




# Preliminary Draft Consultation: Report on Key Issues Raised

January 2015

## Preliminary Draft Consultation: Report on Key Issues Raised

### 1. Introduction

Consultation on the Preliminary Draft version of the Central Lincolnshire Local Plan took place between the 1 October and 11 November 2014: this was the first consultation on the emerging Central Lincolnshire Local Plan. The scheduled stages are as follows:

First Draft of Local Plan for consultation (the October 2014 'Preliminary Draft Local Plan')	October 2014	
Second Draft of Local Plan for consultation (the July 2015 'Further Draft Local Plan')	July 2015	
Final Draft Local Plan for consultation (the January 2016 'Proposed Submission Draft Local Plan')	January 2016	
Examination of Local Plan	April – September 2016	
Adoption of Local Plan	November 2016	

The Central Lincolnshire Local Plan Team wishes to thank all those who took the time to comment on the Preliminary Draft Local Plan during this initial consultation.

All responses received during the consultation period have been read and will be given due consideration as we prepare the next draft Local Plan.

This report identifies the key issues raised during the consultation on the Preliminary Draft Local Plan. The Central Lincolnshire Local Plan Team's full response to each of the issues is not included in this report: all issues raised are being carefully considered together with other relevant considerations, such as changes to national planning policy. However, in the second column, factual or clarification comments are given if it is considered helpful to do so.

Full details of all comments received, including those submitted via post or email, are available to view on Objective:

[http://central-lincs.objective.co.uk/portal/central\\_lincolnshire/pd?pointId=3125494](http://central-lincs.objective.co.uk/portal/central_lincolnshire/pd?pointId=3125494)

### 2. Site suggestions and allocations

The Preliminary Draft version of the Local Plan did not contain site allocations: people were asked to put forward sites with a capacity of 25 dwellings or more, or sites of 0.5 hectares or more for non-residential use, as part of the consultation. We said we would add those new sites to other known sites for consideration, and published an updated report of candidate sites. This should be available by the end of January 2015.

That report will not detail or appraise the site suggestions we received during the consultation: all sites put forward (which met the threshold criteria) will be assessed in a separate Site Selection Evidence Report which will be available at [www.central-lincs.org.uk](http://www.central-lincs.org.uk) once finalised (due sometime mid 2015).

### 3. Summary of key issues raised during the Preliminary Draft consultation

**Note:** all references to section, paragraph and policy numbers are to those in the Preliminary Draft (Oct 2014) version of the Central Lincs Local Plan.

General Comments (i.e. not to a specific policy or paragraph in the plan)	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Misleading description time period (2011-2036). Should be 2016-2036 to reflect when the plan will be published.</li> <li>• The importance of the minerals industry should be given more prominence in the plan.</li> <li>• The eastern relief road should be shown on maps as a key piece of infrastructure.</li> <li>• The plan should make provision for places of worship.</li> <li>• The plan is too complex for much of the public to comprehend. It is excessively wordy and it needs to be edited, using plain English, to make it more intelligible.</li> <li>• Criticism of a consultation event in Navenby which did not have information relating to the consultation of the previous Core Strategy.</li> <li>• Very few people attended the events held which make this consultation invalid.</li> <li>• Current legislation is stacked in favour of developers rather than the aspirations of communities.</li> <li>• The plan should include a policy on telecommunications.</li> <li>• Cannot find reference to Conservation Areas, is the plan to abandon them.</li> <li>• The document is too broad brush and does not make issues very clear.</li> <li>• Understand that the plan will not tackle affordable or agricultural housing which is unacceptable.</li> <li>• The plan ignores issues rather than tackling them in the document.</li> <li>• The plan has been hurried and prematurely put out to consultation and is not supported by an adequate level of information and evidence.</li> <li>• The plan should present genuine options at these early stages.</li> <li>• Wherever Lincolnshire Biodiversity Action Plan is mentioned, so should the Lincolnshire Geodiversity Action Plan.</li> <li>• The six week consultation period is not long enough to effectively engage with local residents and organisations. Many people are not aware of the consultation.</li> <li>• Are results of consultation on the previous Core Strategy, which remain valid, being considered in developing the plan?</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

Foreword	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>Disagree with statements about the area in the foreword. The plan should paint an accurate picture of the area.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>

Chapter 1	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>Does not provide clear, traceable route that the Councils have explored all options for strategies to deliver objectively assessed needs for development</li> <li>Not considered that current consultation document as 'early stage' document is prepared in accordance with NPPF, NPPG or Regulations in terms of consultation arrangements having clear audit trail. Local plan should start again with fresh Regulation 18 scoping consultation</li> <li>Perception is that preliminary draft consultation has been rushed with critical work/evidence not in place</li> <li>Statement of general support</li> <li>Want to see evidence backing up statements including statistics, charts, diagrams, projections etc included in detailed appendices</li> <li>Who made the decision to create arbitrary 7 mile line around Lincoln and on what basis was decision taken?</li> <li>Overall a weak document, concern expressed that will be open to challenge</li> <li>Belief that evidence and conclusions analysis sustainability from Core Strategy should have been used to inform this plan.</li> <li>Considered that this draft document does not fulfil Duty to Cooperate</li> <li>No evidence as to what are considered strategic matters</li> <li>No definitive objectively assessed housing need against which policy implications can be assessed and constructive comment offered</li> <li>Need to ensure that JPU published all accounts relating to Duty to Cooperate, making clear to inspector that requirements have been met</li> <li>Para 1.1.2 – States that new draft sets out what and how much development should take place, but later in document states this is still subject of further work.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>

<ul style="list-style-type: none"> <li>• Para 1.1.3 – Appears to be lack of robust and up to date evidence to underpin sport related policies and inform inclusion of sports infrastructure</li> <li>• Para 1.1.3 – Welcome inclusion of sport related policies</li> <li>• Para 1.1.3 – Concern evidence base fails to provide adequate information and justification to guide effective application of these policies – a recurring theme throughout</li> <li>• Para 1.1.3 – Suggest amended wording of ‘upgraded sewage treatment works’ or ‘upgraded sewerage infrastructure’ to replace ‘upgraded sewerage disposal’</li> <li>• Para 1.2.2 – Paragraph should more appropriately state that document has been prepared in full compliance with the policies of the NPPF and demonstrate how. Consider it fails important legal compliance requirement</li> <li>• Para 1.4.1 - Does not indicate where ‘key issues we already know about’ come from, how they were agreed on or by whom.</li> </ul>	
--	--

Section 2.1 – Central Lincolnshire – a shared approach	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Objection the joint working arrangement.</li> <li>• Para 2.1.3 – Decision making on planning applications rests with the Local Planning Authority, but Parish and Town Councils that obtain Quality Council Status should become statutory consultees within their community.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> <li>• Consultation arrangements is a matter for the Statement of Community Involvements (see website for details).</li> </ul>

Section 2.2 – Central Lincolnshire in context	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Para 2.2.1 – objection to the use of wording about the population of Lincoln when surrounding villages are included as people visiting a city do not boost the population. Grouping these villages with Lincoln will potentially starve Gainsborough of income.</li> <li>• Para 2.2.1 – the villages around Lincoln should be viewed as villages in their own right, not just servicing Lincoln.</li> <li>• Para 2.2.3 – support recognition of the rural nature of much of the area and the recognition that some rural communities function as networks of villages – but this should be reflected in the policies.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



<ul style="list-style-type: none"> <li>• Para 2.2.3 – should include reference to those settlements that exceed a few hundred dwellings.</li> <li>• Para 2.2.5 – there are pockets of deprivation in rural areas too, where access to affordable housing and services and employment are key issues.</li> <li>• Para 2.2.6 – support reference to the importance of the MoD to the local population and economy, but it should not only refer to bases and should include Beckingham Ranges and Training Area. RAF Digby should also be included.</li> <li>• Para 2.2.6 – disappointed that there is no policy to relate to these sites as there was in the previous core strategy.</li> <li>• Para 2.2.7 – there are skill shortages in key sectors that are holding back growth.</li> <li>• Para 2.2.8 – the AONB is not given enough prominence in this plan.</li> <li>• Para 2.2.9 – support the recognition that biodiversity is under threat and that action is needed.</li> <li>• Para 2.2.11 – disappointment that the historic environment does not have a bigger part and should run through the section as a golden thread. In its current form the message is lost and it should be reworded and strengthened. Pressures on the historic environment should be mentioned here.</li> <li>• Para 2.2.11 – it should be made clear that the enhancement of character includes the protecting of archaeology, even if it has been covered up following excavation.</li> <li>• There should be a reference to the rising number of older people, particularly in the Lincoln fringes. This brings with it challenging age structures in some rural settlements and strain on care services.</li> </ul>	
---	--

Section 2.3 – Key Challenges	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• This section is very scarce and should identify in more detail the challenges and issues being faced.</li> <li>• Support recognition that the improvement of social and economic conditions must not be at the expense of the environment.</li> <li>• Key challenges are to grow and support key employment sectors of food and farming, manufacturing, and tourism whilst diversifying the economy, particularly for SMEs.</li> <li>• Para 2.3.1 – should include a repetition of the statement that where all criteria are met, there will be a presumption in favour of sustainable development.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

Section 2.4 – Our Vision	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• The vision is not based on viable data, it does not refer to the number of homes and jobs required in the whole of Lincolnshire, in Central Lincolnshire and consequently in towns and villages.</li> <li>• Not enough emphasis on protection of the environment.</li> <li>• Absence of reference to quality of life.</li> <li>• Other areas should take more growth and new towns or villages should be considered as options.</li> <li>• There should be a stronger aspiration for the creation of networks of green infrastructure.</li> <li>• The policies in the plan do not deliver the vision.</li> <li>• High priority should be given of the need to listen to the views of those producing neighbourhood plans.</li> <li>• Should include recognition that the sustainability of rural communities carries an inherent assumption that many journeys are made by car.</li> <li>• The individual elements of the vision should be tied together in an overarching strategy.</li> <li>• Vision should include: a real vision for the roads; reference of the need to conserve the beauty of the AONB; recognition of the issues around the ageing communities; reference to the importance of the MoD presence in the area; support for infrastructure associated with low carbon and renewable energy.</li> <li>• Says a lot about needing more of everything, but should talk about the balance that is necessary between growth and infrastructure.</li> <li>• Support for vision.</li> <li>• Para 3 – the hugely varied housing figures result in an impossible vision and an unrealistic draft plan. A number of queries on the basis of the numbers.</li> <li>• Para 3 – it is important that the plan does not over-allocate, but set a figure that can realistically be delivered.</li> <li>• Para 3 – rapid, recent development should not be projected at the same rate into the future.</li> <li>• Para 3 – the vision is not the place for figures of development, but should be a statement about meeting objectively assessed need.</li> <li>• Para 3 – the aspirations for growth are over-ambitious and unrealistic.</li> <li>• Para 5 – manufacturing should be included in the list of employment uses.</li> <li>• Para 8 – growth focused on the urban areas is not necessarily sustainable and growth should be spread to allow people to choose to live near to their work place rather than focusing everything in fewer locations.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



<ul style="list-style-type: none"> <li>• Para 8 – support inclusion that ‘villages will not be left behind.’</li> <li>• Para 8 – support for Lincoln area being the focus of growth and its role being strengthened.</li> <li>• Para 8 – objection to focusing growth at Gainsborough.</li> <li>• Para 8 – should not be a presumption that villages in Central Lincolnshire are thriving.</li> <li>• Para 9 – support the inclusion of the need to protect and enhance the natural and historic environment.</li> <li>• Para 9 – there should be greater emphasis on the need for development to support and improve biodiversity.</li> <li>• Para 11 – development of houses will not necessarily create significant new employment.</li> <li>• Para 11 – ‘access to employment’ should be added.</li> <li>• Para 11 – should mention those settlements that prove the need along with proposals for development to tackle the issues.</li> </ul>	
---	--

Section 2.5 – Our Objectives	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Objection to the use of the term ‘our objectives’ – where has the community input been to these?</li> <li>• Para 2.5.1 – objection to the use of the term ‘consistent’ as this is stating the obvious and is not clear what it means.</li> <li>• Objective a – should include reference to meeting objectively assessed need and to boost the supply of housing across the area. Should specifically reference ‘new housing’.</li> <li>• Objective a – support this objective.</li> <li>• Objective b – the objective should set out a clear economic vision and strategy which positively encourages sustainable economic growth.</li> <li>• Objective b – there should be a greater emphasis on job creation to deliver dynamic and diverse communities and avoid unbalanced demographics with a proliferation of older people.</li> <li>• Objective d – there is a limit that most people will realistically walk (1.5 miles) or cycle (3 or 4 miles) to travel to work and this will require improvements to footpaths and cycle paths.</li> <li>• Objective d – this is better achieved if jobs are spread across the area rather than focused in one or two locations as there is a limit to the amount of development that can be built within walking or cycling distance of employment centres.</li> <li>• Objective d – there should be a mention of powered two wheeled vehicles as a sustainable option.</li> <li>• Objective d – Lincoln’s transport infrastructure needs an overhaul and park and rides should be investigated.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>





- Objective d – significant improvements are needed in the transport infrastructure, particularly trains which do not run at appropriate times and are often over-full.
- Objective d – aims to reduce reliance on car are not realistic with poor public transport and often no option but to use a car, particularly for older people or people with disabilities.
- Objective d – refers to making the most of existing transport infrastructure, but this will be inadequate for the levels of growth being discussed and should be reworded to deliver enhancements.
- Objective e – Healthy lifestyles need further promotion.
- Objective e – should include adult outdoor exercise equipment.
- Objective e – support, but should be renamed 'health and wellbeing'.
- Objective g – support the inclusion of the need to protect and enhance the natural environment. There is a particular need to improve the quality and extent of the ecological network.
- Objective g – Lincoln has a deficiency of sports and leisure.
- Objective g – support objective.
- Objective h – support objective.
- Objective h – this objective should be a priority and should be advanced as quickly as possible to become a material consideration in planning decisions.
- Objective i – support objective.
- Objective j – support objective.
- Objective k – should include water pollution.
- Objective k – support objective.
- Objective l – support objective.
- Objective m – support objective.
- Objective n – support inclusion of objective to tackle climate change, but disappointed that the relevant policies are negatively worded and overly restrictive.
- Objective n – suggestion of amended wording.
- Objective o – support the need for climate change adaptation.
- Objective o – this is not met in the plan as it proposes building in flood risk zone 3.
- New objective proposed on the protection and sustainable use of minerals.
- New objective proposed on digital connectivity to enable growth and tackle rural deprivation.
- New objective proposed to protect and enhance public open spaces and recreational areas.
- The objectives should include reference to the need to conserve the natural beauty of the AONB.
- Para 2.5.3 – support inclusion of the Lincolnshire Biodiversity Action Plans.
- Para 2.5.3 – queries around the legitimacy and relevance of plans listed.
- Para 2.5.3 – should include reference to the Humber LEP.

<ul style="list-style-type: none"> <li>• Para 2.5.3 – a high priority should be given to neighbourhood plans.</li> <li>• Para 2.5.3 – the Environment Agency is currently consulting on the River Basin Management Plans, and Flood Risk Management Plans, these should be included in future versions of the plan.</li> </ul>	
--	--

Chapter 3	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• There is no mention of providing new settlements in all of Chapter 3.</li> <li>• Support for the principles.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

Section 3.1 – A Presumption in Favour of Sustainable Development	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• The wording infers that the plan sets out how much growth is needed and where it will go, but this has yet to be determined. The preparation of a Local Plan should follow the route of survey/information/analysis and plan formulation rather than treating it as a series of unconnected tasks.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

Policy LP1 – A Presumption in Favour of Sustainable Development	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Support this policy.</li> <li>• The policies of the plan that affect the location and type of development in rural communities will undermine the delivery of sustainable development.</li> <li>• The statements in this policy about working with developers could give the perception of bias towards developers.</li> <li>• Should include a reference to working with local communities to negotiate a way forward.</li> <li>• The bullet points are too vague and need to be expanded upon.</li> <li>• Additional bullet points should be added for demonstrable evidence of clear local community support or opposition.</li> <li>• This policy talks of sustainable growth, but there is a lack of evidence to justify the high levels of proposed development, a lack of evidence showing that the allocated sites can be delivered sustainably, a likely negative impact on the setting and character of Sleaford, lack of evidence of</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> <li>• The policy wording is standard text required to be included in all Local Plans, as instructed by Government and the Planning Inspectorate.</li> </ul>

<p>plans for infrastructure to accommodate development, and a lack of strategic approach to issues relating to environmental sustainability, climate change, local resilience and self-sufficiency.</p> <ul style="list-style-type: none"> <li>• Growth should be in accordance with neighbourhood plans.</li> <li>• When considering new development it is important to consider the amount of other development locally.</li> <li>• There is no evidence to support this policy.</li> <li>• Developers are taking this statement without the full context of the NPPF as a green light to build large-scale developments on green field sites despite opposition from the Government.</li> <li>• The adverse impacts in the first bullet point need to be defined.</li> <li>• This policy reflects the NPPF too enthusiastically and should instead give an equal emphasis on the necessary balance between presumed approval and sensitivity to the historic environment.</li> <li>• This policy needs greater explanation of the term sustainability with additional focus of being for the benefit of existing members of the community.</li> <li>• This policy should allow for a moratorium on development where neighbourhood plans are in production.</li> <li>• The policy is close to the wording from DCLG that is no longer required to be in plans.</li> <li>• The policy should refer to the strands that make up sustainable development.</li> <li>• The policy suggests that pre-application advice will not be charged for.</li> <li>• This should be introductory text rather than a policy.</li> </ul>	
--	--

<b>Section 3.2 – The Spatial Strategy and Settlement Hierarchy</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• The industrial development on the banks of the Humber servicing the off-shore wind industry offers an opportunity to deliver housing for middle and upper management in north east parts West Lindsey. This will help small and medium businesses to use the opportunity to create businesses that serve the needs of the offshore wind industry and will bring investment.</li> <li>• Accept need for primary growth in Lincoln and Sleaford, but question the need for substantial growth in Gainsborough in paragraph 3.2.1.</li> <li>• Para 3.2.1 – use of the word ‘some’ conflicts with the potential for ‘exceptional cases’ and should be replaced with ‘appropriate’.</li> <li>• Objection to the use of planning speak or jargon, such as ‘policy-on’ or ‘policy-off’, as it makes it difficult for members of the public to understand.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> <li>• Appendix G of the Preliminary Draft Document included a glossary of terms, including ‘sustainable development’</li> </ul>

<ul style="list-style-type: none"> <li>• Explanations relating to the ‘policy-on’ and ‘policy-off’ approach used in the settlement hierarchy are unclear on which policies are applied and why and how villages can move up or down the hierarchy.</li> <li>• Description of sustainable development is needed.</li> <li>• There is a lack of evidence supporting the spatial strategy and settlement, and no evidence of testing alternatives.</li> <li>• There is no demonstration of conformity with national policy.</li> <li>• There is no evidence of community support for the focus of this policy on urban areas and the settlement hierarchy. More explicit consultation should have been undertaken on this topic alone.</li> <li>• The starting point should be looking at how each community can be made more sustainable through growth.</li> <li>• The proposed methodology does not take into account physical geography.</li> <li>• The proposed settlement hierarchy approach restricts development across a wide range of settlements and this is contrary to national policy.</li> <li>• Developing strategy and settlement hierarchy should engage fully with the community to investigate all reasonable options, rather than the proposed approach of telling the community what it will get and defending the position.</li> </ul>	
--	--

<b>Policy LP2 – The Spatial Strategy and Settlement Hierarchy</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<p>Wording of policy</p> <ul style="list-style-type: none"> <li>• The first three sentences of the policy are a repetition of the vision and not a proper description of the strategy itself.</li> <li>• The wording in the policy which describes the amount of development that might come forward in Small Towns and Growth Villages, Limited Growth Villages and Small Villages is unclear.</li> <li>• The wording giving a normal limit on development in each category should be deleted.</li> <li>• Objection to assertion that small villages would welcome growth to support rural communities.</li> <li>• Development in small villages needs to be of appropriate scale rather than small scale.</li> <li>• The third paragraph in the policy box should be reworded to ensure that it is clear that it does not require every development to be mixed use.</li> <li>• Inconsistency where North Hykeham is no longer considered as a SUE under policy LP27 but is considered to be a principle location for growth under LP2.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> <li>• Further evidence is being produced to help refine the policy.</li> </ul>



#### Evidence supporting the policy

- Policy does not appear to take account of consultations on and evidence for the previous Core Strategy.
- No evidence is provided on the caps placed on different settlement types.
- The sustainable futures work produced to support the last core strategy should be used to inform the hierarchy and distribution of growth.
- There is no evidence for the population numbers used in selecting which villages fall into which category of the hierarchy.

#### General approach of the policy

- Inconsistent approach to classifying settlements.
- Support for concentrating growth in urban areas as a means of facilitating sustainable travel.
- Policy is too prescriptive and inflexible, a one size fits all policy is not appropriate.
- A settlement hierarchy approach was rejected by an inspector in South Northamptonshire.
- There should be a greater number of categories to cater for more varied circumstances.
- Emphasis needs to be moved from settlement hierarchy to settlement strategy.
- New villages or small towns should be developed rather than placing development at existing settlements.
- Rural communities should be considered as a network of villages, rather than in isolation, with services provided across the network.
- The policy should focus on how development can enhance the sustainability of the rural network.
- Approach used is policy-on as it considers factors beyond population alone.
- Objection to the lack of maximum limit for overall housing numbers in Small Towns and Growth Villages, Limited Growth Villages, and Small Villages. This contradicts elements of policy LP39 and results in uncertainty for the villages and lead to multiple sites coming forward.
- There appears to be little support for rural communities with no allocations to address affordable housing need and maintain rural economies. Limited Growth Villages and Small Villages should have allocations.
- The Lincoln Area should have a greater focus for growth than proposed due to expanding university and improving road networks. Suggestion of 85% growth to the Lincoln Area.
- Objection to any further house building until traffic problems are resolved.
- Concern that the 'overriding reasons in public interest' will circumnavigate the reasonable limits for small villages.
- Local need should be a key factor for development sites in villages.



- Section 6 of this policy would preclude the provision of gypsy and traveller sites making it difficult to achieve the objectives in policy LP9. This is contrary to government guidance.
- Category 4, Limited Growth Villages should be separated into two sub sets depending on the maturity of the infrastructure.
- Category 3 should be split into two – ‘Small Towns’ and ‘Growth Villages’.
- Growth should be in accordance with neighbourhood plans.
- The plan should require development proposals to take account of other development proposals locally.
- This policy should have a stronger link to policy LP4 with the anticipated level of development being directly linked to access to employment opportunities.
- The policy should allow for enabling development in countryside areas to avoid buildings falling into disrepair and to support agriculture.
- Development on the edge of villages in category six should be allowed where there is overriding reasons in the public interest or where they are provided for in a neighbourhood plan.
- There is no planning reason for development being constrained on the edge of Small Villages when it is accepted at the edge of Limited Growth Villages.
- There is no provision for settlements moving up or down the hierarchy should they gain or lose services, or gain new housing to meet the thresholds set.
- Proposals for development at Small Villages and Limited Growth Villages should be considered on their own merits rather than being capped artificially.
- Limit for Small Towns and Growth Villages should be 200 dwellings, not 50.
- Capacity for growth should determine the position in the hierarchy, not the current level of service provision.
- Policy should be amended to focus growth where it is wanted and away from where it is not.
- The agricultural industry in Lincolnshire is of national importance – category 6 should do more to support this.
- The policy is Lincoln-centric and the growth should be shared equally.
- Villages at the edge of the area are poorly understood and considered in isolation, without considering neighbouring areas across boundaries.
- More information should be provided about the growth needed to sustain local facilities, such as schools and flood defences, to inform whether additional growth should be welcomed.
- The presence of heritage assets should factor when considering the position in the settlement hierarchy and the ability to accommodate growth.



- All settlements should be considered sustainable due to modern living, including working from home, online shopping and supermarket deliveries.

#### Locationally specific comments

- More should be made of 'attractor' locations such as Market Rasen.
- The policy should consider the investment and growth at the Humber Bank.
- The plan should aim to maintain the identity and physical separation of the villages around Lincoln, whilst accommodating appropriate levels of growth.
- There should be a greater focus on making the most of brownfield opportunities in Lincoln.
- Lea is classified as a small village yet the plan states that it is connected to Gainsborough at 7.4.1. Development is needed to deliver amenities at Lea.
- Quarrington and Holdingham are part of Sleaford and should not be listed separately.
- The 7 mile radius used for the Lincoln Area is an arbitrary figure and should be reduced to 4 miles.
- The Ministry of Defence objects to the classification of RAF Scampton. The local planning authority are not in a position to determine what level of growth is required there as this will arise in relation to Defence requirements and a separate policy on defence sites should instead be included.
- Too much emphasis is placed on Gainsborough and Sleaford where there is not the demand for housing.
- Development of retail, employment and other uses should be encouraged in Gainsborough and growth should not be confined by housing.
- Sleaford is hampered by an isolated road system and has grown too quickly in recent years leading to infrastructure issues.
- Sleaford should have a separate category of 'Significant Town' to enhance its role in providing employment, retail and key services and facilities.

#### The following villages received support for their position in the settlement hierarchy:

- Bassingham – Limited Growth Villages
- Bracebridge Heath – Lincoln Area
- Caistor – Small Town and Growth Villages
- Dunholme – Lincoln Area
- Grayingham – Small Villages
- Greetwell – Small Villages
- Metherringham – Small Towns and Growth Villages
- Morton – Limited Growth Villages





- Nettleham – Lincoln Area
- Nocton – Small Villages
- North Greetwell – Small Villages
- North Hykeham – Lincoln Area
- Riseholme – Small Villages
- Saxilby – Lincoln Area
- Scampton – Limited Growth Villages
- Scotter – Limited Growth Villages
- Snitterby – Small Villages
- Sturton by Stow – Limited Growth Villages
- Sudbrooke – Small Villages
- Swallow – Small Villages
- Thurlby – Small Villages
- Welton – Lincoln Area

The following villages were suggested to be moved down the settlement hierarchy:

- Morton – from Limited Growth Villages to Small Villages
- Navenby – from Limited Growth Villages to Small Villages
- Scothern – from Limited Growth Villages to Small Villages
- Scotter – from Limited Growth Villages to Small Villages

The following villages were suggested to be moved up the settlement hierarchy:

- Auborn – Small Villages to not specified.
- Bassingham – from Limited Growth Villages to Small Towns and Growth Villages or to Lincoln Area
- Burton Waters – from Small Villages to either Small Towns and Growth Villages or Limited Growth Villages
- Canwick – from Small Villages to Lincoln Area
- Cranwell – Small Villages to Limited Growth Villages or higher
- Fiskerton – Limited Growth Villages to not specified
- Greetwell – Small Villages to not specified
- Greylees – Small Villages to Limited Growth Villages
- Hemswell Cliff – from Limited Growth Villages to Small Town and Growth Villages.
- Leadenham – Small Villages to Limited Growth Villages
- Owmby – from Small Villages to not specified



- RAF Scampton – Limited Growth Villages to Small Towns and Growth Villages
- Stow Park – from unclassified to Small Villages
- Sturton by Stow – from Limited Growth Villages to Small Towns and Growth Villages
- Sudbrooke – from Small Villages to Limited Growth Villages
- Swinderby – from Small Villages to Limited Growth Villages
- Walesby – from Small Villages to not specified
- Welbourn – Small Villages to Limited Growth Villages

The following settlements received objections to their being in the Lincoln Area:

- Bracebridge Heath
- Branston
- Cherry Willingham
- Dunholme
- Heighington
- Nettleham
- North Hykeham
- Saxilby
- Skellingthorpe
- Swanpool area
- South Hykeham Fosseway
- Waddington
- Waddington Lower Field
- Washinborough
- Welton
- Witham St Hughes

The following settlements were suggested to accommodate additional growth (with no reference to their position in the settlement hierarchy):

- Bardney
- Brookenby
- Burton
- Caistor
- Dunholme
- Greetwell

<ul style="list-style-type: none"> <li>• Hemswell Cliff</li> <li>• Keelby</li> <li>• Market Rasen</li> <li>• Newtoft</li> <li>• Newton on Trent</li> <li>• RAF Scampton</li> <li>• Riseholme</li> <li>• Scampton</li> <li>• Welton</li> </ul> <p>The following village groups were suggested for consideration as opposed to considering each village in isolation:</p> <ul style="list-style-type: none"> <li>• Torksey and The Elms</li> <li>• Scothern and Sudbrooke</li> <li>• Welton and Dunholme</li> <li>• Cherry Willingham, Reepham and Fiskerton</li> <li>• Brookenby, Binbrook Technical Park and Orford</li> <li>• Waddington (village) and Waddington Lower Field</li> </ul>	
---	--

Policy LP3 – Level and Distribution of Growth	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<p>Growth Scenarios and Objectively Assessment Need</p> <ul style="list-style-type: none"> <li>• Concerns over lack of evidence base and objectively assessed need. Local plan consultation is premature.</li> <li>• The range identified in section 3.3.3 of 25,000 to 47,500 is too large, therefore respondents are unable to make meaningful comments at this stage.</li> <li>• Have not taking into consideration neighbouring housing market areas need to take account strategic implications arising from the growth in jobs on the Humber Bank.</li> <li>• The different growth scenarios will have significantly different impacts on villages.</li> <li>• Employment growth scenario is wildly optimistic.</li> <li>• Jobs growth scenario is best approach as it takes into account economic factors.</li> <li>• Lower range is based on 2011 household projections of 25,000, this is equivalent to the lowest housing provision experienced in Central Lincolnshire (1996 -1998). This scenario would not help to</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> <li>• Further evidence is being produced to help refine the policy.</li> </ul>

significantly boost housing supply as required by the NPPF nor would this meet the Local Plan vision for 'positive growth'

- A lower figure than the previous Core Strategy target of 42,800 would be counter to the objectives of the NPPF.
- Important that the growth target should not be influenced by concerns of meeting the five year land supply.

#### Spatial Strategy/Distribution of Growth

- No evidence to support the split/distribution of growth.
- Distribution of growth does not support sustainable development
- Some support for the broad distribution of growth and percentage split between settlements
- Support for significant growth in Lincoln to maintain its position as a regional attractor.
- Main towns could have higher percentage of growth, Sleaford and Gainsborough need more growth have opportunities for regeneration and sustainable urban extensions.
- Growth should not be concentrated in and around Lincoln, it should be more evenly spread through whole of Central Lincolnshire
- More growth should be focused on brownfield sites and not valuable greenfield and agricultural land.
- Lincoln fringe area has already had significant growth over the last 40 to 50 years, these settlements have reached their limits in terms of infrastructure and are becoming commuter towns losing the village character.
- Villages need more jobs and facilities not just homes to survive as viable communities
- Need for a more flexible approach to distribution of growth linked to job creation.
- No justification for the increase from 43% in the previous Core Strategy to 50% for Lincoln in the Local Plan.
- 20% in villages is too high more needed in urban areas with existing services and transport.
- 20% in villages should be restricted in the lower tier settlements and concentrated in small towns.

#### Other issues

- Need for infrastructure to support growth, particularly transport.



Section 3.4 – Prosperity and Jobs	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• MOD suggest that paragraph 3.4.2 should refer to the MOD as being a significant employer as not all MOD sites within the plan area are purely RAF sites.</li> <li>• Considerable investment is required in transport infrastructure, such as A15, A631 Gainsborough Bridge and rail links.</li> <li>• Provision should be made to group as many employment transport nodes as possible into a few easily accessible locations as possible</li> <li>• Concerns raised about lack of housing in rural area for the food industry workforce.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

Policy LP4 – Delivering Prosperity and Jobs	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• The Local Plan ignores Neighbourhood Plans, and views of local communities about rural employment opportunities. The delivery of employment opportunities should be balanced against a backdrop of a requirement for dwellings.</li> <li>• Policies must meet the needs of rural businesses and encourage and maintain local employment opportunities to comply with the NPPF.</li> <li>• New homes must be provided in conjunction with new employment land to prevent unsustainable community patterns.</li> <li>• Support proposals for more jobs particularly jobs that offer more than the basic wage.</li> <li>• Protection of grade 1 and 2 agricultural land for food production.</li> <li>• Jobs proposed are not viable, is there land available?</li> <li>• Support for most significant proportion of new jobs directed towards Lincoln</li> <li>• Employment land should be located close to established areas of employment</li> <li>• Policy must maximise the opportunities for jobs growth but this is at odds with earlier statement that jobs and housing growth will be fully aligned.</li> <li>• Without jobs in rural area more housing will lead to more congestion.</li> <li>• More emphasis required in Gainsborough as a centre for employment growth.</li> <li>• The Humber Bank and employment opportunities in the area need to be mentioned.</li> <li>• Currently limited office space in Lincoln.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> <li>• Further evidence is being produced to help refine the policy.</li> </ul>

<ul style="list-style-type: none"> <li>• There seems to be insufficient measures in the plan to mitigate the transport impact of the proposed development</li> <li>• Road and rail network needs improving to support new jobs</li> <li>• Communications – phone and broadband, many villages have no broadband which has a detrimental impact on new businesses moving into rural areas.</li> <li>• Lack of evidence to support growth targets at this stage.</li> </ul>	
---	--

<b>Section 3.5 – Retail and Town Centres</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• Concerns that the NPPF requirement for impact assessment won't be enough. Policy needs more information.</li> <li>• This policy needs to do more to control takeaways, payday lenders and betting shops.</li> <li>• If more people are to shop in Lincoln more needs to be done about the rail level crossing stopping traffic several times an hour.</li> <li>• Concerns about lack of car parking and cost.</li> <li>• No mention of the Sleaford, Gainsborough and Lincoln Master Plans</li> <li>• Need for Local Independent stores.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

<b>Policy LP5 – Retail and Town Centres in Central Lincolnshire</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• Policy should include more reference to local independent retailers, and recognise the important roles they play in local distinctiveness.</li> <li>• Concerns that the policy precludes the development of farm shops, which are a useful form of farm diversification.</li> <li>• LP5 is not in accordance with the NPPF as its sets a threshold for the requirement of an impact assessment too low at 500sqm. This threshold has been set without any assessment of the scale, impact or variability. One representation suggests 1,500sqm, and another suggests 1,000sqm.</li> <li>• Concerns raised that the evidence base is not up to date. The 2012 retail study does not take into account changing shopping habits since the recession. There is less need for large retail centres. Town centres will become more focuses on entertainment.</li> <li>• 2012 retail study does not fully assess all retail facilities, it does not take into account how existing centres can serve the proposed SUES</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> <li>• Further evidence is being produced to help refine the policy.</li> </ul>

<ul style="list-style-type: none"> <li>• Policy is considered to be Lincoln centric</li> <li>• Location criteria 3 and 4 appear to be the same.</li> <li>• The hierarchy refers to district and local centres but point c of the policy reference to neighbourhood centres, the terms used in the policy need to be consistent.</li> <li>• The retail provision in Castor must be protected as well as Market Rasen</li> <li>• Policy is not clear what retail centres are to be defined as district centres</li> <li>• Retail Hierarchy is not in conformity with NPPF and its approach to promoting sustainable development.</li> </ul>	
---	--

<b>Section 3.6 – The Visitor Economy</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• A sustainable visitor economy is important to the local economy.</li> <li>• Visitor economy is particularly important for Lincoln, but can also have positive benefits to surrounding villages.</li> <li>• The policy fails to fully recognise the world class historic environment, this is a missed opportunity.</li> <li>• Policy does not mention the Lincoln Wolds.</li> <li>• Policy appears to be Lincoln centric, acknowledges the fact that Lincoln is a ‘hook’ but policy must also attract visitors to wider Lincolnshire</li> <li>• Policy criteria does not include mention of assessment of any negative impacts. Assumes all new facilities will bring only positive benefits to an area.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

<b>Policy LP6 – A Sustainable Visitor Economy</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• Should promote more local shops to attract more visitors to the area</li> <li>• Transport and access is already inadequate for visitors to Lincoln</li> <li>• Policy should take into account the importance waterways can play in attracting visitors and as a visitor destination.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

<b>Chapter 4 – A Caring Central Lincolnshire: meeting needs and the provision of infrastructure</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>Poor title, focused on political buzz words. Should be aimed more at the public.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>

<b>Section 4.2 – Health and Wellbeing</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>Provision should be made in the major housing developments for local community health centres to minimise the need for travel into the centre.</li> <li>Outdoor gym equipment in every community within a 15 minute walk.</li> <li>Health services need to be able to cope with present level within an acceptable time frame and be upgraded to deal with new patients well before thousands of homes are built.</li> <li>Lincoln needs to preserve and enhance its green/wildlife areas, such areas are important in the wellbeing of residents and visitors.</li> <li>Para 4.2.3 – poor air quality should be included as a main health determinant.</li> <li>Para 4.2.4 - should be more general rather than referring specifically to the Lincolnshire Health and Care model.</li> <li>Para 4.2.5 - Concerned that the Health Impact Assessments (HIA) are a prime example of an unnecessary policy burden that could constrain and delay development in Central Lincolnshire. Whilst Health and Wellbeing is covered in the NPPG, no such requirement for HIA is included in national policy. Should the plan maintain a policy that requires HIA on 'major developments' it is important that it is made clear what qualifies as 'major development' in this case. Would oppose any HIA requirement that applies the traditional 10 dwellings or more definition for major development which would be clearly out of proportion.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>

<b>Policy LP7 – Health and Wellbeing</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>Green spaces and good quality houses with gardens and community play areas are a must for the mental wellbeing of our communities.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>



- Concerned that already stretched public funds will be insufficient in providing infrastructure relevant to supporting health.
- Policy is vague and unclear as to what is required and how it is to be delivered.
- Concerned that health infrastructure will not be developed in parallel to housing development.
- Part a - suggest that the term “green infrastructure” is specifically used.
- Part a - wildlife sites and woodland should be added to this list.
- Why 'where possible'? This is an easy get out for developers.
- Part b - agree but greater emphasis should be given to safe cycling from home to work.
- Part c - Extend community gardens to 'and orchards'.
- Part g – object RE concentration of hot food takeaways- it is inconsistent with the NPPF
- Part g - Would like to see a prohibition of new hot food takeaways in close proximity to secondary schools (excepting designated town centres) and a restriction on numbers elsewhere; particularly in deprived areas.
- Part h – This requirement should be expanded so it is not just restricted to developments within Air Quality Management Areas.
- LP7 needs closely linking to LP2 and LP3.
- Are gymnasiums etc. realistic in small villages and rural areas where there may be insufficient people to sustain them?
- The historic environment is also an important contributor to health and wellbeing.
- Policy should clarify at what level of development it becomes applicable as we need to make clear that it is not applicable to smaller developments.
- Building Regulations ensures all new houses are already 'healthy'.
- Policy conflicts with section 5.9 'Housing Standards Review' where it is acknowledged that the Local Plan is not proposing to deal with such matters which shall be delivered through other mechanisms (e.g. Building Regulations) -delete reference to 'Healthy homes'.
- Additional recreation land is required.

#### Existing Health Services:

- One development may or may not have an effect on local services, but in conjunction with other large developments it may overwhelm hospital services.
- There is already a shortage of GP provision.

#### Health Impact Assessments:

- Definition of Major Developments needed.



<ul style="list-style-type: none"> <li>• Suggest this is extended to smaller developments, e.g. 2 dwellings.</li> <li>• Requirement for a HIA should be deleted or the appropriate circumstance where it would be justifiably required should be set out.</li> <li>• There is a balance to be made between producing a HIA as part of a sustainable development and it stifling growth by adding cost and reducing viability.</li> </ul>	
--	--

<b>Section 4.3 – Meeting Accommodation Need</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• Support for the promotion of a wide range of housing options in Central Lincolnshire.</li> <li>• Support for encouraging top of the range housing to help attract business.</li> <li>• Support for encouraging self-build plots.</li> <li>• Plan does not provide enough clarification on how the range of housing types will be delivered.</li> <li>• Para 4.3.2 – This paragraph should include reference to housing for service families.</li> <li>• Should include stronger reference to the needs of older people and people with disabilities.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

<b>Policy LP8 – Meeting Accommodation Need</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• The policy is supposed to be about accommodation type/need but the later criteria listed in the policy are detailed development control criteria (e.g. environmental acceptability criteria in part a). This is confusing. All DM policies should be clear and distinct.</li> <li>• There is a lack of evidence and justification to support the requirements. Policy too vague.</li> <li>• This policy should provide guidance about the demands in the areas for properties of different sizes, tenures and types to enable investors to shape proposals accordingly.</li> <li>• There should be a control on houses being built in gardens.</li> <li>• Developers should not be required to build housing that they cannot sell, such as affordable housing.</li> <li>• Policy should be more visionary and look in more detail about the type of locations that types of dwellings to meet need should be provided.</li> <li>• More single-person dwellings are needed for divorcees, younger people and older people.</li> <li>• The interim SHMA does not provide adequate information to allow a sensible debate on the contents of this policy at this time.</li> <li>• Quality of housing has not received enough attention.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> <li>• Further evidence is being produced to help refine the policy.</li> </ul>

- Contradiction between what this policy is trying to deliver and statement in paragraph 5.9.3, where it states that the plan is not trying to introduce housing standards.

#### Executive homes

- Needs to clarify what an executive home is.
- The provision of executive homes is highly dependent on market forces and not a direct question of need.
- There is an urgent need for executive homes in Gainsborough.

#### Custom build

- Why is 100 the trigger for the need to provide custom build plots?
- The provision of custom build properties is highly dependent on market forces and not a direct question of need.

#### Accommodation for older people

- Should include 'sheltered housing' or care villages for older people.
- Location of accommodation for older people is important, to ensure that it is accessible to services and so that staff can access the accommodation.
- An element of care facilities usually accompanies accommodation for older people requiring a critical mass of older residents to maintain. Small scale developments of specialised housing could not realistically provide or maintain these facilities.

#### Single-storey dwellings

- Can 'single storey dwellings' include flatted development?
- The need for single storey dwellings should be assessed on individual circumstances due to increased land requirements and viability.
- There is no planning justification for encouraging single storey dwellings.
- Assuming the policy is aimed at providing accommodation for people with mobility issues the policy should require 5% of homes not to require the use of stairs, to allow flexibility in how this is delivered.

#### Adaptable dwellings

- People will move house as their accommodation needs change and therefore only a proportion of new housing should be required to be built to lifetime homes standards.

#### Gypsies and travellers and travelling showpeople

<ul style="list-style-type: none"> <li>• Important that traveller sites include a good level of amenity for occupiers.</li> <li>• Policy should confirm that the need for pitches will be kept under review.</li> </ul> <p>Student accommodation</p> <ul style="list-style-type: none"> <li>• Students should be confined to living on campus, freeing up many properties in the city centre for families and professionals.</li> </ul>	
---	--

<b>Section 4.4 – Meeting Housing Needs</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• Para 4.4.3 – Contributions from developers as a way to fund affordable housing does not work as the funding is often not used in the same area as the development from which the funding is coming.</li> <li>• Para 4.4.6 – Support a policy that requires affordable housing contribution from all sites.</li> <li>• Para 4.4.6 –Potential conflict between this paragraph and other policies in the plan which talk of only small developments of 2 or 3 dwellings in small villages in rural areas.</li> <li>• Para 4.4.7 – A removal of contributions from schemes of less than 10 dwellings would be devastating to provision of affordable housing. Support a differential rate that is responsive to different housing market conditions.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> <li>• Paragraph 4.4.6 refers to the existing affordable housing requirements of each of the local planning authorities, not what will apply upon adoption of this plan.</li> </ul>

<b>Policy LP9 – Meeting Housing Needs</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• Support the policy.</li> <li>• Affordable housing should not be too high, suggest 30% is a reasonable level.</li> <li>• LP9 needs to be closer linked to policies LP2 (settlement hierarchy and spatial strategy) and LP39 (development in rural areas).</li> <li>• Housing provided for the provision of service family accommodation should not generate a requirement to provide affordable housing as it will not be on the open market and more akin to affordable housing than market housing. These sites are often not accessible to the general public.</li> <li>• Viability is central to affordable housing provision and therefore a viability assessment should be the basis of discussions.</li> <li>• The policy is weak on willingness to negotiate, who will judge what an ‘accurate viability assessment’ is.</li> <li>• Policy needs to clarify that negotiations on affordable housing will be alongside other obligations.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> <li>• Further evidence is being produced to help refine the policy.</li> <li>• Government has also very recently amended policy on affordable housing which we will take into account as we re-draft the plan.</li> </ul>



<ul style="list-style-type: none"> <li>• The policy does not provide targets or justification and it is not framed within a wider housing strategy and as such it is difficult to see how it will be implemented and what effect it will have on the housing market.</li> <li>• In setting levels of affordable housing provision, a concurrent discussion is needed to consider development-funded infrastructure</li> <li>• Support the principle of varied affordable housing rates to accommodate the variances in land values across the area.</li> <li>• Support affordable housing being delivered on all but the very smallest sites.</li> <li>• Care will be needed to ensure that developers do not break up their sites to avoid requirements.</li> <li>• Affordable housing and expensive housing should be kept geographically separate.</li> <li>• Affordable housing for people on low income is only relevant where there is adequate local employment.</li> <li>• Affordable housing is important to enable young people to move out of their family home.</li> <li>• There should be a rural exception policy.</li> <li>• Concerns about the ability of a neighbourhood plan to deliver a rural exception site with the policy.</li> <li>• Concerns about over-delivery of affordable housing and importing people in need of affordable housing.</li> <li>• Proportion of affordable housing should be in line with the needs of the area.</li> <li>• Policy should identify the financial difficulties in delivering SUEs.</li> <li>• Gainsborough does not have a shortage of affordable houses, but problems with the quality of housing. Suggestion of 10% affordable housing provision either delivered on site or as funding for other sites.</li> <li>• There should not be a universal formula for affordable housing, but each site should be considered on its merits.</li> </ul>	
--	--

Section 4.5 – Providing Infrastructure	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• “Why not just say it will be provided by the public sector and not wrap it up. It is all taxes and profits.”</li> <li>• Significant investment is required. The plan gives no indication as to possible sources or the likelihood of such investment.</li> <li>• Copy of the IDP is not available to view.</li> <li>• Support the objective, but the route to delivery is too vague and lacks any indication as to how progress will be monitored and assessed.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> <li>• Infrastructure is provided by a variety of different bodies and organisations and funded through a variety of</li> </ul>

- Para 4.5.2 – commitment to ensuring new and enhanced infrastructure welcomed and various measures identified for achieving this are supported.
- Para 4.5.2 – it is essential to provide further medical facilities in tandem with developments and before people move in. Health services are already stretched with present demand.
- Para 4.5.2 – support for the inclusion of green infrastructure in the list of infrastructure to be provided. New developments should enhance the biodiversity of the area. Recommend that wildlife is “designed in” and that natural green spaces are available for people and wildlife.
- Para 4.5.2 – support for the inclusion of drainage and flood resilience in the list of infrastructure to be provided and the need to ensure flood risk is not increased.
- Para 4.5.2 – welcome reference to sport in the list of infrastructure to be provided.
- Para 4.5.2 – there is no public leisure centre or swimming pool that is not part of a private gym or school to meet current needs.
- Para 4.5.2 – lack of commitment to flood resilience if proposing to build in flood zone 3.
- Para 4.5.2 – surface water flooding is a growing concern given climate change and needs to be mapped.
- Para 4.5.2 – suggested rewording for water, drainage and flood risk for consistency and the need to include water quality to comply with WFD & SuDS.
- Para 4.5.2 – provision of community facilities with an emphasis on access by sustainable transport.
- Para 4.5.2 – Powered Two Wheelers (PTWs) should be included and have an important role to play.
- Para 4.5.2 – transport cannot cope with present demand. Roads in and around Lincoln are currently congested and effected by level crossing closure.
- Para 4.5.2 – Lincoln needs a complete ring road and dualled throughout. Current proposals are inadequate. There should be no more development in the Hykeham/ Waddington area without a Southern Bypass.
- Para 4.5.3 – most broadband in the future will run underground or broadcast from existing hubs. If there are specific environmental impacts these should be articulated.
- Para 4.5.3 – many smaller villages cannot get decent broadband at present.
- Para 4.5.4 – greater reference should be made to working with NHS England Property Services, Local Area Team, Clinical Commissioning Groups, GPs and other partners involved in health and social care provision to develop Health Services or Care Strategies alongside the plan.

- different means. The plan provides a broad overview of what will be provided and by whom and will be supported by an IDP that will provide greater detail and clarity.
- The IDP is currently being prepared and will be available to view at the next consultation stage of the Local Plan. The next version of the Local Plan will also include a monitoring framework.



Policy LP10 – Infrastructure to Support Growth	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>Many representors have stated their support for the policy and its intentions, considering it of vital importance, particularly the need to consider and provide infrastructure before development begins and not afterwards. They consider that sustainable development must be supported by and have good access to physical and social infrastructure. Some have made suggestions for strengthening the wording of the policy and identified the importance of phasing and securing infrastructure which may also benefit the historic environment.</li> <li>Strong support for seeking up front or pro-active development of infrastructure</li> <li>Identified a concern that a large number of small developments under the “threshold” could cumulatively cause a big strain on infrastructure.</li> <li>Concern that the plan does not appear to consider the impact of development on small neighbouring communities should large development occur close by.</li> <li>Fine in theory but needs resolve - Seeking assurance that it will be provided in parallel with development and that developers will be made to contribute. Development should be restricted or refused if infrastructure capacity cannot be proven or delivered.</li> <li>It may be worth considering whether there could be some agreement on how Parish Councils, particularly those with an adopted Neighbourhood Plan, will use the proportion of CIL that is awarded to them in consultation with the LPA.</li> <li>Infrastructure has not been adequately considered in the past - “ensure infrastructure is in place before housing or it will be the same old story not enough money to finish the job”.</li> <li>Present infrastructure is underfunded and unaffordable so cannot cope with more housing.</li> <li>Developers be required to post a bond before any construction on the site.</li> <li>Several respondents have identified existing infrastructure inadequacies and pressures on existing infrastructure. Many have identified the need for specific infrastructure improvements</li> <li>Respondents have stated the importance of meeting infrastructure requirements beyond the actual site or immediate vicinity and that cross boarder infrastructure needs more mention.</li> <li>The Highways Agency highlighted the existing capacity issues on the A46.</li> <li>A need for a published Infrastructure Delivery Plan or Community Infrastructure Levy to comment on.</li> <li>Awaiting further details on the Developer Contributions SPD.</li> <li>In formulating a CIL policy and charging schedule the council is urged to take a cautious approach to the number of infrastructure requirements.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>

<ul style="list-style-type: none"> <li>• Must ensure that the viability of sites is not put at risk. Developer contributions should be limited to their own impact rather than being used to mitigate wider/ existing deficiencies.</li> <li>• No definition of what it means by sufficient infrastructure.</li> <li>• Consider the proposals to be fine for big building firms, but may see the demise of the smaller builder.</li> <li>• Some have questioned whether the policy is necessary as it appears nothing more than a statement of fact on how planning applications will be considered and the likely requirement for planning conditions and/ or obligations.</li> <li>• Consider that large development in rural areas will place an unrealistic burden on local infrastructure. Larger developments must be located in areas where there are excellent transport links including A roads and bus services. Large uncontrolled developments in rural areas will create dormitory villages which lack sufficient essential services and are not sustainable either economically, socially or environmentally.</li> </ul>	
--	--

Section 4.6 – Accessibility and Transport	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Agree with aims but object to Local Plan focusing on 3 main centres of growth which will not result in achieving the aim. Concentration on these will increase congestion. For walking and cycling to work there is a limit to the distance most people with travel.</li> <li>• Could not find reference to freight transport. Request that in relevant section, the benefits of water freight transport could be included in the Plan.</li> <li>• No mention of Park and Ride for Lincoln. Park and ride from Langworth, Reepham and Cherry Willingham railway station.</li> <li>• No indication of how road network will be improved to cope with increased volume of cars.</li> <li>• Would like to see community transport given a bigger role.</li> <li>• Development of pedestrian from Greylees to Rauceby should be a priority plus providing more stopping times at the railway station.</li> <li>• Improve bus services between Lincoln, the Riseholme Green Wedge, Lincolnshire Showground and Scampton, Brigg and Scunthorpe. Proper daytime services might reduce car use on A15 and in Lincoln city centre.</li> <li>• Support objectives in 4.6.1 to 4.6.10. Cross referencing to settlement hierarchy evidence base?</li> <li>• The opportunities provided by the waterways should be considered. The role of the River Trent as a commercial waterway should be noted.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>





- Object as unlikely any of the content will be delivered in the Central Lincolnshire area apart from Lincoln.
- Support inclusion of cycle infrastructure but needs to be done properly. Should be looking to Holland and Denmark for these solutions.
- Would like to see more public transport from A607 to link to other areas of Lincoln where employment is going to be, such as South and North Hykeham and Sleaford.
- Potential to make greater use of rail network. Have new communities based along the lines into Lincoln been considered, e.g. Revesby, Snelland, Stow Park, Swinderby?
- Due to scale of development proposed, it is likely that there will be significant cumulative impacts on the A46 and it will be important these are considered as part of the plan making process.
- With increase in traffic movement, on minor roads and country lanes, how will safety be maintained? How will noise levels be controlled?
- Parking on new housing estates is a problem – there should be inset parking/visitor parking.
- Improve road network – dual A15 and A17
- Not clear from plan where funding will be obtained to improve the infrastructure.
- Need to reference Sleaford Transport Plan.
- Concern road network in Navenby will not be able to cope with circa 900 extra homes, especially at peak times.
- There is a gap in the walking and cycling network north of Lincoln at the bypass roundabout A15 north. This is a good link between urban Ermine and Riseholme Green Wedge and beyond. Needs a pedestrian/cycle bridge.
- Central Lincolnshire Plan should consult with Nottinghamshire and Bassetlaw and produce to a plan for a new route across the River Trent for the A631.
- A pedestrian walkway/cycle path would be very beneficial along Canwick Avenue (B1131) from the junction at Mill Lodge joining the B1188.
- Give more importance to east/west travel, particularly to east coast towns and north to Scunthorpe.
- Para 4.6.3 – In addition to broadband, mobile telephone reception is a vital part of digital connectivity and is a key infrastructure requirement for rural areas.
- Para 4.6.4 – Disagree with statement “within the Lincoln area, the bus network is relatively good”. From Bracebridge Heath it is cheaper to drive than take the bus. Public transport needs improvement as a priority.
- Para 4.6.5 – No mention of Gainsborough - Brigg – Cleethorpes line
- Para 4.6.5 – No mention of Nottingham – Lincoln – Grimsby line



<ul style="list-style-type: none"> <li>• Para 4.6.5 – Possibility of re-opening stations at Cherry Willingham and Langworth should be investigated to minimise road travel to Lincoln.</li> </ul>	
---	--

<b>Policy LP11 – Transport</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• Support bullet b) and object to all the rest. Public transport can never meet the needs of the majority of people in our rural villages.</li> <li>• Opening sentence is ambiguous – does it mean developments that do not offer these things will not be supported?</li> <li>• Criteria under design will discriminate against rural development and are not in conformity with NPPF para 29.</li> <li>• Support aim of bullet d) but concentration of jobs and people in Lincoln and the 2 other towns will mean travelling from home to work by car. Rest of Plan doesn't link with this outcome.</li> <li>• Bullet O) unrealistic and detracts from the credibility of the rest of the document. Cannot get to work on the waterway - only viable as a leisure amenity.</li> <li>• Needs recognition that traffic calming initiatives are an improvement to existing traffic infrastructure.</li> <li>• Like to see more attention given to how to prevent over use of small rural roads by heavy goods vehicles, particularly where they are routed through traditional villages.</li> <li>• Particularly support bullets g) to i) which specifically mention Green Infrastructure and encourage walking and cycling routes.</li> <li>• Suggest additional objective inserted along the lines of “To improve low and ultra-low emission vehicle refuelling infrastructure”.</li> <li>• Bullet n) could be expanded to require a minimum level of Electric Vehicle Recharge points within car parks, e.g. 10% of designated spaces.</li> <li>• Additional objective should be included for Electric Vehicle Recharge provision at domestic and commercial developments. This is supported by para 35 of the NPPF.</li> <li>• Welcome inclusion of design criteria but should make reference to the DfT and DCLG guidance ‘Manual for Streets’ which sets out design principles. Further criterion required which makes reference to heritage assets and transport link, including minimising impacts upon the historic environment as well as supporting enhancements to transport links within historically sensitive areas and exploring opportunities to reinstate/further utilise historic transport routes.</li> <li>• Should have a specific objective to increase public transport provision, especially evening services.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



<ul style="list-style-type: none"> <li>• Bullet p) Threshold of 1 dwelling is too low/unnecessary/ unjustified/disproportionate. Out of step with Guidance on Transport Assessments published by DfT and DCLG which suggests threshold of 50. Is not consistent with the NPPF.</li> <li>• Bullet p) Transport statement should form part of a Design and Access Statement.</li> <li>• No justification for S106/CIL statement. Where development takes place in locations that are already well provided for in terms of sustainable transport, what is the justification for further contribution?</li> <li>• In terms of walking and cycling infrastructure, it is important to understand the inter-relationship between this and recreation/open space provision.</li> <li>• There is no mention of travelling by motorbikes or scooters which are more environmentally friendly than cars. Provision should be made for expanding the number of free motorcycle parking places with lock points in key towns to encourage the use of motorcycles. LCCs Motorcycling Strategy 2010 suggests a ratio of 1 bike space per 20 car spaces.</li> <li>• Should include specific objectives for specific infrastructure developments – the Gainsborough Bridge, A15 and A631 will need considerable improvement to attract people to live in Gainsborough.</li> <li>• This policy is not achievable or deliverable.</li> <li>• Design criteria are development management issues that should be in a separate policy. They are not directly related to the main purpose of the policy.</li> <li>• Bullet n) noted the current car parking standards are working well.</li> <li>• Design criteria demonstrates deep anti car and urban bias in a predominantly rural area. Many of the criterion are impracticable when applied to small developments in rural localities.</li> <li>• Policy is not sufficiently ambitious.</li> <li>• Last para, phrase “significant transport implications” is open to interpretation. Not consistent with NPPF as does not refer to impact being severe.</li> <li>• No mention of non-residential developments.</li> <li>• Support approach set out within the policy which seeks to ensure that development contributes, either physically or financially, towards the provision of a range of transport measures.</li> <li>• Section ‘Delivering Transport Infrastructure’ should make reference to viability.</li> </ul>	
--	--

Policy LP12 – Managing Water Resources and Flood Risk	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• The Upper Witham, Witham 1<sup>st</sup> and Witham 3<sup>rd</sup> IDB consider that as a high level document the section adequately covers the subject and the policy is suitable. They state that some sites must not</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



be developed on the grounds that flood risk is unacceptable or the development of a site would increase flood risk to other areas.

- The EA agree with the principles of the policy but have suggested some revised and additional wording regarding Groundwater Source Protection Zones and culverts, would also like it to be highlighted that much of Lincoln's water is sources from outside the catchment and some reference made to Anglian Water's Resources Management Plan. They have also stated their keenness to work further with us as the situation regarding SuDS and SABs evolve.
- Support the stated objectives but it should be made clear that some historic development and communities already exists in areas now defined as being a risk of flooding. The Local Plan needs to articulate how new development proposals in these areas will be treated, so as to ensure thriving communities are supported (particularly where there are well maintained defences) and not effectively abandoned to lose employment, services and facilities with an embargo on new housing and other development.
- Significant parts of the Local Plan area are shown as at risk of flooding. This has the potential to effectively sterilise wide areas from essential development. Consider it essential to program a future mitigation strategy, flood defence initiatives and strategy for securing site based mitigation and developer contributions. Suggest consideration of a "King's Lynn" type exceptions policy to prevent Lincoln City and east of the Trent development being frustrated.
- Sequential test sensible. Consider enough land is available in areas not at flood risk. EA advice should be sought and followed on all such matters.
- A Scotter resident suggested that EA advice was unhelpful and inconsistent.
- Don't build on flood risk areas. Most flood mitigation pushes the problem on to another area.
- Developers should be held responsible for flooding caused to existing properties.
- Taylor Wimpey support the principles of the policy and have been active in providing technical studies for CoL that have assisted in demonstrating a solution to providing development on the Western Growth Corridor in an acceptable way in relation to flood risk.
- How accurate and reliable are Anglian Water figures for bore holes? We might have more water than we think.
- Should also note District Council responsibility for flood risk management.
- Suggestion of additional text acknowledging the international importance of the Humber Estuary into which the River Trent flows and of The Wash which receives water from the Witham catchment.
- Support the policy but suggest strengthening/ adding reference to surrounding properties under b; reference to during the development's life time under d and suggestion that the developer provide an adequate bond to ensure ongoing maintenance and management is carried out for the lifetime of the development.



<ul style="list-style-type: none"> <li>• North Hykeham TC and South Hykeham PC have asked to be actively consulted on any plans (“Swanpool” specifically mentioned) which will impact members of their communities.</li> <li>• Navenby and Metherringham have stated that they would require improvements to water supply and drainage systems if they are to support any future housing.</li> <li>• Thurlby support the policy but are concerned about surface water from development at Witham St Hughs and gravel working at Swinderby airfield passing through their village to the river.</li> <li>• Natural England welcome the section covering protection of the water environment, particularly the point encouraging positive contribution to the water environment and it’s ecology.</li> <li>• The content of the supporting text is well thought out and detailed but highlights the disparity between this and the Historic Environment Policy.</li> <li>• Support the incorporation of SuDS and support the need for them to demonstrate how they improve biodiversity and the water environment.</li> <li>• The Canal and River Trust pleased to note their role in managing waterways is acknowledged. Support the aim of the policy but feel that further clarification is needed with regard to SuDS – what happens if they are considered impractical or unviable and who are the “appropriate authority” is. They also clarify that discharges to their waterways are not granted as of right.</li> <li>• SuDS – Persimmon wish to point out that it is important to allow flexibility.</li> <li>• The Woodland Trust feel that the role that trees and woods can play in alleviating types of flooding and improving water quality should be acknowledged.</li> <li>• Consider the policy to be contrary to proposals at “Swanpool”.</li> <li>• Why are sites in flood risk areas next to the River Trent still shown.</li> <li>• Welcomed by Public Health for the long term benefits to improving health and wellbeing.</li> <li>• Anglian Water support the policy and have suggested some additional wording for SuDS which may strengthen and suggest covering such issues further in an SPD and recommend further emphasis on water efficiency and have offered to work closely with us.</li> </ul>	
---	--

Policy LP13 – Community facilities	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Support the stated intention but should be cross referenced to the provision of an appropriate level of new housing to enable the retention of some facilities which could otherwise be lost. It should also allow for housing in one village to support the retention of facilities in another. This will require the development of new dwellings in a village or group of villages to be looked at in the context of how</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



the development will improve the sustainability of communities. This cannot be achieved by a fixed threshold figure as set out in policies LP2 and LP24.

- Libraries should be specifically mentioned as examples of community facilities.
- Support the intent of the policy but suggest that it, the supporting text and Glossary includes a succinct all-inclusive description for “community facilities” which would obviate the need to provide examples “community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.”
- Metherringham (and villages in general) have a shortage of land available for burials so land needs to be identified for future cemetery use.
- There is a shortage/ dearth of land for allotments.
- Proper internet connections should be insisted on for new buildings.
- Community facilities should require parking facilities for motorised vehicles and be in accordance with LCC’s motorcycle Strategy.
- Standard policies with an urban aspiration should not be imposed on rural areas.
- Support the provision of community facilities in general but it is an unrealistic expectation if people are only required to be able to walk or cycle to the facility.
- The nearest gyms and swimming pools to Navenby can only be reached by a 20+ minutes car drive and not accessible by bus.
- Every new house should provide some green space/ garden, a play area per 10 houses and must preserve existing green areas and ensure that those communities without the recommended green areas are built up to a good standard. Also need some small woodland and wildlife areas. The River Witham should be designated a green corridor from Lincoln to Boston, accessible on the north and south banks with walk and cycle paths, wetland and woodland - potential as a tourist attraction.
- Object to this policy as it conflicts with other parts of the Local Plan and makes it meaningless for some communities. Sleaford recreation ground will be lost in part to build a road and the St George’s playing field is to be lost to housing.
- Natural green space is an important facility.
- Does it include other open space not in formal recreational use which can make an important contribution to the townscape and function of the area/ village.
- The long term benefit to health and wellbeing is welcomed by Public Health.
- Welcome provision of new and protection of existing community facilities, but wording needs to be consistent with the NPPF and underpinned by robust and up to date evidence.
- Support the criteria for early implementation and maintenance.
- Welcome the emphasis on “like for like or better” but believe that replacements must be integrated with the development and provided contemporaneously.

<ul style="list-style-type: none"> <li>• Welcome the fact that community facilities are to be an integral component of any development and essential with any proposed new development.</li> <li>• Have an issue with the word “viable” as a facility may provide a valuable service to the community but may not be viable in a commercial sense. Therefore suggest “the facility is demonstrably no longer fit for purpose and it can be demonstrated that there is no longer a community need for the facility”.</li> <li>• Does not appear to give sufficient scope for developments to expand facilities which already exists – often the best solution.</li> <li>• Broad agreement with this policy.</li> <li>• Should be realistic, operate within remit and control and only plan for what can be genuinely achieved.</li> <li>• Branston &amp; Mere PC support the policy but believe it should be higher on the list of priorities – village facilities are already at capacity.</li> <li>• Concerned that locally due CIL may be diverted to support requirements when it will be needed to support expanding services that North Hykeham TC may be required to provide.</li> </ul>	
--	--

<b>Policy LP14 – Development on Land Affected by Contamination</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• Support the policy and have been working to undertake technical investigation work to provide solutions and remediation measures (CoL).</li> <li>• Broad agreement with this policy.</li> <li>• Welcomed by Public Health for the long term benefits it will bring to improving health and wellbeing.</li> <li>• Lincs Wildlife Trust welcomes the requirement to take into account the potential environmental impacts on biodiversity.</li> <li>• Given the desirability of developing brownfield land, the policy should state that the cost of remediation will be factored in to abated developer contribution requirements.</li> <li>• Support the policy but acknowledge that land remediation can be costly and might therefore affect the viability of development. Remediation may be achieved by reducing/ removing the requirement to contribute affordable housing or other infrastructure on affected sites.</li> <li>• Supported but think some comment should be included about mitigating the possible effects when processing of the contaminated land commences on the people in neighbouring dwellings, at their places of work and the local environment.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



<ul style="list-style-type: none"> <li>Consider that the section requires more thought about proactively encouraging development of less desirable sites. Perhaps offering some incentive to developers for using waste or contaminated land as much of the “free” greenfield land is better used to grow food.</li> </ul>	
--	--

Section 5.1 – A Quality Central Lincolnshire	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>Support the need to protect character, environmental quality and diversity whilst accommodating growth as an essential requirement for the settlements in Lincolnshire.</li> <li>Para 5.1.1 – ‘Where possible’ should be removed from the penultimate sentence as the requirements should not be optional.</li> <li>Strong supporting policies are needed to protect the landscape.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>

Section 5.2 –Our Landscape	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<p>Agricultural land:</p> <ul style="list-style-type: none"> <li>5.2.3- welcome the inclusion of Best and Most Versatile (BMV) Land but suggest inclusion of the following sentence “Retaining higher quality land enhances future options for sustainable food production and helps secure other important ecosystem services”.</li> <li>Over 90% of our landscape is intensive agricultural production (large profitable agri-businesses). Markets for this produce are ‘global’ rather than ‘local’ and significant quantities are exported. Diversification is increasingly seen as a way of reducing the risks presented by the volatility of global markets and the maximising the opportunities offered by the poultry, renewables and processing sectors. It is absolutely essential that The Central Lincolnshire Local Plan acknowledges this.</li> <li>Agree that category 1, 2 and 3a agricultural land should be safe guarded for food production and not for development.</li> </ul> <p>Waterways:</p> <ul style="list-style-type: none"> <li>5.2.4 could make specific reference to the inland waterways within Central Lincolnshire as forming significant and important features within the landscape, in both a rural and an urban context.</li> </ul> <p>Development Height:</p>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>



<ul style="list-style-type: none"> <li>support the ideals but recent developments have been allowed to obscure beautiful views because of their height.</li> </ul>	
--	--

<b>Policy LP15 – Our Landscape</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>First sentence should be in supporting text- not policy.</li> <li>What is meant by "massing"?</li> <li>Include improvement to public access to the listed landscape features.</li> <li>2<sup>nd</sup> para- wording is weaker and inconsistent with previous sections- suggest-"valuable attributes of our landscape are protected and enhanced" (i.e. remove 'and, where possible, enhanced').</li> <li>May work better as two separate policies- assessment criteria for landscape and agricultural land quality are quite distinct.</li> <li>Propose a ban on fracking.</li> </ul> <p>Criteria b)- Brownfield:</p> <ul style="list-style-type: none"> <li>Prioritisation of the use of brownfield land is a fine aspiration but is unlikely to happen unless some objective targets are set.</li> <li>Use of brownfield is not a means to protect landscape character as such.</li> <li>After "brownfield land" add "and commercial buildings (for solar power)".</li> </ul> <p>Criteria c)- Distinctive local features and heritage assets:</p> <ul style="list-style-type: none"> <li>Key part of Lincolnshire's landscape character are its qualities of natural and man-made features within the landscape (topography, trees and woodland, hedgerows, walls, water features, field patterns and intervisibility between rural historic settlements). – a further criterion should be added to ensure regard to this.</li> <li>Agree with statement that villages including heritage assets contribute to character- this conflicts with LP2.</li> </ul> <p>Criteria d)- agricultural land:</p> <ul style="list-style-type: none"> <li>Suggested that the policy be reworded at bullet point (d) to only refer to windfall sites and to specifically exclude allocated land.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>





<ul style="list-style-type: none"> <li>Landscape is a workplace- food and farming is not subordinate to landscape, it is the activity which has / will shape it. Economic salience of the food / farming sector will be compromised if policies do not give due weight to economic growth alongside 'protecting landscape'.</li> </ul> <p>Criteria e)- farm diversification:</p> <ul style="list-style-type: none"> <li>Support farms and rural enterprises- omit "directly" - could be difficult to prove that a particular development directly supports a particular business.</li> <li>The local plan will identify the housing, employment, retail etc. need. An assessment of all the potential land will be undertaken and the most suitable land will be identified for use, including green belt, flood zones and also the best agricultural land. If an assessment finds that some of these land types are needed then this land should be released for development.</li> </ul>	
---	--

<b>Section 5.3 – Climate Change and Low Carbon Living</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>Support the proposed priority bullet point list (paragraph 5.3.5) approach to cutting carbon emissions.</li> <li>Remove 'in priority order' at 5.3.5.</li> <li>Is it realistic to plan for and achieve a large reduction in the demand for energy in the Plan area, particularly in the rural areas, whilst accommodating up to 47,500 new houses?</li> <li>The supporting text refers to not using private cars to travel to work and other facilities as a means of reducing energy usage but the new draft Local Plan needs to be a realistic plan for the area where many people in the remote areas rely heavily on car travel.</li> <li>Agree low carbon living should be the priority.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>

<b>Policy LP16 – Climate Change and Low Carbon Living</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>Woodland planting is not the only option available for carbon off-setting. Other habitats such as fenland and grassland also store carbon and we would recommend that this is reflected in this policy. The Central Lincolnshire Biodiversity Opportunity Map should be used as a guide to what the most suitable habitat would be in a particular area.</li> <li>Suggests planting woodland for carbon off-setting but doesn't join this up with consideration of the implications for biodiversity and green infrastructure, such as whether other forms of land management might provide a greater net benefit, whether certain forms of tree planting should be</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>



preferred or whether there are locations where tree plantations might not be beneficial, for example because of its impacts on other habitats.

- CLLP is to be commended for its desire to contribute to combatting the human contribution to climate change. Particularly through its support for localized employment, the development of a transport plan which encourages alternative forms of transport and its development linked proposals.
- Need to put jobs back into villages and countryside for sustainable growth.
- All new building should be as self sustaining as possible from use of natural heat & light to use of grey water. They should all be thermally insulated and have solar panels to minimise energy use. This should also become a requirement for all housing stock in our area.
- Helpful and could go some way to also tackling issues of fuel poverty and related health problems. However, important that the policy is applied in a proportionate way.
- Helpful if this policy was linked to LP21 so that schemes in rural areas will have the opportunity to respond to this policy potentially using radical design solutions without being judged to take away from local character.
- Ensure industrial development is equipped with renewable facilities to reduce the burden on the grid & also ensure there is the infrastructure to put any extra power back into the grid.
- Lack of reference to viability and practicality.
- The Housing Standards Review's mandate was to reduce bureaucracy and make building processes easier.

#### Renewable energy technologies:

- Should distinguish between small, medium and large turbines as they all have different potential impacts and requirements. Projects should be assessed on a case-by-case basis.
- Why not require PV solar panel on all new development or installation of heat pumps for every new home?

#### 4 priorities:

- Support but would like to see it strengthened. Agree with preference order- more could be made of energy production within large-scale developments. Technologies such as land heat pumps could make a significant difference to the infrastructural and energy demands of such developments, while creating no visual detriment.
- Within the 'resource efficiency', 'energy production' and 'carbon off-setting' sections we would recommend that 'could' should be changed to 'should'.
- Each priority will need to be addressed simultaneously to achieve the dramatic reduction of emissions required.



<p>Energy production:</p> <ul style="list-style-type: none"> <li>• Criterion unduly restrictive, requiring energy production within a development to be ‘inconspicuous’. A balance in respect of the impact against its contribution is not taken into consideration.</li> <li>• Some carbon reduction measures can have an adverse effect on local air quality, e.g. biomass. ‘Energy production’ should therefore include a caveat that “renewable energy schemes should not be provided at the detriment to local air quality”.</li> </ul> <p>Final para:</p> <ul style="list-style-type: none"> <li>• Amend: Resource minimising proposals (whether a proposal for an existing development or as part of a wider new development scheme) which are poorly designed and/or located and which, for example, have a detrimental impact on the landscape, the amenity of residents or the built or natural environment will be refused.</li> <li>• Should also make reference to heritage assets here, for the avoidance of doubt.</li> </ul>	
---	--

Policy LP17 – Stand-alone Renewable Energy Proposals	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Policy particularly applicable to large-scale wind farms. Would prefer a positive statement about preferred renewable energy sources</li> <li>• The policy does not cover (or excludes) non-standalone renewable energy schemes. It does not cover Anaerobic, CHP, ground source heat or other emerging renewable energy technologies.</li> <li>• As the government withdraws the grants the companies are rapidly withdrawing applications anyway so there is no need to include a provision for solar farms in a 20 year plan.</li> <li>• Seek to maximise the use of waste heat from stand-alone renewable energy plants to heat homes, particularly in deprived areas and off gas grid areas.</li> <li>• Worded very vaguely and could be applied negatively and as such runs contrary to the positive LP16.</li> <li>• It would be helpful to include a policy supporting small scale community led standalone renewable projects.</li> <li>• There is a considerable, albeit unavoidable degree of subjectivity in the policy criteria in measuring and determining potential adverse impacts of a renewable energy proposal. Appendix F is useful supporting guidance in this respect.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



- Recall research into the potential suitability of broad locations across the plan area for renewable energy generation and identifying other broad areas where such installation would be unsuitable. If this research was updated and made available as guidance (potentially linked to Appendix F) it would better inform the policy context.
- The phrase “unacceptable adverse impacts” is repeatedly used throughout the policy. The phrase is subjective and ambiguous.
- Fails to properly consider the plan area’s need for energy, electricity or indeed other utility requirements.
- Policy should protect the landscape and skyline of the Lincoln Edge, the Lincolnshire Wolds, the open skies and rural openness of West Lindsey. Surprised no mention of the AONB.
- Should be tougher and aim to prevent development on good agricultural land.
- Renewable energy proposals should be small scale.
- Policy should include a clause to protect local air quality from impacts from biomass proposals, e.g. “Not result in unacceptable air quality impact (and shall be accompanied by proportionate levels of mitigation or compensation).”
- Need to recognise that all communities have the responsibility to contribute to energy generation from renewable or low carbon sources, and have a positive strategy to promote energy from such sources.
- Needs to include ancillary equipment such as substations, inverters, compounds etc. and methods of grid connection e.g. pylons, bore holes etc.
- Part a- The cross reference to and requirement to meet the stated design principles under LP 21 is out of accord and inconsistent with this policy advice, in requiring such developments to adhere to design principles that are unachievable for renewable energy proposals. Cross reference - delete.
- Part a- The National Policy Statement for Renewable Energy Infrastructure (EN-3) para 2.7.48 is strongly supportive of onshore wind. This criterion is not in accordance with the thrust of EN3. Limit the protection of townscape and landscape to specific designations such as AONB’s or Conservation Areas.
- Parts a and c need to be strengthened.
- Parts a – c: do not conform with the NPPF and is unsound in this respect. Our specific concern relates to the requirement that proposals will not result in ‘unacceptably adverse’ impacts upon heritage assets and landscape. Delete the word ‘unacceptably’.
- Part b- Commercial Wind turbines are inherently safe structures and this criteria is considered unnecessary, particularly as detailed guidance is already set out in the NPPG section entitled ‘Is safety an issue when wind turbine applications are assessed?’



<ul style="list-style-type: none"> <li>• Part c- this criteria is considered unnecessary, particularly as detailed guidance is already set out in the NPPG.</li> <li>• Part c- support.</li> <li>• Part d- the entirety of appendix f is considered unnecessary and this reference should be struck out, as it is not in accordance with the NPPF and NPPG.</li> <li>• Part e- should read noise... and/or shadow flicker not noise... and shadow flicker. This is a substantive change –as the current wording would imply that the development is acceptable as long as you do not have both issues.</li> <li>• Part e- unnecessary, particularly as detailed guidance is already set out in the NPPG.</li> <li>• Part f- MOD welcomes the reference within this policy to ensure that proposals have no unacceptable impact on the operation of aircraft movement and operational radar.</li> <li>• Reservations over apparent restrictive tone of the policy as set out in Appendix F could stifle promotion of renewable energy.</li> </ul>	
--	--

Section 5.4 – Reducing Demand on the National Grid Network	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• The capacity of the national grid should not be a significant factor in the determination of applications for standalone renewable energy generation, or other developments.</li> <li>• The policy should be drafted to seek to explore all forms of renewable energy provision at scales suitable to the current and future grid capacity.</li> <li>• All available grid capacity should be used in Central Lincolnshire and policy should be supportive of carefully sited new grid connections that allow for additional capacity from renewable and low carbon generation.</li> <li>• Objection to wind turbines being erected.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

Section 5.5 – Green Infrastructure Network	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Strongly support commitment to GI networks.</li> <li>• Support reference to Green Infrastructure Study</li> <li>• Riseholme is a network that should be protected and enhanced.</li> <li>• How green spaces in rural areas will be defined and delineated needs further clarification.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



<ul style="list-style-type: none"> <li>• Ensure house builders incorporate larger gardens to allow productivity with fruit and vegetables.</li> <li>• Include compulsory purchase/legal means to enforce improvement to GI.</li> <li>• Support as will prevent future expansion in adjacent villages leading to loss of settlement identity.</li> <li>• GI can have significant effect of health and wellbeing and policy is therefore welcomed.</li> <li>• Building biodiversity into new development should be encouraged.</li> <li>• The Gainsborough Town Plan will identify green wedges to be created and maintained in the town.</li> <li>• Maintaining GI could be linked strategically with health and wellbeing, landscape, climate change and carbon off-setting policies.</li> <li>• Para 5.5.2 – Support the recognition of the importance of GI to a range of policy aspirations.</li> <li>• Para 5.5.3 – Green corridors – meaningless with specification of minimum width. Consider 2km is necessary.</li> <li>• Para 5.5.3 – More positive commitment needed to protect existing allotment sites and plan new ones on all new housing developments.</li> <li>• Para 5.5.4 – Difficult to identify sites on GI Network Concept Plan – clearer if GI identified on interactive mapping.</li> <li>• Para 5.5.5 – Support the inclusion of GI as part of new developments.</li> </ul>	
--	--

Policy LP18 – Green Infrastructure Network	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Role of climate change adaptation should be included in the policy.</li> <li>• Needs a statement on how GI will be developed and funded.</li> <li>• Increasing woodland cover needs to be specific and quantifiable.</li> <li>• Role of waterways as green infrastructure assets should be acknowledged.</li> <li>• Mention Green Wedges</li> <li>• Reference Central Lincolnshire Biodiversity Opportunity Mapping Study.</li> <li>• GI networks need promoting as well as protecting.</li> <li>• Replace ‘should’ with ‘must’.</li> <li>• ‘Mitigation’ provides ample opportunity for a developer to appeal a decision to refuse permission.</li> <li>• Remove ‘where appropriate’ from first sentence.</li> <li>• The Green Infrastructure Study should be in supporting text or written in the policy as criteria to be complied with.</li> <li>• Bullet Points a) and b) - Remove ‘where appropriate’– weakens policy.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

<ul style="list-style-type: none"> <li>Bullet Point c) - Remove 'where possible' – all new development should seek to enhance the biodiversity of the area.</li> <li>Linkages between components of GI network very important and should be stressed.</li> </ul>	
--	--

Section 5.6 – Biodiversity and Geodiversity	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>Reference to Wolds AONB should be included.</li> <li>Role and importance of non-designated features should also be recognised and given appropriate protection.</li> <li>Object to lack of reference to Nature Improvement Areas in the plan – must put forward clear strategy as to how NIAs will be encompassed and supported.</li> <li>Reads re-actively – a more proactive approach to encouraging and promoting bio and geo diversity would be welcomed.</li> <li>Fully agree with aims of LP19.</li> <li>Actual policies in plan do not match up to aspirations to recognise importance of biodiversity- this policy should be stronger.</li> <li>Appears to be too many opportunities for developers to have decisions overturned against the wishes of local communities.</li> <li>Para 5.6.1 – Also list Local Geological Sites, Local Wildlife Sites and Sites of Nature Conservation Importance here – incorrect to list in para 5.6.2 as sites outside designated areas.</li> <li>Para 5.6.1 – Insert “that are currently recognised as being” to 3<sup>rd</sup> sentence after “wildlife sites and habitats”.</li> <li>Para 5.6.1 – Remove reference to Nature Improvement Area and include in para 5.6.2. Note correct name for NIA is “Humberhead Levels”.</li> <li>Para 5.6.1 – There are 2 RIGs not 6.</li> <li>Para 5.6.1 – Add sentence to state that proposals that adversely affect a European Site or cause significant harm to a SSSI will not normally be granted planning permission.</li> <li>Para 5.6.1 – Concept of landscape scale approach should be established in this para not 5.6.3 to ensure compliance with para 117 of NPPF.</li> <li>Para 5.6.2 – Recommend deleting 2<sup>nd</sup> sentence and making reference here to NIA. Suggest following sentence at end of para: “Places where this work is focused are Nature Improvement Areas (NIAs). The Humberhead levels is a nationally selected NIA and additional NIAs will be selected</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>



<p>locally. NIAs are landscape scale initiatives that aim to ensure land is used sustainably to achieve multiple benefits for people, wildlife and the local economy”.</p> <ul style="list-style-type: none"> <li>• Para 5.6.2 – Acknowledge role of waterways and corridors in providing wildlife habitats and supporting flora and fauna.</li> <li>• Para 5.6.2 – Suggest last sentence is strengthened to read “Development should seek to preserve, restore and re-create priority habitats, ecological networks and the protection and recovery of priority species”.</li> <li>• Para 5.6.3 – Welcome inclusion of the Central Lincolnshire Biodiversity Opportunity Mapping Study. Recommend “known” is inserted into the 2<sup>nd</sup> sentence after “The maps illustrate the most important..” There may be other important areas for biodiversity not yet identified or surveyed.</li> <li>• Para 5.6.4 – Support recognition given to important habitats and species in planning process and importance of ecological surveys.</li> </ul>	
---	--

<b>Policy LP19 – Biodiversity and Geodiversity</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<p>General:</p> <ul style="list-style-type: none"> <li>• Specifically refer to role of waterways and waterway corridors.</li> <li>• There is no specific guidance on geodiversity despite policy title which is required to comply with para 117 of NPPF. Suggest references to geological conservation and need to conserve, interpret and manage geological sites and features in the wider environment.</li> <li>• Protection of ancient woodland and veteran trees should be included to reflect para 118 of NPPF.</li> <li>• There is no mention of Ecosystem Services – this would reflect para 109 of the NPPF.</li> <li>• Clarity required on how will relate to small applications and extensions.</li> <li>• Reword phrase “seek to”.</li> </ul> <p>1<sup>st</sup> Paragraph:</p> <ul style="list-style-type: none"> <li>• Recommend “as appropriate” and “where possible” are removed – weakens policy.</li> <li>• Reword 1<sup>st</sup> sentence as follows: “All development should protect, manage and enhance the network of habitats, species and sites of international, national and local importance (statutory and non-statutory), and sites that meet the criteria for selection as a Local Site, avoid inappropriate development and seek to deliver a net biodiversity and geodiversity gains”.</li> <li>• Strengthen by adding “wherever possible” after “protect”.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



<p>2<sup>nd</sup> Paragraph:</p> <ul style="list-style-type: none"> <li>Remove “local” from before wildlife sites, Biodiversity Action Plan and Geodiversity Action Plan.</li> <li>No reference to NIA – recommend new sentence after 1<sup>st</sup> sentence: “Where development is within a Nature Improvement Area (NIA) this should contribute to the aims and aspirations of the NIA”.</li> </ul> <p>Biodiversity by design:</p> <ul style="list-style-type: none"> <li>Recommend “where appropriate” is removed – weakens policy.</li> <li>Should be a stronger statement – made a duty.</li> </ul> <p>Mitigation:</p> <ul style="list-style-type: none"> <li>This section should specific that “a Water Framework Directive assessment may be required where the scale, nature or location of development is such that it is likely to adversely impact on a WFD body”.</li> <li>Change “conservation value” to “geodiversity value” in 1st sentence.</li> <li>Suggest adding “important habitats” to read: “Where any mitigation and compensation measures are required, they should be in place before development activities that may disturb protected or important habitats and species start”.</li> </ul>	
--	--

Section 5.7 – The Historic Environment	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>Heritage-led regeneration is the best way to care for the historic environment.</li> <li>The protection and management of conservation areas is important.</li> <li>Para 5.7.2 – should refer to the historic Fosdyke Canal</li> <li>Para 5.7.4 – The Heritage Assets at Risk in Appendix E should be referred to in the sixth bullet point.</li> <li>All of the Canal and River Trust’s waterways should be considered to be non-designated heritage assets worthy of protection from inappropriate development.</li> <li>There will be adverse impacts for the historic core of any villages allocated for growth.</li> <li>The supporting text provides only a very basic description of Central Lincolnshire’s historic environment and fails to identify opportunities and threats.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>



Policy LP20 – The Historic Environment	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Support the policy.</li> <li>• Policies need to be adhered to avoid harm important views being spoilt as has been the case in Navenby.</li> <li>• Whilst protection of the historic environment is supported, it needs to be accessible to all.</li> <li>• Developers should be required to understand and work with heritage assets that come into their possession.</li> <li>• The policy as written is not in accordance with the NPPF.</li> <li>• The policy lacks in detail and clarity. It should clearly set out how a decision maker should react to a proposal.</li> <li>• First para – very generic and is not supplemented by any locally relevant detail.</li> <li>• Second para – relates only to the process and information requirements. Whilst this is useful, it should be followed up by a clear steer of what will or will not be acceptable.</li> <li>• As written, the policy suggests that development which will cause harm or loss will be acceptable if justified.</li> <li>• The policy should not defer to the NPPF, whereas the NPPF says that Local Plans should not repeat NPPF policy.</li> <li>• The policy provides too many opportunities for developers.</li> <li>• The policy should include a comment about Lincoln Cathedral and views from the train and by car in particular from the south, south east and south west quadrants.</li> <li>• The policy should include archaeology and its historical importance.</li> <li>• The policy should make reference to conservation villages.</li> <li>• Statements in the policy should be stronger with regard to the protection of the historic environment.</li> <li>• More power should be granted to the parish councils in relation to the historic environment when considering planning applications due to their advanced local knowledge.</li> <li>• Historic sites should become part of a historic trail to support tourism.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

<b>Section 5.8 – Design Principles</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• Para 5.8.1 – Agree that good design is inseparable from good planning.</li> <li>• Para 5.8.2 – Agree that new development should always have regard to context and make a positive contribution to the character and appearance of the local environment.</li> <li>• Innovation needs encouraging.</li> <li>• Supporting text should make reference to relevant documents and evidence such as Village Design Statements and Townscape Assessments.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

<b>Policy LP21 – Design Principles</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• Positive requirements in the policy are diluted by ambiguous statements such as “...demonstrate...consideration of...” and “where appropriate”. This should be strengthened.</li> <li>• Policy LP26 gives further advice on design requirements that are different to this policy, resulting in inconsistencies.</li> <li>• Policy needs to be reworked in light of the government’s housing standards review.</li> <li>• There should be green connections between existing villages.</li> <li>• The policy should refer to the requirement to fully address flood risk, through floor levels and safe access and egress for example.</li> <li>• Support inclusion of incorporation of natural and historic features, but it should go beyond and require biodiversity enhancements, provision of a network of green space and wildlife being designed in at an early stage.</li> <li>• Wildlife enhancements should contribute to targets in Biodiversity 2020 and the Lincolnshire Biodiversity Action Plan.</li> <li>• Regard should be paid as to whether development in Limited Growth Villages and Small Villages respects and enhances the character and local distinctiveness of the area as sought in this policy.</li> <li>• This policy should be aligned with policy LP16 to encourage sustainable buildings that minimise climate change.</li> <li>• Criterion a) should include reference to waterways as a part of the existing landscape to be respected and encourages development to facilitate and encourage access to the waterside, creating active frontages wherever possible.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



- Some types of development will not be able to achieve the requirements of the local context section – for example renewable energy schemes, infrastructure, utility and transport proposals. As such the policy should be amended to recognise this.
- Criteria a-g are bland statements.
- Contradiction in the introductory sentence of the local context section of policy as it uses the word ‘must’ and goes on to say ‘proposals should’, making the policy weaker.
- Criterion e) requires all development to make use of innovative design, architecture and technology, which is not appropriate. Objection to the inclusion of criterion e).
- The policy does not refer to viability and it will not always be possible to embrace innovative design and technology.
- Policy should make a reference to renewable energy of a size and scale in keeping with the development it is serving.
- More renewable technologies should be included from the outset and building should, for example fibre optic, solar technology, ground source heat pump and rainwater harvesting.
- Policy should specifically refer to orientation, materials and energy used to support the Government’s national standards.
- Criterion f) should refer to appropriate materials rather than high quality materials.
- Additional point for local context requirements of the policy – Prevent the parking of vehicles on nearby road verges and driveways to new housing developments.
- The policy repeats design criteria in the NPPF without adding local input.
- The amenity section should be a separate policy.
- The wording in the introductory paragraph for the amenity section is poorly worded and does not provide an enforceable test. It requires developers to consider aspects but not to adhere to them.
- Policy should include a minimum outdoor amenity space requirement to protect against over-development.
- Criterion j) should be reworded to refer to over domination of the setting and neighbouring development rather than ‘outlook’ which could be misinterpreted as a right to a view.
- Criterion k) should refer to shadowing and loss of light rather than sunlight/daylight which could lead to complicated tests.
- Reference to household and commercial waste in criterion n) should be strengthened by requiring that applications take into account information from the Lincolnshire Joint Municipal Waste Management Strategy.
- Objection to criterion o) of the policy as it is contrary to paragraph 32 of the NPPF and not justified for smaller schemes. It is also not a design issue so should not be in this policy.

- The linking of safe environments and pedestrian and cycle routes in criterion p) is unnecessary.

### Section 5.9 – Housing Standards Review

Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• The Local Plan should introduce a policy to require dwellings to be accompanied by outdoor private amenity.</li> <li>• Central Lincolnshire should utilise standards in the Code for Sustainable Homes and BREEAM to set stringent requirements for new development. Building houses in bulk to these formats reduce unit costs and these costs should be factored into land purchase costs.</li> <li>• Objection to the lack of adoption of Code for Sustainable Homes.</li> <li>• Support the approach that housing requirements are being delivered through building regulations.</li> <li>• Para 5.9.4 – space standards and wheelchair housing requirements should be provided for in Part M of the Building Regulations.</li> <li>• Para 5.9.6 – support any improvement in water efficiency standards.</li> <li>• Para 5.9.7 – support outdoor amenity standards being included.</li> <li>• Para 5.9.7 – no evidence to support the assertion of a possible one third of building plot being required for outdoor amenity space.</li> <li>• Para 5.9.7 – There should be no set amount of outdoor amenity space as this is a considerable cost in the development process.</li> <li>• Amount of outdoor amenity space should not be a policy decision, but a personal one when deciding on a home.</li> <li>• It is not clear when these aspirations will be included in building regulations and, in the absence of this, it is not clear how policies LP7 and LP8 will be achieved.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

### Section 5.10 – Open Space, Sports and Recreation Facilities

Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• More open space needed and opportunities to access the countryside.</li> <li>• Brownfield sites should be used first where possible.</li> <li>• Riseholme assists in meeting these needs and is easily accessible by walking and cycling.</li> <li>• Should cross reference to Policy LP18 Green Infrastructure Network.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



<ul style="list-style-type: none"> <li>• New community facilities should include provision for PTW parking in accordance with LCC Motorcycle Strategy.</li> <li>• Open space in front of Croft House Grayingham should remain so as per saved Policy Core 9 and 10 of the previous Local Plan.</li> <li>• Difficult to make appropriate provision or policy statements without evidence on open space deficiencies and information on standards of existing provision.</li> <li>• Open Space Study is essential to identifying areas of need for open space, sports and recreation.</li> <li>• The Gainsborough Town Plan will set out standards for sports, recreational spaces and public parks within the town.</li> <li>• Important to develop other green spaces as well as protecting existing.</li> <li>• Lincoln, in comparative terms, is short of such areas – what we have must be preserved and enhanced.</li> <li>• New sports facilities, linked to schools or otherwise, should be of benefit to the entire community and not exclusive to ‘members’ who can afford it.</li> <li>• Para 5.10.1 – Support and welcome recognition that open spaces can make an important contribution to biodiversity.</li> <li>• Para 5.10.1 – Promotion of multifunctional open space welcomed.</li> <li>• Para 5.10.3 – On site or contribution to nearby site if there are already facilities in the area.</li> <li>• Para 5.10.4 – Natural England’s Accessible Natural Greenspace Standards should be used to ensure that there is sufficient natural greenspace accessible to residents and available for wildlife.</li> </ul>	
---	--

Policy LP22 – Open Space, Sports and Recreation Facilities	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Wording could be improved and strengthened.</li> <li>• There should be no absolute requirement to provide open space when sufficient ‘other’ provision is made. An additional part should be added to the policy to allow for some fair discretion.</li> </ul> <p>Paragraph 1:</p> <ul style="list-style-type: none"> <li>• New standards should not seek to mitigate against existing open space deficiencies. New developments should be limited to contributing towards their own open space impacts.</li> </ul> <p>Paragraph 2:</p> <ul style="list-style-type: none"> <li>• Insist on more than 5% green space per development</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

<p>Paragraph 3:</p> <ul style="list-style-type: none"> <li>Community as a whole may rather have improved existing facilities as opposed to smaller on site facilities and policy should reflect this.</li> <li>Suggest replace 'unrealistic' or 'inappropriate' with 'cannot be achieved or delivered'.</li> <li>Should be scope for developers to add to existing facilities rather than provide on site where this is a better option.</li> <li>Whilst on site may sometimes be the best option, a presumption in favour of on-site provision may be contrary to achieving optimum benefits, for example an isolated single pitch site with no supporting infrastructure.</li> </ul> <p>Paragraph 4:</p> <ul style="list-style-type: none"> <li>Unrealistic to expect most people to walk, cycle or use public transport to get to open spaces unless more numerous and local – provision for parking will be needed.</li> <li>Object to the omission of inclusion of access by cars.</li> </ul>	
--	--

<b>Policy LP23 – Shop Fronts and Advertisements</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>Support the policy in principle.</li> <li>CCTV cameras need to blend into surroundings.</li> <li>Point 'f' should be deleted and proper policing should be provided in towns.</li> <li>Shop fronts should be deigned to be sympathetic, rather than of high quality design.</li> <li>Higher tests are needed for shop fronts and advertisements in conservation areas or near to listed buildings.</li> <li>Policy should tackle the problems posed by mobile snack bars, such as litter, noise and smells.</li> <li>Part 'b' should be amended to read 'Protect and enhance traditional or original shop fronts or features...' and the following sentence should be added, 'especially in the case of a listed building or within a conservation area'.</li> <li>Should consider a SPD to provide further guidance on this topic.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>

Section 6.1 – Your Central Lincolnshire	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>For areas not taking up neighbourhood plans a parish based survey should be a minimum to validate the SHELAA; identify the nature, location and type of growth and protection where needed; validates the SHMA, making it more meaningful at the local level; and makes the local plan more meaningful at a local level. This would help guide decision making.</li> <li>Support intention of this section, but needs to be demonstrated.</li> <li>Potential conflict with policy LP1.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>

Section 6.2 – Neighbourhood Planning	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>The current Cherry 2020 plan should be given more weight.</li> <li>The draft plan ignores neighbourhood plans in settlements not in categories 3-5. Neighbourhood plans are being produced in a number of areas not in these categories – how will they fit in with the Local Plan?</li> <li>How much impact will this have where the local need is at odds with the Central Lincolnshire view?</li> <li>Para 6.2.3 – Heritage considerations should be included as a bullet point in the text.</li> <li>It should be clarified which policies of the plan are strategic.</li> <li>More weight should be given to what the villagers want.</li> <li>Concern that a planning vacuum will arise in rural areas due to the lack of settlement boundaries and lack of allocations of sites of less than 25 dwellings.</li> <li>Suggest following the example of the Cornwall Local Plan or the Shropshire Local Plan, which support dispersed rural development.</li> <li>Policy should reflect the duty of local authority's to support the production of neighbourhood plans.</li> <li>Policy should support other types of plan that can be used by communities to shape their neighbourhood.</li> <li>More support is needed for the development of neighbourhood plans.</li> <li>Weight should be given to neighbourhood plans during production when making decisions on planning applications.</li> <li>No direct contact has been made by the JPU with groups producing neighbourhood plans to share evidence, understand local community views or consider the work undertaken by the groups. Work should be shared and aligned.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>





<ul style="list-style-type: none"> <li>Communities should be able to 'sign up' to the policies that affect them.</li> <li>There should be a specific policy that clarifies the relationship between the Local Plan and neighbourhood plans.</li> <li>The local authorities should issue a template for neighbourhood plans to assist with their production and to ensure consistency between plans.</li> <li>How will conflict between neighbourhood plans and the Local Plan be dealt with in respect of site allocations?</li> </ul>	
--	--

<b>Policy LP24 – Threshold Test for Locally Supported Growth in Villages</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>Approx. half of respondents supported this policy.</li> <li>Policy LP24 needs proper cross referenced with Policies LP2 and LP3</li> <li>Policy approach, whilst appearing to be in accordance with the principles of "Localism", fails to provide any justification for principle aims of the policy nor the specific details of the policy with regard to the proposed trigger points.</li> <li>The policy exceeds the requirement for prior public consultation set out in the NPPF.</li> <li>Policy is tortuous and complicated</li> <li>The restriction to hierarchy levels 3-5 is inappropriate.</li> <li>Policy is far too simplistic and restrictive</li> <li>MOD has concerns with how policy would be applied to operational development for Defence purposes. The MOD wishes to see the inclusion of a specific policy MOD policy within the Local Plan.</li> <li>There is no definition of what a 'proportionate' consultation exercise would be, nor of what would constitute 'demonstrable evidence' of local public will.</li> <li>Policy is ambiguous in what "committed" could refer to.</li> <li>I see potential tension between this and the approach in Policy LP39 "Development in Rural Areas".</li> <li>Fully support a % limit.</li> <li>Concerned about how the 10% increase in base dwellings was derived.</li> <li>Is 10% sufficient to meet growth?</li> <li>Thresholds need reducing to a figure lower than 10%.</li> <li>Increase the threshold to 20%.</li> <li>Only support this policy if the current curtilage policy is abandoned (which is a massive mistake).</li> <li>Support removal of village curtilages only if LP24 is not watered down.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> <li>A separate report detailing all LGS suggestions will be published in early 2015.</li> </ul>

<ul style="list-style-type: none"> <li>• Scotter- for Scotter date should be 2000.</li> <li>• Fenmarc- would prevent any meaningful investment in the Fenmarc site (Swinderby)</li> <li>• An alternative to deletion, it may be possible to make Policy LP24 workable by excluding existing employment sites or brownfield land.</li> <li>• Navenby- no support from the community for any development in Navenby. It already has a 28% increase in the past 10 years.</li> </ul>	
---	--

Section 6.3 – Local Green Spaces	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• General support for policy, aims and protection of local green spaces.</li> <li>• Villages should keep identity and not merge with Lincoln or each other. Keep green space all around villages and between them.</li> <li>• New developments should have minimum size gardens.</li> <li>• Control number of houses built in gardens.</li> <li>• The Gainsborough Town Plan will identify LGS within the Gainsborough area.</li> <li>• LGS are a designation not a constraint to development – lesser valued green spaces may need to be re-evaluated and potentially released for development.</li> <li>• Object to lack of clear maps showing LGS and Green Wedges.</li> <li>• Brownfield land should be used first for development before greenfield.</li> <li>• Allocation should be done by each district council in consultation with Parish and Town Councils.</li> <li>• Para 6.3.1 – Should reference NPPF as origin of this policy.</li> <li>• Para 6.3.1 – Extend definition to cover green space between settlements.</li> <li>• Para 6.3.1 – Essential LGSs consistent with all criteria in NPPF and not used to block development.</li> <li>• Para 6.3.1 – Support inclusion of playing fields with potential for LGS designations.</li> <li>• Para 6.3.2 – Guidance is Appendix B welcomed but could be more detailed.</li> <li>• Para 6.3.2 – Appears confusion about most appropriate place to include LGSs – Local Plan or Neighbourhood Plan?</li> <li>• Para 6.3.2 – Contact landowners at early stage about proposals to designate any part of their land as LGS.</li> <li>• A variety of sites have been put forward for LGS status.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> <li>• A separate report detailing all LGS suggestions will be published in early 2015.</li> </ul>

<b>Policy LP25 – Local Green Spaces</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• Policy implies LGSs are same as Green Belt areas – this is not correct as they perform different functions and this should be made clear. Remove reference to Green Belt.</li> <li>• Object as doesn't protect green spaces in Sleaford – CLLP promotes removal of some in the town.</li> <li>• Concern will be used to protect large areas of land from development, including farm and rural diversification. Can guidelines be put in place to prevent this?</li> <li>• Needs criteria to guide development that would be acceptable in such localities.</li> <li>• Policy too vague.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

<b>Chapter 7</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• Support in principal, but details are important;</li> <li>• States that this section is about allocating development sites, but does not do so, this is confusing;</li> <li>• Please be aware that extensions to Whisby Quarry and Lea Marsh Farm are being promoted within the Mineral and waste Local Plan. These will be long term sites that could impact on the Local Plan process;</li> <li>• Support the principles, provided geography of the area is remembered and villages close to growth areas are not jeopardised</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

<b>Section 7.1 – Introduction</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<p>Para 7.1.4</p> <ul style="list-style-type: none"> <li>• Expressions of support given on number of occasions;</li> <li>• Objections to allocation minimum of 25 dwellings, suggestions of 10 dwellings in line with 'Major Development' being 10 dwellings</li> <li>• A limit of 25 dwellings or more does not proactively support sustainable development in rural areas;</li> <li>• Why 25, does this mean virtually no allocations in villages? Allocations should be related to how they contribute to the sustainability of the settlement and not an inflexible threshold</li> </ul> <p>Para 7.1.5</p>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



- A number of expressions of support;
- Objection to blanket principle, existing conservation villages should have their boundary protected;
- Object to removal of settlement boundaries, they guide development to sustainable locations, highlighting the areas that are more acceptable;
- A sensible development limit must be imposed for villages – 15% suggested.
- Support this principle, but, this supports argument for more detailed historic environment policy
- Long overdue, boundaries have led to refusal of permission on sites where development would have been sensible
- Boundaries provide some security to compactness of community, object to removal
- Welcome flexible approach of not having boundaries, however, feel this is negated by approach of Policy LP2
- Who determines organic development? Need to give some incentive/importance to infill and brownfield development
- Parishes should have the opportunity to review and redefine curtilages in local or neighbourhood plans, rather than simply removing them altogether
- Boundaries particularly important to small villages

#### Para 7.1.6

- A number of expressions of support;
- How and why has 0.5 ha been derived? Where is audit trail of decision?

#### Para 7.1.7

- A number of expressions of support;
- This is a broad locational matter pertinent to the distribution of sites and not criteria for determining how to select sites

#### Para 7.1.8

- A number of expressions of support
- This is a broad locational matter pertinent to the distribution of sites and not criteria for determining how to select sites
- Support, but robust housing trajectory should be in place
- Phasing critical to ensure infrastructure is in place first to support growth, policies need to be implemented in their entirety.

#### Para 7.1.10 – A

- The two sites being pursued in Bassingham far exceed the envisaged size within plan. Should these sites move forward to planning application stage they will render this plan irrelevant for the village



<p>Para 7.1.10 – B</p> <ul style="list-style-type: none"> <li>• Opposition of any SHLAA sites that would lead to loss of, or significant adverse impacts on sites of nature conservation or geological importance;</li> <li>• Any site allocations will need to be assessed to ensure no detriment to water network, sites within 400m of water recycling centre should be assessed for odour impact;</li> <li>• Specific objections to site on Green Man Road, Navenby, on ground of putting too much pressure on roads and local services;</li> <li>• No specific objections, however, it is noted that many contain, or are within setting of designated heritage assets</li> </ul> <p>Para 7.1.10 – C</p> <ul style="list-style-type: none"> <li>• This implies that allocations could be made in villages (25 dwelling threshold does not) an example of how plan lacks cohesion</li> </ul> <p>Para 7.1.11</p> <ul style="list-style-type: none"> <li>• Site screening methodology generally acceptable, a precise scoring system should be put in place.</li> </ul> <p>Para 7.1.12</p> <ul style="list-style-type: none"> <li>• SSSI's, NNR's and LNR's and non-statutory designated sites should be included</li> <li>• Should read "sites protected for nature conservation value"</li> <li>• Need to be aware of M&amp;W local plan preparation to ensure coordination and that Policies map does not contain out of date information;</li> <li>• Registered parks and gardens should be included on policies map.</li> <li>• May also consider allocating land not suitable for development</li> <li>• Support inclusion of playing fields in policies map</li> </ul>	
---	--

Section 7.2 – Sustainable Urban Extensions (SUEs)	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• The integration to the rest of the community could be stronger.</li> <li>• A comprehensive master plan for traffic movements in and around the City would also need to be implemented that goes beyond simply the Eastern Bypass and East West link before ANY development should proceed.</li> <li>• Accept the need for more development in the Lincoln area, but concerned that just adding more to the fringe villages which have had waves of development over the last 50 years will simply result in</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



<p>an ever increasing suburban sprawl. Not convinced that the authorities are prepared to be truly radical and consider entirely new sustainable settlements (albeit with the loss of some agricultural land). It is especially important to maintain space between villages- sprawl would have serious consequences for community quality of life, transport, health and education infrastructure and would mean the area lost much of its present character.</p> <ul style="list-style-type: none"> <li>• Paras 7.2.1 – 7.2.4 – This approach conflicts with the policy’s stated intent and includes a level of detail across a range of issues which may not be directly relevant for the individual SUEs concerned. On this basis the policy criteria including “overarching”, “design and energy”, “infrastructure and employment”, and “landscape” combine a mixture of aspirations and requirements which will provide no sound basis for the consideration of individual schemes. They will also duplicate areas covered by other policies in the Local Plan.</li> <li>• Para 7.2.1 – insert the following at the end of the paragraph for clarification: 'and other relevant policies within the plan'.</li> <li>• Saxilby is not an area that can become a SUE area. It is too far from a city and cannot cope with present demands let alone mass building.</li> <li>• The Western Growth Corridor should not be included at this stage. The flooding issue is extremely serious.</li> </ul>	
---	--

Policy LP26 – Sustainable Urban Extensions	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• First two paragraphs could be explanatory text as they are not explicit policy.</li> <li>• Until the areas for Sustainable Urban Extensions are defined it is of limited value creating a spatial strategy or trying to define a settlement hierarchy (LP2). As an example: - if the entire planned growth of Lincoln was to be collected in a SUE that is attached to the Eastern side of the City, along with the planned Eastern (and potentially Southern?) Relief Road, it will then presumably impact upon the suitability of villages to the Western side of the city as designated "Growth Villages".</li> <li>• Currently worded such that each new urban extension proposal must satisfy all 22 policy criteria subsequently listed in the policy, implying that failure to comply with just one of the criteria technically brings the proposed SUE in conflict with the policy. This wording makes the policy unreasonable and potentially unachievable. The policy needs to be reworded to allow some room for flexibility.</li> <li>• Welcome that, once the options for SUE's have been decided upon, the plan will include individual policies in support of these- this is essential in order to fully protect and reflect site specific matters.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



- Object to SUE's because no such thing- SUE's are little more than a use of crafty words that allow significant housing construction without the full range of infrastructure investment that should go with them.
- Agreement of landowners is mentioned but what about the agreement of the community.
- Policy as currently worded makes no reference to viability.
- Para 5- Safeguards to prevent cherry-picking of the profitable elements of the SUEs will perhaps need an enforceable timetable?
- Para 5 - Support cherry picking element of policy.
- Para 5 - It is not the role of a planning policy document to restrict the phasing of less costly or more profitable elements of a development proposal. This is a commercial consideration of the developer.
- Para 5 - This will relate strongly to viability. It will not be possible, for example, to construct health and education facilities prior to the occupation of a certain number of dwellings.
- Part d - the range of housing will depend largely on market demand and viability.
- Part f - recognise the requirement of the Council to provide plots/pitches for Gypsies and Travellers but object to provision within the SUEs. These are the prime sites necessary to contribute to Central Lincolnshire's significant housing need in sustainable locations. There are a number of other considerations which weigh against this prioritised approach for travellers on these key sites, including those relating to the delivery of market and affordable housing. An individual call for sites for Gypsy and Travellers would be appropriate to find suitable. Gypsy and Traveller provision would have a significant effect on marketability, with the potential for a site become unavailable.
- Part g - Should include the need for sequential and exception test.
- Part j - The flexible approach established in LP16 is a good one and would be less constraining to bringing development forward. Consequently we believe that such an approach should be mirrored on the SUE's proposed within the plan.
- Parts l to t - agree with these aims regarding public rights of way, bridleways and cycle ways. The Councils have to be prepared to achieve this by compulsory purchase as necessary to improve the network, not just relying on the good will of farmers.
- Part l - plan needs to provide for more growth of housing and jobs in each community and not just in the three centres of Lincoln, Gainsborough and Sleaford.
- Part l - it is not good enough to provide opportunities for public transport - include measures to ensure that the opportunities are both sufficient and are utilised to the maximum (e.g. road layout to be designed specifically to facilitate bus transport).
- Part m - needs to be strengthened to include compulsory purchase/legal means where necessary.
- Part u – support, however recommend that 'where possible' is removed from in front of 'enhance'.





- Part v - suggest the reference to “Landscape criteria” is changed to “Environmental criteria” to cover both landscape and biodiversity issues. Green Infrastructure should also be included.
- Makes no reference to heritage assets. Given that SUE’s are proposed for the three main settlements of Lincoln, Gainsborough and Sleaford, this is a significant omission as all three settlements contain numerous designated and non-designated heritage assets.
- Sensible objectives.
- North Hykeham - The Joint Local Plan previously recognised North Hykeham in particular and the South West quadrant as a SUE. Concerned that within the draft plan North Hykeham is no longer identified as such (p57) and is now considered to be one of the "...principle locations for significant growth." (p10), though it is ignored in Policy LP27. Waddington Lower Field and South Hykeham Fosseway are similarly designated.
- SUEs provide a key opportunity for large, landscape-scale habitat creation as part of the development- recommend an additional criterion to ensure each new urban extension proposal must: ‘Demonstrate they have investigated opportunities to undertake a large, landscape-scale approach to biodiversity, reflecting the opportunities identified in the Biodiversity Opportunity Mapping Study’.
- Provision of facilities and services should add to and complement those already in the community but should not detract from the town centres.
- Allow flexibility in case new sites come forward during the life of the Plan so that they can be investigated and developed if necessary.
- Policy is not consistent with national policy (NPPF para 143)- is ineffective in terms of the need to protect mineral resources- should make reference to the need for new development to avoid the needless sterilisation of minerals.
- Support need for overarching master plan and refusal of extension which come forward prior to agreement of master plan.
- General concerns over the wording of this policy and the potential burdens this could place on a landowner / developer
- The policy lacks the flexibility for schemes to come forward within the SUEs, relying on the assumption that coordination of a comprehensive approach, across potentially a multitude of land ownerships, can be achieved in a timely fashion. In reality, there are likely to be a range of practical and legal implications which will cause extended timescales and undermine the housing strategy.
- What status would a masterplan have? Seeing as the masterplan will not be linked to a planning application (as it is suggested that it needs to be approved before an application can be approved) the credibility of the ‘in principle’ approval seems to be in question.

<ul style="list-style-type: none"> <li>• Para 4 - should be more robust and require the SPD process. As it is written the option to avoid this is too open and we believe that in such crucial developments the importance of a plan led process must be adhered to.</li> <li>• An outline planning application would be the most appropriate delivery mechanism for SUEs. Would be unreasonable to request a full planning application given the inevitably long development timescales for the SUEs, the inherent inflexibility of such a consent and the level of detail which would be expected as part of one.</li> </ul>	
--	--

Section 7.3 – Lincoln	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Delete 'historic' from 'historic heritage'.</li> <li>• Future development could result in communities merging, with a consequent loss of village identity e.g. Metherringham and Dunston; Potterhanworth/Washingborough/Heighington. Any new major road structures should not separate one part of an existing settlement from another.</li> <li>• Little consideration of already high levels of traffic congestion when assessing housing proposals.</li> <li>• Development at South East Quadrant will speed completion of Eastern bypass whilst development at South Quadrant (Hykeham area) will enable completion of full bypass. Development up to line of Eastern bypass supported.</li> <li>• Too little emphasis on infrastructure needs.</li> <li>• Plan needs to consider future of central Lincoln</li> <li>• Include reference to Lincoln's heritage in introduction.</li> <li>• Retain a green belt between Lincoln and growing satellite villages to maintain a sense of local community which ensures greater civic responsibility and pride. Concern about urban sprawl.</li> <li>• Support for park and ride.</li> <li>• Suggestion of an additional policy on air quality in Lincoln.</li> <li>• Green Wedges are already being built on.</li> <li>• Green wedges, footpaths and cycle paths are important in order to protect the Lincoln fringe villages becoming suburbs of Lincoln.</li> <li>• Section about Lincoln so inappropriate to introduce options relating to broader distribution of development including outside of city.</li> <li>• Specific policy needed recognising economic importance of University and its growth and to support development of its estate.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



- Para 7.3.1 – I object to the assumption that many of us in your ‘satellite’ villages look to Lincoln for services and employment.
- Para 7.3.2 – Need to make clearer that facilities/amenities listed in the second half of this paragraph are located in WL and NK and serve the greater area.
- Para 7.3.2 – Replace ‘Lincolnshire Limewoods’ by ‘Bardney Limewoods’.
- Para 7.3.2 – ‘Cultural Quarter’ not centred on Brayford Pool
- Para 7.3.3 – Refer to poor air quality in parts of City.
- Para 7.3.3 – Recognition of present infrastructure situation welcomed.
- Para 7.3.5 – The proposal to centralise 50% of the growth of employment and housing in Lincoln is totally wrong. Should be reversed with Lincoln 20% growth and elsewhere 50%.
- Para 7.3.6 – ‘Town cramming’ and putting undue pressure on services also applies to surrounding villages, e.g. Welton.
- Para 7.3.6 – Give recognition to previously developed land may be of high environmental quality and so not suitable for development.
- Para 7.3.6 – Why target villages that cannot cope.
- Para 7.3.8 – Agree designation of Sustainable Urban Extensions is an appropriate way of contributing towards meeting the identified need for housing and employment in Lincoln.
- Para 7.3.10 – Propose land at North Hykeham is included as a suitable location for a SUE.
- Para 7.3.11 – The questions lead people to agree to Lincoln swallowing up chunks of West Lindsey. This must be removed. Paragraphs 7.3.11 to 7.3.15 have to go.
- Para 7.3.11 – All options will impact on historic environment, presenting both opportunities and risks.
- Para 7.3.11 – Bracebridge Heath a suitably sustainable village to take substantial growth after provision at SUEs.
- Para 7.3.11 – Key questions about deliverability of significant growth for Lincoln area, directly related to settlement hierarchy which is considered flawed.

#### OPTION 1:

- Should be deleted.
- Particularly harmful for historic environment.
- Too many negative aspects in respect of natural environment and biodiversity.
- Contrary to LP18 and LP 30.
- Protect Green Wedges from development.
- Flood risk implications although also opportunities to improve current situation.
- Robust SuDs policy will be beneficial.



- Likely to impact on the role of the bypass.
- Support option but not beyond bypass.
- Major expansion of Witham St Hughs supported, plus expansion at RAF Scampton accommodation area. (Plan should refer to 'RAF Scampton accommodation area' not RAF Scampton to make clear not proposing developing airfield).
- Only by growing Lincoln will the region have a chance to attract investment, talent and employment opportunities from outside the region. This option seems to be the lowest cost and most sustainable way to develop the economy.
- Support option 1 but the views of the historic and world class cathedral should never be infringed upon.
- Does not promote critical mass of services.

#### OPTION 2:

- Take account of previous growth.
- Exclude Saxilby from significant growth.
- Most sustainable for historic environment for both city and villages.
- Supported but development at larger villages should be last resort.
- Merging of smaller villages through growth not supported.
- Too much focus on protecting Lincoln with no regard to impact on fringe villages, many of which already under pressure.
- Larger villages orbiting Lincoln, e.g. Welton and Saxilby can accommodate significant growth, which will support their sustainability.
- Needs commitment to masterplanning.
- Support option, consider villages such as Bardney, Bracebridge Heath, Metherringham, Nettleham, North Hykeham, Saxilby, Sturton by Stow, Waddington and Washingborough, for further growth.
- Support as maintains sense of boundary for Lincoln and preserves delineation, while offering the best opportunity for appropriate infrastructure growth.
- Vision of sprawling dormitory annexes to the threatened villages.
- Focusing on fewer settlements offers opportunity to improve village services and facilities, including sustainable transport links to Lincoln and elsewhere.
- Preferred option based on current and previous evidence base work, such as the Sustainable Futures Study, which supports the case for Lincoln being the principal urban area for Central Lincolnshire by virtue of its size, scale, services and facilities whilst at the same time providing opportunities for growth in key villages.



#### OPTION 3:

- Most sympathetic option for area.
- This option includes many of Option 2's negative aspects and does not reflect ability of villages to accommodate growth; as such conflicts with NPPF on need for sustainable growth.
- Support option.
- Proportionate village growth should be attuned to the typology of the settlement and its ability and desire to accommodate growth.
- Totally opposed to the outward extension of Saxilby to the north.
- Fewer opportunities to create critical mass of services.
- Would enable bulk of growth to be located in Lincoln area but also allow proportionate growth in surrounding villages which look to Lincoln for provision of many services and facilities. In accordance with the NPPF. Less reliance on SUEs to meeting housing need, which may not deliver in short to medium term due to scale of infrastructure required

#### OPTION 4:

- Do not reject this option. Create 'new settlement' at Hemswell Cliff. Best option, most sustainable.
- Spatial strategy will become heavily reliant on large strategic sites which are difficult to deliver.
- Need mix of sites to include sites in surrounding villages, e.g. land east of Bath Road Estate, Bracebridge Heath.
- Some attraction in developing a new settlement but no obvious opportunities, apart possibly from Scampton if future of base determined, but questionable whether any truly successful examples delivered elsewhere that are more than commuter villages.
- New settlement not appropriate, plenty of land near to Lincoln that could be delivered to support infrastructure to benefit wider community plus existing villages that can take sustainable growth.
- Development should be first located on areas identified under para 7.3.6.
- Support, existing villages will be destroyed through over expansion.
- Restrict development of Lincoln that goes beyond Eastern bypass.
- Least disruptive to existing settlements and best way to create viable and sustainable new communities.
- Allows key infrastructure to be put in place before new settlements are built. Appreciate loss of countryside, but this would happen anyway if villages were to be expanded.
- Ex RAF airfields at Dunholme Lodge in the north and Swinderby in the south west, both large brownfield sites, are 2 of the most sustainable locations for new settlements with excellent road connections to Lincoln.



<ul style="list-style-type: none"> <li>Allows transport, health and education needs to be planned and met, rather than trying to improve these across the whole area.</li> </ul> <p>Combination of Options:</p> <ul style="list-style-type: none"> <li>Support mixture of Options 3 and 4. Suggest Hemswell Cliff for a new settlement. Other possibilities are Scampton, Brookenby and Newtoft. Housing developments to the north of the area would allow residents to commute to the growing number of job opportunities being created in the South Humber.</li> <li>Option 3 Preferable to Options 1 and 2 but should allow growth in outlying areas if West Lindsey as well as combining with Option 4.</li> <li>Para 7.3.21 – Reference to heritage assets supported but more information needed.</li> <li>Para 7.3.23 – Request careful consideration be given to the extension of Green Wedge in place to the west of Greetwell Lane in Nettleham. Propose Green Wedge be extended to the east side in an easterly direction.</li> <li>Para 7.3.23 – Policy LP30 is particularly important to Canwick as the Green Wedge to the North provides a clear separation between the village and the City of Lincoln which is an important aspect of its rural character.</li> <li>Para 7.3.23 – If Green Wedges are to be reviewed as part of further evidence base work for the Local Plan we wish to be engaged at an early stage.</li> <li>Para 7.3.26 – Many areas adequate for industrial uses on public transport routes.</li> <li>Para 7.3.27 – References to Lincoln’s heritage as fundamental part of tourism offer supported.</li> <li>Para 7.3.27 – ‘Cultural Quarter’ not centred on Brayford Pool.</li> <li>Para 7.3.30 – References to securing future development that is not at a cost to Lincoln’s heritage supported.</li> <li>Para 7.3.30 – Add “...new development should not exacerbate the City’s traffic and associated air quality problems....”</li> </ul>	
--	--

Policy LP27 – A Growing Lincoln	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<p>General:</p> <ul style="list-style-type: none"> <li>Support the locations identified which appear to be the most appropriate given the supporting evidence currently available.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>



- If sites are still under investigation, they should not be included in a policy in this new draft Local Plan. It is inappropriate and implies a level of support which they may not merit.
- The focus of the Local Plan should be to consider each locality in the Lincoln fringe individually and to assess what growth is reasonable.
- Lincoln city must not extend beyond the current or new bypasses. Surely there is a case for the further expansion of Witham St Hughson the available former RAF Swinderby land, provided new infrastructure is included.
- Expanding settlements not in Lincoln for work in Lincoln means more transport need and contrary to reducing carbon emissions.

#### Western Growth Corridor:

- Serious concerns due to number of Local Wildlife Sites within and adjacent to the site which could be directly or indirectly impacts upon by development. Particularly concerned about Boultham Mere, Hartsholme Country Park and Swanholme Lakes SSSI. Significant areas of natural greenspace would need to be included within the development.
- This policy should be more definitive in making clear that the WGC site is a preferred option for growing Lincoln. It should also make clear that in all 4 options that are set out under Policy 27 that the WGC SUE is common to all 4 and will be required even if a lower growth option for housing is chosen.

#### North East Quadrant:

- SUE at Greetwell Quarry must take note of increased traffic on Greetwell Road as more residents of Cherry Willingham and Fiskerton have to use this road due to the closure of Hawthorn Road, plus increased traffic from the hospital and new eastern bypass.
- Very serious concerns as would involve development of Greetwell Hollow Quarry SSSI, Local Wildlife Site and Local Geological Site and could affect Greetwell Hollow Nature Reserve. Development would lead to loss of LWS habitat and could impact on geological features of interest. May be possible to recreate calcareous grassland in a suitable location to compensate for loss of this habitat, however there should be a net gain in Biodiversity Action Plan habitats as a result of any development.
- Support inclusion of NEQ. Long recognised as a suitable and sustainable location to contribute to the development needs of Central Lincolnshire. The site doesn't include any significant environmental or physical constraints and previous masterplanning has demonstrated that the site is developable for a range of uses.



<p>South East Quadrant:</p> <ul style="list-style-type: none"> <li>• There is 1 candidate LWS within the candidate SUE and additional LWS adjacent to the northern boundary, which could be directly or indirectly impact upon by development.</li> <li>• Conditional support. This is providing that alternative sustainable development site are not prevented in coming forward for development in the same locality.</li> <li>• While appreciating need for some growth within the line of the proposed eastern bypass, we feel it would be extremely detrimental to build on land to the north of Canwick Avenue leading down to South Common – need to maintain view of Lincoln Cathedral, maintain integrity and character of South Common, maintain village identity of both Bracebridge Heath and Canwick.</li> <li>• How Lincoln SEQ interrelates with Bracebridge Heath is an important and fundamental question that needs to be resolved. Bracebridge Heath needs to retain its own identity and development of Lincoln SEQ must respect this an avoid coalescence.</li> <li>• Support inclusion of South East Quadrant. There are no known environmental or physical constraints to the development of the site, is in single ownership and would be deliverable within the short term.</li> </ul>	
--	--

<b>Policy LP28 – Transport Priorities / Movement Strategy</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<p>GENERAL</p> <ul style="list-style-type: none"> <li>• Include use of motor cycles/scooters (PTWs), encouraging their use in preference to cars -</li> <li>• New road planning strategy required to overcome Lincoln's propensity to become grid locked.</li> <li>• Fully supported; every development proposal across Central Lincolnshire must take account of these transport schemes and principles before being granted.</li> <li>• Growth provides major challenges for Lincoln's historic environment in relation to transport infrastructure, both positive and negative impacts. This adds weight to concerns at lack of detail for LP20: The Historic Environment.</li> <li>• Lincoln NEQ will meet objectives of policy.</li> <li>• Lincoln transport schemes must not take precedence over those needed for growth at Gainsborough and Sleaford.</li> <li>• Reads as list of potential developments. What are policy aspirations and criteria for assessing sties for transport issues?</li> </ul> <p>LINCON EASTERN BYPASS (LEB) AND EAST-WEST LINK (EWL)</p>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

- LEB strongly supported but build before significant growth takes place. A fundamental infrastructure scheme for the area.
- Extend EWL to LEB to alleviate pressure on Canwick Hill/Road.
- Build bypass to south to link with LEB to alleviate pressure in Hykeham.
- LEB will not make any difference to city centre traffic and exacerbate issues in south of Lincoln and North Hykeham.
- EWL will cut Lincoln shopping in half and increase congestion.
- Plan not clear as details of LEB not provided. Will it actually be delivered, and in first 5 years of Plan? SEQ will not provide sustainable development. Accessibility to centre, west and south of Lincoln not good; better places for development.
- Early delivery of LEB critical to delivery of NEQ. Whilst in principle agreement that housing can be developed before its completion, its construction is necessary for completion of SUE. Phased development with triggers needed to ensure new and existing road network able to accommodate scale of growth.
- LEB and EWL offer scope for Park and Ride schemes.

#### LINCOLN TRANSPORT HUB

- Overdue, bus station a disgrace.

#### PARK AND RIDE

- Needed to reduce congestion.
- Not feasible as roads too narrow to provide bus lanes.
- LEB and EWL offer scope for Park and Ride schemes. Site CL1087 provides opportunity for P & R and transport interchange, including in future for rail.
- Provide P & R with incentives for workers; reduces car parking stress in city centre and stimulates spend. Safeguard the site for such use.

#### QUALITY BUS CORRIDORS

- Not feasible because level crossings always down.

#### RAIL SERVICE IMPROVEMENT

- More trains will lead to more delays on road due to level crossings being down more often. Alternatives to level crossings needed.
- New stations needed to improve access.

<p><b>PARKING STRATEGY</b></p> <ul style="list-style-type: none"> <li>• Provide ample free lockable parking places in city /town centres for motor cycles/scooters.</li> <li>• Include LCC guidance on parking for motorcycles in Motorcycle Strategy 2010</li> </ul> <p><b>SUSTAINABLE TRAVEL INITIATIVES</b></p> <ul style="list-style-type: none"> <li>• Include traffic management and calming opportunities and benefits.</li> <li>• Need for high quality cycle ways to ensure ordinary cyclists feel safe and prepared to use them. Give cyclists same priority as vehicles</li> <li>• Whilst welcomed, effects on current Lincoln traffic negligible. Cyclists will not use dual cycle-pedestrian paths and instead expose themselves to dangers on roads and cause more congestion. Many opportunities to create cycle paths away from roads but these not generally developed.</li> <li>• Include LCC Motorcycle Strategy 2010 &amp; 'Wheels to Work'.</li> <li>• 'Access Group' needs to assess realistic access for cyclists i.e. clear safe cycle lanes including Advanced Stop Lines – not usual cheap option of white lines on the road or shared use footpaths.</li> <li>• Include aspirations and achievements of Access LN6.</li> </ul>	
---	--

<b>Policy LP29 – Houses in Multiple Occupation Including Student Housing</b>	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Too many buildings in the City just for students destroying the city as a whole. Allowing high blocks that are obscuring the cathedral from many parts of the shopping areas.</li> <li>• Support the development of a variety of good quality housing options for students.</li> <li>• Best solution for managing many of the issues regarding HMOs is by having a licensing and accreditation scheme for landlords.</li> <li>• Bring in developers who will build/ rent accommodation in apartment style complexes to meet need.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

<b>Policy LP30 – Protecting Lincoln's Setting and Character</b>	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<p>General:</p> <ul style="list-style-type: none"> <li>• Support Green Wedges as set out in current Local Plan and want to see them in new Local Plan.</li> <li>• Agree special circumstances set out in policy should be only reason to grant planning permission.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



<ul style="list-style-type: none"> <li>• View of historic and world class cathedral should NEVER be interrupted.</li> <li>• Setting and views of Lincoln from West Lindsey and other areas are an important part of the landscape and should be protected strongly</li> <li>• Welcome policy. The setting of Lincoln city gains attractiveness in its' juxtaposition with the countryside.</li> <li>• Strongly object. This is an unnecessarily Lincoln centric policy. It is the villages surrounding Lincoln that are more at risk/need safeguarding from damage to their setting and context by new development. Safeguarding their setting, character and contextual relationship with the countryside should be a key objective for any policy.</li> <li>• Policy should be expanded to allow the appropriate redevelopment of the brownfield sites within the Green Wedge.</li> <li>• Fully support Green Wedges and welcome their inclusion, however these are just one tool which will help protect the setting and character of Lincoln; the setting of Lincoln is not wholly defined by the extent of Green Wedges and the two should not be conflated.</li> <li>• Development outside Green Wedges could adversely affect the setting of Lincoln and therefore require addressing. Suggest a further sentence could be added: "Development proposals outside of the Green Wedges, which negatively impact on the character and setting of Lincoln will not normally be acceptable. Proposals should...." Criteria should then be added.</li> <li>• Cross referencing to other relevant policies such as landscape and historic environment policies is also useful.</li> <li>• Strongly support this policy when it states planning permission will not be granted for developments within the Green Wedge.</li> <li>• Bullet ii): Suggest amended to read "the setting of the City of Lincoln, views into and out from it and its 'green character'"</li> <li>• Generally support, particularly bullet V which protects linked open spaces that extend out from Lincoln into the surrounding countryside, provides connectivity to the Witham Valley Country Park and protects associated wildlife.</li> </ul>	
--	--

Policy LP31 – Lincoln's Economy	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Object to the primary focus on Lincoln. Believe this to be to the detriment of regeneration and sustainability of the rest of Central Lincolnshire. The sustainability of the towns and villages should be as high as the expansion of Lincoln, Gainsborough and Sleaford.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



<ul style="list-style-type: none"> <li>• Conversion of existing farm buildings to modern office or trading use should be encouraged.</li> <li>• There needs to be a point about the cultural quarter.</li> <li>• Pleased to see that the importance of the Brayford Pool and Lincoln's waterways is acknowledged, but wording should not be used to preclude appropriate waterway-dependent development</li> <li>• Reference to the Lincoln Townscape Assessment is not relevant and should be amended.</li> <li>• Welcome and support the contents of the policy. Consider that reference to the Townscape Assessment should be included within the bullet points as it contains no specific "actions" but is relevant in relation to its character and local distinctiveness.</li> <li>• The "levelling up" of landscape quality provision is welcome, protecting the best, lifting up the worst.</li> <li>• Lincoln University is a key partner in the Lincoln Science and Innovation Park, which aims to regenerate and area on the edge of Lincoln City Centre. Believe that within the Local Plan consideration should be given to recognising the importance of the Lincoln Science and Innovation Park to the economy of the area.</li> <li>• No mention of the business community or the large business area to the west at Doddington Road which overlaps with the NK area of LN6, nor the strategic links afforded by the A46. The visitor economy is the only aspect referenced in the text.</li> <li>• Excessive numbers and concentrations of visitors – Lincoln squashes its Christmas market uphill where the streets and area is poor for pedestrians especially in the thousands. Why can't it take advantage of its pedestrianised high Street.</li> <li>• A welcome policy. One of the few areas that makes complete sense, but is compromised by LP32 – there is no definition for "natural evolution".</li> <li>• Some economic growth in Lincoln would be welcome and the importance of maintaining a variety of employment opportunities is crucial.</li> </ul>	
---	--

Policy LP32 – Supporting the Natural Evolution of Lincoln	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Recommend that areas protected from development should include statutorily designated SSSIs and non-statutory designated Local Wildlife Sites, SNCI, Local Geological Sites and Regionally Important Geological Sites.</li> <li>• Several representors support the strengthening and preservation of Green Wedges to prevent the merger of the surrounding villages with the urban expansion of Lincoln City. Used wisely, but not unduly restrictively, such measures should assist Lincoln to maintain an appropriately pastoral approach to an outstanding historic and attractive Cathedral City.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



- It is hoped that this will be addressed in the Lincoln Sub-regional Study.
- Specific suggestions have been made for the protecting and reinforcing of Green Wedges around the north, east and west of Lincoln, comment made on the thinness of the Green Wedge as it passes Nettleham and Riseholme and preventing coalescence with the North East Quadrant. Retention of the existing Green Wedge to the south and west of Nettleham, along the A15 and around Riseholme and Burton-by-Lincoln. Allocation of Green Wedge in the Greetwell areas, particularly the disused quarry. Extension of the Green Wedge from Greetwell Lane, Nettleham to the new rugby pitch area off Lodge Lane. There is also a suggestion that there needs to be a minimum 2km corridor width if protection is to be effective and to contribute to the protection of the setting and character of Lincoln and the Lincoln fringe villages.
- Concerned that elements allow for, and appear to facilitate, the removal of the protective elements from areas already protected in return for the applicants offering by way of compensation an alternative commensurate area for protection.
- Concerned about the merging of villages such as Welton/ Dunholme and Cherry Willingham/ Reepham.
- Several representors have also stated that Green Wedges should be made accessible to the public with an expansion of the footpath/ cycleway/ bridle path network. Areas in which to walk and pathways through the Green Wedges are one of the essentials for the well being of the people of Lincoln.
- Brownfield sites and extension of the City boundaries should be considered before developing land in Green Wedges and protected areas.
- Recommend that development growth be restrained within the limits of the bypass and proposed bypasses.
- Consider allocating sites where development is inappropriate such as land where its non-designated archaeological significance is high and warrants protection.
- Support the requirement for additional allocations. Support the inclusion of North Hykeham as a SUE as part of the Lincoln area as it is a sustainable settlement and a highly suitable location to accommodate further growth. Also support the allocation of sites at Bracebridge Heath, Fiskerton and Ewerby (Sleaford) as submitted on the site suggestion forms.
- Unless the traffic issues, the rail network issues and the mass developing of areas is addressed Lincoln will evolve but not into the lovely City this draft seems to be visualising.
- What does this mean? Without proper explanation it is impossible to provide meaningful observations.

Section 7.4 – Gainsborough	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Need more Gainsborough specific policies to address its specific issues in relation to the historic environment and regeneration, town centre, environmental, etc. These were included in the Core Strategy; omission in a full Local Plan of great concern. Also need Gainsborough specific portrait, vision and objectives. All of this required as part of positive strategy for the historic environment, in accordance NPPF.</li> <li>• Alongside the SHMA and SHELAA, matters such as Gainsborough's growth point status, the strong aspirations to support 3 sustainable urban extensions WLDC's promotion of brownfield sites for smaller developments and other consultation responses, particularly from the Town Council, should be used in allocating housing numbers and future employment/retail sites.</li> <li>• Petrol station to serve north of town would be welcomed.</li> <li>• Paras 7.4.1 to 7.4.5 – Strengthen references to Gainsborough's historic environment, identifying issues and opportunities.</li> <li>• Para 7.4.10 – Incorrect to say limited scope for a Local Plan to address regeneration challenges; it is a key opportunity and a requirement of NPPF.</li> <li>• Para 7.4.12 – Recognition of need for green infrastructure network welcome. Include reference to Central Lincolnshire Biodiversity Opportunity Mapping Study</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

Policy LP33 – A Growing Gainsborough	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Growth of Gainsborough supported. Brownfield sites before greenfield sites.</li> <li>• Development should be restricted to within Gainsborough's existing footprint; infilling numerous vacant spaces and empty industrial lots.</li> <li>• Whilst recognising Gainsborough is a key economic driver positive encouragement of establishing new business opportunities in rural area towns and villages needed; sustainability of towns and villages should be of equal priority to expansion of Lincoln, Gainsborough and Sleaford.</li> <li>• Principle and locations of proposed SUEs supported.</li> <li>• Policy is not consistent with national policy and ineffective in protecting mineral resources. Specific policy requirement needed to ensure Southern SUE does not sterilise Lea Marsh sand and gravel site.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



<ul style="list-style-type: none"> <li>Concerns over impact of development on areas of nature conservation importance adjacent to SUE sites. Mitigation measures needed – buffer zones, woodland management. Provision of green infrastructure corridors and natural greenspace as part of developments to significantly enhance biodiversity. Design in wildlife at masterplanning stages.</li> <li>Northern and Eastern SUEs will have negative effect on well-being of community. Instead 'Gainsborough Town Plan' will identify locations for housing development within existing urban area although acknowledged Eastern SUE may still be needed, but reduced in size. Sewerage system needs upgrading to serve SUEs.</li> <li>Past growth rates indicate further major development over and above already consented Southern Sue not needed. Distribute growth to other more sustainable locations in Plan area.</li> <li>Site selection needs to be robust. Allocations to recognise historic environment opportunities and provide details on how affected heritage assets to be addressed.</li> <li>Ensure appropriate road structure incorporated for SUEs. Provide bypass linking the 3 SUEs.</li> </ul>	
--	--

<b>Policy LP34 – Building a Better Gainsborough</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>Gainsborough Masterplan inadequate as template for development in town. Use 'Gainsborough Town Plan' instead.</li> <li>Support fast broadband to encourage new small businesses.</li> <li>Encourage small and medium businesses, afforded by opportunities emerging on North and South of Humber.</li> <li>Allocate land for economic activity as well as housing, as happens in France.</li> <li>Policy too broad brush. No reference to specific issues. Reference required to need for protection of heritage assets. However, this policy no substitute for more detailed local policy guidance.</li> <li>Maps needed to be able to assess proposed developments. If all sites in vicinity of Lea in SHELAA went ahead it would be same as current size of Gainsborough.</li> <li>Policy supported, particularly criterion 'g'.</li> <li>Broad agreement with policy. Broader mix of homes needed. Latest figures indicate deprivation not just an issue in SW Ward, others too.</li> <li>Encourage use of rail links. Open up Central Station.</li> <li>Policy supported. Support for employment, particularly manufacturing. High levels of unemployment, particularly youth.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> <li>SHELAA only identifies sites put forward <u>for consideration</u> for development, not sites to be developed.</li> </ul>

<ul style="list-style-type: none"> <li>• Develop SUEs sequentially, not simultaneously, in order for growth to be sustainable and development of infrastructure needed to be supported.</li> <li>• Policy's requirements on green infrastructure and natural greenspace supported.</li> <li>• Include references to both Gainsborough rail stations, the lack of bus service from north –west of town, serving N and E SUEs, and when new needed bus station to be built.</li> </ul>	
--	--

<b>Policy LP35 – Supporting the Natural Evolution of Gainsborough</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• The 'Gainsborough Town Plan' will revise the definition of 'Town Centre' and identify 'District Centres'</li> <li>• Consider allocating sites where development inappropriate, e.g. sites of high, but non-designated, archaeological significance.</li> <li>• Include reference to a second road bridge across River Trent beyond lifetime of the Plan.</li> <li>• Too much focus on Gainsborough. Sustainability of towns and villages should be as high a priority as expansion of Lincoln, Gainsborough and Sleaford.</li> <li>• Areas protected from development should include statutorily and non- statutorily designated biodiversity/geodiversity sites.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> <li>• The Central Lincolnshire Local Plan will be the statutory development plan, including for Gainsborough, and will provide the policies by which planning proposals are assessed by, including the identification of Town Centre boundaries and District Centres. A 'Gainsborough Town Plan' will be a non-statutory document unless its preparation follows the statutory process for Neighbourhood Plans and meets each of the legislative requirements for it to be adopted as part of the development plan for the area.</li> </ul>



Section 7.5 – Sleaford	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Could evolve in a positive way with right planning – it's also more convenient for the south.</li> <li>• Sleaford needs more recreational land and retention of Queen Elizabeth II field. Regeneration is not the same as destroying the best parts of a town.</li> <li>• Grow Sleaford more – centre of the county and could manage a larger growth.</li> <li>• Comment when site detail and specific policy requirements are set out in next version of the plan.</li> <li>• Object to proposed growth.</li> <li>• Difficult to see relevance of this plan when so much non-statutory material has already been issued and acted upon. Presumably this statutory plan will sweep all previous items, which will be reviewed where commitments have not already been made.</li> <li>• Development provide a network of green infrastructure as well as protect nature conservation sites. Wildlife should be 'designed in' during masterplanning. Developers should seek to produce a net gain in biodiversity.</li> <li>• Lack of genuine vision and based on ill-considered ideas. Proposals will prevent a better Sleaford from actually happening. More consultation is needed with people in the town because the ideas are there in plenty.</li> <li>• Sleaford Masterplan is flawed and should be abandoned.</li> <li>• Support. Regeneration and growth of Sleaford town centre is a vital part of this plan as the town is a primary settlement in North Kesteven.</li> <li>• Reference to Sleaford Masterplan and Transport Strategy supported, but need to be revisited in light of longer plan period and higher proportion of growth being directed towards the town.</li> <li>• Like to comment but mentions strategic policies relating to Sleaford and yet to find these.</li> </ul> <p>Para 7.5.1</p> <ul style="list-style-type: none"> <li>• Welcome references to historic environment attributes, including Bass Maltings.</li> <li>• Concerned no specific vision and objectives identified – required as part of positive strategy for historic environment (NPPF para 126).</li> <li>• Could be strengthened with further issues and opportunities. Quality of townscape could be improved by revitalising existing historic fabric, tackling heritage at risk, raising standard of urban design, making best use of existing landmarks, social assets and heritage assets.</li> <li>• Concerned about lack of Sleaford specific policies, as per Core Strategy, relating to regeneration, town centre, environment etc. Consider significant omission and missed opportunity.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



Para 7.5.2

- Hoped for future a more strategic approach to consequences of major expansion is adopted.
- Reference Sleaford Masterplan.

Para 7.5.3

- Update and replace with “Sleaford has very low levels of unemployment and thriving industrial estates with growing companies in food, manufacturing and engineering sectors. In recent years there has been significant growth in the wider services sector, particularly B2B, sports leisure and retail, leading to overall improvements in GVA”.

Para 7.5.5

- Would like to see informed approach to distribution of housing.
- Suspect 15% figure should be higher.
- Agree designations of SUEs appropriate way of contributing towards meeting identified need for housing and employment in Sleaford. Support locations identified which appear to be the most appropriate given the supporting evidence currently available.
- Expect site selection to be robust and any future allocations to provide details on how any affected heritage assets should be addressed as well as recognising historic environment opportunities.
- Agree may be potential need for further SUEs.
- Proposed expansion of Sleaford has implications for delivery of education and health facilities , including construction of a new secondary school, new primary schools and new healthcare facility, which come at a considerable cost to be borne in the main by new development at the SUEs and other residential sites.
- Para 7.5.6 – Will not be easy to minimise congestion. Town can’t absorb anymore cross town journeys. Tesco will increase traffic in the one way system.
- Para 7.5.8 – Include Corn Exchange in list of assets.
- Para 7.5.11 – Support this policy and consider role of Sleaford can be supported by allowing some growth in surrounding villages. Consider Ewerby presents opportunity to support growth of Sleaford and have submitted site allocation suggestion for housing in the village.
- Para 7.5.11 – Support need for other allocations as long as defined and justified assessment takes place for each to ensure sustainable use of land.

<b>Policy LP36 – A Growing Sleaford</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• Regard Sleaford South as only long term option for later expansion. Not proposal but commitment so consultation in this plan is meaningless.</li> <li>• Sleaford West – strategy to cope with surface water essential before any development takes place. Access is also an issue.</li> <li>• Comprehensive landscaping plan is essential and procedures to ensure permissions comply with it.</li> <li>• Object to focus on Sleaford as will be to detriment of regeneration and sustainability of rest of Central Lincolnshire. Other towns and villages should have same priority as expansion of Lincoln, Gainsborough and Sleaford.</li> <li>• Two identified SUEs should be developed in line with the principles outlined in the SUE policy to ensure sustainable development.</li> <li>• Once overall housing need is finalised, may be necessary that further SUEs are needed to meet housing requirements.</li> <li>• Support inclusion of Sleaford West as candidate SUE site.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

<b>Policy LP37 – Building a Better Sleaford</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<p>General:</p> <ul style="list-style-type: none"> <li>• Need overall strategic vision for the town. Should not set out a blue print that may become out of date quickly.</li> <li>• Support objectives in policy LP37 and consider many can be viably delivered through the Sleaford Masterplan and Town Centre Regeneration SPD.</li> <li>• Objectives are laudable but unobtainable.</li> <li>• Policy to reduce advertising would be helpful.</li> <li>• Restore housing uses in town centre rather than just shops.</li> <li>• Policy should require development servicing other than a quadrant of the town to be located in the town centre to encourage single trips. Some mitigation could come from requiring improvements in public transport although funding may be problematic.</li> </ul> <p>1<sup>st</sup> paragraph:</p>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



- Delete sentence starting “All development proposals should contribute....”. This has very little support in Sleaford.
- Add “have positive impact on the performance of the town as a retail and leisure destination choice for residents of the town and those settlements comprising the town’s immediate hinterland”.

Bullet a):

- Implications must be considered in the balance of all planning obligations sought and have due regard to NPPF viability guidance.
- Do not regard SERR as essential other than to serve Tesco. Conflicts with bullet e). Pedestrian bridge will wreck rare survival of Victorian station complex.
- Delete all of this bullet point.
- Whilst the footbridge would allow pedestrians to make safe transit over the railway line there is less certainty about how vehicular flows would be accommodated especially for those wishing to access premises to the north in the town centre – further clarity is required.
- Object to closure of level crossing and delivery of footbridge

Bullet b):

- Implications must be considered in the balance of all planning obligations sought and have due regard to NPPF viability guidance.

Bullet e):

- Error of fact - there is no Corn Exchange – acquired the name.
- Should include Queen Elizabeth Field and support for a sylvan walk.
- Welcome criterion e) – out of equivalent for Lincoln and Gainsborough it is the strongest policy and provides means to address more locally specific issues. Disparity between this policy and equivalents.
- Add war memorial, historic cinema building and Sleaford museum.

Bullet f):

- Welcome requirement to protect and enhance River Slea Navigation however, recommend additional guidance added relating to need for development to take opportunities to deliver green infrastructure as per point f) in policy LP23 for Gainsborough.

Bullet i):

- Object – remove “Support the development of the Sleaford East West Leisure Link”.

<b>Policy LP38 – Supporting the Natural Evolution of Sleaford</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>Consider allocating sites where development is inappropriate (para 157 of NPPF, bullet point 7). Could include land where its non-designated archaeological significance is high and warrants protection.</li> <li>Amend wording to include open space such as Queen Elizabeth II Field.</li> <li>Delete – outlines potential impacts of other policies in the plan.</li> <li>Object to focus on Sleaford. Sustainability of towns and villages should be as high a priority as Lincoln, Gainsborough and Sleaford.</li> <li>Areas protected from development should include SSSIs, LWSs, SNCIs, LGSs and RIGs.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>

<b>Section 7.6 – Development in Rural Areas</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>Concern that there are no policies supporting ‘Small Towns and Growth Villages’, many of which have historic significance, other than through generic policies.</li> <li>Site allocations will need supporting policies in order to provide the clarity required by the NPPF, including reference to any heritage assets and enhancement/mitigation where applicable.</li> <li>Local Plan needs a more local profile of issues. Central Lincolnshire very large area and policies appropriate to a village in the south necessarily appropriate to a village in the north.</li> <li>Need to understand how villages work. Not sustainable to just build more houses. Villages must keep own identities and not merge with Lincoln/each other.</li> <li>Para 7.6.1 – should refer to those villages that are already stagnating and those villages should be reviewed for potential regeneration</li> <li>Para 7.6.3 – concern over interpretation of ‘modest’ in relation to Skellingthorpe when existing level of housing commitments taken into account let alone any additional planning consents.</li> <li>Para 7.6.4 – text about commercial enterprises supported.</li> <li>Para 7.6.4 – Economic Needs Assessment will give better steer on employment growth in rural areas.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>



Policy LP39 – Development in Rural Areas	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<p><b>GENERAL</b></p> <ul style="list-style-type: none"> <li>• Policy too prescriptive/restrictive.</li> <li>• Assumed that SUEs are excluded from definition of development in rural areas – this should be stated in explanatory text.</li> <li>• Special policies needed to support growth in hamlets and small communities.</li> <li>• Allow conversion of large properties (comment does not specify residential or otherwise) in countryside into flats.</li> <li>• Allow development of ‘retirement villages’.</li> <li>• Typology and characteristics of individual villages should inform type, scale and form of acceptable development.</li> <li>• Limit development in rural areas to maintain character. Rural areas do not have infrastructure to make large scale development sustainable.</li> </ul> <p><b>PART A</b></p> <ul style="list-style-type: none"> <li>• Develop brownfield before green space and agricultural.</li> <li>• Criteria supported and should be applied to protect Riseholme.</li> <li>• Mitigation needs to be reflected more widely in the criteria.</li> <li>• Delete reference to settlement categories in title as these guided by either being named in LP2 of open countryside policies.</li> <li>• Should also cover ‘Growth Villages’.</li> <li>• ‘Other Villages’ not defined in document.</li> <li>• Policy (particularly criteria b, c &amp; d) may restrict future development required for operational defence purposes at MOD sites. (MOD)</li> <li>• Policy compromised by LP24 threshold test.</li> <li>• Hemswell’s existing developed footprint as defined in WL Local Plan 2006 should be carried forward into new Local Plan.</li> <li>• Part A redundant; LP2 sets out scales of development whilst environmental and design matters can be addressed through generic policies LP12 to LP22.</li> <li>• Combine ‘growth’ aspects of LP26 with ‘rural’ aspects of LP39 to create single policy.</li> <li>• Development at Greenman Lane, Navenby does not comply with criteria ‘d’, ‘e’, ‘f’, ‘i’, ‘j’ &amp; ‘k’.</li> <li>• Ban on ribbon development supported.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> <li>• The ‘developed footprint’ defined under LP39 is not the same as ‘settlement boundaries’, as identified in the WL Local Plan 2006.</li> <li>• The Central Lincolnshire Local Plan will replace the ‘saved’ planning policies for the Districts of North Kesteven and West Lindsey and the City of Lincoln. Unless identified as specific to a particular location, each of the policies will apply to Central Lincolnshire as a whole.</li> </ul>



- Criterion 'a': Development in Rural Area villages should be within existing footprint and not on adjacent greenfield sites, which adversely impact on character and appearance of villages and surrounding countryside. Greater emphasis on infill development as primary source of growth at 'Limited Growth Villages'. Development should not be restricted to infill in 'Small Villages' as most appropriate sites may be on edge and some may not have sufficient infill sites to meet needs; each site should be treated on its merits. NPPG states that "blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence". Policy inconsistent with concept of Plan without settlement boundaries. Defining development footprint misunderstands the loosely defined built form of some smaller villages; other criteria should provide sufficient safeguards. Remove 'or adjacent to' and 'normally'.
- Criterion 'b': Add statement that development should not reduce existing 'green wedge' between settlements.
- Criteria 'c' & 'e': These could be contradictory if primary shape and form of village is linear.
- Criterion 'd': Supported.
- Criteria 'f' & 'g': Growth at Hemswell Cliff likely to be on brownfield land but which looks like greenfield land meaning 'f' and 'g' would be problematic.
- Criterion 'g': 'Important public or private open space' ambiguous and is open to interpretation as could be argued that much open space within a settlement is 'important'; criterion could be misinterpreted and used to try and establish Local Green Space designations and prevent sustainable development in villages. Review Policy Core 9 'Retention of Important Open Spaces/Frontages' in the West Lindsey Local Plan First Review (2006) and assess open space needs. More flexibility needed; through development proposals facilities can be replaced and improved.
- Criterion 'h': Should refer only to 'significant' features with mitigation/replacement to be facilitated.
- Criterion 'i': Most of land in Plan area will be best and most versatile agricultural land and Policy needs to accept there will be loss without need for comprehensive justification on each occasion. Supported.
- Criterion 'j': How and by whom is 'risk' identified?
- Criterion 'k': Add reference to there being no adverse impact on infrastructure provided to existing home owners or any reduction in enjoyment in use of current services and facilities.

## PART B

- Amend to reflect changes to GDO in respect of facilitating reuse of buildings in countryside.



- Too prescriptive and could inhibit the viable delivery of rural housing on brownfield sites which can make a valuable contribution to local housing need.
- Protection provided by policy to viable employment sites in countryside not needed as other policies address this. Rather than protecting unviable historic employment sites need to ensure sufficient adequately serviced rural employment sites. NK Local Plan 'saved' Policy E1 adequate protection for sites not offered by Policy DC6 and the marketing test.
- Criterion 'a': No justification for either evidence requests. No definition of what represents a reasonable marketing period. Marketing test provided under NK Local Plan 'saved' Policy DC6 not fit for purpose. Replace wording with "The location of the enterprise will have a positive impact on the local economy".
- Criteria 'b' & 'c': Approach restricts development only to buildings of architectural/historic merit and with limited alteration, which is even beyond NPPF Green Belt policy requirements; policy should be flexible enough to consider re-use and redevelopment of existing building within the rural areas providing those developments have no greater material impact on the character of those rural areas.
- Criterion 'd': How will this be measured?

#### PART C

- Criterion 'b': Replace 'remarkable' by 'of any architectural or historic merit' as traditional rural buildings can be unremarkable but still make valuable contribution to landscape.

#### PART D

- Strengthen to no support with exception for during construction.

#### PART E

- Acknowledge inland waterways and the need for scope to allow appropriate water-linked development to maintain economic well-being of network and realise full potential as multi-functional community assets.
- Policy on Live/Work units needed.

#### DEFINITION OF 'DEVELOPED FOOTPRINT'

- Agricultural buildings and associated land on edge of settlements to be included to allow farmyards to be moved away from villages and redundant vernacular buildings saved through conversion.

#### ADDITIONAL CRITERIA REQUESTED

- Part A:

<ul style="list-style-type: none"> <li>- Enhancement of biodiversity within development sites.</li> <li>- Proof of 'Local Need' to prevent speculative development in small villages (not meaning Tier 5 of Settlement Hierarchy).</li> <li>• Part B: <ul style="list-style-type: none"> <li>- Retention of character and appearance of rural buildings to ensure historic merit and significance not eroded. (In addition to criterion 'c')</li> </ul> </li> <li>• Part F: <ul style="list-style-type: none"> <li>- "The development would significantly contribute toward sustainable development in Central Lincolnshire through a Stand-alone Renewable Energy Proposal in accordance with Policy LP17."</li> </ul> </li> </ul>	
---	--

Section 8.1	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Para 8.1.2 – Concern about the loss of some of the more recent SPDs and some should be retained as part of a review.</li> <li>• New SPDs on Shopfront Design Guidance and Traditional Rural Buildings and a Local List would be useful.</li> <li>• Additional West Lindsey policies should be included, namely – STRAT 1, NBE 7, NBE 8, NBE 9, NBE 10.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

Appendix A – Site Screening Methodology	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>• Broad agreement and support for site screening methodology</li> <li>• Support for inclusion of Minerals and Waste criteria</li> <li>• Local Green Space needs to be added as a criteria</li> <li>• Assessment process should be based information such as: Heritage Assets, Historic Land scape Character Assessment and the Historic Environment Records</li> <li>• Green Infrastructure should be added as a criteria</li> <li>• Must ensure there is capacity for sewerage and sewage treatment infrastructure</li> <li>• Should include Air quality and Air Quality Management Areas as part of the assessment</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



<ul style="list-style-type: none"> <li>Concerns about use of colour coding scoring system. Some criteria will carry more weight and therefore a scoring/weighting system should be applied.</li> <li>Assessment process makes no specific reference to trains, which is a sustainable form of transport</li> <li>Assessment criteria only seems to apply to housing sites, it is not clear that it also applies to employment and traveller sites</li> <li>Concerns raised that local community won't get chance to have their say at next stage</li> <li>Clarity is need about the size of site that is being assessed. Currently this is unclear</li> <li>No justification for the distance based criteria used. What the difference between 1 mile to access a doctors and 1.5 miles?</li> <li>Should not combine natural and built historic impacts as one criteria, these should be separated to avoid a clash</li> </ul>	
--	--

Appendix B – Local Green Space	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>Point 3e) should be amended from 'richness of wildlife' to read 'richness of nature' and amend supporting text to 'provides for biodiversity, geodiversity, known protected species, features and meadows.'</li> <li>Point 3e) should refer to habitats rather than just meadows.</li> <li>Geology should be added to point 3.</li> <li>Add Local Green Spaces to wherever Local Wildlife Sites are mentioned.</li> <li>Local Wildlife Sites are non-statutory designated sites and should not be included in the list of sites which cannot be included in Local Green Spaces</li> <li>Proposals received for designation of areas.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>

Appendix C – Open Space Standards	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>Offer received to work with JPU to develop open space standards.</li> <li>List of open space standards in previous local plans is incomplete and did not include Policy Core 9 or Policy Core 10 of the West Lindsey Local Plan.</li> <li>Open space designation in Grayingham requested.</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>

<ul style="list-style-type: none"> <li>• Should use Natural England's Accessible Natural Greenspace Standards.</li> <li>• Unclear as to whether the standards apply to the whole area or to each settlement.</li> <li>• 'Minutes walk' is a good measurement for distance to open space.</li> <li>• More allotments are needed in Sleaford.</li> </ul>	
--	--

<b>Appendix D – Parking Standards</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• Suitable provision of Powered Two Wheelers must be included in standards.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

<b>Appendix E – Heritage Assets at Risk</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• More up to date information is needed on heritage assets at risk, such as in a revised table from September 2013.</li> <li>• There is no sign post in the Local Plan to this appendix.</li> <li>• There will be a new National Heritage Protection Plan and the reference in the appendix will become out of date.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>

<b>Appendix F – Residential and visual impact of renewable energy schemes</b>	
<b>Summary of issues raised</b>	<b>Central Lincolnshire Local Plan Team comments</b>
<ul style="list-style-type: none"> <li>• It is unclear what the status of the types of renewable energy schemes will be and how they will be used.</li> <li>• There are likely to be occasions where heritage assets need to be assessed and this is not accounted for in the appendix.</li> <li>• The requirements of the appendix are restrictive and this is not justified.</li> <li>• There is conflict with parts of the proposed policy LP17.</li> <li>• Wording of Appendix F should be more neutral.</li> </ul>	<ul style="list-style-type: none"> <li>• Comments noted and will be carefully considered.</li> </ul>



- Requirements fail to have regard to paragraph 97 of the NPPF.
- The appendix could be considered as part of the cumulative effects element of policy LP17(a) and, as guidance, it should be less prescriptive.
- A number of suggested amendments provided.
- Wording is vague and generic and does not refer to the need to consider proposals on a case-by-case basis.
- Guidance is not necessary as it is in the Planning Practice Guidance.
- Guidance on Anaerobic Digesters should also be included – including distance from homes, odour management plans, visual amenity, noise mitigation plans, traffic plans and safety requirements.

#### Wind turbines

- Criterion b – vague and unclear and goes beyond national requirements.
- Criterion e – vague and unclear and goes beyond national requirements and is inappropriate to require. If it is to be retained it should only be applied from view points of acknowledged importance. 'Clashing blades' will be inevitable from some angles.
- Criterion f – vague and unclear and a direct line of site could be over a great distance and therefore would not be a fair design principle to impose.
- Criterion g – requirements are unrealistic as electrical infrastructure cannot be placed within the turbine structure.
- Criterion h – vague and unclear and goes beyond the requirements at the national level. The meaning of 'visual order and conformity' is unclear, as is how it will be used in determining an application.
- Criterion i – vague and unclear and goes beyond national requirements.
- Criterion j – unnecessary as the matter is dealt with at a national level.
- Criterion k – goes beyond the requirements at the national level.
- Criterion l – is unrealistic and goes beyond the national requirement.
- Criterion m – is vague and unclear and the requirements are dealt with in an EIA submitted with an application.
- Should include specific exclusion zones for wind turbines and farms such as the Lincolnshire Edge and the Lincolnshire Wolds.
- Policy should make it clear that no development with an adverse impact on the skyline will be allowed.



Appendix G – Glossary	
Summary of issues raised	Central Lincolnshire Local Plan Team comments
<ul style="list-style-type: none"> <li>Reference is made to conservation areas, but no other heritage asset. Suggest that heritage asset should be defined.</li> <li>Definition of biodiversity should be amended to change ‘plans’ to ‘plants’.</li> <li>Definition of geodiversity should be amended to read, 'The range of rocks, minerals, fossils, soils, landforms and the processes that formed them.'</li> </ul> <p>The following should be included in the glossary:</p> <ul style="list-style-type: none"> <li>Community Infrastructure Levy</li> <li>Infrastructure Delivery Plan</li> <li>Local Geological Site</li> <li>Local Nature Reserve</li> <li>Local Wildlife Site</li> <li>National Nature Reserve</li> <li>Regionally Important Geological Site</li> <li>Site of Nature Conservation Importance</li> <li>Site of Special Scientific Interest</li> <li>Special Area of Conservation</li> <li>Special Protection Area</li> </ul>	<ul style="list-style-type: none"> <li>Comments noted and will be carefully considered.</li> </ul>