshire Policies Map. The Green Wedges are based on a robust analysis and assessment of whether they meet the criteria for designation as Green Wedges. Policy evidence report for S63 (paragraphs 6.3 to 6.5 of EVR063) explains that some Green Wedge boundaries were reviewed, and minor amendments made to these boundaries, to reflect development which had taken place or that had received planning permission since the adoption of the current Local Plan.</p>
<p>Land to the rear of 352 Brant Road in Waddington does not perform any of the functions of a Green Wedge. Should be removed from the Green Wedge and the site should be noted as a housing allocation on the policies map.</p>	<p>The Central Lincolnshire Green Wedge and Settlement Breaks Review, (EVR003) sets out the process that was followed to inform the identification of the Green Wedges shown on the Central Lincolnshire Policies Map. The Green Wedges are based on a robust analysis and assessment of whether they meet the criteria for designation as Green Wedges. Policy evidence report for S63 (paragraphs 6.3 to 6.5 of EVR063) explains that some Green Wedge boundaries were reviewed, and minor amendments made to these boundaries, to reflect development which had taken place or that had received planning permission since the adoption of the current Local Plan.</p>
<p>Amendment of the Burton to Nettleham Green Wedge to remove area of land between Burton Road and A15 (Ellis Farm). There is plenty of other land which achieves the Burton to Nettleham Green Wedge without this land being designated.</p>	<p>The Central Lincolnshire Green Wedge and Settlement Breaks Review, (EVR003) sets out the process that was followed to inform the identification of the Green Wedges shown on the Central Lincolnshire Policies Map. The Green Wedges are based on a robust analysis and assessment of whether they meet the criteria for designation as Green Wedges. Policy evidence report for S63 (paragraphs 6.3 to 6.5 of EVR063) explains that some Green Wedge boundaries were reviewed, and minor amendments made to these boundaries, to reflect development which had taken place or that had received planning permission since the adoption of the current Local Plan.</p>
<p>Removal of the land at A15/A46 intersection from the Green Wedge in the interests of providing a service area.</p>	<p>The Central Lincolnshire Green Wedge and Settlement Breaks Review, (EVR003) sets out the process that was followed to inform the identification of the Green Wedges shown on the Central Lincolnshire Policies Map. The Green Wedges are based on a robust analysis and assessment of whether they meet the criteria for designation as Green Wedges. Policy evidence report for S63 (paragraphs 6.3 to 6.5 of EVR063) explains that some Green Wedge boundaries were reviewed,</p>

	and minor amendments made to these boundaries, to reflect development which had taken place or that had received planning permission since the adoption of the current Local Plan.
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Policy S64: Local Green Space

Issue	Response
Various expressions of support for protecting LGS's, including in both the Local Plan and Neighbourhood Plans; specific sites;	Noted.

Policy S65: Important Open Space

Issue	Response
Expressions of support	Noted
Suggested rewording to paragraph 11.6.1 as existing wording is considered incorrect and does not adequately reflect the process undertaken: 'In addition to Local Green Space (LGS) designations, this Local Plan also protects other existing Important Open Spaces (IOS). These open spaces are different to LGSs, in that LGSs are previously known as Visual Amenity Areas (VAA) which were specific areas of Playing Fields and functional amenity areas, whereas IOSs are other previously known as VAA's which were open spaces important to the settlement in which they are located. IOS's can be reassessed to see if they meet the criteria but would need consultation by Interested parties and approval by the Planning Committee.'	The current wording sets out the difference between the two types of open space identified within the plan, and the origins of their identification. The Important Open Spaces Methodology and Review document (March 2022) sets out the process undertaken in identifying the sites designated in the Proposed Submission Local Plan, whereas the suggestions for Local Green Space designation, from members of the public are set out in EVR064.
The plan is not in line with previous Planning Inspectors advice in respect of an IOS designation at Swaton. The area of designation should be amended to remove area identified on submitted plans	Officers have carried out additional site visits and have held discussions with Development Management colleagues in relation to the extent of the designation of this IOS. Following the visits and discussions, the boundary of the designation has been amended to take into account the planning permission that has recently been granted and it has been concluded that the remaining area identified as an IOS meets the criteria for designation. The value of this Important Open Space has also been supported by an inspector in a s78 appeal.
Local green spaces can provide suitable locations for schemes such as flood alleviation to be delivered without adversely impacting on the	The policy allows enough flexibility for flood alleviation schemes where they do not undermine general purpose of designating these areas.

primary function of the open space. The policy should include support for development of flood resilience schemes within local green spaces provided the schemes do not adversely impact the primary function of the green space.	
The exception criteria in paragraph 99 of the NPPF to the presumption against building on existing open space, sports and recreational buildings and land should be included in Policy S65	It is not necessary to replicate the NPPF within Local Plan policy. Therefore it is considered that no changes to the policy are required in response to this comment.
Request for removal of IOS at Lee Road in Lincoln from the Policies map, in accordance with the Important Open Spaces Methodology and Review document (March 2022) which sets out this site is proposed for removal.	This open space had been screened out as inclusion as an IOS, as is detailed on page 14 of the Important Open Space Evidence Paper (ref SOS001) and as such should not have been shown on the map.
The land at 'Caddle Beck', Keelby should have its designation changed from open green space to something more realistic in light of the fact the owner has provided access and services.	This site was reviewed in response to comments at the regulation 18 consultation and, as a result, the boundary of the designation was amended, however, it is considered that the designation should remain as it is of benefit to the setting of the village.

Policy S66: Trees, Woodland and Hedgerows

Issue	Response
Various expression of support, as protection of trees is important for a variety of reasons.	Noted
Protection needs to be much stronger. Mitigation measures need to be much more stringent to prevent the trees being cut down and added as a simple cost on the development. Removal of trees needs to be immediately compensated by an equivalent carbon footprint of trees. Mitigation measures must at least immediately replace what is lost. At least as much emphasis should be put on protecting those that are already mature in the landscape. Decaying trees should be protected and made safe, rather than removed.	The policy as worded provides substantial protection for trees, woodland and hedgerows.
It is noted that the Central Lincolnshire Whole Plan Viability Assessment does not allow for the cost of replacement tree planting, a semi-mature tree specimen can cost circa £2,000 which is potentially quite significant. While appreciated there are benefits to providing trees in urban areas, building at higher densities in urban areas reduces greenfield land-take. A reduced tree standard for sites in urban areas would be more appropriate. Suggest the following amendments:	The need to accept replacement trees will hopefully be an exception. The cost associated with the removal of trees should not be applied in all cases, therefore has not been included in the viability assessment.

1. Reduce the requirement for additional tree planting in urban locations. 2. To include a separate cost for tree planting in the Central Lincolnshire Whole Plan Viability Assessment.	
Some trees may require removal to facilitate operational development to support growth or enable environmental improvements at water treatment works or other infrastructure sites.	The points raised are noted, however, it is not considered that any changes to the policy are necessary, as there is flexibility to enable points such as those raised to be addressed.
Watercourses should also be protected to ensure that the natural drainage processes can be maintained and prevent the increase of flood risk. Watercourses also provide access to water for wildlife and habitats.	Whilst the benefits of watercourses are recognised, it is not considered necessary to include here.
Developments need to leave sufficient space for all trees, newly planted or existing mature trees, to grow to their full capacity without root impairment and housing density will need to take this into account. New developments should contribute to a proportion of the required tree canopy for the District and Central Lincolnshire as their contribution to the green infrastructure as well as open space.	It is considered that the policy adequately addresses the points made, with sections relating to existing trees and woodland, as well as new trees and woodland.

Policy S67: Best and Most Versatile Agricultural Land

Issue	Response
Various expression of support	Noted.
Protection should also be extended to 3b land, as this is so important as a source of food production.	Neither the policy nor supporting text excludes class 3b land. No changes required to the policy.
One ha is too large an area to lose and can be easily circumvented. The one ha limit should be removed and the tests applied to all loss of agricultural land from 3b up.	All non-allocated sites are subject to policy criteria a to d regardless of size. Where sites are over 1ha an agricultural land classification report is also required.
The vast majority of this Local Plan Review and informative evidence base was undertaken before the onset of the recent war in Ukraine, which has resulted in global grain and cooking oil shortages, future insecurities along with unprecedented price increases. As such, allocations on class 2 and 3 agricultural land are unjustified and unsound in light of the recent change in food sustainability.	The point raised is noted, however, the events referred to occurred only a very short time before the Regulation 19 consultation was commenced, and therefore could not be taken into account. The Plan seeks to balance the need for land to meet the housing need with protection of the best and most versatile agricultural land.

Chapter 12 – SUEs, Regeneration Areas and Opportunity Areas

Policy S68: Sustainable Urban Extensions

Issue	Response
Support for policy and component parts considering it meets the tests of soundness	Noted and agreed.
There is a significant reliance in the plan and the anticipated delivery rate is unjustified and unsound.	A significant amount of progress has been made on the majority of SUEs and the delivery rate included is informed by discussions with the developers and promoters and delivery to date on these sites as well as being sense checked by delivery rates on other sites in the area (as set out in the Housing Land Supply Assumptions October 2019, ref HOU010). The background to delivery on the SUEs is set out in the Sustainable Urban Extension Topic Paper, ref HOU011. Trajectories for these sites has been updated as progress has been made and reflects the latest picture on sites.
Health should be specifically included as part of the infrastructure needed on SUEs.	Where new health facilities have been sought by NHS they have been included within the specific SUE policies (see SEQ policy bullet i on page 155 of the plan for example). Lack of specific reference in Policy S68 or the specific SUE policies does not mean that health facilities will not be delivered as they can be covered by the community uses referenced in the policies. NHS Lincolnshire will continue to be consulted on applications on SUEs where relevant.
The form and content of broad concept plans to be required are not set out in the policy – this should be included and should include the requirement to safeguard electricity infrastructure.	The exact contents of a broad concept plan will depend on the specific site, informed by its constraints and opportunities. Presence of electricity (or other utilities) infrastructure will inform these broad concept plans, much as it done with the South East Quadrant for example, where the route of the electricity pylons on the site have been incorporated into the design and layout.
It would be helpful to have an overarching reference to heritage and views in this policy.	There are references and requirements that relate to heritage assets, their settings and views in the specific SUEs policies.

Policy S69: Lincoln Sustainable Urban Extensions

Issue	Response
Support for the SUEs and the policy.	Noted.

<p>The North East Quadrant SUE, the South West Quadrant SUE and the South East Quadrant SUE have electricity assets on the sites and should be referenced in the policy.</p>	<p>The presence of such assets should be dealt with through the Broad Concept Plan and the design code to be produced for the sites. The South East Quadrant SUE's Broad Concept Plan and Design Code¹ which was adopted in December 2020 incorporates the pylons in the layout with green space planned for the route of the pylons. There are no objections to specific reference being made in the policy, but it is not considered necessary to ensure that the assets are protected.</p>
<p>An overarching criteria is required in relation to conservation areas, key heritage assets and views to the cathedral and historic hillside.</p>	<p>Policy S69 includes reference to specific heritage assets, including the historic hillside where relevant for each SUE.</p>
<p>The policy wording in relation to the South West Quadrant SUE should be amended to allow an early phase to come forward prior to the North Hykeham Relief Road being built.</p>	<p>The policy does not restrict the SUE from coming forward prior to the North Hykeham Relief Road. The supporting text in bullet 2 under paragraph 12.1.10 clarifies that early delivery will be acceptable where it will not prejudice the potential to deliver the relief road and as long as it is supported by a Broad Concept Plan for the entire site.</p>
<p>The requirements under point d for the South West Quadrant SUE relating to access points should not be fixed as further transport assessment and traffic modelling is being undertaken.</p>	<p>The wording in relation to the access has been informed by the highways authority and connected to the emerging proposals for the North Hykeham Relief Road. They are considered to provide a deliverable and suitable set of access points to the site.</p>
<p>The boundary for the South West Quadrant SUE should be expanded as it presently cuts through the middle of a field on Long Lane, South Hykeham. This site does not appear to have been assessed.</p>	<p>The area of land in question has been assessed in the Site Allocations Evidence Report (ref. EVR076-082, Appendix D North Kesteven Part 1, page 28). This has not been included as part of the SUE as it is an area of land deemed important to retain the setting of South Hykeham village as required under bullet c of the South West Quadrant SUE part of the policy.</p>
<p>The part of the policy relating to the Western Growth Corridor SUE should specifically reference and consider the impacts on the railway and level crossing safety.</p>	<p>Following comments received at the Regulation 18 consultation a additional point f) was added to Policy S47 to require proposals to consider and make provision for strategic transport infrastructure. This included: "Deliver opportunities for improved road and rail interaction, and avoiding impacts upon level crossings." This policy is applied to all relevant applications, and not limited to SUEs. Managing impacts on level crossings is covered in policy S47. Furthermore, hybrid permission, which included detailed consideration of access to Tritton Road which included bridges over the railway line, was approved in January 2022.</p>

¹ Available at <https://www.n-kesteven.gov.uk/resources/assets/attachment/full/0/109381.pdf>

Policy S70: Gainsborough Sustainable Urban Extensions

Issue	Response
Support for the SUEs and the policy.	Noted
It is essential that large sites incorporate SUDS.	This is required under Policy S21.
The figures for SUEs should not be viewed as a ceiling for development.	The wording of the policy states approximately and so should not be viewed as a ceiling. Capacity should be based on the output of a design led approach.
The policy should include broad locations for future growth at Gainsborough Eastern Neighbourhood SUE as it does in the current plan.	With the new requirement to review Local Plans every 5 years the need for broad locations in areas with sufficient land supply is not necessary. Instead, these sites will be considered in each review of the plan and potentially allocated when appropriate.

Policy S71: Sleaford Sustainable Urban Extensions

Issue	Response
Support for the SUEs and the policy.	Noted
The policy does not consider the impacts upon the railway	Following comments received at the Regulation 18 consultation a additional point f) was added to Policy S47 to require proposals to consider and make provision for strategic transport infrastructure. This included: "Deliver opportunities for improved road and rail interaction, and avoiding impacts upon level crossings." This policy is applied to all relevant applications, and not limited to SUEs.

Policy NS72: Lincoln Regeneration and Opportunity Areas

Issue	Response
Support for the regeneration areas and the policy.	Noted

Policy NS73: Gainsborough Riverside Regeneration Area

Issue	Response
Support for the regeneration areas and the policy.	Noted

There are a number of buildings within this area with combined sewers. It is important that where possible surface water is separated and managed through SUDS before being discharged.	Noted. These matters are covered in policy S21.
This policy does not protect the Maltings, an established industry in active use or support its ongoing use and could lead to conflict between uses if actively allowed.	This matter is covered in policy S33, part 7, bullet b). The employment policies are considered to provide a positive framework for making decisions on applications needed to expand this business.

Policy NS74: Sleaford Regeneration and Opportunity Areas

Issue	Response
ROA9 is supported and a heritage led masterplan should be put in place for the registered park.	Noted
Support for policy and areas being allocated.	Noted

Policy S75: RAF Scampton

Issue	Response
Support for policy and component parts considering it meets the tests of soundness.	Noted and agreed.
The site fails to present this large brownfield site as the opportunity it is, failing to quantify the ability of the site to meet housing need – it is not sound to develop on greenfield sites in village locations where infrastructure is strained when this site is available. By failing to address this site head on it is unsound.	The complexities on this site and the timing of the withdrawal have not allowed for developing a full strategy for this site in this plan. Site assessment work is still ongoing as part of the disposal strategy, as such, the approach taken in this policy – a clear policy framework and expectations for a masterplanned approach – is sound and will ensure that future development proposals will be deliverable and sustainable.
Detailed comments provided about what should occur at the site.	The policy does not seek to deliver specifics on the site, but instead provide a framework to ensure that it is appropriately assessed and masterplanned to make the most of this unique opportunity and to protect the nationally and locally significant attributes.
Point c fails to adequately protect the historic landscape and the policy needs to give stronger protection to views throughout the entire site not just where there are more historic assets present.	Point c requires an assessment of landscape character views and any mitigation required to make impacts acceptable. This allows for full consideration of the historic landscape.
In point d, what constitutes a sufficient level of infrastructure is subjective and this should be amended to ensure local concerns are given significant weight in any determination.	Point h of the policy requires any applications to include engagement with the community and infrastructure providers and detail how the findings have been incorporated in the masterplan. Point d cannot

	determine precisely what infrastructure will be required until more detail is known about what development will occur.
Unless a timetabled bus service is provided, expecting a modal shift away from private car will not occur as sought in point e.	Given there can be no clarity just yet on what can be developed at this site, it is impossible to say whether a timetabled bus service can be viable. Point e requires a detailed assessment of transport and delivery of active travel and other sustainable transport to minimise reliance on private car and will help ensure that appropriate initiatives are delivered.
The requirement to deliver net zero carbon should not undermine all of the other policy constraints on this site.	Agree and the policy will be delivered as a whole so all requirements will be applied.
The net zero requirements should not be applied to existing dwellings at the site as this will create a burden for new development.	This is a strategic site with the potential to deliver a community fit for the future. As such opportunities to enhance the green credentials of the existing properties should be included.
It is unclear how the value on the airspace will be interpreted and weighed in the planning balance against other objectives. The control of R313 exists outside of planning and is not clear why reference to it is included in the policy.	R313 was created by Statutory Instrument and as such is a recognised feature associated with RAF Scampton. There are clear interdependencies between the future use of the land at RAF Scampton and the potential on-going use of the airspace. As such it is important that the policy recognises R313 and requires any future masterplan to take account of its potential value. The policy does not seek to require the on-going use nor does it require R313 to be removed only that its existence and potential as part of the re-development should to be fully assessed and understood in the context of developing a deliverable and sustainable future development on the land the airspace relates to. It is considered both appropriate and justified that reference to R313 included in the policy and that the options for re-use including the value of the airspace should be explored as part of the site masterplanning process.
Not clear why point k needs to be there as it has been clarified that the MOD will withdraw fully from the site so it is not clear why this is needed.	Whilst MOD have clarified its intention to withdraw fully from the site, this point has been included as a safeguard in the event that this does not occur to avoid unnecessary conflict.
This policy should be reworded from being prepared in the event that the MOD withdraw from the site to reflect that this site is due to become vacant from 2023 onwards.	The policy was initially drafted when there was perhaps less certainty than there is now that MOD will withdraw from the site. Whilst there may still be potential that this withdrawal may not occur, there is no objection to it being reworded to 'when the Ministry of Defence withdraw from the site...'
The policy should clarify the status of the masterplan, potentially giving options as the term 'masterplan' does not appear in the NPPF.	The term masterplan adequately covers the intention – a masterplanned approach on the site. It was not intended to specifically require a

	Supplementary Planning Document or non-statutory document to be produced. Depending on what the constraints, evidence gathering and proposals for the site are, it may be necessary to take a formal route such as a Supplementary Planning Document, or a design code, or even an Development Plan Document or Area Action Plan. Through joint working the most appropriate status of masterplan will be determined and pursued.
There is no reference to health services and this should be included to ensure health facilities are considered as part of the scheme	Whilst health services are not specifically mentioned it would be covered by point d.
The masterplan should address issues experienced at other ex MOD sites, i.e. unadopted roads.	It is agreed that this has been an issue in other ex-MOD sites. It has not been included specifically within the policy, but arguably could be covered by point j regarding integration with the existing community. The opportunities to facilitate the adoption of existing roads will be sought through the masterplan and subsequent applications.

Chapter 13 – Site Allocations

Issue	Response
With the lowering of the threshold for allocating sites the windfall assumption should also be reduced.	The justification for the modest windfall allowance included is provided in the Housing Delivery Paper (reference HOU008). This position is considered to be both robust and justified by evidence.
The approach for assessment of sites should be revisited to take into consideration the needs and capacity of each settlement.	The process has included the assessment of capacity and sustainability of development in each settlement and of the housing needs of the area.
The plan should make provision for contingency sites to come forward should housing delivery fail to meet the projections.	This does not need to be provided for in the plan. The requirement in national policy for local plans to be reviewed every five years means that there will be opportunities to adjust. Through these reviews is the appropriate way to approach this matter.
Some of the sites being allocated will require upgrading to the Water Recycling Centres in some locations (assessment provided)	This information is gratefully received. The timing of delivery of sites in the areas affected will be considered when reviewing the land supply position from this year's monitoring.
In the sequential test document supporting the site allocations, sites in flood zone 2 and 3 are listed as not passing, but it is usual practice to say that this has been passed if there are no reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding.	The sequential test was applied in the first instance to understand which sites were at risk from flooding. All of these sites were then assessed in the Level 1 SFRA to understand more about the flood risk at these sites. Any sites then proposed for allocation in these areas at risk from flooding, and where the areas at risk from flooding could not reasonably

	be avoided within the site or where the site does not benefit from planning permission, have been subject to further assessment and exceptions test in the Level 2 SFRA. The sequential test was used to show the process of the assessments undertaken and should be read alongside the SFRA documents.
Site specific requirements should be removed for sites where there is an outline permission in place.	The site specific requirements are included as, based on the evidence collated, they need to be investigated and potentially inform the development of a scheme. Through the detailed work up of a scheme it may be that the requirement is not necessary and this can then be justified as part of the application.

Policy S76: Residential Development on Sustainable Urban Extensions

Issue	Response
Support for the policy and some allocations.	Noted
The site area for NK/CAN/003 excludes an area up to the Lincoln Eastern Bypass at the eastern edge of the site, south of Heighington Road. This was part of the safeguarded route, but was only safeguarded during construction and should now form part of the allocation.	Agreed, this site boundary was intended to be to the bypass in all locations. It was mapped against the safeguarding area and, whilst the boundary has been checked through the process of this Local Plan, the OS map base was not updated at this time. Now the OS map base is in place with the boundary of the bypass, it will be suggested that an amendment to this site boundary be made on the Policies Map and that the site area be amended in this policy accordingly.
There is an over-reliance on SUEs which will deliver nearly half of the overall housing requirement to 2040 and the housing trajectories are unrealistic. More smaller sites should be included to diversify the site portfolio as allocations or reserve sites.	Work has been ongoing on many of the SUEs for a number of years with their land owners and, in a number of cases, developers. The expectations from the SUEs is based on the evidence developed to support applications and gained from this joint working. This has also been sense checked by the Housing Land Supply Assumptions Report (Doc ref: HOU010a) which reviewed delivery rates and lead in times to confirm the position taken on SUEs and other sites. As such, the delivery rates on SUEs are shown to be realistic based on the number of developers anticipated to be involved at each site.

Policy S77: Housing Sites in the Lincoln Urban Area

Issue	Response
Support for the policy and some allocations.	Noted

The site-specific requirements for site COL/MIN/005 – Land at Cathedral Quarry should not be included, specifically the requirement to retain the bunds on site. These should be dealt with through the application process with other policies in the plan guiding decision making.	There is a condition on the approval for the former minerals operation of this site for the aftercare and this site is also a Local Geological Site. Given the value identified on this site, it is considered more appropriate for any exception to the policy to be justified in a planning application. This site is understood to offer a good opportunity to deliver biodiversity net gain.
Alternative/additional sites proposed: <ul style="list-style-type: none"> COL/PAR/024 – Land to the rear of Newark Road, Lincoln NK/WAD/001 – Land to the rear of 320-378 Brant Road, Waddington NK/WAD/012 – Four Acres, Land to the west of 67 Station Road, Waddington 	Detailed information about the reasons why these sites were rejected is included in the site allocations evidence reports (document ref EVR076-082 including relevant appendices) and also in the Sustainability Appraisal (document refs STA004.1e, and STA004.1hi). We stand by the justification for inclusion or exclusion of sites as allocations in this Local Plan.

Policy S78: Housing Sites in the Main Towns

Issue	Response
Alternative/additional sites proposed: <ul style="list-style-type: none"> NK/SLEA/013 – Land at Quarrington, Sleaford NK/SLEA/013a – Land south of Town Road, Quarrington, Sleaford 	Detailed information about the reasons why these sites were rejected is included in the site allocations evidence reports (document ref EVR076-082 including relevant appendices) and also in the Sustainability Appraisal (document refs STA004.1e, STA004.1hii, and STA004.1hiii). We stand by the justification for inclusion or exclusion of sites as allocations in this Local Plan.
Support given for the policy and some allocations.	Noted

Policy S79: Housing Sites in the Market Towns

Issue	Response
Support for the policy and some allocations.	Noted
The infrastructure in Caistor is totally inadequate to support the scale of development being proposed – specifically health care and roads (particularly North Kelsey Road and Caistor Road through North Kelsey Moor.	The NHS has been involved in the development of this plan and no specific health infrastructure improvements have been identified as being needed in this location. However, contributions may be sought as part of any permissions being granted if they are identified as being necessary. The engagement with the highways authority has identified that some minor works will be required as part of these schemes.
Alternative/additional sites proposed: WL/CAI/010 – Land north of North Kelsey Road, Caistor	Detailed information about the reasons why these sites were rejected is included in the site allocations evidence reports (document ref EVR076-

	082 including relevant appendices) and also in the Sustainability Appraisal (document refs STA004.1e, and STA004.1hiii). We stand by the justification for inclusion or exclusion of sites as allocations in this Local Plan.
Site WL/MARK/001 should be extended to the south to support the delivery of open space and biodiversity net gain	Policy S61 allows for off-site delivery of biodiversity net gain where appropriate. If an appropriate scheme came forward using land to the south for biodiversity net gain and other natural environmental benefits, it is likely this will be viewed positively.

Policy S80: Housing Sites in Large Villages

Issue	Response
Support for the policy and a number of allocations.	Noted
More villages should be receiving new allocations.	The allocations in this plan deliver adequate housing to meet the needs of the area with some flexibility and are based on detailed assessments of settlements and sites. This ensure a sound position in the plan.
<p>Alternative/additional sites proposed:</p> <ul style="list-style-type: none"> • NK/BRAN/001 – Land off Thacker’s Lane, Branston • NK/BRAN/002 – Land between Mere Rd and Sleaford Rd, Branston • NK/BRAN/003 – Land south of Lincoln Road, Branston • NK/BRAN/004 – Land to the north of Brambles Farm, Mere Road, Branston • NK/BRAN/005 – Land to the south of Hall Lane, Branston • NK/BRAN/008 – Land at Moor Lane, Branston • NK/BRAN/010 – Land north of Lincoln Road, Branston • NK/BRAN/011 – Land north of Lincoln Road, Branston • NK/HEC/011 – Land to the east of Cameron Street, Heckington • NK/HEC/012 – Land to the north of Boston Road, Heckington • NK/HEI/003a – Land north of Park Lane, Heighington • NK/HEI/004 – Land south of Fen Road, Heighington • NK/NAV/001 – Land adjoining medical centre, Grantham Road, Navenby • NK/NAV/002 – Land east of High Dyke, Navenby • NK/NAV/004 – Land east of Grantham Road, Navenby • NK/NAV/008 – Land to the east of Pottergate Road, Navenby 	Detailed information about the reasons why these sites were rejected is included in the site allocations evidence reports (document ref EVR076-082 including relevant appendices) and also in the Sustainability Appraisal (document refs STA004.1e, STA004.1hii, and STA004.1hiii). We stand by the justification for inclusion or exclusion of sites as allocations in this Local Plan. In relation to NK/RUSK/017, this was screened out from assessment in the SA (see Appendix 7.2) by virtue of it being detached from the settlement and therefore being in the open countryside. This site is included the site allocations evidence report where the reason for not being allocated is clarified.

<ul style="list-style-type: none"> • NK/RUSK/001 – Land to the south of Winchelsea Road, off Sleaford Road, Ruskington • NK/RUSK/002 – Priory Road, Ruskington • NK/RUSK/003 – Smiths Farm, Land off Fen Road, Ruskington • NK/RUSK/012 – Land north of Fen Road, Ruskington • NK/RUSK/013 – Land north of Whitehouse Road, adj railway, Ruskington • NK/RUSK/017 – Land East of Sleaford Road, Ruskington • NK/WAD/013 – Land at Green Farm, Waddington • NK/WSH/003 and NK/WSH/003a – Land north of Moor Lane, Witham St Hughs • WL/BARD//008 – Land south of Henry Lane, Bardney • WL/CW/006 – Land south of Hawthorn Road, Cherry Willingham • WL/DUNH/001 – Land north of Market Rasen Road, Dunholme • WL/DUNH/002 – Land north of Market Rasen Road, Dunholme • WL/SAXI/002 and WL/SAXI/003 – Land North of Church Land, Saxilby • WL/SAXI/015 – Land to the north of Saxilby and west of B1241, Saxilby • WL/SCO/007 – Land west of Scotton Road, Scotter 	
<p>Alternative/additional site proposed: Land south of Riby Road, Keelby</p>	<p>This site has not been promoted through the process by the landowner and as such has not been assessed to date.</p>
<p>Sites served by Water Recycling Centres (WRC) which are at capacity should not be permitted until such capacity is delivered. This includes Reepham WRC, Corringham WRC</p>	
<p>Support for Branston being capable of accommodating additional development both now and in the future.</p>	<p>Noted</p>
<p>Support for Nettleham being capable of accommodating additional development both now and in the future.</p>	<p>Noted</p>
<p>Nettleham cannot take more growth – more has been built since the 2017 Local Plan, increased pressure on the medical centre and the schools.</p>	<p>The evidence gathering undertaken as part of the plan has demonstrated that there is capacity to accommodate the growth in Nettleham.</p>
<p>Support for Saxilby being capable of accommodating additional development both now and in the future.</p>	<p>Noted</p>

Welton and Dunholme do not have the employment, facilities or infrastructure to support the additional growth identified in the Local Plan particularly when taking into account recent population increase.	The evidence gathered in support of site allocations indicates that there is adequate capacity in local infrastructure to support the increase in population with additional funds being sought to increase capacity in schools and other infrastructure.
Welton and Dunholme are identified as being lower priority for delivering housing in the Lincoln Strategy Area in Policy S2. Delivering so many homes through allocations in this location is contrary to this policy, particularly when the fact that there is an over-supply of 2,000 in the Lincoln Strategy Area and 3,000 in the Plan.	Welton is receiving more dwellings from allocations than many other villages. Evidence has shown that there is good capacity in infrastructure and opportunity to expand and enhance these further through funding from new development. All known suitable and deliverable urban regeneration opportunities in the Lincoln urban area have also been allocated in the plan and the majority of development is located on the Sustainable Urban Extensions – delivery at other villages is also an important part of the strategy.
The speed at which Welton will grow with all of these allocations will overwhelm infrastructure and sites should be phased to ensure they are spread across the plan period.	It is agreed that some phasing in Welton would be beneficial given the amount of development proposed in the allocations. Policy S80 seeks to do this with site WL/WELT/008A.
Concerns about the cumulative impacts of development on sites in Welton on traffic, road safety, water and wastewater capacity, and electricity, amongst impacts on other services.	No information has been submitted by the statutory providers or highways authority through the site allocations process to indicate specific issues. Development of a scale brings potential to invest in services and improve infrastructure.
Should look at RAF Scampton site rather than placing more homes in Lincoln fringe villages.	Policy S75 deals with RAF Scampton. At the time of the Local Plan being produced evidence in relation to opportunities and constraints on the site are still being developed. Policy S75 provides a clear framework for future development opportunities to be established through a masterplan. Future plan reviews will include more detail about the types of development suitable to take place at RAF Scampton site in order to secure a sustainable and viable future for the site and the wider community.
Site NK/SKEL/007 needs a bullet point to protect the GII Listed Manor House.	The site has permission and a start has been recorded which is why no criteria has been included.
Sites WL/CW/001, WL/CW/002 and WL/CW/003 have not come forward for development despite being allocated in the 2017 Local Plan. This brings into question their deliverability in the plan period.	Progress on these sites has been slow, but with a planning application on the first phase this does provide a good indication that things will start to move on the site. The delay to progressing with the sites is understood to be as the developer has been focusing on other sites in the area and awaiting capacity to commence on this site.
Site WL/SAX/014 needs a bullet point to protect the setting of St Botolph's church.	The site has permission and is being built out which is why no criteria has been included.

<p>Site WL/KEE/003 – concerns about access and suggestion that the site should be ‘squared off’.</p>	<p>Access to this site would likely need to come through the neighbouring site (WL/KEE/001) as Church Lane would likely not be a suitable access unless significant improvements could be made.</p>
<p>Site WL/NHAM/011 and WL/NHAM/018 – concerns about flooding on these sites and increasing flood risk at neighbouring properties.</p>	<p>Some of the north of site WL/NHAM/011 is at risk of flooding and there are some small areas in site WL/NHAM/018 with surface water flood risk. This is addressed in the policy for WL/NHAM/011 but it has been noticed that reference to the need to address drainage and surface water flood risk has not been included for site WL/NHAM/018.</p>
<p>Site WL/WELT/001A:</p> <ul style="list-style-type: none"> a) Is not justified for allocation in this plan as it is on productive agricultural land particularly given the global shortages being experienced. b) The site suffers from drainage problems with a large amount of water gathering in the south west corner after rain. c) The site is a habitat to a number of species (specific species named) – should not be destroying this habitat. d) The road access to this site would be inadequate with no footpaths or cycle routes. 	<ul style="list-style-type: none"> a) The vast majority of land in Central Lincolnshire is agricultural land, with most of this being Grade 2 or 3. This site is identified as being Grade 3 agricultural land according to the DEFRA mapping. Agricultural land classification has been taken into account when making decisions on site allocations. b) The EA flood map identifies areas of surface water flood risk and the policy requires any scheme to address drainage on the site. c) The site is currently arable farm land with some hedgerows at the boundaries. Whilst there will be species on the site, arable farm land is typically not a rich habitat. d) Heath Road (the preferred access to the south) is a straight road with footway provision to the site from the village.
<p>Site WL/WELT/007 is not justified for allocation in this plan as it is on productive agricultural land particularly given the global shortages being experienced.</p>	<p>The vast majority of land in Central Lincolnshire is agricultural land, with most of this being Grade 2 or 3. This site is identified as being Grade 3 agricultural land according to the DEFRA mapping. Agricultural land classification has been taken into account when making decisions on site allocations.</p>
<p>Site WL/WELT/008A:</p> <ul style="list-style-type: none"> a) The site phasing is incorrect and it should in fact be phased back after sites WL/WELT/003. b) The site should be allocated but should not be phased back. c) The assessment of this site and similar site WL/WELT/008 are inconsistent. d) The assessment by the highways authority is incorrect and should be amber rather than red. e) The allocation is on productive agricultural land its development is not justified, particularly taking into account global shortages of food. f) The justification for selecting this site and rejecting WL/WELT/008 in Appendix 7.3 of the Sustainability Appraisal is inconsistent. 	<ul style="list-style-type: none"> a) Agreed that the phasing should <u>also</u> be after WL/WELT/003 b) Welton is receiving a substantial amount of development from this plan. In order to manage the amount of growth that comes forward at any time, both to avoid risks of local market saturation creating uncertainty, and to help ensure that impacts on infrastructure are managed it is important that not all sites come forward in the early stages of the plan period. c) The assessment of the two sites in doc EVR076-082 are very similar. The outcome is different as the revised boundary to the north was preferred as it did not extend beyond the existing building line of the neighbouring site.

<p>g) There are flooding issues on the site with water draining from the north of the site to the south, which then pools at the southern boundary and does not drain away quickly. Development here will exacerbate this and place risk on neighbouring properties.</p> <p>h) The drains along Eastfield Lane are insufficient to carry existing levels of water and foul water and cannot accommodate this level of development. Anglian Water technicians who regularly maintain the pump house and drains have indicated that it is working to maximum capacity.</p> <p>i) The site is poorly located in relation to the services and facilities in the village and the schools and health centre do not have capacity to accommodate the demands from additional development.</p> <p>j) The site cannot reasonably be accessed from Eastfield Lane as it will need widening and will require third party land (and at least one land owner has indicated that this will not be possible). There are also doubts about the potential to access the site from the neighbouring site to the west. There are insufficient footways and road safety concerns on Eastfield Lane including the junction with Ryland Road and insufficient.</p> <p>k) The outline application on this site includes a statement from the applicant that access to the west will not be suitable as it is too narrow to support a new housing estate.</p> <p>l) Wider concerns about road safety and traffic and air pollution.</p> <p>m) Development of this site would be harmful to the character of the village particularly when entering the village from Eastfield Lane.</p> <p>n) The site will be harmful to biodiversity including at neighbouring properties and will not be able to deliver biodiversity net gains required.</p> <p>o) The comments and responses to the planning application should be taken into account on this site.</p> <p>p) Concerns about how construction traffic will safely access the site.</p>	<p>d) Noted. The preference is for the site to be accessed from the site to the west, unless suitable solutions can be delivered to make Eastfield Lane acceptable and safe.</p> <p>e) The vast majority of land in Central Lincolnshire is agricultural land, with most of this being Grade 2 or 3. This site is identified as being Grade 3 agricultural land according the DEFRA mapping. Agricultural land classification has been taken into account when making decisions on site allocations.</p> <p>f) Having reviewed the wording in this appendices it is accepted that the two sites appear to have been treated inconsistently when they are effectively the same site with a minor change to the boundary. However, this should not be viewed as the full justification for the site selection process, but a quick snapshot to help identify why decisions were made. The scoring in both the SA and the evidence is consistent across the two sites with the amended boundary being selected as it was seen to more appropriately round off the settlement at this location. The sites have scored the same, but the wording in this brief summary could have more clearly justified the selection in this instance.</p> <p>g) The EA flood maps only indicate a small area of the site being at risk from surface water flooding. On site attenuation could improve the overall situation on site.</p> <p>h) No specific concerns about the drainage at this location have been raised by Anglian Water.</p> <p>i) It is accepted that this site is a greater distance than the other allocations in Welton from most of the main services. Concerns have not been raised by NHS or Lincolnshire County Council in relation to not being able to accommodate the development proposed in Welton, but it is accepted that this situation may have developed or a firmer position reached as a result of the application on the site.</p> <p>j) It is agreed that Eastfield Lane is questionable as a suitable access and indeed, may not be deliverable. Preference is for an access through the site to the west.</p> <p>k) There are concerns about the potential for delivering an acceptable access on Eastfield Road. If this access cannot be made acceptable and safe and access cannot be achieved from the west, there are question marks about the deliverability of the site emerging as a</p>
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	<p>result of this application. As such it is intended to recommend to the inspector that this site is not taken forward in</p> <p>l) The highways authority have not identified issues with the wider road network and environmental health have not raised concerns about air pollution.</p> <p>m) The allocation of a site does not necessarily mean that it will result in harm to character. The policies of the local plan will guide development to ensure proper design and landscaping is used to ensure that it is compatible or even enhances local character.</p> <p>n) Biodiversity net gain will be assessed at application stage with the appropriate metrics being applied.</p> <p>o) Clearly having a live application at the same time as an allocation being progressed in the local plan has caused some confusion. The information obtained during this application is welcomed to be incorporated in making a decision on whether this allocation is sound.</p> <p>p) An application would require a construction plan to demonstrate that the site can be safely accessed by construction vehicles.</p>
<p>Site WL/WELT/011 should have a capacity of 350 rather than 288 dwellings to align to the permission on the site. Furthermore, this capacity should be increased to 450 dwellings with additional development delivered on the land safeguarded for additional housing in the extant permission on the site.</p>	<p>288 dwellings has been used as it is understood that a number of the properties to be built will not be C3 use and that 288 dwellings (including 10 specialist retirement units) will be delivered on the site. The figure provided in the Local Plan is indicative only and, as such, any proposals on the site based on a design led approach may result in more or fewer dwellings being delivered, including potentially through delivery on land safeguarded within the site for housing.</p>

Policy S81: Housing Sites in Medium Villages

Issue	Response
Support for policy and a number of proposed allocations.	Noted
More villages should be receiving new allocations.	The allocations in this plan deliver adequate housing to meet the needs of the area with some flexibility and are based on detailed assessments of settlements and sites. This ensure a sound position in the plan.
<p>Alternative/additional sites proposed:</p> <ul style="list-style-type: none"> • NK/BAS/005 – Land North of Thurlby Road, Bassingham • NK/BAS/009 – Land south of Linga Lane, Bassingham 	Detailed information about the reasons why these sites were rejected is included in the site allocations evidence reports (document ref EVR076-082 including relevant appendices) and also in the Sustainability Appraisal (document refs STA004.1e, STA004.1hii, and STA004.1hiii).

<ul style="list-style-type: none"> • NK/DIG/002 – Land East of Station Road, Digby • NK/EAG/001 – Land at Eagle Farm, Swinderby • NK/LEAS/005 – Land south of Moor Lane, Leasingham • NK/LEAS/007 – Land adjacent to Leasingham Hall, Leasingham • WL/BLYT/007 – Land east of Gainsborough Road, Blyton • WL/FISK/002 – Tanya Knitwear Factory, Fiskerton • WL/FISK/003 – Manor Farm, Blacksmith Road, Fiskerton • WL/LEA/002 – Lea Estate Farm, Gainsborough Road, Lea • WL/SC/006 – Land south of Langworth Road, Scothern • WL/SC/008 – Land off Sudbrooke Road, Scothern • WL/STUR/006 – Land to the rear of Gilberts Farm, Saxilby Road and Tillbridge Lane, Sturton by Stow 	<p>We stand by the justification for inclusion or exclusion of sites as allocations in this Local Plan. Site NK/LEAS/007 was not provided prior to the Regulation 19 consultation and so has not been assessed and is not in the evidence document.</p>
<p>Fiskerton should not be accommodating the amount of growth proposed and should be closer to the 12% in the adopted 2017 Local Plan.</p>	<p>Whilst the percentages of the 2017 Local Plan may have been exceeded in some locations, the local plan review has identified issues with this policy approach and it is no longer proposed to be progressed. The decision on allocations has taken into account the situation at individual villages as well as site-specific considerations.</p>
<p>Lea should receive further growth in the plan beyond the existing allocation.</p>	<p>The allocated site in Lea will deliver 60 dwellings. Lea as a settlement and all sites within the village have been assessed in the evidence base in documents STA008 and EVR076-082 to form the decision on whether or not to allocate additional sites in Lea at this time.</p>
<p>Petition submitted in Leasingham seeking no sites of 10 or more dwellings to be allocated in the village.</p>	<p>Noted.</p>
<p>Scothern is getting more growth than proposed under the percentages in the 2017 Local Plan.</p>	<p>Whilst the percentages of the 2017 Local Plan may have been exceeded in some locations, the local plan review has identified issues with this policy approach and it is no longer proposed to be progressed. The decision on allocations has taken into account the situation at individual villages as well as site-specific considerations.</p>
<p>Scothern does not have the facilities to accommodate additional development and concerns about traffic in the village.</p>	<p>Infrastructure providers and the Highways Authority have not raised any concerns in relation to allocation of the sites in this village.</p>
<p>Question marks over suitability and deliverability of sites NK/BASS/010 and NK/BASS/007</p>	<p>These sites are allocated in the made neighbourhood plan. Whilst neither site has a planning permission at this time, they form part of the development plan.</p>
<p>Site NK/LEAS/001: a) Site is unsuitable for development due to flood risk and as they are used for storing run off from the fields.</p>	<p>a) The policy specifically requires development to be located outside of the flood risk zones and schemes will be required to provide a Flood Risk Assessment and attenuation as needed.</p>

<ul style="list-style-type: none"> b) Proximity to water treatment works is a concern. c) Lack of capacity in local infrastructure including health care and schools. d) Concerns about road conditions nearby and lack of maintenance. e) Concerns about the impacts on road safety with regards to the junctions with the A15. f) Site is not allocated in the neighbourhood plan. g) Concern about capacity of Deepdale Drive to accommodate development. h) Concerns about the capacity of the water treatment works. i) Concerns about impact on biodiversity with observed species listed. j) Concerns about impact on character of the area. 	<ul style="list-style-type: none"> b) The eastern part of this site is likely to be too close to the water treatment works for new housing, but with prevailing winds from the south west, western parts of the site are likely to avoid odours. This allows for flood attenuation and landscaping to be located at the eastern part of the site. c) NHS and the education authority did not raise any concerns during the process about additional development at this location. Development of this site may provide funds to improve capacity of the provision. d) The Highways Authority did not raise any concerns about the state of the road network at this location. Development of this site may help to provide funds to help improve this. e) The Highways Authority did not raise any concerns about road safety in relation to these sites. f) At the time of producing this local plan the neighbourhood plan was not at an advanced stage. g) The Highways Authority did not raise any concerns about the potential to access the site from Deepdale Drive. h) The statutory undertaker has not raised concerns about the capacity at this water treatment works. i) This site is not a protected habitat nor were any concerns raised through the plan-making progress by wildlife and ecology organisations. j) Design and landscaping can help enhance the character of the village at these locations.
<p>Site NK/LEAS/006:</p> <ul style="list-style-type: none"> a) Site is unsuitable for development due to flood risk and as they are used for run off from the fields. b) Proximity to water treatment works is a concern. c) Lack of capacity in local infrastructure including health care and schools. d) Concerns about road conditions nearby and lack of maintenance. e) Concerns about the impacts on road safety with regards to the junctions with the A15 and Moor Lane. f) Site is not allocated in the neighbourhood plan. g) Site has mains gas and other utilities running through. h) Concerns about the capacity of the water treatment works. 	<ul style="list-style-type: none"> a) The policy specifically requires development to be located outside of the flood risk zones and schemes will be required to provide a Flood Risk Assessment and attenuation as needed. b) No concerns were raised by environmental health about proximity to the water treatment works. c) NHS and the education authority did not raise any concerns during the process about additional development at this location. Development of this site may provide funds to improve capacity of the provision. d) The Highways Authority did not raise any concerns about the state of the road network at this location. Development of this site may help to provide funds to help improve this.

<ul style="list-style-type: none"> i) Concerns about impact on biodiversity with observed species listed. j) Concerns about impact on character of the area. 	<ul style="list-style-type: none"> e) The Highways Authority did not raise any concerns about road safety in relation to these sites. f) At the time of producing this local plan the neighbourhood plan was not at an advanced stage. g) HSE information about potential hazards has been reviewed as part of the site allocation process and this did not identify any significant constraints to development. h) The statutory undertaker has not raised concerns about the capacity at this water treatment works. i) This site is not a protected habitat nor were any concerns raised through the plan-making progress by wildlife and ecology organisations. j) Design and landscaping can help enhance the character of the village at these locations.
<p>Site WL/HEMC/001 should have the capacity increased to 196 dwellings.</p>	<p>The justification for capacities included in the plan are provided in evidence report EVR076-082. The numbers provided in the plan are indicative only and paragraph 13.2.4 clarifies that this indicative figure need not be a constraint to development with an appropriate design-led solution.</p>
<p>Site WL/SC/003:</p> <ul style="list-style-type: none"> a) There is not the infrastructure to support the development. b) Greater detail is required to address the risk to public health by smoke inhalation from the neighbouring biomass burner. 	<ul style="list-style-type: none"> a) Evidence has identified sufficient infrastructure to support development here and no concerns were raised by statutory providers throughout the local plan review process. b) This matter was looked into as a result of concerns raised. The biomass burner has been decommissioned and is to be removed from the neighbouring site.
<p>Site WL/STUR/006a:</p> <ul style="list-style-type: none"> a) Loss of employment land and productive agricultural land. b) There is no access off Saxilby Road, the area shown is a garden. c) The access off Tillbridge Road is to serve the current development of 6 dwellings and is a private road. d) The map is not up to date as it does not show the permission for the current dwellings under construction. e) Part of this site is subject to substantial surface water flooding. f) Concerns about the environmental impacts of the nearby highways depot on the site. 	<ul style="list-style-type: none"> a) The vast majority of land in Central Lincolnshire is agricultural land, with most of this being Grade 2 or 3. This site is identified as being Grade 3 agricultural land according the DEFRA mapping. Agricultural land classification has been taken into account when making decisions on site allocations. b) The site area promoted included the area fronting onto Saxilby Road and is understood to be in single ownership and available for development. c) This access is included within the site area submitted. It is noted that there is a scheme for 6 dwellings at this access point and there may be opportunity to utilise this access for some of this proposed allocation to access too.

	<p>d) The map is an OS base map which will be updated in due course once developments are completed.</p> <p>e) The policy for this site allocation requires any scheme to assess surface water flooding on the site.</p> <p>f) Permission has been granted for residential development between this site and the council depot.</p>
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Policy S82: Housing Sites in Small Villages

Issue	Response
Support for some sites and specific policy requirements.	Noted
More small villages should receive allocations.	All small villages and the sites within have been considered for allocations in this Local Plan.
<p>Alternative/additional sites proposed:</p> <ul style="list-style-type: none"> • NK/CLM/005 – Land at Corner Farm, Basingham Road, Carlton-le-Moorland • NK/EAG/002 – Land west of Eagle Moor, Eagle • NK/EAG/007 – Large Farm, Eagle Road, North Scarle • NK/NSCA/002 – Land east of South Scarle Lane, North Scarle • NK/NSCA/003 – Land at Eagle Road, North Scarle • NK/SWI/001 – Land east of High Street, Swinderby • NK/SWI/003 – Southern Lane, Morton • NK/TOTH/002 – Land south of Sempers Close, Thorpe on the Hill • NK/TOTH/006 (and a and b) – Land south of Westfield Lane, Thorpe on the Hill • WL/BUR/002 – Land at Burton Waters • WL/GLH/002 – Land off Bishop Norton Road, Glentham • “Manor Farm Garden Village”, Newton on Trent (map not supplied). 	
New Toft should receive development and investment.	New Toft has very limited services and facilities in the village and is not well-connected to larger urban areas. As such, the decision was made not to allocate in this location.
Site NK/SWI/006 should include protection of views of Swinderby Church Tower from Green Lane.	The outline permission on the site was supported by a heritage statement and landscape and visual impact assessments.
Site WL/BUR/005 and WL/BUR/005a should be in policy S81	Agreed

Site WL/COR/002a is inconsistent with the Corringham Neighbourhood Plan.	The Corringham Plan was made part of the development plan in January 2022 and it does include allocation of three small sites for between 2 and 7 dwellings each totalling 14-15 dwellings.
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Chapter 14 – Gypsies and Travellers and Travelling Showpeople

Policy S83: Gypsy and Traveller and Travelling Showpeople Accommodation

Issue	Response
Support for the policy.	Noted.

Chapter 15 – Ministry of Defence Establishments

Policy S84: Ministry of Defence Establishments

Issue	Response
Reference should be made to the need for discussions to be held with the local NHS to agree the needs from developing civilian communities.	This would be covered under criterion e which relates to infrastructure and community facilities.
Policy S84 addresses sites currently in MOD use which may present opportunities for future redevelopment, but it does not provide clear guidance for a former MOD site such as Nocton Hospital. A clear statement with regard to the re-use of the site should be included within the Local Plan. As a matter of principle, a site remains ‘a former MOD site’ up to the point at which it is redeveloped and in planning terms the nature of ownership does not alter this matter of principle.	The redevelopment of a site which has long since been out of use by the MOD would not be covered by this policy. Proposals at sites, such as that at Nocton, will be considered against the wider policies of the development plan, including any relevant neighbourhood plan policies.
The creation of appropriate infrastructure should be a consideration in all development that impacts on MOD sites that relate to communal housing and other communal areas so that the forces community equally benefit under this policy as a new civilian community would.	Proposals relating to the ongoing use by the MOD will largely be outside the control of the local plan.
The ‘in principle’ support for defence related development, within and adjacent to operational MOD sites afforded by Part 1 of draft policy S84, is welcomed. The MOD cautiously welcomes the addition of Part 1 to policy S84 in relation to military housing. It is important to recognise that policies within the broader plan applicable to open market residential	It is recognised that the wider policies of the plan cannot always apply to MOD establishments, which is why this policy is included. Any proposals will be considered under this policy and relevant policies elsewhere in the plan.

development, may not be appropriate or necessarily carry the same weight on MOD land.	
Part 2 of Policy S84 is welcomed by MOD as it will assist in safeguarding against inappropriate development close to key Defence sites which would adversely affect matters of National Defence.	Noted.
Part 3 of Policy S84 refers to the redevelopment of land surplus to MOD requirements, the flexibility afforded by this policy is welcomed.	Noted.

Appendix 2 – Car Parking Standards

Issue	Response
Expression of support, as a rural area it is acknowledged that privately owned vehicles remain a significant part of life and the appropriate provision for parking is important and should be appropriately factored into the design and layout of new housing developments to support principles of place making.	Noted

Glossary

Issue	Response
Definition of “developed footprint” in the glossary - criteria are overly restrictive, especially the third bullet point which relates to agricultural buildings.	Disagree, the definition has been used in the adopted local plan and continues to be suitable to apply.
‘Retain the core shape’ has been removed from the policy but is still in the definition in the glossary for ‘appropriate location’.	It is appropriate to include this in the glossary. It has been removed from Policy S4 as that part of the policy related to areas within the developed footprint and the term ‘appropriate location’ is also used elsewhere.

Policies Map²

Issue	Response
Welcome the clarity provided by showing locations suitable for large scale wind turbines.	Noted and support welcomed.
Figure 1 of the Minerals and Waste Local Plan Core Strategy and Development Management Policies document provides the Minerals Safeguarding Areas for the entirety of the Lincolnshire Authority Area. We propose that this figure, along with all the site safeguarded within Figure 2 and 3 of the CSDMP, and the 'Areas of Search' in Figure 5 should be included on the Policy map.	The Minerals and Waste Local Plan policies map is available to view on the interactive policies map.
Policies Map Inset 47 Lincolnshire Showground. The area of the Showground allocated should be increased to include two additional areas of land. The charity considers that two areas owned by the charity, should be included in the Showground's allocated area on Policies Map 47 to overcome their concerns of Policy S44 not being positively prepared nor effective at encouraging future development.	Disagree. There is no justification for why the showground area should be extended.
Inconsistent use of terminology across the Local Plan policy wording, supporting text and Policies Map with references to 'locations suitable in principle for large scale wind turbines', 'Broad area suitable for larger scale wind energy turbines' and locations 'potentially suitable' for 'medium-large scale wind turbines'.	It is agreed that the terminology on the legend should be consistent with the wording in the policy – 'Broad area suitable for larger scale wind energy turbines'.

Sustainability Appraisal

Issue	Response
The results of the SA process should clearly justify policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the draft CLLP's decision-making and scoring should be robust, justified and transparent.	Noted. The SA has undertaken these requirements.

² Please note, comments against the policies map have not been repeated here when the issue has also been recorded against the relevant policy in the plan.

<p>WL/WELT/008A</p> <p>Information in the SA is incorrect. Thus, the decisions are being made on incorrect information.</p> <p>Respondent disagrees with a number of the effects identified and makes suggestions for alternatives scores.</p>	<p>The SA forms an important part of the Local Plan evidence base and informs decision-making. The SA criteria help to assess the accessibility of potential sites to services and facilities, and to assess key environmental constraints. However, sites are not exclusively selected based on the SA. Other factors were also taken into account in reaching decisions on sites to be allocated. These are set out in EVR 076-082 Residential Site Allocations Evidence Report.</p> <p>All sites were assessed against the same SA Framework using the same methodology. There has been no deviation from the assessment criteria to take into account supplementary information, such as ecological assessments or masterplans.</p> <p>This was to ensure fairness and consistency across all sites, so that each site was assessed on the same basis and to the same level of detail.</p>
<p>NK/BAS/009</p> <p>Not clear how the SA has been used to inform the plan, given that the Neighbourhood Plan sites have been accepted without a clear consideration of alternative allocations.</p>	<p>The SA assessed 4 reasonable alternative housing site allocations in Bassingham, including NK/BAS/009. It is therefore considered that alternative allocations were considered.</p> <p>The SA was an aid to decision-making. Other factors were also taken into account in reaching decisions on the sites to be allocated, such as community aspirations set out in Neighbourhood Plans.</p> <p>The Neighbourhood Plan sites have been allocated as they are already part of the Development Plan.</p>
<p>WL/DUNH/002</p> <p>Respondent disagrees with a number of the effects identified and makes suggestions for alternatives scores.</p>	<p>All sites were assessed against the same SA Framework using the same methodology. There has been no deviation from the assessment criteria to take into account supplementary information, such as ecological assessments or masterplans.</p> <p>This was to ensure fairness and consistency across all sites, so that each site was assessed on the same basis and to the same level of detail.</p>
<p>WL/ING/005</p>	<p>The Growth Options Paper (STA0011) sets out the process behind the proposed distribution of growth in the draft Local Plan and considers options for the overall distribution of growth with variations in the</p>

The SA assesses only one site in Ingham, which is proposed for allocation and does not assess any reasonable alternatives. The SA is therefore lacking and does not demonstrate that the most sustainable option for growth at Ingham has been chosen.

proportion of total growth apportioned to the different geographies. The SA Report signposts to this document in paragraphs 4.2.12 and 4.2.34.

Paragraph 5.2 of the Growth Options paper states that Option 5 will form the basis of the distribution of growth in Central Lincolnshire, with the exact amount and locations of development to occur within these sub areas to be considered through the detailed site assessment process.

Appendix 3 of the SA (STA004.1f) sets out the SA of the 5 high level growth options as stated in the Growth Options Paper. Option 5, a balanced combination of Options 1 to 3, performed the best against the SA objectives. The SA recommended that site selection should consider accessibility to key services and facilities.

The Site Allocations Settlement Analysis report (STA008) considers suitability and sustainability, or otherwise, of Central Lincolnshire villages to accommodate housing development. The report does not make recommendations for each village about whether or not they should accommodate growth but was used to inform the site selection process for residential allocations.

The site selection process is explained in the policy evidence report for S76 to S82 (EVR 076-082 Residential Allocations). Section 4 sets out which settlements were considered and paragraph 4.2 states that village profile assessments were undertaken for the small and medium villages to assess the sustainability of locations. Where villages were found to have limited services and/or connections it was considered that sites would not be allocated in these locations with the exception of any planning permissions. This accords with the preferred Spatial Strategy as set out in S1 and the preferred distribution of growth as set out in S2.

All sites proposed for allocation in the settlements listed in the settlement hierarchy have been assessed against the criteria used in the Sustainability Appraisal.

The above commentary summarises the process for site selection, and the integration of the SA requirements into that process. However, after

	<p>considering the representation received (left) which is specific to Ingham, we have undertaken a review of the SA documentation as a whole. From that review, it is acknowledged that a reader of the SA documentation as published for consultation might consider there to be a degree of inconsistency in the SA process in terms of presenting the assessment of sites in different villages with some villages having alternative (non-allocated) sites appraised in the SA whereas other comparable villages do not. Ingham is an example of this, where arguably an even more comprehensive SA process could have assessed, in the SA, alternative sites.</p> <p>To address the issue raised and to ensure the SA presents as full a picture as possible, we have already commenced an addendum to the SA which provides a site-specific SA of all alternative sites in those villages (i.e. not just Ingham) listed in the settlement hierarchy, if this has not already been done.</p> <p>Whilst it is important not to prejudge the outcome of that additional SA work, it is a fact that the site allocations process (as described above) has already included the consideration of the key features and framework of the SA in the published Site Allocations Evidence Report. Consequently, because it is the same information to be used, it is anticipated to a very high degree of confidence that the additional SA work will not reach an alternative conclusion to that in the site allocations report for individual sites assessed. Nevertheless, for completeness, and in recognition of the need for the SA work to be fully compatible with all due SA requirements, we will do this parallel SA process for the arguably missing alternative sites. We estimate that this work, which will be in the form of an addendum to the main SA report, should be complete before the end of July. Our intention at that point is to ask the inspector to agree that we can consult immediately for 6 weeks on that SA addendum, with such consultation therefore taking place very early in the examination timetable, ending early September and prior to any hearing sessions. This consultation will give the opportunity for any representors to not only make representation on the SA addendum but if necessary to raise any concerns arising from that addendum at a future hearing session. We are confident that such a</p>
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	<p>process, including the six week consultation stage, should have no material effect on the timetable of the examination.</p>
<p>WL/LEA/002</p> <p>At Regulation 18 consultation stage the Interim SA STA004g set out an appraisal of sites WL/LEA/002 and WL/LEA/003. However, in the final SA the appraisal for chosen site allocation WL/LEA/003 is absent. It is assumed this is in error.</p> <p>Respondent disagrees with a number of the effects identified and makes suggestions for alternatives scores.</p> <p>The SA does not take into account the proposed masterplan, mitigation and enhancement proposed for the site.</p>	<p>WL/LEA/003 was not included in the final SA as it has planning permission and is under construction.</p> <p>All sites were assessed against the same SA Framework using the same methodology. There has been no deviation from the assessment criteria to take into account supplementary information, such as ecological assessments or masterplans.</p> <p>This was to ensure fairness and consistency across all sites, so that each site was assessed on the same basis and to the same level of detail.</p>
<p>NK/BRAN/010/10A and 10B NK/NAV/004 WL/SC/006 NK/HEI/003A NK/NAV/002</p> <p>The SA reaches incorrect technical conclusions in discounting the sites.</p>	<p>The SA forms an important part of the Local Plan evidence base and informs decision-making. The SA criteria help to assess the accessibility of potential sites to services and facilities, and to assess key environmental constraints. However, sites are not exclusively selected based on the SA. Other factors were also taken into account in reaching decisions on sites to be allocated. These are set out in EVR 076-082 Residential Site Allocations Evidence Report.</p> <p>All sites were assessed against the same SA Framework using the same methodology. There has been no deviation from the assessment criteria to take into account supplementary information, such as ecological assessments or masterplans.</p> <p>This was to ensure fairness and consistency across all sites, so that each site was assessed on the same basis and to the same level of detail.</p>
<p>WL/BARD/008</p> <p>The site is assessed as a 'reasonable alternative', however, a number of conclusions within the SA report are queried.</p>	<p>Comments on the appraisal of WL/BARD/008 noted.</p> <p>All sites were assessed against the same SA Framework using the same methodology which was subject to consultation. This was to ensure fairness and consistency across all sites, so that each site was assessed on the same basis and to the same level of detail.</p>

<p>WL/MARK/001</p> <p>Concern benefits of including additional land not reflected within supporting evidence, including the SA. Extending allocation to south would support delivery of open space, biodiversity net and support connectivity to wider public right of way.</p>	<p>All sites were assessed against the same SA Framework using the same methodology. There has been no deviation from the assessment criteria to take into account supplementary information, such as ecological assessments or masterplans.</p> <p>This was to ensure fairness and consistency across all sites, so that each site was assessed on the same basis and to the same level of detail.</p> <p>Policy S61 allows for off-site delivery of biodiversity net gain where appropriate. If an appropriate scheme came forward using land to the south for biodiversity net gain and other natural environmental benefits, it is likely this will be viewed positively.</p>
<p>WL/STUR/006</p> <p>The justification for not allocating site WL/STUR/006 is considered unsupported by evidence.</p> <p>Comparison with the allocated part of the site (WL/STUR/006A), identifies that the SA's assessment of both sites is absolutely identical with regard to landscape, noise, and access to employment impacts.</p>	<p>The SA forms an important part of the Local Plan evidence base and informs decision-making. The SA criteria help to assess the accessibility of potential sites to services and facilities, and to assess key environmental constraints. However, sites are not exclusively selected based on the SA. Other factors were also taken into account in reaching decisions on sites to be allocated. These are set out in EVR 076-082 Residential Site Allocations Evidence Report.</p>
<p>The SA Report does not include an assessment of RAF Scampton as a potential housing allocation or reasonable alternative.</p>	<p>Without the nature and quantum of development it would be difficult to undertake an SA at this stage.</p> <p>The SA includes an assessment of policy S75 RAF Scampton and has been treated in the same way as other opportunity areas identified on the Policies Map.</p>
<p>Appendix 3 SA framework & assumptions. Section 6 of the table on page 106/107 is welcomed, in particular the removal of the proximity buffer from the 'Assumptions and Approach'.</p>	<p>Noted.</p>
<p>There appear to be inconsistencies within the site selection methodology and process in respect of residential allocations. There are some sites which have not been draft allocated (NK/RUSK/015) which actually score better than some sites which have been draft allocated (NK/BRAN/007 or NK/RUSK/007 for example).</p>	<p>The SA forms an important part of the Local Plan evidence base and informs decision-making. The SA criteria help to assess the accessibility of potential sites to services and facilities, and to assess key environmental constraints. However, sites are not exclusively selected based on the SA. Other factors were also taken into account in reaching decisions on sites to be allocated. These are set out in EVR 076-082 Residential Site Allocations Evidence Report.</p>

<p>Appendix 7</p> <p>The reasons for selecting and rejecting site WL/WELT/008 and WL/WELT/008A are inconsistent. The sites are essentially the same site, however site WL/WELT/008A boundary to the north has been adjusted slightly.</p> <p>The Sustainability Appraisal documentation should be reviewed to ensure a consistent narrative and assessment.</p>	<p>There has been a consistent assessment of the sites in the SA.</p> <p>All sites were assessed against the same SA Framework using the same methodology. There has been no deviation from the assessment criteria to take into account supplementary information, such as ecological assessments or masterplans.</p> <p>This was to ensure fairness and consistency across all sites, so that each site was assessed on the same basis and to the same level of detail.</p> <p>Acknowledge the justification text in Appendix 7 for WL/WELT/008 and WL/WELT/008A could have been more clearly worded given the sites are essentially the same.</p>
<p>Non-Technical Summary</p> <p>Policy S4 and S5 on more rural locations for development are assessed as having neutral or negligible effects when some locations are likely to require significant investment in networks and/ or capacity which will be carbon intensive relative to the number of houses being provided.</p>	<p>Comments noted. The effects were considered to be neutral or negligible in relation to the natural resources – water objective for these policies because, under S4, any development coming forward is expected to be small scale (up to 10 dwellings in large and medium villages and 5 dwellings in small villages) and under S5, the policy sets out criteria as opposed to a quantum of development to be delivered.</p>
<p>Non-Technical Summary</p> <p>Policy S12 on Water Efficiency is rightly assessed as having a major positive effect for natural resources. However, we would question why that reduction in water use has a possible mixed impact on biodiversity and green infrastructure. Policies S59 to S66 on the natural environment are by contrast said to have a positive effect on Natural Resources – Water sustainability objectives.</p>	<p>The impact was assessed as neutral to minor positive as it was felt only the green roof element of the policy was relevant to this objective.</p>
<p>Non-Technical Summary</p> <p>Policy S21 on Flood Risk has significant major positive benefits for natural resources although is assessed as having no effect on Climate Change when it is specifically designed to support adaptation in response to climate change.</p>	<p>There are two climate change objectives in the SA Framework (objective 12 and objective 13). One in relation to climate change effects, which focuses on energy and reducing emissions, and one in relation to climate change adaptation, which focuses on reducing the risk of flooding and adapting to a changing climate. Policy S21 scored major positive in relation to objective 13.</p>
<p>Non-Technical Summary</p>	<p>Two SA Frameworks were used in the SA; one for policies and one for sites. It is therefore not possible to compare the SA of policies with the SA of sites, as different appraisal criteria were used.</p>

<p>Policies S69 to S71 on the SUE allocations at Lincoln, Gainsborough and Sleaford are assessed as having a positive impact on natural resources – water. However, under Policy S76 the eight individual allocations have either a mixed/ unknown or neutral impact on the water objective.</p>	<p>The SA of S69 to S71 assesses the proposed policy which guides development on each SUE. S76 assesses the site before any policy requirements are taken into account.</p>
<p>Given the balance of growth and allocations, the assessed cumulative impact (Table 6) somewhat surprisingly, suggests the impact on the Plan on Natural Resources – Water is positive or unknown.</p>	<p>Table 6 summarises the cumulative impact of the whole plan, taking into account both policies and site allocations. Commentary is provided in the Main SA Report (STA004.1b) in Table 5.4 (page 73 to 80). This acknowledges that growth will increase the demand for water and could result in increased pressure on existing water infrastructure. However, on balance, it was felt that the policy requirements within the plan would help mitigate, hence minor positive effects, although there is some uncertainty as this is dependent on implementation.</p>
<p>Support the four Monitoring indicators proposed to assess the significant effects of the Plan on Natural Resources – Water. The measures though need to then set out the target for that measure, responsibility for monitoring and corrective action.</p>	<p>Noted. The monitoring framework will be finalised on adoption of the Local Plan.</p>
<p>Growth Options</p> <p>There is no justification at all for how Option 5 (Balanced combination of Options 1 to 3), assessed as the most Sustainable growth option from the Issues and Options stage was dismissed as a reasonable alternative for the Proposed Submission stage.</p>	<p>The Growth Options Paper (STA0011) sets out the thought process behind the proposed distribution of growth in the Local Plan. Section 4 looks at high level options and principles for how growth could be distributed. These options are all based on using the housing requirement range of 1,060 to 1,325 dwellings per year. Five options were identified and discussed.</p> <p>Paragraph 5.2 of the Growth Options paper states that Option 5 will form the basis of the distribution of growth in Central Lincolnshire, with the exact amount and locations of development to occur within these sub areas to be considered through the detailed site assessment process.</p> <p>Appendix 3 of the SA (STA004.1f) sets out the SA of the 5 high level growth options as stated in the Growth Options Paper.</p> <p>Appendix 4 of the SA (STA004d) assesses the preferred option and reasonable alternatives for policies S1 and S2 in the Proposed Submission Local Plan. Both the preferred options for S1 and for S2 are based on Option 5 of the Growth Options Paper. It has therefore not</p>

	been dismissed but is the preferred approach to the distribution of growth in the Proposed Submission Local Plan.
<p>Policy S2</p> <p>It is not clear from the Sustainability Appraisal how distribution of development within the 'Elsewhere' category has been tested and whether therefore options for a greater proportion of development within the Elsewhere category, and greater proportion of the overall requirement to Market Rasen has been tested, as this would not necessarily lead to more growth overall within the 'Elsewhere' category (Option 2).</p>	<p>The Growth Options Paper (STA0011) sets out the thought process behind the proposed distribution of growth in the draft Local Plan and considers options for the overall distribution of growth with variations in the proportion of total growth apportioned to the different geographies. The SA Report signposts to this document in paragraphs 4.2.12 and 4.2.34.</p> <p>As the Growth Options Paper highlights in paragraph 4.1, there could be any number of detailed options for how to distribute growth. However, the approach taken was to consider high level options and principles for how growth can be distributed sustainably, with the exact amount and locations of development to occur in each of the geographical sub areas to be considered through the detailed site assessment process.</p>

Habitats Regulations Assessment

Issue	Response
<p>We are satisfied that the Screening Report follows accepted methodology and is in line with appropriate legislation and guidance. We also acknowledge that policies that may have a Likely Significant Effect on a European Site have been identified and further considered through an Appropriate Assessment.</p> <p>Agree with the HRA report's conclusions that the Central Lincolnshire Local Plan would not be likely to have a significant effect on a European Site either alone or in combination with other plans or projects, and no further assessment work is required.</p>	<p>Noted and welcomed.</p>

Evidence Base

Issue	Response
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<p>The evidence base used to support the development of the Local Plan Policies is correct and reflective of the operation of the current housing markets in West Lindsey.</p>	<p>Noted and welcomed.</p>
<p>A detailed evidence base is required to reflect heritage assets across the borough, such as including Conservation Area appraisals and Local Lists within the evidence base pages. Reference to an evidence base is unclear and it would be helpful to make its' location clearer. Provide a comprehensive heritage evidence base to support the plan, within a separate section in the Consultation Library.</p>	<p>A detailed and comprehensive heritage evidence base for the Local Plan exists, predominantly hosted by the Central Lincolnshire authorities on their websites (City of Lincoln, North Kesteven, West Lindsey and Lincolnshire County Council). Following similar comments made by Historic England at the regulation 18 consultation, the details of the evidence base, including direct links to current web pages was included in the evidence report for Policy S57 (ref EVR057). Further to this latest comment, an independent document has been added to the library which signposts to the location of the heritage evidence base.</p>
<p>Whole Plan Viability Assessment</p> <p>Before the Local Plan is submitted for examination, the Councils overall policy requirements should be revisited and reduced. Without revision, trade-offs between policy requirements, affordable housing and infrastructure provision will be necessary. The Councils will have to accept site specific viability assessments at development management stage resulting in delay and uncertainty and non-delivery.</p>	<p>Disagree. The Whole Plan Viability Assessment (ref INF002) provides confidence that the plan and its policies are deliverable.</p>
<p>Infrastructure Delivery Plan and Whole Plan Viability Study</p> <p>Page 21. 3.2.3 Water. The plans referred to from 2018 and 2019 will be superseded by the two new plans. The final plans are expected to be agreed by Ofwat in late 2023 and the new investment that they cover commenced from 2025.</p> <p>Anglian Water will be consulting on its two new plans in 2022 and would welcome comments from the Council's on whether the planned investment supports the growth set out in the draft Central Lincolnshire Plan.</p> <p>Appendix A. Page 6. We would ask that the investment plans set out in Appendix A are updated with information in the new WRMP and DWMP.</p>	<p>Noted.</p>