



Gladman Developments Ltd

Central Lincolnshire Local Plan EiP

Matter 13 – Design and the Natural Environment (LP26, LP14, LP16, LP17, LP18, LP19, LP21)

Issue 13b – Landscape, Townscape and Views – Policy LP17

Q6. Are the designations justified effective and consistent with national policy? Are there any significant factors that indicate that any sites or areas should not have been designated and Q9. For purposes of Policy LP17 how are 'key local views and vistas' defined? Does this give certainty to decision makers, developers and communities? Is the policy effective in this regard?

1. Gladman raise concerns with the policies identified above in relation to the reference 'key local views and vistas'. Gladman are not aware of any policies which identify specific key views and vistas worthy of protection. Policy LP10 provides no clarity on how this will be applied in a consistent manner through the development management process as it would seek to protect views that have not been identified. Opinions on landscape are highly subjective, therefore, without any further clarity, this policy is likely to lead to inconsistencies in the decision making process. Gladman do not consider this policy to be effective as required by the Framework.
2. Paragraph 113 of the Framework refers to the need for criteria based policies in relation to proposals affecting protected wildlife or geodiversity sites or landscape areas, and that protection should be commensurate with their status and gives the appropriate weight to their importance and contribution to the wider networks. As currently drafted Gladman do not believe that Policy LP17 aligns sufficiently with the requirements of the Framework and needs to be revisited to ensure that it is consistent with the approach set out by national planning policy.

Issue 13c – Climate Change and Renewable Energy – Policies LP18 and LP19

Q10. The Written Ministerial Statement of 25 March 2015 states that local planning authorities should not set in their emerging Local Plans any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. Does Policy LP18

introduce any new standards relating to the construction of buildings that are inconsistent with national planning policy?

3. Gladman do not consider that LP18 is necessary nor consistent with national policy. The matters addressed in this policy are adequately covered by primary legislation and the standards suggested by policy LP18 above the building regulations are inconsistent with government policy. This policy should be deleted or significantly amended.

Issue 13d – Water Resources and Flooding – Policy LP14

Q11. The PPG states that all new homes already have to meet the mandatory national standard in the Building Regulations of 125 litres/person/day. Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations requirement of 110 litres/person/day (Ref ID 56-014-20150327). Is the standard of 110 litres/person/day in Policy LP14 justified on available, up-to-date evidence?

4. Gladman do not consider that there is any robust up-to-date evidence for seeking a requirement above and beyond the building regulations target of 125 litres/person/day. No consideration has been given as to the impact of seeking this higher level or whether this is actually achievable across the area – the impact on viability has not been appropriately assessed. This policy should be removed.