



Proposed Submission Consultation: Report on Key Issues Raised

Technical Note:

This Report forms part of the Statement as required to be produced under Regulation 22(C) of The Town and Country Planning (Local Planning) (England) Regulations 2012.

Specifically, this Report covers part (v) of Regulation 22(C), which requires a statement to be produced which confirms that “*if representations were made...the number of representations made and a summary of the main issues raised in those representations*”.

The requirements under parts (i), (ii), (iii) and (iv) of Regulation 22(C) are set out in separate Reports.

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1. Introduction

- 1.1 Consultation on the Proposed Submission version of the Central Lincolnshire Local Plan took place between 15 April and 26 May 2016. The timeframe for the production and adoption of the Central Lincolnshire Local Plan is as follows:

First Draft of Local Plan for consultation (the 'Preliminary Draft')	October 2014	<input checked="" type="checkbox"/>
Second Draft of Local Plan for consultation (the 'Further Draft')	October 2015	<input checked="" type="checkbox"/>
Final Draft Local Plan for consultation ('Proposed Submission')	April 2016	<input checked="" type="checkbox"/>
Examination of Local Plan (estimate)	June – November 2016	
Adoption of Local Plan (estimate)	December 2016	

- 1.2 The Central Lincolnshire Local Plan Team wishes to thank all those who took the time to comment during the consultation on the Proposed Submission Local Plan. It can be confirmed (as required by Regulation 22(C)(v)) that **we received a total of 1,034 separate representations, from 358 separate representors.**
- 1.3 All duly made representations received during the consultation period have been logged and will be submitted (alongside the Local Plan and other documents) to the Planning Inspectorate, for examination on behalf of the Secretary of State.
- 1.4 This report (as required by Regulation 22(C)(v)) identifies the key (or 'main') issues raised during the April – May 2016 consultation on the Proposed Submission Local Plan. All comments received during the consultation on the Proposed Submission Local Plan, including those submitted via post or email, are available to view in full on Objective (our online consultation portal): <http://central-lincs.objective.co.uk/portal/>. All of the comments received in relation to the earlier Preliminary Draft and Further Draft Local Plan consultations are also available on Objective.
- 1.5 Key Issues Reports similar to this one were produced following the 2014 consultation on the Preliminary Draft version Local Plan and following the 2015 consultation on the Further Draft Local Plan: these reports are available in our library on our website www.central-lincs.org.uk (see documents LP01A and LP02A).
- 1.6 An Evidence Report was published in April 2016 for each of the 'Proposed Submission' Local Plan policies: these are also available on our website (see documents with the prefix 'PS.EVR' followed by the policy number). These Evidence Reports (as required by Regulation 22(C)(iii) and (iv)) detail how representations received during the Preliminary and Further Draft consultations were taken into consideration when finalising the Proposed Submission Local Plan.
- 1.7 **IMPORTANT CAVEAT: The summaries of issues raised as set out in this Report have been prepared by officers, and attempt, as accurately and clearly as possible and with best endeavours, to draw out the key (or 'main') issues raised by the representations. However, these summaries are only intended to act as a guide, and should not be used as a substitute for reading the full submitted representations. For the avoidance of doubt, the Inspector examining the Local Plan will receive a full and comprehensive set of all duly made representations.**

2. Summaries of key issues raised during the Proposed Submission consultation

Note: all references to section, paragraph and policy numbers are to those in the Proposed Submission (April 2016) version of the Central Lincolnshire Local Plan.

General comments on Proposed Submission Local Plan	
Summary of issues raised	
<ul style="list-style-type: none"> The following comments were logged by the respondents under the Plan as a whole, and hence summarised in this table. However, please note some of the comments are specific to individual policies, and are not always repeated in the summary of key issues for that specific policy. The majority of respondents felt that the Plan is legally compliant, although some did not, with most of those objecting stating that the Plan is not positive, justified, effective or consistent with national policy. The reasons stated by those who felt that the policy is not legally compliant included: <ul style="list-style-type: none"> The Plan fails to meet section 22(c) (4) of The Town and Country Planning (Local Planning) (England) Regulations (2012) as it has not been made clear how submitted comments to consultations under regulation 18 of the Local Planning Regulations have affected the policies and allocations set out in the Plan; The Plan fails to meet section 19 (a) of The Town and County Planning (Local Planning) (England) Regulations (2012) as the submission documents were not available to view alongside the Local Plan on the consultation portal, despite the website directing readers to the portal as the most appropriate place to make comments; It is not clear what procedures were in place to consider comments received and no direct feedback as to why comments have been disregarded; There has been a lack of publicity, specifically in relation to the Western Growth Corridor SUE in Lincoln (LP30). The following amendments were proposed to make the Plan legally compliant: <ul style="list-style-type: none"> The Joint Committee should be presented with and consider the representations submitted at earlier stages in the plan process, with clear indication of where representations have, or have not, resulted in changes to proposed policy and/or allocations; The consultation should be extended and/or run again with all the required documents published clearly on the website. The reasons stated by those who felt that the Plan is not positive, justified, effective or consistent with national policy included: <ul style="list-style-type: none"> Concern there is no policy provision for residential caravan sites other than Gypsies and Travellers. There may be a growing demand for tourist accommodation which should be acknowledged in the Plan; Concerns around how infrastructure to support growth will be funded and the pressure growth will put on existing infrastructure; The Plan should contain a site specific enabling policy for Nocton Hall, Nocton, to provide a plan led framework for the site; The Plan doesn't set out clearly how infrastructure will be augmented to accommodate significant levels of growth identified in Waddington parish. Concern around the impact of growth on existing infrastructure in the parish. Concern LP9 appears to place the onus on the developer. 	

- The following amendments were proposed to make the Plan positive, justified, effective or consistent with national policy:
 - Protection urban encroachment of Branston by identifying a Green Wedge;
 - Insert a site specific policy for Nocton Hall, Nocton.
- There were various general comments, support and objections made against the Local Plan, including:
 - Support for the Plan in relation to Bassingham village, particularly in relation to policy LP2;
 - Objection to the Western Growth Corridor SUE in Lincoln, with particular concern around flooding;
 - Support for community facilities provision in LP15;
 - The Local Plan should contain a policy for Comprehensive Development as contained within policy C7 of the adopted North Kesteven Local Plan 2007;
 - Support for LP5 in relation to Saxilby Enterprise Park and expansion;
 - Support for LP22 in relation to Saxilby, but would like further green spaces to be considered and added as identified in the Neighbourhood Plan;
 - General support in relation to LP7, LP9, LP10, LP12, LP13, LP15, LP17 and LP25;
 - In relation to LP23 and Keelby, support for the designation of the sports ground as a Local Green Space, but field to the north east of the site has been included in the site boundary and is not part of the sports ground – Policies Map needs amending;
 - Level of growth proposed could place significant pressure on the A46, particularly at the A46 Hykeham roundabout. There is no reference to any impacts on the A46, analysis of the impacts on the A46, or any potential mitigation being identified;
 - Site CL4114, Land at Glebe Farm, Market Rasen, should be included as a residential allocation as the site has been granted outline planning permission;
 - Concern housing allocated and built in advance of business development will lead to a reduction in economic well-being. Housing should only be built when the jobs are there. Land should be released gradually;
 - Numbers of people and houses are too high and need to be reduced substantially. Need to achieve a balance of economic success, jobs, housing, the environment and services;
 - Central Lincolnshire is too large an area for a Local Plan and the Plan is too Lincoln focussed;
 - There may be impacts on public transport requirements along routes entering the Nottinghamshire area. These services may need to be reviewed and may require developer contributions where significant change is proposed along the route;
 - Support for the Local Plan is reliant on completion of updates to the Water Cycle Study and Strategic Flood Risk Assessment.

Foreword, Preface and Chapter 1

Summary of issues raised

- There were various general comments, support and objections made against the Foreword, Preface and Chapter 1, including:
 - Concerns that the proposed level of growth will not be met by sufficient infrastructure improvements.
 - Concern there has been little change to the Plan since it was last submitted to the Planning Inspectorate.
 - Concern raised around the public consultation, including lack of publicity and length of time to respond (not long enough).
 - One respondent objected to the exclusion of Welton and Dunholme from the list of venues where the consultation documents could be viewed. Another expressed concern regarding the availability of the documents at a venue in Lincoln.

Chapter 2

Our Vision: A prosperous, stronger and sustainable Central Lincolnshire

Summary of issues raised

- General support for the Vision and Objectives set out in this Chapter, though mixed views on the housing growth figure of 36,960. Comments on 36,960 housing figure include that this should be a minimum level, and that this number is too high.
- The majority of respondents felt that the Vision and Objectives are legally compliant, but one respondent felt they were not, and the majority of those objecting felt that they were not positively prepared, justified, effective or consistent with national policy.
- The reasons stated by those who felt that the Vision and/or Objectives are not positively prepared, justified or effective included:
 - The Objectives fail to recognise the objectives of education needs and service infrastructure (electricity and sewage);
 - Objective 'a' housing should specifically reference new housing;
 - The minerals industry, efficient use of minerals and the need to avoid mineral sterilisation should be given greater prominence;
 - Inadequate infrastructure in the rural areas, lack of infrastructure planning and should use S106 agreements to fund local infrastructure (*note: whilst the respondent logged this comment under 2.4 Our Vision, it was probably meant as a response under policy LP12. The comment has, therefore, been summarised in this document under both 2.4 Our Vision and LP12*).
- The following amendments were proposed to make the policy positively prepared, justified and effective:
 - Reword Objective 'a' to read: "To boost significantly the supply of new housing to ensure that the future housing stock meets the needs of the Central Lincolnshire area";
 - An additional Objective should be added on minerals (see wording below).
- The reasons stated by those who felt that the Vision and/or Objectives are not consistent with national policy included:
 - Vision and Objectives do not reflect the objectives of the NPPF to "maximise" renewable energy development;
 - There should be a greater focus of new housing around transport hubs as suggested in the NPPF.
 - There is no consideration of the protection and sustainable use of minerals, which is required by the NPPF.
- The following amendments were proposed to make the Vision and/or Objectives consistent with national policy:
 - Reword Objective 'n' to read: "*To minimise the effects of climate change by **maximising** the area's renewable energy resources, reducing dependency on fossil fuels, minimise energy use, and to reduce greenhouse gas emissions from the area*";
 - Reword the Vision to read: "*A move to a low carbon economy and society will be **maximised**, but not at the expense of our **valued** landscapes and other assets*".
 - An additional Objective should be added as follows: "*To ensure that the unnecessary sterilisation of minerals is avoided*".
- Other comments on Chapter 2 included:

- The statement that Lincoln Cathedral is “one of only three tourist icons in the East Midlands” should be clarified or sourced;
- More emphasis should be placed in the Vision on Market Towns and small and medium villages;
- The Vision should mention small scale developments, up to 10 houses, and using in-fill locations and not greenfield sites adjacent to villages.

LP1 A Presumption in Favour of Sustainable Development

Summary of issues raised

- In general, most representations on this policy were supportive and felt that it met the tests of soundness.
- The majority of respondents felt that the policy is legally compliant, but one respondent felt it was not, and the majority of those objecting felt that the policy is not positively prepared, justified, effective or consistent with national policy.
- The reasons stated by those who felt that the policy is not positively prepared, justified or effective included:
 - One respondent felt the presumption will be taken as an excuse to pass planning applications in order to meet future growth targets;
 - Concern expressed that the Plan will not take full account of the need to meet the three dimensions of sustainable development, particularly the provision of infrastructure;
 - To make sustainable development decisions, need to start from the local situation and the views already given by local people. A centrist top down approach undermines the views of existing residents and makes consultation difficult.
- The following amendments were proposed to make the policy positively prepared, justified and effective:
 - The plan must be worded such that sustainable development means just that; Developments that provides growth, whilst meeting the needs of current and new residents;
 - Local surveys should be undertaken instead of relying on national information. The SHMA and OAN are at too high a level so the local supply factors are ignored.
- The reasons stated by those who felt that the policy is not consistent with national policy included:
 - The NPPF requires the Local Plan to be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements and a duty to cooperate. These two aspects largely have been ignored.
- There were various comments related to sustainable development in general, including:
 - Jobs in the three categories of villages should be discouraged to minimise car commuting out of Lincoln. Need to create sustainable growth where public transport is plentiful;
 - Business development should be concentrated in areas and along routes well served by public transport.
- One respondent raised concern that the Western Growth Corridor will encourage growth away from the Central Lincoln area and will therefore increase travelling distances and put a strain on the already limited capacity of the local transport infrastructure on Skellingthorpe Road and the A46 at the Skellingthorpe roundabout. *(Note: whilst the respondent logged this comment under policy LP1, it was probably meant as a response under policy LP30. The comment has, therefore, been summarised in this document under both policy LP1 and LP30).*



LP2 The Spatial Strategy and Settlement Hierarchy

Summary of issues raised

- The majority of respondents felt that the policy is not legally compliant, with most stating that the policy is not positive, justified or effective.
- The reasons stated by those who felt that the policy is not positively prepared, justified or effective included:
 - Over reliance on Sustainable Urban Extensions risks under delivery of housing;
 - Sustainable Futures work carefully assessed how Central Lincolnshire works – replaced by a cruder blanket approach, which applies arbitrary figures to villages;
 - Proposed capping of growth on non-allocated sites is excessively restrictive;
 - Peripheral growth around large villages risks the merging of some communities;
 - No evidence provided for downgrading of Wildsworth from a small village to a hamlet;
 - Lea village has own identity and should not be associated with the built up area of Gainsborough;
 - Potential for confusion between Lincoln Urban Area and Lincoln Strategy Area;
 - Lack of evidence to support limit on dwelling numbers under each category;
 - Concern dwelling limits could constrain development in sustainable settlements and do not allow flexibility for change;
 - Unclear what is meant by ‘exceptional circumstances’;
 - No definition of ‘local circumstances’;
 - Lack of evidence as to why Scotter was moved up the settlement hierarchy;
 - Objection to no housing allocations for medium villages;
 - There are factual inaccuracies in relation to Cherry Willingham in the Settlement Hierarchy and Growth Distribution Study;
 - Policy recognises constraints, but not opportunities, such as brownfield sites;
 - Object to inclusion of Riseholme Campus as a small village, which will undermine the University’s capital investment plans;
 - Add Walcot to small villages or policy should facilitate very limited growth under Hamlets and Countryside (1 or 2 dwellings);
 - Concern policy for large villages has no maximum. Removal of curtilage requires a maximum limit, such as 10 or 15% to prevent unsustainable sprawl.
- The following amendments were proposed to make the policy positively prepared, justified and effective:
 - Amend policy wording (LP2, LP3 and LP4) to allow a more dispersed level of growth and more permissive approach to enable a greater degree of housing growth within the villages;
 - Further work on the Five Year Land Supply Report to identify how many sites included with planning permission are likely to be developed within the five year period;
 - Reinstate Wildsworth as a small village;
 - Re-categorise Lea as a small village;
 - Include a plan showing the Lincoln Urban Area;
 - Remove limits to dwelling numbers under each category;
 - Bracebridge Heath to be included as part of the Lincoln Urban Area;
 - Allow sustainable windfall development in villages;
 - Policy wording should recognise the need for appropriate types and scale of development other than housing;
 - New text to Policy LP2 or the addition of a new Policy LP2A to deal with the ‘brownfield’ opportunities in the district;
 - Review the spatial distribution in policies LP2 and LP3;
 - Include a definition of ‘local circumstances or remove this restriction’;
 - Remove Riseholme from settlement hierarchy and control development through an allocation;



- Amend policy wording of Level 1 (Lincoln Urban Area) and Level 2 (Main Towns) to incorporate the additional words at the end of Hierarchy 3 (Market Towns).
- Amend first paragraph of point 6 to read *"..... unless otherwise promoted via a Neighbourhood Plan, these settlements will accommodate small scale development of a limited nature and the proposals will be considered on their merits. The scale of development will be restricted to that which is proposed through policy LP4 and the table which can be found commencing on page 133"*;
- Amend wording of final paragraph to read *"Very limited development will be allowed of 1 or 2 units where the site is within the established settlement boundaries and has not in the recent past been used for agricultural purposes"*.
- Some respondents felt that the policy is not consistent with national policy. The main reason was in relation to medium village and small villages criteria, which was considered by some to be too restrictive, and therefore in conflict with paragraph 55 of the NPPF.
- There were various comments supporting the settlement hierarchy and elements of the policy, including:
 - Focusing growth in larger, more sustainable settlements;
 - Limiting growth in smaller settlements, but delivering some appropriate growth.
- There were various comments objecting to the policy on the grounds of:
 - Wording under hamlets and countryside should refer to supporting infrastructure to reflect nature and extent of linear infrastructure projects;
 - Object to change to dwelling threshold for small villages from 3 to 4 – no consultation or justification;
 - Policy lacks a sequential test – exceptional sites should only be used once all allocated sites have been built out;
 - Policy fails to make clear the role of brownfield land;
 - Bassingham, should be classified as a large village – question evidence contained within the evidence report for LP2;
 - No site size for employment land is identified under large villages;
 - Concern around the removal of village curtilage lines – easy for public to understand;
 - No evidence to support criteria restricting non-allocated sites to below 25 dwellings in large villages.
- The following amendments were proposed:
 - Add *"...(including infrastructure necessary to support renewable energy projects)"* after renewable energy generation in final paragraph under hamlets and countryside.
 - Amend wording under medium villages to read: *"However, proposals may exceptionally come forward at a larger scale on sites of 25 dwellings or more, or 0.5 hectares or more per site for employment uses, where proposals can be justified by local circumstances"*.
 - Amend policy wording to read: *"These large villages will be allocated sites through the Local Plan which will deliver the anticipated growth level for each settlement. It is not anticipated that other large development sites will be delivered in these settlements unless supported by a neighbourhood plan or a similar demonstration of community support"*.
 - Amend policy wording to read: *"Proposed residential growth in Saxilby is constrained in that only one site is allocated for residential development. The Council will therefore look to approve planning applications for residential development on non-allocated sites in appropriate locations on the edge and within the village"*.
- There were comments supporting the position and/or amount of growth at the following settlements:
 - Bassingham
 - Billinghay
 - Cherry Willingham



- Cranwell
- East Ferry
- Heckington
- Heighington
- Hemswell Cliff
- Laughton
- Lea
- Lincoln
- Market Rasen
- Navenby
- Riseholme
- Ruskington
- Saxilby
- Scotter
- Skellingthorpe
- Sleaford
- Welbourn

- There were comments objecting to the position and/or amount of growth at the following settlements:
 - Bassingham
 - Bracebridge Heath
 - Glentham
 - Greylees
 - Lea
 - Linwood
 - Morton
 - Riseholme
 - Scotter
 - Swinderby
 - Waddington
 - Walcot
 - Wildsworth

LP3 Level and Distribution of Growth

Summary of issues raised

- A relatively large volume of representations on this policy, predominantly in the form of an objection.
- Objections generally fall into two camps: objections relating to the level of growth, and objections to the distribution of growth.
- A wide variety of reasoning for the objections, in terms of the tests of soundness and legal compliance.

Representations relating to the housing growth target of 36,960 (1,540 per annum):

- No demand for 1,400+ homes per year.
- 1,540 per annum is over optimistic.
- 1,540 per annum is too low – the upper objectively assessed need range should be set i.e. 1,780 per annum (*high volume of the representations make this, or a similar, point*).
- 1,540 per annum should be explicitly stated as a 'minimum'.
- Plan fails in its duty to cooperate – local survey of need is required.
- Targets are too high considering the state of the Steel Industry.

- Too much reliance on sustainable urban extensions (SUEs) for delivery. More dispersed growth is needed, with LP3 re-written accordingly.
- Not clear how backlog has been factored in.
- Support for Strategic Housing Market Assessment and Economic Needs Assessment – but not how the conclusions in those documents have been translated into plan targets.
- The plan should be more ambitious.
- The risk of building more homes than required is outweighed by the benefits.
- Higher number of houses will help maintain a five year land supply.
- Object to the fact that economic growth forecasts leads to housing growth – it is a one way street. If economic growth doesn't happen, excessive amounts housing would be provided. Needs flexibility to revise target down, if economic growth doesn't happen.
- Job growth (and therefore housing growth) unsupported by evidence.
- Land for employment growth (high) is not matched by appropriate housing land (too low).

Representations relating to the distribution of growth (*Local Plan states Lincoln Strategy Area – 64%; Gainsborough = 12%; Sleaford = 12%; Elsewhere = 12%*):

- Over-reliance on SUEs – growth should be more dispersed / re-distributed.
- Support for Lincoln Strategy Area target.
- Gainsborough too high. Some suggest it should be 10%.
- Sleaford too high. Some suggest it should be 10%.
- Elsewhere should be higher. Some suggest 16%.
- Lincoln Strategy Area should be higher. Some suggest 66%.
- Larger villages warrant specific identification within the spatial strategy.
- Sleaford is more sustainable than Gainsborough and therefore should take additional growth.
- Sleaford target should include Ewerby within its catchment area.
- Sustainability of settlements has not influenced distribution of growth.
- Lincoln Strategy Area is too large – should be drawn tighter.
- Support LP3 and inclusion of Morton in the Gainsborough area.

Other representations:

- Unclear how LP3 (a) parts (i)-(iii) will be implemented in a practical sense.
- Villages within part (a) of the Policy (i.e. Lincoln Strategy Area) should be referred to in part (a) rather than in part (d) (i.e. Elsewhere).
- Clarity needed on how five year land supply calculations will be undertaken for each district.
- Part LP3(a)(iii) should read “growth *in and around* settlements which serve, and are serviced by, Lincoln”.

LP4 Growth in Villages and Appendix B

Summary of issues raised

A number of comments were received both for and against policy LP4, including in-principle support or objection, and a large number of detailed comments about the proposed policy.

Many comments were received in relation to the tests of soundness stating that individual aspects of the policy did or did not meet the tests, and the following issues were raised:

- **Positively prepared** – the sequential test for land is not positively prepared; and the requirement for the demonstration of local community support is not positively prepared.
- **Justified** – the policy is justified as it allows for a greater amount of growth within sustainable villages; the sequential test for land is not justified; the requirement for the demonstration of local community support is not justified; and there is no justification for requiring extra validation for sites of more than 9 dwellings in medium villages.



- **Effective** – the policy is effective as it allows for a greater amount of growth within more sustainable villages; the sequential test for land is not effective in delivering the required housing need; and the policy is not effective as it does not address need.
- **Consistent with national policy** – the policy is not overly restrictive and so is consistent with national policy; blanket policies restricting growth is contrary to national policy requirements; sequential approach to prioritising brownfield land is not consistent with national policy; and requiring public support is not in accordance with national policy.

In addition to the comments relating to the test of soundness, the following issues were raised about the policy in general and about specific elements of the policy:

- Wording is too prescriptive and does not allow adequate flexibility for local circumstances;
- Queries on the clarity of parts of the policy and definitions of 'local circumstances', and 'developed footprint' for example;
- Queries about how the policy will be implemented and monitored;
- Policy is likely to constrain development on sustainable sites and takes no account of opportunities for community benefit in schemes;
- Completed dwellings should not be counted towards targets;
- Whilst gaining public support is desirable, it should not be a requirement as it is not always possible to achieve this even if the proposal is suitable in planning terms;
- Support for allowing communities to deliver additional growth and support for the sequential approach to sites;
- Availability of brownfield land in village should be one of the criteria to set growth levels;
- Distance to main settlements should be based on the settlement, not the city or town centre;
- Villages in the Lincoln Strategy area should have higher growth levels, e.g. 20%;
- Proximity to services and facilities is irrelevant if they are not easy to access without a car;
- Concerns about the difficulties in applicants being able to undertake the sequential test and suggestions that it should be based on site sustainability, not land classification;
- Identification of services takes no account of full range available and the approach is too crude; and
- Appendix B should demonstrate how the sites with permission are deliverable.

The Integrated Impact Assessment for this policy received some criticism for only considering the principle of setting a percentage level for every settlement and not the suitability of the targets in terms of demographic change, availability of services or the wider economy.

In addition to the general comments about the policy, a number of issues were also raised about specific settlements:

- **Bassingham** – support for growth level; growth level should be a minimum; growth level should be set higher; should be classed as a Large Village due to services available; and questions about the change in delivery figures in Appendix B for Bassingham;
- **Bishop Norton** – support growth level; and some information about the village is incorrect;
- **Burton and Burton Waters** – very limited facilities available and proposals should take account of this;
- **Cranwell** – support 15% growth; and it is unlikely that 8 separate sites of up to 9 dwellings would come forward in the village and so a larger site is needed.
- **Doddington** – should have a higher growth level as housing needed to support the substantial employment at Doddington Hall and the services it provides;
- **Ewerby** – growth level for Ewerby should be higher due to proximity to Sleaford and its services;
- **Fiskerton** – the growth level for Fiskerton should not have been reduced from the Further Draft Local Plan (from 35%-15%); Fiskerton is a sustainable village with good service provision; and the neighbourhood plan is currently being produced with the last consultation identifying deliver of 200 dwellings (approx. 35% growth);
- **Hemswell Cliff** – support the approach for Hemswell Cliff;



- **Lea** – the status of Lea needs to be clarified as it has a site allocated in LP50 and a growth level in LP4; growth level should take account of the high levels of sewage and surface water flooding; and should allow for a large scale development to boost the village;
- **Morton** – policy does not address how housing need in Morton will be delivered;
- **Riseholme** – support growth levels in Riseholme; and limiting growth in Riseholme to 15% will significantly inhibit the university's future investment, contradicting the Employment Needs Assessment;
- **South Hykeham** – growth level should be higher; sustainable location; and development of more than 9 dwellings would not harm character and would support services;
- **Swinderby** – additional wording should be added about the unique position of Swinderby, in relation to available brownfield site; and
- **Welbourn** – support 15% growth but should be a minimum; and questions about the deliverability of the dwellings with permission.

Comments were also received in relation to Large Villages in this policy, but they are not covered by it.

LP5 Delivering Prosperity and Jobs

Summary of issues raised

- A relatively large number of representations were made to this policy, with a mixture of support and objection, and a mix of representations against generic policy aspects and against specific sites allocated in (or omitted from) the policy.
- Objections varied as to which tests of soundness/legal test had not been met.

Representations against the principle of the policy and the criteria based elements of the policy:

- A few representations welcomed the policy, felt it was in conformity with national policy and overall 'sound'.
- Supporting text should make cross reference to the need to comply with LP21, given the presence of Local Wildlife Sites within and adjacent to Established Employment Areas (EEAs) and Sustainable Urban Extensions (SUEs).
- It is urgent we stop employment commutes.
- Concern at blanket requirement for 12 month marketing in relation to loss of employment sites. Suggest this requirement is removed.
- Existing businesses should be encouraged to expand, even if outside allocated areas - suggested text given.
- Local surveys need undertaking to develop true 'need' upon which the plan targets should be based – current use of central data is flawed.
- The growth aspirations for employment land are welcomed and accord with the National Planning Policy Framework – though the level of housing in LP3 needs to increase to stimulate this growth and ensure sustainable commuting patterns.
- Central Lincolnshire should be ambitious, but realistic, about delivering prosperity and jobs and should therefore plan for appropriate houses to support higher growth.
- Question whether employment land is located on too few, too large sites in the wrong locations.
- Appraisal process for sites is purely quantitative. It lacks qualitative approach. Approach not reasonable or transparent.

Representations against specific sites (or omission of sites):

- Network 46, Camp Road – support allocation
- Hemswell Cliff SES – support allocation
- Outer Circle Road (E11) and LN6 Industrial Area (E18) – support allocations

- Local Employment Sites should be mapped – otherwise a greater risk they will be lost
- EEA in Heckington (site E28 on Inset map 16) should be reduced in size, to allow adjacent cemetery to expand
- Western Growth Corridor SUE should be predominantly an employment site
- SUE employment figures should be amended to be 'up to' targets, deliverable subject to market demands
- Strongly object to site E11 – Outer Circle Road being allocated as an EEA for B1, B2 and B8. The site is designated a district mixed use centre in adopted local Plan (1998)
- Objection to Waterside South (Ruston Works) as an EEA – should be allocated as a regeneration and opportunity area under LP35
- Object to the lack of any allocated employment sites in Skellingthorpe – suitable land for this village is submitted
- Continue to object to designation of Moorland Industrial Estate EEA (E15). Given current retail (A1) uses, there is no justification for it to be an EEA.

LP6 Retail and Town Centres in Central Lincolnshire

Summary of issues raised

- One respondent expressed support for policy LP6.
- One respondent felt that while the policy was legally compliant, it was not positively prepared, justified, effective or consistent with national policy stating that whilst they supported the requirement for new centres as part of the SUEs, they consider that small scale retail development should not be subject to onerous Retail Impact Assessments, should be treated flexibly and should be appropriate in scale and location to the need of the area they serve.
- Another also felt that whilst the policy was supported in principle, it was not positively prepared, justified, effective or consistent with national policy as they felt that the former bakery site off Wragby Road, Lincoln should be retained in the Wragby Road District Centre.
- One respondent felt that while the policy was legally compliant, it was not justified or consistent as they considered the floorspace threshold for an impact assessment had been set too low. They suggested that a minimum threshold of 1,500m² should replace the proposed 500m² which they thought reflected the existing role, function and vitality and viability of the City Centre.

LP7 A Sustainable Visitor Economy

Summary of issues raised

- Only 4 representations were made in relation to this Policy. Of these representations, 2 respondents felt that the policy is not positively prepared, justified, or consistent with national policy, while 3 respondents consider the policy not to be effective.
- Specific matters raised included:
 - Concern that there is no policy provision for residential caravan sites in the Local Plan other than for Gypsy and Traveller accommodation: suggestion that any such applications are considered using the criteria identified in policy LP56.
 - Concern that while policy LP7 may be appropriate for many existing and new cultural and leisure facilities which are urban based, there are large parts of Central Lincolnshire with tourist potential which are rural in nature.
 - Concern that the policy fails to recognise that certain visitor facilities are location specific, such as those relating to a particular heritage asset, landscape or ecological interest feature. In these locations the onus should be on demonstrating that there is a need for the development (i.e. in order to deliver anticipated economic/social/environmental

benefits) rather than on demonstrating that urban areas are unsuitable: alternative wording suggested.

- Objection that the policy does not properly acknowledge that some longstanding and established tourist facilities, such as Market Rasen Racecourse, are already located outside the settlements. Concern that the starting point for any development within the Racecourse is 'negative': suggestion that policy CRT7 as included in the West Lindsey Local Plan (2006) be reinstated, with amendments.

LP8 Lincolnshire Showground

Summary of issues raised

- Hemswell Parish Council welcomed plans to include the business park with the Lincolnshire Showground.

LP9 Health and Wellbeing

Summary of issues raised

- 6 representations were received in relation to this policy. Half of the respondents consider that the policy is not positively prepared or justified, and the majority deem it not to be effective (5 respondents) or consistent with national policy (5 respondents).
- Specific matters raised include:
 - Infrastructure contributions from developers tend to be 'bricks and mortar' biased which are unlikely to resolve the shortfall in medical support: health care is not a market driven resource, it is finite.
 - The Woodland Access Standard (WAS_t) is still not being acknowledged. Easily accessible woods close to residential areas provide measurable benefits: they encourage people to exercise; help reduce the mental stresses of modern society; improve air quality and reduce respiratory diseases.
 - It is not in clear how this policy will be implemented: concern that the policy will become an additional burden on developers and be used by other statutory authorities such as the National Health Service to replace some of their primary functions.
 - Concern that health infrastructure is not on the Central Lincolnshire Authorities Draft Regulation 123 List and therefore there are limits on the pooling of obligations towards health infrastructure.

In relation to the Health Impact Assessment (HIA) requirement:

- Concern that a HIA is unlikely to incorporate specific local concerns given the top down methodology of the NPPF.
- It is not clear when or what will be required for HIAs: concern that this requirement will only add to the costs of bringing sites forward and will become a major deterrent to the investment. Suggestion that the policy should merely make reference to major developments making provision for such facilities within Masterplans such that appropriate sites can be integrated into overall developments in the right locations.
- Policy will certainly have a policy cost implication (the Central Lincolnshire Local Plan and Community Infrastructure Levy Viability Study (2016) identifies that Policy LP9 will 'possibly' have a policy cost implication on development): the threshold for the requirement of a HIA is too low and the costs should be considered in combination with other standards in the Local Plan. For a development of only 25 dwellings, or 0.5 ha of non-residential development, this is an onerous requirement.



LP10 Meeting Accommodation Needs

Summary of issues raised

- The majority of respondents feel that the policy is not justified or effective. There were mixed thoughts on whether the policy is positively prepared and consistent with national policy. Numerous representations expressed explicit support for the policy.
- The key issues raised by respondents were:
 - Local Planning Authorities' should have regard to the phasing of development when granting planning permission to assure that new service or infrastructure provision keeps pace with development.
 - Support for the intention of the policy, but objection to the specific requirements. View that the requirement for new residential development to maintain, provide or contribute to a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities should not be too prescriptive and that account should be taken of the local area characteristics and market demand. Need to carefully consider priorities if viable housing development is to be achieved.
 - Support for aspiration to secure specialist accommodation need and the fact that that the policy contains an element of flexibility, but belief that it should also allow for an exemption on grounds of viability.
 - Some support for the requirement for proposals for 6 or more dwellings to provide 30% of the dwellings to M4(2) (accessible and adaptable dwellings) of the Building Regulations. However, there were also objections to the 30% M4(2) requirement on the following grounds:

Viability:

 - The requirement is punitive and will add unnecessary cost to developments which could affect overall scheme viability and ultimately deliverability.
 - There has been insufficient evidence produced to justify such an inclusion: the costs of such provision will have a detrimental effect on viability.
 - Policy should allow for an exemption on grounds of viability.

30% requirement:

 - It is not clear where the 30% proportion has been derived from.

LP11 Affordable Housing

Summary of issues raised

- 28 representations were logged against this policy. Of the respondents that commented on the four tests of soundness, 6 considered the policy to be positively prepared, 3 deemed it justified and 3 consistent with national policy.
- There was some support for the policy, though many representations raised concerns in relation to viability, deliverability and recent changes to national policy.

The key issues raised are summarised below:

- The term affordable housing is not clearly defined.
- It is important that the Council consider the delivery of new forms of affordable housing, including affordable rent to buy, which have the potential to improve overall development viability.
- During the plan preparation period the Government has launched an unprecedented assault on the future provision of affordable housing that threatens the future of sustainable communities, particularly low waged rural communities.
- If the national policy review prevails then affordable housing may not be able to be retained in the affordable sector in perpetuity, undermining the original intention of the policy and displacing the households that the policy was intended to protect. To counter this, the LPA's

could levy a significant infrastructure contribution to such sites that might come forward with some of the proceeds being used to fund affordable housing in perpetuity in the village, perhaps by funding the acquisition of existing property to be held in trust.

Starter homes:

- Policy is currently silent on the provision of starter homes: the policy should acknowledge the imminent inclusion of starter homes and as such provide greater flexibility in terms of the tenure mix for the site.

Viability:

- The flexibility which allows for negotiation where the affordable requirements constrain the viability of development proposals is welcomed. Without this allowance for negotiation a number of development schemes could be put at risk, compromising the ability of the plan to deliver the housing target identified.

Deliverability:

- Some of the housing allocations within the Local Plan already have the benefit of planning permission with legal agreements requiring less affordable housing than the policy LP11 position. These sites all include delivery in the first five years which means, in reality, the Plan will deliver much less than the 911 required by the Strategic Housing Market Assessment.

4 dwelling threshold/ national policy:

- The threshold of four dwellings is too low and should be revised upwards.
- Recommend threshold is changed to 10 dwellings in light of the Housing & Planning Act 2016, other recent Government consultations and the Court of Appeal judgement on The Secretary of State for Communities & Local Government v West Berkshire Council & Reading Borough Council.

Percentage requirements:

- The identified thresholds of 15% affordable housing provision within the Sustainable Urban Extensions (SUE's) and 20% affordable housing provision elsewhere are fine in themselves, but at all times must be subject to viability testing / assessment, particularly given that Community Infrastructure Levy will be in place for much of the Plan period.
- Dependent on the outcome of the Community Infrastructure Levy and other policy requirements such as LP12, the target percentages may require amendment.
- The target levels of affordable housing provision are realistic and potentially deliverable. However, the Policy needs to be more explicit in expressing the affordable housing percentage as a target: suggested wording "b. Where a site qualifies for affordable housing, the target percentage sought will be up to..."
- In isolation the percentages requested appear achievable and are broadly in line with what we have delivered on recent schemes. The proposed introduction of starter homes into the affordable housing definition may well assist the ability to achieve these targets.
- The amount of affordable housing sought should be higher: 47% of housing needs to be affordable, so seeking only 15%-25% is never going to be sustainable. Less is requested from the SUE's with big multi-national developers, and more is requested from our smaller, local developments: the evidence from the CIL report is that the developers can afford more.
- Affordable housing requirement is extremely high and as a proportion of overall housing need is not considered to be deliverable against the backdrop of infrastructure requirements, other site constraints and local market conditions.

Allocation of additional housing sites:

- There is an identified need for 17,400 affordable homes, representing 47% of the total proposed housing requirement yet only 15% - 25% of affordable housing provision will be achieved from Section 106 contributions due to viability constraints. As set out in the NPPG,



an increase in the total housing target should be considered where it could help to deliver the required number of affordable homes.

- Policy not consistent with national policy threshold of more than 10 dwellings and must be modified accordingly. Such a policy change will have additional implications for the effective delivery of sufficient affordable homes to meet the needs identified in the Strategic Housing Market Assessment: a greater number of sites delivering more than 10 dwellings must be identified/allocated given that the policy shift will result in no affordable housing contribution arising from sites of less than 10 dwellings.

Exception sites:

- Suggest extending this policy so that Affordable Exceptions Sites can be permitted not just in rural areas but in other settlements in the Central Lincolnshire area as well.
- Welcome the reference to the use of cross subsidy schemes within this policy but would strongly argue that this does not need to be limited to rural affordable housing and is equally applicable to exceptions sites on the edge of any settlement within the district.
- Policy includes stipulations that provision of rural affordable housing sites will only be acceptable where there is a 'desire' for affordable housing and where there is 'local support for the scheme'. Such policy restrictions will have a constraining effect on the delivery of rural affordable housing sites: policy should not seek to limit supply by considering subjective matters such as local support.
- The wording of the rural section is unacceptably vague, and a clearly defined numerical cap should be set out to limit the scale of 'enabling' market housing development.

Local priority:

- Need should be provided for in a manner that responds to the immediate local need as a priority. A cascade requirement should be embodied in the draft policy to ensure that it is sound.
- Affordable housing should be provided flexibly across the tenure range (social, affordable and intermediate) rather than, as set out, through mechanisms to ensure the highest priority need is met first.

Offsite provision:

- Welcome the recognition that there may be circumstances when it would be more appropriate to provide affordable housing on an alternative site or acceptable to pay a fee in lieu of onsite provision.

Community Infrastructure Levy (CIL):

- There is an identified discrepancy between the recommendations of the viability assessment (for 20% affordable housing provision / CIL charge of £20 per square metre in Lincoln and 15% affordable housing provision / CIL charge of £15 per square metre elsewhere) and the proposed Draft CIL Charging Schedules (which include figures of £30, £25 and £20 per square metre). Such proposed CIL charges combined with Policy LP11 means compliant levels of affordable housing provision are not viable.
- Policy concerns based on the Central Lincolnshire Plan Viability and Community Infrastructure Levy Study:
 - Paragraph 6.3.18 of the viability study includes for a plan wide threshold land value of £85,000 per gross acre. This is significantly lower than the figures paid in recent land transactions.
 - The study includes for an external works cost of 10% of build costs: 15% is a regularly accepted standard.
 - The developer profit level is too low at 17.5%: 20% is an industry wide acceptable figure.
 - Local Plan should acknowledge the strategic nature of the Peter Brett Associates viability study and that the study should not be used on a site specific basis: this point is acknowledged in paragraph 9.5.2 of the Viability Study.



Ministry of Defence:

- The amendments made to Policy LP11 appear to have been made in line with the comments provided on behalf of the MOD during the previous round of consultation in 2015 and therefore these changes are supported.

LP12 Infrastructure to Support Growth

Summary of issues raised

- The majority of respondents felt that the policy was legally compliant.
- Network Rail (Infrastructure) Ltd welcomed recognition that infrastructure cannot be improved by statutory undertakers alone;
- Anglian Water support the requirement to demonstrate that sufficient infrastructure capacity is there, or can be there, to serve the development, and support the need for development to be phased to ensure the timely provision of infrastructure.
- Although considering the policy to be legally compliant, some feel that it is not positive, justified, effective and/ or consistent with national policy. The reasons stated included:
 - CPRE expressed concern that relatively low house prices and high infrastructure costs will result in many developers negotiating little or no contribution on viability grounds, rendering the development unsustainable, and should therefore be refused;
 - Partner agencies and service providers should provide necessary infrastructure. Mitigation by developers should be assessed more locally: there is no justification to provide more strategic requirements such as surgeries or schools;
 - Should be no potential double charging: the assumptions for infrastructure requirements and costs in Community Infrastructure Levy charges were questioned;
 - A funding shortfall for the identified infrastructure requirements has been identified and it is important to identify how this funding gap will be overcome.

The following amendments were proposed:

 - If the LPA is minded for strategic reasons to grant planning permission with reduced developer contributions then there should be a hierarchy of contribution with a ranked funding priority: flood mitigation in an area of flood risk; sustainable transport; affordable housing provision; education (for relevant dwelling types); health care facilities; habitat retention, creation and management; road and highway improvements; open space and play (dwelling type dependent); and sports facilities.
 - One respondent highlighted that the Peter Brett Associates Viability Study suggested that LP12 be reworded as so:

“The infrastructure delivery assessment takes account of infrastructure both development specific and that arising as a result of the cumulative impact of growth and adopts relevant developer funding mechanisms to support the delivery of these.”

The respondent considered that the policy should be amended to state:

“Development proposals must consider the infrastructure implications of the scheme which are directly related to the development.”;
- The finalisation of the policy needs to be seen in the context of the overall debate incorporating the Community Infrastructure Levy, Infrastructure Delivery Plan and any Supplementary Planning Document.
- Of those that did not consider the policy to be legally compliant, some feel that it fails to meet the tests of ‘soundness’. The reasons stated were:
 - Strategically important land for infrastructure is not identified, designated or safeguarded, particularly park and ride sites for Lincoln and it is therefore not positively prepared to meet known infrastructure requirements;
 - The government has given developers significant powers to provide housing by relaxing the need for them to provide many of the traditional “extras” such as open space,

affordable housing, transport provision, highway upgrades and education facilities which means that there is now little scope to provide community benefits;

- An explanation for the different urban/ rural rates for developer contribution and how CIL/ developer contributions monies will be used to improve infrastructure in the rural areas is not given.

The following amendments were proposed:

- Central Lincolnshire and North Lincolnshire authorities should liaise on proposed developments and their impacts;
 - Section 106 agreements should be used to fund local infrastructure development;
 - Alternative Scotter sites, such as CL1454 are much nearer to existing education and health facilities and therefore more likely to receive developer improvements. A local Strategic Housing Market Assessment should be undertaken rather than the umbrella one that drives the proposed submission.
- The Environment Agency support the policy as it states that “planning permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the necessary requirements arising from the proposed development”. It does express concerns that, where adequate infrastructure planning is not forthcoming, a lack of infrastructure planning and the time required to implement the necessary measures could result in environmental limits being exceeded.
 - One respondent agreed with the policy, but felt that it should be more prescriptive and specifically say that funding for roads and associated infrastructure funding should be allocated before permission is granted, so as to prevent developers avoiding providing infrastructure for large development by piecemeal breakdowns.
 - One respondent strongly supported the requirement to ensure development will only take place where it can be supported by adequate infrastructure but consider that the emerging Community Infrastructure Levy and section 106 agreements will render the Infrastructure Delivery Plan unworkable, given Planning Policy Guidance constraints on the use of s106 agreements and possible issues with viability. Considered that the generation of adequate funding for essential growth related infrastructure has not been demonstrated (particular reference made to the Lincoln Eastern Bypass and SEQ).
 - It was felt that “locally” should be incorporated with an explanation as to what is meant by “local”.
 - One respondent whilst supporting the plan and considering it to be positive and justified, felt that traffic planning was a crucial aspect of the plan and a relief road into Lincoln to reduce traffic on Tritton Road is absolutely necessary for the Western Growth Corridor. Another respondent also expressed concerns about the traffic implications of development in the Western Growth Corridor area without significant investment in roads, public transport and schemes such as park and ride.
 - One respondent felt that phasing of infrastructure was key to successful development.
 - It was considered by one respondent that the wording of paragraph 4.6.9 is so important that it should be included in the policy wording, to ensure that developers are fully aware of their responsibilities from the start.
 - The Home Builders Federation did not feel that the policy was positive, justified, effective or consistent with national policy, stating that it should be clarified that there will be no extra financial burdens imposed by the Supplementary Planning Document.
 - One comment stated that there was inadequate infrastructure in the rural areas and a lack of infrastructure planning.



LP13 Accessibility and Transport

Summary of issues raised

- The majority of respondents felt that the policy was legally compliant. However, of those, two did not think that it was positive, justified, effective or consistent with national policy and Network Rail whilst supporting other points, did not feel that it was effective.
The reason stated included:
 - Concern regarding the requirement for all new development to ensure allowance is made for low and ultra-low emission vehicle refuelling infrastructure, the effect of this on viability and lack of clear guidance on its implementation;
 - Suggestion that all development proposals are required to make a contribution to transport related infrastructure as it was felt that this should only be requested where it is necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development; and
 - Safety issues related to increased use of level crossings is not considered.
 The following amendments are proposed:
 - Remove bullet point d. from the policy;
 - Reword the policy to make it clear that contributions will not be required for all proposals and that any measures will only be required where appropriate, necessary, relevant to the development and viable; and
 - Add "... and, wherever possible, a reduction in the number of railway level crossings in the Plan Area." To the end of LP13 bullet point f.
- Two respondents felt that the policy was not legally compliant, one feeling that it was not positive, justified, effective, consistent with national policy or compliant with duty to cooperate, while the other felt that it was not positive, justified or effective.
The reasons stated included:
 - Strategically important land for infrastructure is not identified, designated or safeguarded, particularly park and ride sites for Lincoln and is therefore not positively prepared to meet known infrastructure requirements;
 - The two proposed allocation sites in Scotter are unacceptable on highway grounds; and
 - To abandon a Scotter bypass for the future is short sighted and not in the long term interests of the Scotter community; and
 - Central Lincolnshire and North Lincolnshire have a duty to cooperate and should liaise and consider the impacts on those communities along the A159, particularly given the 6,000 homes planned at Lincolnshire Lakes.
 The following amendments were proposed:
 - Alternative sites such as CL1454 in Scotter are proposed as a safer alternative and CL1456 and CL4674 should be avoided; and
 - Central Lincolnshire and North Lincolnshire authorities should liaise on proposed developments and their impacts.
- Caistor Town Council did not consider the policy to be positive or effective and put forward the case for the need to provide a Caistor Western Relief Road which had been previously identified by Lincolnshire County Council and is listed as an aspiration in the Caistor Neighbourhood Plan. They were of the view that it would protect historic Caistor and the regenerated town centre, cater for identified expansion of the town and allow for expansion of the industrial estate thereby increasing local employment. However, another respondent felt that a Caistor bypass from Brigg Road to the A46 between Caistor and Nettleton could not be provided without causing problems and made detailed alternative suggestions.
- One respondent did not feel that the policy was positive, justified or effective as it did not set aside land specifically for a park and ride in the Lincoln area potentially losing the opportunity forever.

- One respondent felt that the policy was positive and welcomed reference to bus travel and increased access via bus thereby reducing congestion and fumes for other road users in the city centre.
- One respondent felt that whilst encouraging alternative means of transport was laudable, the inevitable reliance on private vehicles was noted and the requirement for developers and planners to take this into account when submitting plans welcomed.
- One respondent welcomed the recognition of the rural nature of the area and the flexible approach suggested in relation to parking and considered a more site specific approach to be more appropriate.
- One respondent felt that following latest government guidance, better parking provision should now be included and also suggested that “Sleaford or Gainsborough” needs to be added to bullet point m. which requires development proposals to assist in bringing forward one or more park and ride facilities in the Lincoln area.
- Two respondents strongly supported bullet points c., g., o., p. and q. in the policy, welcoming the emphasis on the provision of “well designed, safe and convenient” access to cyclists and stated that the gaps in the existing cycle routes need to be completed. However, one did suggest that further details would be welcome regarding “well designed” and “safe”, such as:
 - a minimum width for on-road cycle lanes;
 - all cycle lanes being free from street furniture,
 - parking cars on cycle lanes should be a punishable offence,
 - provision of cycle parking must be increased; and
 - cycle racks must be an adequate quality.
- One respondent did not feel that the policy was justified, effective or consistent with national policy in relation to the proposed allocation site at Willingham Road, Lea which was not felt to meet the sustainability requirements set out in the policy. The respondent suggested removal of the proposed site allocation. *(Note: whilst the respondent logged this comment under policy LP13, it was probably meant as a response under policy LP50. The comment has, therefore, been summarised here, but has also been noted under policy LP50).*

LP14 Managing Water Resources and Flood Risk

Summary of issues raised

- The majority of respondents felt that policy LP14 was legally compliant although two felt that it was not effective, consistent with national policy or compliant with duty to cooperate and one felt that it was not positive, justified, effective or consistent with national policy. The reasons stated include:
 - The allocation of so many housing sites in areas at risk of flooding;
 - Trees and woodland should be acknowledged for their potential contribution to positive water use change, combating climate change, flooding, soil erosion and improving the effectiveness of SuDS whilst also contributing to other objectives; and
 - Although supporting the principle of SuDS, clear guidance needs to be given with clear working practices, viability needs to be acknowledged more and there needs to be a greater degree of flexibility for future maintenance.
 The following amendments were proposed:
 - Acknowledge the role that trees and woods planted in appropriate locations make to managing flood risk;
 - Add “or unviable or not in keeping with the proposed design” to the end of bullet point k.; and
 - Add “or Management Company/ Registered Provider” to the end of bullet point Q.
- Two respondents felt that the policy was not legally compliant, feeling that it was not positive, justified, effective, consistent with national policy or compliant with duty to cooperate. One objected to the proposed site allocations in Scotter and felt that, for flood risk reasons, other sites should be identified away from the river, while the other felt that the WGC should not be

developed and development sites found elsewhere in the Lincoln area. *(Note - whilst the respondents have logged their comments under LP14 Managing Water Resources and Flood Risk, their representation question specific site allocations and were therefore probably meant as a response under LP30, LP48 and LP52. The comments have, therefore, been summarised in this document under both LP14 and the relevant site specific policies.)*

- The Home Builders Federation whilst not stating whether they felt the policy was legally compliant or not, felt that the policy was not positive, justified, effective or consistent with national policy. The reason stated being that there is insufficient evidence to justify the higher optional standard for water, whether all or part of the area is subject to water stress and the cost not being included in the latest viability testing.
- The EA generally support the policy and welcome incorporation of previous comments. They support the inclusion of the optional water efficiency standard which reflects evidence previously submitted by them showing the Central Lincolnshire authorities located in a water stressed area and they support reference to the Water Framework Directive as a relevant policy consideration in bullet point h. They support reference to fluvial flood risk but feel that the reference to climate change should be strengthened by inclusion in bullet point a. and suggest consistent wording between bullet point b. and the supporting text for clarification.
- Anglian Water note the need for a Water Cycle Study review and their continued work with the Local Plan Team. They have expressed support for the requirement for adequate foul water treatment and disposal to exist or be provided in time to serve the development, support the requirement to use SuDS, support restricting the disposal of surface water to combined or surface water sewers where it is demonstrated that there are no reasonable alternatives and support the optional water efficiency standard being applied within the Central Lincolnshire local Plan area.
- One representor expressed disappointment that the Lincoln Western Growth Corridor Technical Working Group Flood Risk Report is not referenced and an explanation sought as to why it has been excluded. They also felt that the statement requiring the incorporation of SuDS at an early stage of the development process in the supporting text was inconsistent with the policy stating “unless they can be shown to be impractical” and that “impractical” needs to be explained.
- One representor supported the policy, feeling that it is vital that everything be done to encourage sensible water use and that the fragile nature of our water supply be taken into account. They suggest requiring porous surfaces for parking areas and expressed concern regarding possible hydraulic fracturing to the north of Lincoln.
- One representor felt that no increased risk of flooding was acceptable.
- One representor stated “flood risk policy should include a provision that where development poses a flood risk potential, an in-principle assessment has been prepared, prior to the land concerned being included in the Local Plan showing that no such risk exists for the lifespan of the proposed development. Policy LP44k relates.”

LP15 Community Facilities

Summary of issues raised

- Two representors, whilst considering the policy to be legally compliant, do not consider it to be positive, justified, effective or consistent.
The reasons stated are that:
 - the policy is too wide ranging and insufficiently prescriptive;
 - the policy does not take sufficient account of viability;
 - the requirement for facilities to have a robust business plan and governance arrangements is onerous;
 - the Developer Contributions SPD or Infrastructure Delivery Plan are not referenced (although it is questioned whether they would provide any further details); and



- the approach to community facilities throughout the Local Plan, Developer Contributions SPD and Infrastructure Delivery Plan is inconsistent and needs to be clarified. The following amendments were suggested in order to make the policy positive, justified, effective and consistent:
 - make specific reference to viability as part of the policy requirement; and
 - remove criteria i. from the policy.
- One representor felt that the policy should explicitly state that the provision of new or upgraded community facilities as part of a new development will be viewed as a positive benefit in favour of the development, to be weighed in the planning balance when determining applications.
- Sport England supports the inclusion of a policy that recognises the value of community facilities and presumption in favour of retaining existing facilities. However, they do not consider the policy to be justified, effective and consistent with NPPF para 74, particularly criteria a. to c. as it implies that an alternative replacement may be acceptable even if there was no evidence to demonstrate that the facility was surplus and there is no requirement to replace it with an equivalent or better facility. They also seek clarification about how policy LP15 is to be implemented alongside LP23 and LP24 and noted that 'open space' is now no longer expressly mentioned but outdoor sports pitches and other sports facilities are nevertheless understood to be classified as community facilities. They suggest further discussions to agree rewording.

LP16 Development on Land Affected by Contamination

Summary of issues raised

- No representations received.

LP17 Landscape, Townscape and Views

Summary of issues raised

- Nine representations were received in relation to this policy: several respondents considered that the policy is not positively prepared, justified, effective, nor consistent with national policy.
- The key issues raised were:
 - Concern that given that one of the Local Plan objectives is 'employment for everyone', this policy might be employed by developers to argue for new development which would harm the function, character or tranquillity of the countryside. Development should be resisted unless it can demonstrate that it '*meets the sustainable development needs of the area in terms of economic, community AND environmental benefits for Central Lincolnshire*'.
 - Consider it unnecessary for the sole policy within the Local Plan which deals with landscape to also refer to heritage given Policy LP25. NPPF paragraph 113 requires local planning authorities to set criteria based policies against which proposals for any development on or affecting landscape areas will be judged, with distinctions being made between the hierarchy of international, national and locally designated areas. Policy LP17 as worded does not do this and would appear to give the same level of weight to effects by proposals on the Lincolnshire Wolds AONB, Areas of Great Landscape Value and other areas of landscape which are not specifically identified for protection on a local/ regional/ national level.
 - "...and upon Lincoln's historic skyline": this is a weak statement.
 - Policy is very general: while there is mention of Areas of Great Landscape Value and The Wolds, there is no area-specific information concerning the landscapes of West

Lindsey, Lincoln or North Kesteven. Areas of Great Landscape Value are not even identified by name on the Policies Map. Suggestion that LP17 should refer to Appendices that present abbreviated landscape character assessments for West Lindsey, Lincoln and North Kesteven which include a general characterisation of the topography of the area; discuss the key characteristics of the general landscape; and identify specific Areas of Great Landscape Value that require a higher level of protection.

- Acknowledgment that the Local Plan includes a number of development management policies (including the landscape): agreement with the inclusion of these policies, but concern that they are not fully consistent with the presumption in favour of sustainable development because they do not expressly explain that some harm can be acceptable in circumstance where the identified harm (even following mitigation) is outweighed by the benefits of the development.
- Site CL416: object to site allocation as Area of Great Landscape Value (AGLV) shown on Inset 1 'City of Lincoln' of the Proposed Submission Policies Map is disputed.
- It is not always going to be possible to be able to preserve or enhance key local views. The emphasis should be changed to make sure that it is accepted that there may be some affect, but attempts should be made to minimize the impact on local views and vistas.

LP18 Climate Change and Low Carbon Living

Summary of issues raised

- Few responses were received in relation to this policy: of the limited responses, the majority feel that the policy is not effective or consistent with national policy.
- Key comments made / issues raised include:
 - Support for policy.
 - Suggestion that to ensure that Policy LP18 is sound, the policy needs to include reference to viability and incorporate the flexibility for planning applications to be considered on their merits, having regard for the nature and scale of development and the level of carbon reducing measures that may be deliverable / viable when balanced against other benefits the proposal may be delivering.
 - Suggestion that the policy should insist on design features beyond current building regulations which positively support low carbon living in all new-build premises, e.g. rainwater harvesting, renewable energy use, insulation standards.
 - The Deregulation Act 2015 specifies that no additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings should be set in Plans other than the nationally described space standard, an optional requirement for water usage and optional requirements for adaptable / accessible dwellings. Need to ensure that local standards are not been introduced by policy LP18 which would be inconsistent with national policy.

LP19 Renewable Energy Proposals

Summary of issues raised

- 7 responses were received in relation to this policy. There was mixed opinion on the soundness of the policy, with some respondents answering 'don't know' or opting not to answer the questions in relation to the four tests of soundness.
- The key issues raised by the respondents were:
 - Disappointment that there is no willingness to attempt to identify suitable (and by association 'non-suitable') areas for wind as part of the Local Plan.



- Suggestion that the policy should make specific reference to infrastructure which is necessary to support renewable energy projects, e.g. "...proposals for non-wind renewable technology (including supporting infrastructure for such development) will be assessed on their merits ..."
- Policy unsound: the policy will have the effect of imposing a moratorium against all wind energy development in Central Lincolnshire, unless a Neighbourhood Plan identifies suitable areas for wind energy development. It is unrealistic and inappropriate for Neighbourhood Plans to be regarded as a suitable vehicle for identification of locations for wind energy projects.
- Policy is not justified: the Integrated Impact Assessment (incorporating Sustainability Appraisal) does not robustly appraise the relative "pros and cons" of a policy that identifies areas suitable for wind energy development.
- Second part of the policy considered to be broadly consistent with the presumption in favour of sustainable development insofar that it confirms that the impacts of a development will be considered against its potential benefits, having regard to matters such as effects to landscape character and residential amenity. However, the first part of the policy is considered to be inconsistent with national policy because it is not consistent with the presumption in favour of sustainable development; it conflicts with national policy which encourages a positive and proactive strategy for renewable energy development; and does not allow for the decision maker to exercise a planning balance.

The following changes were suggested to make the policy 'sound':

- Policy wording should be amended to "...proposals for wind energy development ~~will~~ **should** only be permitted if...": the use of "will" is definite and completely inflexible whereas the use of "should", as surmised by its use by the Secretary of State, implies a level of flexibility and adaptability on a case by case basis and if necessary allowing approval.
- Additional wording from the NNPG could be added to Policy LP19 to further clarify the current position, i.e. "whether a proposal has the backing of the affected local community is a planning judgment for the local planning authority." Wording should also be added so that any wind energy development that is then suitable, will be assessed against the criteria for 'Proposals for non-wind renewable energy development', otherwise there is no criteria with which to assess valid wind energy developments.
- To make the policy positively prepared and effective: identify areas suitable for wind energy development to accord with the NPPF requirement "to meet the objectively assessed infrastructure requirement where it is reasonable to do so and consistent with achieving sustainable development".
- Justified: the option of identifying areas suitable for wind energy is required.
- Consistent with national policy: it is necessary to revise the policy wording to explain that the impacts of wind energy development will be balanced against their benefits and to include transitional arrangements relating to 'live' planning applications.

LP20 Green Infrastructure Network

Summary of issues raised

- There were various comments broadly supporting the policy, including support from Natural England, the Environment Agency and the Lincolnshire Wildlife Trust.
- Natural England felt that the policy met all the tests of soundness, providing a positive approach for the protection and enhancement of the Green Infrastructure (GI) network throughout Central Lincolnshire.
- The majority of respondents felt that the policy is legally compliant, but those objecting felt that the policy is not positively prepared, justified, effective or consistent with national policy.
- The reasons stated by those who felt that the policy is not positively prepared, justified or effective included:

- The need to replace any lost trees is not being acknowledged;
- The policy as written is onerous and is likely to add significant costs to developments. The policy does not recognise that it may not be suitable or viable on smaller schemes to contribute to the establishment, enhancement and on-going management of GI. The policy does not set out clearly how developments will be expected to contribute to this requirement;
- There should be a strong evidence base to justify the need for GI in relation to the other infrastructure requirements and planning obligations.
- The following amendments were proposed to make the policy positively prepared, justified and effective:
 - The Local Plan should ensure any lost tree should be replaced with at least two or more trees in the same or different location.
 - CIL should be used to provide GI rather than developer contributions.
- The reasons stated by those who felt that the policy is not consistent with national policy included:
 - Para 5.5.2 indicates that agricultural land is part of GI and the policy states that proposals that cause loss or harm to the GI network will not be permitted. Does this prevent all development on agricultural land including farm buildings and farm diversification?
 - The need to replace any lost trees is not being acknowledged.
 - Any planning obligation applied to developments requiring GI must be necessary to allow the development to proceed and must relate directly to the effects of the proposed development. CIL should be used to provide GI rather than developer contributions.
- The following amendments were proposed to make the policy consistent with national policy:
 - Remove agricultural land from the list of types of land that make up the GI network in para 5.5.2;
 - The Local Plan should ensure any lost tree should be replaced with at least two or more trees in the same or different location.

LP21 Biodiversity and Geodiversity

Summary of issues raised

- There were various comments broadly supporting the policy, including support from the Lincolnshire Wildlife Trust and Natural England.
- Natural England felt that the policy meets all the tests of soundness, setting out a clear framework for the protection and enhancement of biodiversity and geodiversity within the Central Lincolnshire.
- The majority of respondents felt that the policy is legally compliant, but those objecting felt that the policy is not positively prepared, justified, effective or consistent with national policy.
- The reasons stated by those who felt that the policy is not positively prepared, justified or effective included:
 - Object to the use of the words “seek to” in the first and fifth paragraphs of LP21. Ancient woodland should have absolute protection within the Local Plan.
 - The Green Wedge allocation at the University’s Riseholme Campus should be reviewed, given the substantial benefits from redevelopment at Riseholme along with the duty of the Council to plan positively to meet its housing needs. The site is already protected by its statutory Listed Parks and Garden status. The University also expressed concern with a blanket Green Wedge allocation across the majority of the campus. (*Note: whilst the respondent logged this comment under policy LP21, it was probably meant as a response under policy LP22. The comment has, therefore, been summarised in this document under both policy LP21 and LP22*).
 - Opportunities for enhancement are not always possible/practical or viable, and the policy wording should reflect this rather than being an absolute requirement.

- The policy seeks major development to have specific reference to the Central Lincolnshire Biodiversity Opportunity Mapping Study, in relation to landscape scale and ecosystem services. Suggest major development should be Sustainable Urban Extensions.
- One respondent would like to see specific mention made in the Plan about the retention and management of existing hedgerows. There should be a presumption in policy against the removal of established hedgerows, and that management plans should be a conditioned to ensure their long term survival. *(Note: whilst the respondent logged this comment under policy LP29, it was probably meant as a response under policy LP21. The comment has, therefore, been summarised in this document under both policy LP29 and LP21).*
- The following amendments were proposed to make the policy positively prepared, justified and effective:
 - Request that the line of the Green Wedge allocation at Riseholme is reduced to follow the line of Riseholme Lane;
 - The policy should be more specific as to what developments the policy should apply to, which it is suggested should be the proposed sustainable urban extensions.
- The reasons stated by those who felt that the policy is not consistent with national policy included:
 - Object to the use of the words “seek to” in the first and fifth paragraphs of LP21. Ancient woodland should have absolute protection within the Local Plan.
 - The policy is more restrictive than the Green Belt test *(Note: whilst the respondent logged this comment under policy LP21, it was probably meant as a response under policy LP22. The comment has, therefore, been summarised in this document under both policy LP21 and LP22).*
 - Opponents of development can think of many potential adverse effects of any developments, but the question is are there real adverse effects.
- The following amendments were proposed to make the policy consistent with national policy:
 - Remove the word “potential” from the first line of the penultimate paragraph of the policy.

LP22 Green Wedges

Summary of issues raised

- There were various comments broadly supporting the policy or elements of the policy, and allocation of Green Wedges on the Policies Map.
- The majority of respondents felt that the policy is legally compliant, but those objecting felt that the policy is not positively prepared, justified, effective or consistent with national policy.
- The reasons stated by those who felt that the policy is not positively prepared, justified or effective included:
 - The policy states “prevention of the physical merger of settlements, preserving their separate identity, local character and historic character” There is no provision to maintain Heighington, Canwick and Branston as separate settlements;
 - Consider policy unsound as it does not include Willingham Fen as Green Wedge as recommended in the Green Wedge and Settlement Break Review. Planning permission for the marina should not preclude inclusion of the Willingham Fen area;
 - There is no robust evidence supporting the extent of the current countryside gap designations;
 - The policy has some weaknesses as there is no indication of what development is considered to be ‘essential’, or of the type of development which might be allowed within a Green Wedge;



- Object to inclusion of site CL416, land at Urban Street with the Green Wedge;
 - Object to the inclusion of Water Recycling Centres within Green Wedges – the policy has the potential to severely restrict their operation;
 - Concern was expressed by one respondent that the policy appears to facilitate the removal of the protective elements from areas already protected, in return for applicants offering by way of compensation, an alternative commensurate area for protection;
 - The Green Wedge allocation at the University's Riseholme Campus should be reviewed, given the substantial benefits from redevelopment at Riseholme along with the duty of the Council to plan positively to meet its housing needs. The site is already protected by its statutory Listed Parks and Garden status. The University also expressed concern with a blanket Green Wedge allocation across the majority of the campus. *(Note: whilst the respondent logged this comment under policy LP21, it was probably meant as a response under policy LP22. The comment has, therefore, been summarised in this document under both policy LP21 and LP22).*
- The following amendments were proposed to make the policy positively prepared, justified and effective:
 - The policy should rule out housing of all types and commercial development and it should indicate the type of development that is potentially 'essential'.
 - Site CL416 should be removed from the Green Wedge.
 - Canwick, North Hykeham and South Hykeham WRCs should be removed from the green Wedge designation and/or the following paragraph included in the policy: *"There are various "non open-space" uses and activities within Lincoln's Green Wedges, ranging from residential, leisure and commercial uses to the Sewage Treatment Works. This Plan's objective is to ensure that these uses do not develop in a way which harms the character of the Green Wedge within which they are situated. Consequently, proposals to develop these uses further will normally only be permitted where they are contained within the present curtilage, provided other concerns are satisfied."*
 - Request that the line of the Green Wedge allocation at Riseholme is reduced to follow the line of Riseholme Lane.
- The reasons stated by those who felt that the policy is not consistent with national policy included:
 - The policy is more restrictive than the Green Belt test *(Note: whilst the respondent logged this comment under policy LP21, it was probably meant as a response under policy LP22. The comment has, therefore, been summarised in this document under both policy LP21 and LP22).*
- New Green Wedges/extensions to Green Wedges were suggested at/near:
 - South of Nettleham;
 - Between Heighington, Branston and Canwick;
 - Area between the Catchwater Drain and River Sleas in Sleaford in relation to the Sleaford West Quadrant SUE;
 - Land to the west of Cherry Willingham between the village and proposed Lincoln; Eastern bypass;
 - Greetwell.
- Current Green Wedges/extensions to current Green Wedges were supported to in part or whole at the following:
 - Riseholme;
 - Burton to Nettleham (around the north of Lincoln and to the south and west of Nettleham and at Burton);
 - Green Wedge designations as shown on the City of Lincoln Policies Map Inset 1.

- Current Green Wedges/extensions to current proposed Green Wedges were objected to in part or whole at the following:
 - Waddington to Bracebridge Heath;
 - Canwick to Washingborough.
- Green Wedges/extensions to Green Wedges identified at the Further Draft Local Plan stage, removed at the Proposed Submission Local Plan Stage, were objected to in part or whole at the following:
 - Willingham Fen.

LP23 Local Green Space and other Important Open Space

Summary of issues raised

- There were various comments broadly supporting the policy or elements of the policy.
- The majority of respondents felt that the policy is legally compliant, but those objecting felt that the policy is not positively prepared, justified, effective or consistent with national policy.
- The reasons stated by those who felt that the policy is not positively prepared, justified or effective included:
 - Local Green Space designation must not be used as a means of preventing otherwise sustainable development coming forward;
 - There were a number of objections to specific Local Green Space and Important Open Spaces allocations as identified below.
- The following amendments were proposed to make the policy positively prepared, justified and effective:
 - Removal of Important Open Space allocation at CL4652;
 - Removal of Important Open Space allocation at Land at Lee Road;
 - Removal of Important Open Space allocation at Land off Wolsey Way;
 - Ensure identified areas in Fiskerton are cemented into the Local Plan.
- The reasons stated by those who felt that the policy is not consistent with national policy included:
 - Concern expressed that only land falling within the two specified designations and identified on the Policies Map would benefit from the safeguarding policy, whereas the protection needs to be afforded to other sites covered by para 74 of the NPPF, regardless of whether they are on the Policies Map;
 - There were a number of objections to specific Local Green Space and Important Open Space allocations as identified below.
- The following amendments were proposed to make the policy consistent with national policy:
 - Revise policy wording to ensure compliance with para 74 of the NPPF.
- Proposed Local Green Spaces were objected to in part or whole at the following:
 - Land south of Chapel Road, Fiskerton;
 - Land south of Nettleham.
- Proposed Important Open Spaces were supported in part or whole at the following:
 - Hemswell Cliff.
- Proposed Important Open Spaces were objected to in part or whole at the following:
 - Within residential allocation CL4652, Lincoln;
 - Land at Horsley Road, Gainsborough;

- South End, rear of 15 Riby Road, Keelby;
- Land south of Ferry Land and east of the High Street, Skellingthorpe;
- Land at Lee Road, Lincoln;
- Land off Wolsey Way, Lincoln.
- New Local Green Spaces were suggested at/near:
 - Waterhills, Caistor (one comment expressed that Caistor housing allocations CL1888 and CL2093 will encroach on land which should be allocated green space);
 - St Paul Avenue, Cherry Willingham.
- New Important Open Spaces were suggested at/near:
 - Greetwell Hollow/Quarry;
 - Holmfield Estate, Fiskerton.
- Objections were received to sites that did not meet the Local Green Space criteria at/near:
 - Hemswell Cliff.

LP24 Creation of New Open Space, Sports and Recreation Facilities

Summary of issues raised

- There were various comments broadly supporting the policy, including support from the Lincolnshire Wildlife Trust, who welcome the requirement for the design of new open space to take account of the green network and the protection and enhancement of nature conservation and the water environment.
- Sport England supports the overall aim of the policy, but expressed concern around the strict application of generic standards in respect of sports provision will not deliver facilities to meet local requirements.
- One respondent expressed concern that there is a shortfall of open space provision in Fiskerton compared to the standards in Appendix C of the Local Plan. They requested the Plan emphasises the importance of the Local Authority in conditioning new developments to make realistic contributions for addressing the shortfall.
- One comment stated that the development of Greetwell Hollow/ Quarry (North East Quadrant Sustainable Urban Extension) would result in a failure to comply with the open space provision standards for the North and North East of Lincoln.
- The majority of respondents felt that the policy is legally compliant, but those objecting felt that the policy is not positively prepared, justified, effective or consistent with national policy.
- The reasons stated by those who felt that the policy is not positively prepared, justified or effective included:
 - One respondent expressed concern at the potential effects on viability of the policy with its reference to the SPD on Developer Contributions.
 - This policy and the standards included as Appendix C do not appear to be accompanied by any further detail of how this approach would operate in practice. It is noted an SPD will be prepared, but this would not be subject to full examination and therefore would not carry the same weight as the Local Plan policy.
- The following amendments were proposed to make the policy positively prepared, justified and effective:
 - Provide further clarification in the Local Plan on how locally derived evidence is to be applied alongside standards.
- The reasons stated by those who felt that the policy is not consistent with national policy included:

- Potential effects on viability;
- Strict application of generic standards will not deliver facilities to meet local requirements.
- The following amendments were proposed to make the policy consistent with national policy:
 - Provide further clarification in the Local Plan on how locally derived evidence is to be applied alongside standards.

LP25 The Historic Environment

Summary of issues raised

- Nine representations were received in relation to this policy: four of these expressly supported and welcomed the policy.
- The key issues raised were:
 - Policy is too broad and imprecise.
 - The NPPF distinguishes between substantial harm and less than substantial harm: the policy does not reflect this.
 - Acknowledgment that the Local Plan includes a number of development management policies (including the historic environment): agreement with the inclusion of these policies, but concern that they are not fully consistent with the presumption in favour of sustainable development because they do not expressly explain that some harm can be acceptable in circumstance where the identified harm (even following mitigation) is outweighed by the benefits of the development.
 - Policy should recognise that for outline planning applications, archaeological remains can be protected by requiring intrusive investigation to be carried out prior to development. Conditioning intrusive archaeological investigation works is considered appropriate by the Planning Inspectorate and avoids delaying the grant of planning permission.
 - Historic England raised no concerns in principle to the revised text but highlighted that earlier iterations of the policy included reference to planning conditions and developer contributions which has been omitted. Recommended that this point be clarified, or additional text included under a separate heading of 'Conditions and S106 contributions', to read *'Where permission is granted, the Council will secure appropriate conditions and/or developer contributions through a S106 obligation, as required, to ensure heritage assets are suitably conserved and, where possible, enhanced'*.

LP26 Design and Amenity

Summary of issues raised

- Only 7 representations were received in relation to this policy. Of this limited response, most respondents did not consider that the policy was positively prepared, justified, or effective, yet the majority of respondents stated that they supported or welcomed the policy.
- Specific matters raised were:
 - That viability should be a consideration, particularly with regard to measures identified such as the use of 'innovative design', 'new technologies' and 'high quality materials'.
 - Opinion that some of the measures, for example 'd' and 'e' in relation to physical coalescence and ribbon development respectively, are not design principles: suggestion that these criteria should be applied flexibly to ensure that sustainable development is not restricted, particularly in villages.
 - Support for criteria 'd' and 'e': the principle of preventing coalescence between settlements is one which is extremely important to village communities and clear policy preventing such coalescence is essential for the maintenance of the appearance and character of communities.

- Concern that criteria 'e' would result in an infill of green spaces.
- Support for the aims of the amenity section, but objection to the requirement for developers to demonstrate that such matters 'have been considered': this will undermine the policy intent, is inadequate and much too vague. Suggestion that the policy should explicitly include wording to the effect that any 'unacceptably harmful impact on residential or public amenity' will be a reason for refusal of a planning application.

LP27 Main Town Centre Uses - Frontages and Advertisements

Summary of issues raised

- One comment received stating that the policy should include provision for a strategy of reducing total advertising in the interests of visual amenity, particularly in Conservation Areas.

LP28 Sustainable Urban Extensions

Summary of issues raised

- 14 responses were received in relation to this policy. Of the respondents which answered the questions in relation to the 'soundness' of the plan, all felt that the policy is positively prepared, and the majority found it to be consistent with national policy, however the majority considered it not to be justified or effective.
- The key issues raised were:
 - Some support for the principle of the requirement to prepare a Broad Concept Plan for each Sustainable Urban Extension (SUE) in its entirety, though another respondent suggested an amendment to require a phased masterplan as part of the planning application.
 - Concerns regarding the requirement to clearly evidence the support of all significant landowners: this lacks flexibility for schemes to come forward within the SUEs, relying on the assumption that the 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.
 - Criticism that the policy as currently worded makes no reference to viability: the sites and scale of development identified in the Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.
 - Anglian Water support the need for an agreed concept plan to be linked to the timely delivery of key infrastructure, stating that it is important that proposed SUEs within Anglian Water's area of responsibility are phased to ensure that they are aligned with water and water recycling infrastructure.
 - The release of Urban Extensions in Lincoln is the most sustainable way of providing for long term growth. The alternatives (e.g. providing a large standalone new settlement) would not provide the same degree of sustainability that urban extensions at Lincoln would nor would it benefit from a large critical mass of development and early stages of development.
 - Conditions imposed by the policy create uncertainty and could lead to delays or longer lead-in times for the delivery of the SUEs, and therefore the Plan should allocate a greater range of non-SUE sites to guard against this and ensure a rolling five-year supply of housing can be demonstrated throughout the plan period.

Specific comments on the various criteria:

- Various objections to criteria 'c' (requirement to set aside land for Gypsy and Traveller provision):



- Question whether the locations of the proposed SUEs are the correct geographical location for the provision of gypsy and traveller pitches.
- Places an unfair and unnecessary burden on the identified SUEs but in particular those SUEs (e.g. Lincoln SEQ) that currently do not benefit from a planning permission (unlike Sleaford SSQ). This Policy cannot be retrospectively applied to existing consents and is therefore not being applied in an equitable manner.
- There is no reasoned justification for restricting the Gypsy and Traveller provision solely to the SUEs. There are numerous other sites within the Local Plan that are identified for allocation of significant housing numbers that do not have the same infrastructure and planning obligation requirements as the proposed SUEs.
- Do not consider that the SUEs are the appropriate place for such provision. The SUEs are the key sites necessary to contribute to Central Lincolnshire's significant housing need in the most sustainable locations. The costs of providing land for gypsy and traveller pitches will add to the already significant financial burden which is placed on the SUEs.
- Can see no evidence that the Joint Planning Unit has undertaken a targeted Gypsy and Traveller specific call for sites. The evidence base provided in the Integrated Impact Assessment only refers to 4 non-SUE gypsy and traveller options, which suggests that limited consideration to alternative ways of meeting gypsy and traveller pitch needs has been carried out.
- The Joint Planning Unit's own evidence base does not support the need to site new Gypsy and Traveller pitches within new sustainable urban extensions. The Central Lincolnshire Gypsy and Traveller Accommodation Assessment 2013 demonstrates that it is unlikely that the Gypsy and Traveller community wish to establish new sites within an urban environment. The 2013 assessment identifies West Lindsey has the largest requirement for new pitches (para 10.12) and it must therefore be logical to meet this need in locations where it is required as opposed to spreading across the Central Lincolnshire area.
- Provision of gypsy and traveller pitches would reduce the housing capacity of sites, therefore compounding the ability to deliver essential infrastructure and planning gain.
- Requirement would impact upon the commercial marketability of the site.
- The provision of funding for Gypsy and Traveller provision would be far better served through the Community Infrastructure Levy. This would provide a mechanism for the Local Planning Authorities to collect significantly more receipts as it would be levied against all developments and not just those classified as SUEs.
- Should the requirement to provide G&T provision remain within this Policy then it should be amended to provide the option for the landowner/developer to pay a commuted sum in lieu of the onsite provision.
- o Criteria e (education facilities): it should be noted that secondary education is included on the Central Lincolnshire Authorities Draft Regulation 123 List as district infrastructure. There should not be any actual or perceived 'double dipping' with developers paying twice for the same infrastructure.
- o Mixed response in relation to criteria 'h' (protection against sterilisation of mineral resources): one representation expressed strong support for criteria 'h', noting that it will ensure the effective protection of mineral resources. Another representation stated that the inclusion of criteria 'h' is not necessary as the NPPF provides national policy in relation to facilitating the sustainable use of minerals.

Additional criteria suggested:

- o Concern that the impact on existing infrastructure is not referenced: additional criteria wording suggested.
- o Recommendation that there is specific reference in this policy to the protection and enhancement of biodiversity and geodiversity, similar to wording that was included within an earlier draft of this policy. In addition to the protection and enhancement of existing features of biodiversity value, developers should be required to take action to create

additional areas of habitat within the green infrastructure of the site to ensure that there is a biodiversity gain: criteria wording suggested.

Chapter 7 Lincoln

Summary of issues raised

- Several comments were received relating to specific paragraphs within the Lincoln chapter.
- One respondent made several comments on the policy and supporting text including:
 - The Collection is not 'new'; and
 - The universities and colleges have been great assets, but how many do they serve?
- Reusing derelict and vacant land is a good idea, but the vast majority of the land is farmland (including Western Growth Corridor) and therefore 7.2.1 and 7.2.2 are misleading.
- One respondent welcomed recognition of the role of the Lincoln Strategy Area, level of growth and the identification of Sustainable Urban Extensions (SUEs) as a logical policy approach to meeting the need but feel that total reliance on the SUEs is not a practical option. They feel that the plan needs to allow enough flexibility for a significant element of additional sites, with a significant proportion in the Lincoln Strategy Area villages and suggest a new policy enhancing the role of the wider strategy area.
- One respondent questioned why inappropriately tall buildings are allowed on the approach to the City (e.g. Tritton Road) if the cathedral was such a dominating feature and request that we stop allowing the building of multi-story accommodation, hotels and university accommodation in the Brayford area.
- 'A high quality environment' is subjective and it may be considered that the proposed development is destroying what already exists.
- Several felt that the North East Quadrant, South East Quadrant and South West Quadrant should be priorities as a means of delivering the Eastern and Southern bypasses and dualling of the Western bypass.
- A few respondents did not feel that the Western Growth Corridor SUE was suitable on flood risk grounds and felt that other areas were better suited for housing. Concern was expressed for important flora and fauna; loss of green space; how the former landfill site will be remedied; and how the road infrastructure will cope with the proposed development.
- One respondent felt that Greetwell Hollow/ Quarry should be designated an Area of Outstanding Landscape Value and that the Quarry SSSI, Local Wildlife Site and Lincolnshire Wildlife Trust reserve should be excluded from the SUE.
- One respondent felt that a masterplan should not be asked for as it hadn't been specifically stated as required for all SUEs: parcels of land could be developed in isolation without the same need for services and facilities and should not be inhibited by the need to be part of a masterplan, it is therefore recommended that the first sentence in para 7.4.11 be removed.

LP29 Protecting Lincoln's Setting and Character

Summary of issues raised

- Historic England have stated that they have no objection in principle to the revised text but feel that specific reference to Lincoln Castle should be added to part a.:
"a. Protect the dominance and approach views of Lincoln Cathedral, Lincoln Castle and uphill Lincoln on the skyline;"
- CPRE state that they are generally supportive but would like to see specific mention about the retention and management of existing hedgerows (*Note: whilst the respondent logged this comment under policy LP29, it was probably meant as a response under policy LP21 The*

comment has, therefore, been summarised in this document under both policy LP29 and LP21).

- Two respondents felt that the policies relating to issues such as landscape and the historic environment are not consistent with national policy and not sound. They felt that in order to make them sound they should include text to explicitly explain that harm should be balanced against the benefits of the development.
- One respondent strongly supported the text for the SEQ SUE (paras 7.4.5 & 7.4.6) and policy LP30 as it relates to high quality development respecting its landscape setting and local character and feel that it should form the basis for the masterplan for the SUE.
- One respondent welcomed recognition of the role of the Lincoln Strategy Area and level of growth and the identification of SUEs as a logical policy approach to meeting the need but feel that total reliance on the SUEs is not a practical option. They feel that the plan needs to allow enough flexibility for a significant element of additional sites, with a significant proportion in the Lincoln Strategy Area villages and suggest a new policy enhancing the role of the wider strategy area.
- One respondent supported LP29 b. but felt that it should be strengthened by adding:
 - “• The designation ‘Lincoln Strategy Area’ should not function implicitly or explicitly to allow inadequately controlled development within it nor to facilitate an extension of a physical ‘Greater Lincoln’ except where specifically allowed by this plan. The physical and functional independence and the sustainability of existing villages near to the city must be respected, maintained and enhanced”.
- One respondent made several comments on the policy and supporting text:
 - The Collection is not ‘new’;
 - The universities and colleges have been great assets, but how many do they serve?
 - Reusing derelict and vacant land is a good idea, but the vast majority of the land is farmland (including WGC) and therefore feel that para 7.2.1 and 7.2.2 is misleading;
 - Brayford Pool was not protected when permission was granted for Wagamama, blocking views;
 - ‘A high quality environment’ is subjective and it may be considered that the proposed development is destroying what already exists.
- One respondent questioned why inappropriately tall buildings are allowed on the approach to the City (and mentioned Tritton Road) if the cathedral was such a dominating feature and request that we stop allowing the building of multi-story accommodation, hotels and university accommodation in the Brayford area.
- One respondent felt that the undeveloped green areas in the city and views of the cathedral are one of Lincoln’s attractions that residents and visitors value and creating huge housing developments would destroy its character.
- The EA have asked for the Lincoln Urban Opportunities Study that seeks to enhance the waterside environment to be referenced in policy LP29 in the same way that the Sleaford Urban Opportunities Study has been referenced in policy LP43.
- Anglian Water have suggested adding the following wording to the policy for those sites that come forward without a site specific policy:
 - “• Where new non-waste development involving buildings which would normally be occupied is proposed in proximity within 400m of a sewage treatment works, the application should be accompanied by an odour assessment report.”

LP30 Lincoln Sustainable Urban Extensions

Summary of issues raised

General:

- A number of respondents expressed support for the policy, overall distribution of growth, principle of SUEs and the specific SUEs identified.

- Church Commissioners for England (CCE) support the identification of SEQ, NEQ and SWQ as SUEs and provide evidence of the availability, suitability and deliverability of their land.
- Several respondents, whilst supporting the concept of SUEs, felt that a logical and controlled sequence of development was required with an ordered timetable/ trajectory to ensure sustainability.
- Several felt that the NEQ, SEQ and SWQ should be priorities as a means of delivering the Eastern and Southern bypasses and dualling of the Western bypass.
- One felt that delivery of the SUEs may be uncertain, delayed or have long lead in times due to the need for key infrastructure and the plan should therefore allocate a greater range on non-SUE sites to ensure a rolling 5-year supply.
- The Lincolnshire Wildlife Trust (LWT) have objected to the policy as there are a number of Local Wildlife Sites, Local Geological Sites and SSSIs within and close to the proposed SUEs to which it is not felt that the policy offers sufficient protection. Wording suggestions for specific SUEs are listed below. They also felt that wildlife should be “designed in” to developments at an early stage of the masterplanning/ concept planning process.
- The Greater Lincolnshire Nature Partnership (GLNP) do not feel that LP30 is legally compliant or consistent with the NPPF as they feel that it does not take adequate consideration of biodiversity. Wording suggestions for specific SUEs are listed below.
- One representor felt that reference to “other green infrastructure” was too vague and felt that the text supporting policy LP20 “allotments, community gardens and urban farms” was preferable and that the policy should require each SUE to provide an allotment site with a minimum number of plots per specified number of new dwellings.

North East Quadrant

- One respondent felt that Greetwell Hollow/ Quarry should be designated an Area of Outstanding Landscape Value and that the Quarry SSSI, Local Wildlife Site and Lincolnshire Wildlife Trust reserve should be excluded from the SUE.
- Another stated that the development of Greetwell Hollow/ Quarry would result in a failure to comply with the open space provision standards for the North and North East of Lincoln.
- Another felt that no more houses other than the 500 already granted permission should be allowed here with the existing recreational area designated as a Local Nature Reserve/ Park for the area.
- LWT suggest adding the following to bullet point 3 and at the end of the last bullet point:
“...adjacent to the site (including the Local Wildlife Site and Local Geological Site) or provides adequate...”
“...other green infrastructure, including areas of accessible natural greenspace.”
- GLNP suggest adding the following to bullet point 3:
“...adjacent to the site (including the Local Sites) or provides adequate...”
- CCE consider that the bullet point stating the amount of employment space should say “up to” the amount specified, subject to market demand.

South East Quadrant

- One respondent strongly supported the text for the SEQ SUE (paras 7.4.5 & 7.4.6) and policy LP30 as it relates to high quality development respecting its landscape setting and local character and feel that it should form the basis for the masterplan for the SUE.
- LWT suggest adding the following to bullet point 3 and at the end of the last bullet point:
“...adjacent to the site (including the Local Wildlife Site), as shown on an agreed concept plan, ...”
“...other green infrastructure, including areas of accessible natural greenspace.”
- GLNP suggest adding the following to bullet point 3:
“...adjacent to the site (including the Local Wildlife Site), as shown on an agreed concept plan, ...”
- CCE object to the draft framework plan in the SEQ Topic Paper.



- CCE consider that the bullet point stating the amount of employment space should say “up to” the amount specified, subject to market demand.
- A few respondents who are promoters/ landowners for the SEQ felt that proposed allocation site CL415 should be included in the SEQ SUE as they felt it would rely on the infrastructure provided by the SUE and should contribute a proportionate share of the costs.
- Those respondents also suggested adding the following to bullet point 5:
“Consideration of the need for a park and ride on or adjacent to the SUE to minimise the overall traffic impacts of the proposed development;”
- There is an objection to the requirement for bus priority on the B1188 which they feel is premature and dangerous and could have a negative impact on the character of Canwick and South Common.
- One respondent considered that Inset Map 1 should show International Bomber Command Centre (IBCC) and also felt that phasing of the SUE should be shown on the plan, distinguishing those areas that are to be developed outside the plan period.

South West Quadrant

- One respondent felt that a masterplan should not be asked for as it hadn’t been specifically stated as required for all SUEs and that parcels of land could be developed in isolation without the same need for services and facilities and should not be inhibited by the need to be part of a masterplan. It is therefore recommended that the first sentence in para 7.4.11 be removed.
- The urgent need for a Southern Bypass was referenced, but the wording of the 4th bullet point questioned. Alternative wording was suggested:
“The early completion of the Southern Bypass is recognised as crucial to the overall success of the economic development of the area and to ease some of the traffic congestion likely to be generated by these further housing and commercial developments as well as encouraging visitors to the area by reducing congestion on the Western bypass. If the Southern Bypass has to be developed in stages then the first Stage will be from Pennell’s roundabout on the A46 to x? but the second and final phase should be scheduled to follow as a matter of urgency.”
- LWT suggest adding the following to the 3rd bullet point:
“...existing green infrastructure, including areas of accessible natural greenspace, into multi-functional movement networks...”
- CCE consider that the bullet point stating the amount of employment space should be subject to market demand.
- Anglian Water suggest additional text to the final bullet point to strengthen it:
“... residents and occupants of non-residential buildings. To provide evidence to demonstrate that a suitable distance is provided from South Hykeham WRC and sensitive development (buildings which are regularly occupied) as part of the detailed masterplanning of the site.”

Western Growth Corridor

- A number of respondents expressed support for the identification of the WGC as a SUE, though there was comment that the WGC should not be developed and alternative sites should be found.
- It was suggested by the owners of Decoy Farm that their farmyard, currently excluded from the site boundary, should be included on the policies map.
- The Scarborough Family support the identification of WGC as a SUE and confirm the availability and deliverability of their land within it. They do however express concern about the merits of providing a park and ride site and whether this would complement the SUE or whether it would overly complicate traffic and transportation and feel that it’s requirement needs to be justified by the council. They express similar concerns about the potential for a gypsy and traveller site.

- Decoy Farming Company support the identification of WGC as a SUE. They object to “if required” at the end of bullet point 5 and suggest it should be removed or the bullet point reworded to read:
 - “• A direct route incorporating priority for public transport linking the A46 through to the city centre via the Beever Street area with connection onto Skellingthorpe Road if required;”
- One respondent raised concern that the Western Growth Corridor will encourage growth away from the Central Lincoln area and will therefore increase travelling distances and put a strain on the already limited capacity of the local transport infrastructure on Skellingthorpe Road and the A46 at the Skellingthorpe roundabout.
- City of Lincoln Council (CoL) feel that affordable housing on the site will need to be considered on a phased basis related to the viability of each phase and suggest that the policy could be strengthened by adding the following criteria:
 - “• The viability of the development will be assessed on a phased basis in accordance with the approved phasing plan submitted as part of the masterplan for the scheme.
 - The provision of affordable housing (see policy LP11) will be made on a phased basis at a level commensurate with the viability of each development phase.”
- One respondent felt that the 11th bullet point should read:
 - “... the former Skewbridge tip...”
- Several respondents objected to or expressed concern over WGC on flood risk grounds. One felt that flood risk needed to be properly understood and one felt that that proposed solutions should be fully explained.
- A number of respondents expressed support for LSIP and some suggested that the WGC should be developed for employment uses only and not for housing and that it should be reserved for long term economic expansion.
- One respondent stated that the vista of the historic Lincoln hill and skyline should not be lost.
- LWT suggest adding an additional bullet point and additional text to the last bullet point:
 - “• A development that protects and enhances the existing features of biodiversity value, including Local Wildlife Sites, within and adjacent to the site.”
 - “...other green infrastructure, including areas of accessible natural greenspace.”
- GLNP suggest adding the following to the last bullet point:
 - “...other green infrastructure, including the protection and enhancement of Local Wildlife Sites.”
- Concern was expressed for important flora and fauna and loss of green space.
- Questions are raised about how the road infrastructure will cope with the proposed development and potential park and ride and lack of detail of how the former landfill site will be remedied.
- Network Rail (Infrastructure) Ltd have recommended an additional bullet point to para 7.4.4 to reflect discussions and agreement:
 - “• Elimination of a number of level crossings on the adjacent railway.”
- One respondent felt that a Park and Ride here should be a good idea.
- It was suggested that whilst the proposed link to the A46 was essential, connection to this already busy road would be difficult.

LP31 Lincoln's Economy

Summary of issues raised

- One representor supports the policy considering it to be consistent with national planning policy and considers it to be a justified and effective and therefore sound policy in that it supports economic growth in the most sustainable location in the plan area.
- One representor supports the principle of the policy but is concerned that the University of Lincoln is not afforded sufficient status requiring a suitably flexible and supportive policy and suggest rewording:



“Development proposals within the Lincoln Strategy Area should support the strengthening of Lincoln’s economy, contributing toward the delivery of objectives as set out in the Growth Strategy for Lincoln 2014 – 2034.

It is important that the Local Plan recognises the clear and direct link between the University's Riseholme Campus and Brayford Pool and therefore the competitiveness of Lincoln as a place to invest. Any capital receipt realised through the sale of land at Riseholme will be ring-fenced and reinvested in:

- a. The new LIAT Centre;*
- b. the retained heritage assets and parkland at Riseholme;*
- c. a new University Sports Hub with wider community access; and*
- d. the next phase of investment at Brayford Pool*

and used to leverage further investment/ Joint Venture opportunities.”

LP32 Lincoln’s Universities and Colleges

Summary of issues raised

- A respondent welcomed policy amendments and that the concerns of the Parish Council have been listened to regarding Riseholme.
- Riseholme PC state that they are a small village and attach their emerging Neighbourhood Plan, supporting report and letter from Historic England in support of their representation.
- The University of Lincoln provide details of their masterplan and feel that without explicit policy support for development at Riseholme they have reservations about the ability to deliver its estate strategy. They make two suggestions for rewording of the policy.

Either:

“When considering development proposals, the Central Lincolnshire districts of West Lindsey, Lincoln City and North Kesteven will support development proposals which facilitate the continued growth of the University of Lincoln to maximise the economic benefits the University brings to Central Lincolnshire and within the Lincoln Strategy Area. Support will be given to:

- Deliver more efficient and flexible academic buildings and high-quality urban design on the existing Brayford Pool Campus in accordance with the University’s adopted masterplan;
- Develop the Lincoln Science & Innovation Park as a high quality location for knowledge based industries and with functional and physical linkages between the Park and the University of Lincoln;
- Deliver a masterplanned approach to the redevelopment of the University’s Riseholme Campus to create a new rural settlement as part of retained University facilities including the new Lincoln Institute of Agri-food Technology Centre. A planning obligation will be sought which provides that money realised from the sale of surplus estate at Riseholme will be reinvested in the University’s retained estate to achieve the investment priorities of the University;
- Assist in the disposal of ad-hoc properties declared surplus by the University’s Estate Department and in accordance with the University’s Estate Strategy and Corporate Plan.”

Or:

“Development proposals will be supported where they support ongoing development of higher and further education establishments in the City, provided that these will be integrated with, and contribute positively to their surroundings.

University/ College related development proposals will be supported where the development would facilitate their continued growth and assist in maximising the economic benefit the Universities/ Colleges bring to Central Lincolnshire.

Support will be given to deliver more efficient and flexible academic buildings and high-quality urban design on the existing Brayford Pool Campus in accordance with Lincoln University's adopted masterplan.

Support will be given to deliver the Lincoln Science & Innovation Park as a high quality location for knowledge based industries and with functional and physical linkages between the Park and the University of Lincoln:

Redevelopment of University/ College land and assets will be supported where such redevelopment demonstrably outweighs any harm to ensure the future growth of the institution."

LP33 Lincoln's City Centre Primary Shopping Area and Central Mixed Use Area

Summary of issues raised

- Coordinated terminology, list of uses supported within the Central Mixed Use Area and allocation of St Marks West within Primary Shopping Area and Secondary Frontage are all welcomed by one representor.
- However, the representor felt that the Lincoln City Centre Masterplan should be more formally incorporated into the Local Plan and that St Marks should be more expressly identified as a site to meet identified retail need.
- Another representor felt that Lindongate should be identified as the most appropriate site to improve the retail offer of the City Centre.
- They also felt that the policy should be more explicit in terms of the sequential and impact tests that need to be complied with for retail schemes outside the Primary Shopping Area.

LP34 Lincoln's District and Local Shopping Centres

Summary of issues raised

- A representor supported the extension of the Wragby Road District Centre to include the Carlton Centre but felt that the former bakery should also be included rather than identified as part of the E11 Outer Circle Road Established Employment Area.

LP35 Lincoln's Regeneration and Opportunity Areas

Summary of issues raised

- One representor supported the inclusion of Firth Road as a Regeneration and Opportunity Area.
- The representor did however object to the identification of Waterside South as an Established Employment Area (LP5) rather than a Regeneration and Opportunity Area.

LP36 Access and Movement within the Lincoln Area

Summary of issues raised

- Highways England welcome retention of reference to encouraging the use of more sustainable modes of transport across the area.
- Highways England consider that specific reference needs to be made to the important role of the A46 in the road network of the Lincoln area and the intention to work in partnership to ensure that the route continues to function effectively in the future and is able to support the economic growth planned.

LP37 Sub-division and multi-occupation of dwellings within Lincoln

Summary of issues raised

- No representations received.

Chapter 8 Gainsborough

Summary of issues raised

- All comments logged against Chapter 8 as a whole (rather than specific policies in Chapter 8) related to the settlement of Lea.
- Lea is noted as being a medium village and so should not be part of Gainsborough. No sites should be allocated for further development, with brownfield sites a priority.
- It is illogical and inconsistent with National and Local Planning policies for a site within an unsustainable location within Lea village to be treated as part of the urban expansion of Gainsborough.
- Paragraph 8.2.3 identifies Lea and Morton village as part of the Built-Up-Area of Gainsborough town. It is submitted that neither Lea or Morton are part of the Built-Up-Area (BUA) of Gainsborough otherwise why identify these villages individually within the Medium Villages criteria. Furthermore, Lea village possesses a separate village identity and should not be associated with Gainsborough as part of the BUA.

LP38 Protecting Gainsborough's Setting and Character

Summary of issues raised

- No representations received.

LP39 Gainsborough Sustainable Urban Extensions

Summary of issues raised

- Five representations were made against this policy: two respondents considered that the policy is not consistent with national policy.
- The key issues raised were:
 - The policy attaches various conditions to the SUEs: these conditions create uncertainty and could lead to delays or longer lead-in times for the delivery of the SUEs, and therefore the Plan should allocate a greater range of non-SUE sites to guard against this and ensure a rolling five-year supply of housing can be demonstrated throughout the plan period.
 - Concern about impact on Local Wildlife Sites (LWSs): development could impact on the nature conservation interest of the woodlands directly through the development of new pathways and increased visitor pressure, and indirectly from light, noise and visual disturbance, and functional separation in the case of Warren Wood and Lea Wood. Buffer zones would help to minimise habitat disturbance especially if the buffer zones are left to develop scrub naturally. The requirement relating to open space and green corridors is welcomed, but given the above concerns, it is recommended that additional wording should be added to this policy relating to the protection and enhancement of existing open spaces including the LWSs.
- Thonock & Somerby Estates (TSE) expressed its commitment to bringing forward an outline planning application in 2016 for the 750 residential units anticipated within the Local Plan



period to 2036. The remaining circa 1750 dwellings are anticipated to come forward beyond the Local Plan period post 2036. TSE support the adjustments to the Northern Neighbourhood boundary, stating that the extensions will assist in the integration of the SUE to the existing built up area of Gainsborough through the creation of a larger frontage to the rest of the settlement. However the Estate suggests that the boundary is further amended slightly, as per their submitted plan.

LP40 Gainsborough Riverside

Summary of issues raised

- Only two representations were received in relation to this policy.
- The Environment Agency was pleased to note that the policy now includes reference to the Water Framework Directive (WFD) and highlighted that it is satisfied that the Local Plan contains adequate information on both land contamination and groundwater protection.
- The second representation considered the policy to not be justified and thus unsound. The reasons stated were:
 - Appreciation of the aim to promote the delivery of an uninterrupted pedestrian and cycle corridor connecting Gainsborough's riverside area with nearby settlements, but concern that the wording is currently very prescriptive and inflexible.
 - It is unclear what is meant by the policy's reference to 'all relevant development proposals'. Clarification as to whether minerals-related developments are included within this classification requested.
 - The policy is disproportionate and could potentially put an unnecessary burden on future development in the area.
 - Suggestion that the policy could be reworded as so to make it sound:
"All relevant development proposals on sites adjacent to the River Trent [as defined in paragraph XX] should seek, where appropriate/ practicable, to assist in the delivery of the long term aim of creating an uninterrupted and attractive pedestrian and cycle corridor connecting Gainsborough's riverside area with the settlements of Lea to the south and Morton to the north...relevant proposals for sites adjacent to the River Trent should, where appropriate/ practicable, seek to extend and enhance the existing public realm and/ or deliver an enhanced pedestrian and cycle network."

LP41 Regeneration of Gainsborough

Summary of issues raised

- No representations received.

LP42 Gainsborough Town Centre and Primary Shopping Area

Summary of issues raised

- No representations received.



Chapter 9 Sleaford and Key Diagram

Summary of issues raised

- One respondent identified a minor typing correction in the Key Diagram for Sleaford, where “grammar” should read “grammer” school.
- One respondent felt the Local Plan was not in compliance with the Duty to Co-Operate. The reason they gave was that they were unable to find their contribution to the consultation, which they had submitted at every consultation stage. In terms of amendments to the Plan, they felt that the Sleaford chapter of the Plan had not changed, even with a change of circumstances, for example the withdrawal of the CPO for the link road route.

LP43 Protecting Sleaford’s Setting and Character

Summary of issues raised

- One respondent identified a minor typing correction in paragraph 9.2.1 where “Castlefield” should read “Castle Field”.
- One respondent felt that the policy was legally compliant but not positively prepared, justified, effective or consistent with national policy. They felt the Sleaford section of the Plan should be amended to include reference to development in towns and villages located within the Sleaford area, in addition to the two proposed Sustainable Urban Extensions. *(Note: whilst the respondent logged this comment under policy LP43, it was probably meant as a response under policy LP44. The comment has, therefore, been summarised in this document under both policy LP43 and LP44).*

LP44 Sleaford Sustainable Urban Extensions

Summary of issues raised

- The majority of respondents felt that the policy was legally compliant, with most stating that the policy is not positively prepared, justified, effective or consistent with national policy.
- The reasons stated by those who felt that the policy is not positively prepared included:
 - Object to distribution of growth and over allocation at Gainsborough. Less sustainable location than providing additional growth in Sleaford. *(Note: whilst the respondent logged this comment under policy LP44, it was probably meant as a response under policy LP3. The comment has, therefore, been summarised in this document under both policy LP44 and LP3);*
 - The wording of LP54 only allows site CL1001 to come forward if certain targets are reached. Policy fails to recognise that if sites do not deliver as expected, then there needs to be greater flexibility. *(Note: whilst the respondent logged this comment under policy LP44, they also submitted similar comments under policy LP54. The comment has, therefore, been summarised in this document under both policy LP44 and LP54);*
 - The conditions attached to each of the SUEs create uncertainty and could lead to longer lead-in times for the delivery of the SUEs.
- The following amendments were proposed to make the policy positively prepared:
 - Additional growth should be directed to Sleaford;
 - Changes to LP54 should be made to make it clear that the land at Quarrington should be considered earlier if other sites do not deliver and housing growth targets are not achieved;
 - The Plan should allocate a greater range of non-SUE sites to guard against uncertainty and longer lead in times and, to ensure a rolling five year supply of housing.



- The reasons stated by those who felt that the policy is not justified included:
 - The delivery aims of LP44 in relation to Sleaford West SUE omit reference to a hotel; a use proposed by the Sleaford West SUE planning application. The Sleaford Hotel Study (2014) prepared by Nathaniel Lichfield and Partners identifies growth in Sleaford is most likely to lead to additional demand for overnight accommodation.
- The following amendments were proposed to make the policy justified:
 - The section of the policy which refers to the Sleaford West SUE should include a hotel use;
 - Provide a link from Sleaford South Quadrant SUE through the Quarrington land to the A15. This will provide an acceptable solution to the traffic mitigation measures referred to in bullet points e and f;
 - In bullet point h, the planning authority has missed a great opportunity to provide further green corridors and linkages.
- The reasons stated by those who felt the policy is not effective included:
 - There is a need for an odour assessment to be prepared for the Sleaford West SUE as it is in close proximity to an existing water recycling centre;
 - Objection to the identification of site CL1001 at Quarrington as a broad location for growth and continued omission of the site from the allocation of sites under the Local Plan. *(Note: whilst the respondent logged this comment under policy LP44, they also submitted similar comments under policy LP54. The comment has, therefore, been summarised in this document under both policy LP44 and LP54).*
- The following amendments were proposed to make the policy effective:
 - Add the following text to policy LP44, bullet point m: *“Undertake an odour assessment to demonstrate no adverse impact on future residents and occupants of non-residential buildings from Sleaford Drove WRC and take account of this issue in detailed masterplanning of this site”*;
 - Removal of Sleaford South West SUE as it is not as sustainable and deliverable as site CL1001 at Quarrington.
- The reasons stated by those who felt the policy is not consistent with national policy included:
 - Growth has been over allocated at Gainsborough. Sleaford is a more desirable location for growth. The distribution of 12% of the growth elsewhere in Central Lincolnshire is not fully compliant with the NPPF. *(Note: whilst the respondent logged this comment under policy LP44, it was probably meant as a response under policy LP3. The comment has, therefore, been summarised in this document under both policy LP44 and LP3).*
- One respondent felt the Sleaford section of the Plan should be amended to include reference to development in towns and villages located within the Sleaford area, in addition to the two proposed Sustainable Urban Extensions (SUEs). *(Note: whilst the respondent logged this comment under policy LP43, it was probably meant as a response under policy LP44. The comment has, therefore, been summarised in this document under both policy LP43 and LP44).*
- One respondent expressed concern regarding flooding at Sleaford West Quadrant SUE and lack of evidence investigating this issue. They proposed that the policy should state that there is no increased risk of flooding to the town.
- One respondent questioned how much car access is proposed via the Drove and whether it is intended to enter any new development immediately west of the railway bridge (bullet point f).



LP45 Sleaford's Regeneration and Opportunity Areas

Summary of issues raised

- One comment broadly supported the policy.
- One comment questioned the current retail strategy for Sleaford and suggested the Market Place should be the heart of retailing in the town centre. *(Note: whilst the respondent logged this comment under policy LP45, it was probably meant as a response under policy LP46. The comment has, therefore, been summarised in this document under both policy LP45 and LP46).*
- One comment requested an amendment to paragraph 9.4.2 in relation to the numbering of buildings within the Heart of Sleaford Regeneration Opportunity Area. The respondent requested reference to number 18 Market Place, as well as numbers 17 and 19.

LP46 Sleaford Town Centre

Summary of issues raised

- One comment broadly supported the policy.
- One comment questioned the current retail strategy for Sleaford and suggested the Market Place should be the heart of retailing in the town centre. *(Note: whilst the respondent logged this comment under policy LP45, it was probably meant as a response under policy LP46. The comment has, therefore, been summarised in this document under both policy LP45 and LP46).*

LP47 Access and Movement within Sleaford

Summary of issues raised

- One comment broadly supported the policy.
- One respondent felt that the policy met all the tests of soundness. They supported the retention of the link road route, which they felt represented a once in a lifetime opportunity to closed the level crossing.
- The majority of respondents objected to the inclusion of the link road route in the policy and the closure of the level crossing. The reasons stated by those who objected include:
 - The level crossing is one of the safest in the UK and therefore its closure is unnecessary;
 - The regeneration of the Bass Malting is not dependent upon the link road – it would have to use existing access without the link road;
 - Questions around how the link road is to be funded and if this has not been agreed then it shouldn't be in the Plan;
 - Alternative access routes should be investigated, for example from Southgate to the Advanta site;
 - The link road route would lead to a loss of public open space and trees, some of which have TPO status, at the Boston Road Recreation Ground. Alternative line through the Bowls Club should be explored;
 - If the link road route is in the Plan it should state a CPO is required and specify a date by which the road shall be completed;
 - Suggest closing part of the town centre to through traffic.



Chapter 10 Development Sites

Summary of issues raised

- A number of comments were received about the general approach to the proposed residential allocations in Chapter 10. These included:
 - Over-reliance on Sustainable Urban Extensions (SUEs), both in terms of over the whole plan period and particularly in terms of short term housing supply;
 - Unrealistic expectations about delivery rates of SUEs;
 - More smaller sites should be allocated to help provide flexibility, choice, and to make the plan deliverable;
 - Support for capacities only being indicative and identifying that eventual capacities will be identified through design;
 - Over-reliance on allocations in 5 year supply;
 - Concerns over surplus of growth over the first 10 years of the plan;
 - Large villages should have a % cap on growth with only incremental growth;
 - Confusion over why market towns have less growth than some large villages; and
 - The housing trajectory should include a detailed trajectory of each site clearly stating how the current shortfall will be met.
- A number of comments were received about the detailed site assessment accompanying the allocations in the evidence base, including:
 - The assessment is overly simplistic and not transparent and so it is difficult to say whether the approach is sound and justified;
 - The criteria are not consistently applied;
 - There is either no weighting attached to criteria or it is not clear what weighting has been applied;
 - Highways scores are not consistent with comments at application stage and highways comments are only included on some sites;
 - Does not add weight to brownfield sites with many brownfield sites in the Lincoln area not being allocated;
 - Questions over the amended school distance in the 2016 version of the evidence report;
 - The statement often used that 'better sites are available' lacks meaningful certainty and transparency;
 - Site selection is driven by willingness of land owners to offer their sites rather than the site's suitability;
 - There are inconsistencies between Integrated Impact Assessment Scoring and the Evidence Report Scoring;
 - The rationale for how the level of growth for each village was achieved is not made clear and as such alternative growth levels may be appropriate;
 - Assessments only offer brief commentaries and do not offer clear guidance about suitability or otherwise;
 - Traffic light system takes no account of whether constraints can be overcome; and
 - It is not clear if education capacity issues can be overcome and this should not be a constraint to development.
- Various comments were received against the soundness of the policies in chapter 10, with many suggesting the process is unjustified, ineffective, not legally compliant, and not consistent with national policy. However, others disagreed with these assertions. Reasons for these views are included against specific sites in the following sections.

Policy LP48 Sustainable Urban Extensions - Allocations

Summary of issues raised

The following SUEs received comments during the consultation:

- **CL818 – North East Quadrant, Lincoln** – Support for allocation; site should exclude Greetwell Hollow and Quarry for impact on wildlife and habitat; SUE topic paper indicates delays for reserved matters which may reduce overall delivery.
- **CL819 – Western Growth Corridor, Lincoln** – Overall support for allocation, though one objection; part of the site can come forward in isolation with no constraints and direct access to deliver 150 homes; objection to building on flood plain and concern about impact on wider Lincoln area if developed; and SUE Topic Paper indicates concerns over deliverability.
- **CL428 – South East Quadrant, Lincoln** – Support for allocation; and timeframe indicated is unrealistic.
- **CL4668 – South West Quadrant, Lincoln** – Support for the allocation and additional support for an area within the SUE that can be delivered in advance of the wider SUE.
- **CL1241 – Gainsborough Northern Neighbourhood SUE** – delivery rates are unrealistic.
- **CL1239 – Gainsborough Southern Neighbourhood SUE** – concerns about deliverability, particularly in the short term.
- **CL1016 – Sleaford South Quadrant** – concerns over deliverability, particularly in the short term; and there are issues with access that remain unmitigated that can be resolved by allocating a neighbouring site (CL1001).
- **CL3036 – Sleaford West Quadrant** – Site should be removed from allocations.

It should be noted that other comments were received against SUEs in the relevant SUE policies in the previous chapters (LP28, LP30, LP39, and LP44).

In addition to comments against the proposed SUEs one additional SUE was proposed:

- **CL1001 – Land at Quarrington, Sleaford** – Site would be deliverable and sustainable; it is more desirable than the Sleaford West Quadrant SUE; it is all within single ownership; it would allow for greater flexibility within the plan; and it will deliver a direct link to the A15 which is needed to support the Sleaford South Quadrant.

Policy LP49 Residential Allocations - Lincoln

Summary of issues raised

The following sites received comments during the consultation:

- **CL525 – Former CEGB Power Station, Spa Road, Lincoln** – should be removed from allocations; and concerns over deliverability due to flood risk, contamination and access issues harming viability.
- **CL532 – Land north of Ermine West, Lincoln** – Support for allocation as it is suitable and deliverable and evidence is being gathered in advance of a planning application.
- **CL703 – Land adjacent to Yarborough School, Lincoln** – Objection to loss of playing field and should be omitted as an allocation unless it can satisfy NPPF requirements and there is no strategic need for it to accommodate sport.
- **CL1068 – Land north of Station Road, Waddington Low Fields** – Objection to site as was selected for geological interest; and objections as it is within the area of great landscape value and the green wedge.
- **CL1882 – Land off Millbeck Drive, Lincoln** – Support allocation as a logical extension, it is sustainable, in single ownership and there are no major constraints, and as such it is deliverable within 5 years.
- **CL4379 – Land at junction of Brant Road and Station Road, Waddington Low Fields** – Support the allocation and the owner is actively pursuing its development.
- **CL4615 – Land north west of Lincoln Road, Romangate, Lincoln** – Support for allocation, but whilst the policy does not preclude commercial uses it should be clarified that mixed use is acceptable here; and the site benefits from existing infrastructure to facilitate development.



- **CL4652 – Land at and north of Usher Junior School, Lincoln** – Support as this will allow for comprehensive development with neighbouring sites; designation of important space should be removed from part of the site; and objection to apparent loss of playing field.
- **CL4704 – Land off Western Avenue, Lincoln** – Support as its allocation will allow for comprehensive development with neighbouring sites.

In addition to comments against the proposed allocation sites, the following sites were proposed as additional or alternative allocations:

- **CL416/CL813 – Land South of Urban Street, Lincoln** – dispute designation as green wedge and area of great landscape value as it does not contribute to these; surrounded by development on three sides; no conflict with neighbouring land uses; gas holder site is being decommissioned and the site has been sold; there are no major constraints; the site is sustainably located and suitable direct access can be achieved through multiple access points; development would help regenerate the area and the site is in single ownership, controlled by a house builder and is deliverable within 5 years.
- **CL929 – Former Lincoln Castings Site D, Station Road, North Hykeham** – dispute highways score in light of lack of objection against recent application; site is brownfield as a former gravel workings; detailed flooding and drainage report contest assertion that some of the site is at risk from flooding; sustainably located; and a full drainage strategy is in place informed by Anglian Water.
- **CL2178 – Land at Thorpe Lane, South Hykeham Fosseway** – no major constraints on the site; it is sustainably located; it is well contained by surrounding roads and development; dispute highways scores and comments; and working together with neighbouring land owners for a comprehensive development for which a developer has agreed terms and this can be delivered within 5 years.
- **Part of CL3073 – Land off Thorpe Lane, South Hykeham Fosseway** - no major constraints on the site; it is sustainably located; it is well contained by surrounding roads and development; dispute highways scores and comments; reduced area from that assessed in allocations work; site is in horticultural use rather than agricultural; and working together with neighbouring land owners for a comprehensive development for which a developer has agreed terms and this can be delivered within 5 years.
- **CL4431 – Land at Lee Road, Lincoln** – site is of minimal recreational value with only bowling club occupied with short term lease; any loss of leisure use can be mitigated through contributions; site subject of anti-social behaviour; there are no major constraints; it is in single ownership and it is deliverable within 5 years.
- **CL4432 – Land off Wolsey Way, Lincoln** – dispute designation as important open space, supported by a landscape review; site is bound by development on three sides; evidence report is incorrect in saying that it links two open spaces as one is now being developed; it is sustainably located with suitable access; the site is not constrained; and it is in single ownership, controlled by a house builder and can be delivered within 5 years.

Policy LP50 Residential Allocations – Main Towns

Summary of issues raised

The following sites received comments during the consultation:

- **CL3044 – Land south of Willingham Road, Lea, Gainsborough** – allocation does not meet the sustainability requirements set out in the policy; lack of capacity in infrastructure; traffic and road safety concerns; pressure on Lea Park; impact on wildlife; drainage and sewerage issues, with soakaway tests having been undertaken recently; impact on house prices; impact on area of great landscape value; and potential implications for the village if this is allocated and other planning applications in the village are approved.
- **CL4691 – Former Castle Hills Community College Site, The Avenue, Gainsborough** – support allocation and it should be extended to include a longer frontage to the Avenue.



- **CL1013 – Land at Poplar Farm, Sleaford** – development will result in landscape and noise issues.
- **CL1007 – The Hoplands Depot, Boston Road, Sleaford** – concerns about whether a suitable access can be delivered.

In addition to comments against the proposed allocation sites, the following sites were proposed as additional or alternative allocations:

- **CL1324 – Land adjacent to Lea Park, Lea, Gainsborough** – site is at appeal for 450 dwellings; offers a comprehensive approach to delivering a sustainable mixed use development; and there are no technical or environmental constraints.
- **CL1348 – Land behind 51 Walkerith Road, Morton, Gainsborough** – site should be allocated in order to meet growth needs in Morton; can deliver in excess of 25 dwellings and would reduce the reliance on windfall; flood risk assessment indicates that risk can be mitigated on this site; and there are no alternatives.
- **CL1351 – Land off Granary Close, Morton, Gainsborough** – application soon to be submitted for 37 dwellings including 10 affordable units; site would deliver additional benefits such as open space; will help deliver houses in the short term; EA have supported flood mitigation on the site; and no technical constraints on the site and development would not intrude into the countryside.
- **Land west of the Avenue, Gainsborough** – site CL4691 should be extended to include this area as it would not have an adverse impact on the surrounding area.
- **Land off Horsley Road, Gainsborough** – application is being prepared and it should be allocated.

Furthermore, in relation to Lea there are concerns about the discrepancy between the settlement hierarchy which identified Lea as a medium village and this policy which allocates a housing site to the village for Gainsborough. There is a lack of clarity about whether the 15% growth level for Lea in policy LP4 is over and above this allocation or if it is included. One comment also suggested a preference for a number of smaller development sites in Lea.

Policy LP51 Residential Allocations – Market Towns

Summary of issues raised

The following sites received comments during the consultation:

- **CL1888 – Land adjacent and rear of Roman Ridge on Brigg Road, Caistor** – objection as an area of natural and geological beauty which benefits residents and visitors; impact on local infrastructure; and issues with houses in Caistor not selling.
- **CL2093 – Land north of North Street, Caistor** – objection as an area of natural and geological beauty which benefits residents and visitors; impact on local infrastructure; and issues with houses in Caistor not selling.
- **CL3086 – Land south of North Kelsey Road, Caistor** – support allocation and land owner is actively pursuing development here.
- **CL1358 – Gallamore Lane, Market Rasen** – support allocation of this site and detailed proposals are being brought forward; and objection as the site is not well connected to services and residents will rely on car so the capacity should be reduced.
- **CL1359 – Land off Linwood Road and The Ridings, Market Rasen** – site is not well connected to services and residents will rely on private car so the capacity should be reduced; and lack of capacity in schools and health centre.
- **CL1364 – Caistor Road, Market Rasen** – support allocation but it can accommodate 400 dwellings; a planning application is being produced for this year; the site is deliverable and developable; site is not well connected to services and residents will rely on private car so the capacity should be reduced; and lack of capacity in schools and health centre.

- **CL1369 – Land to the rear of Walesby Road, Market Rasen** – support allocation and the owner is actively pursuing its development.

In addition the following site was proposed as an alternative allocation for Caistor:

- **CL2092 – Land south of A46 and Whitegate Hill, Caistor** – the site should be allocated to provide growth for Caistor; and traffic lights could be installed to allow safe access and pedestrian control.

In addition to comments against the proposed allocation sites, the following general issues were raised regarding development in Market Rasen and Caistor:

- The number for Market Rasen is too high and infrastructure cannot cope;
- CIL funding from sites in Middle Rasen and Market Rasen should be shared out due to service provision;
- Properties have failed to sell in Market Rasen;
- Caistor housing allocations CL1888 and CL2093 will encroach on land which should be allocated green space. The suggested 500 dwellings in Caistor will increase the requirement for close and accessible green space.

Policy LP52 Residential Allocations – Large Villages

Summary of issues raised

The following sites received comments during the consultation:

- **CL415 – Land south of Bracebridge Heath** – site is reliant on neighbouring SUE to deliver social infrastructure and so should either be included in SUE boundary or have its development put back to later in the plan period when the facilities are built; support allocation but it can deliver around 369 dwellings including open space and buffer planting as demonstrated in the concept plan; Bracebridge Heath is a sustainable settlement; and the site is in single ownership and a planning application is being prepared so the site can be delivered in the short term.
- **CL1179 – Land north of Rudgard Avenue, Cherry Willingham** – support allocation as a logical extension to the village; it has no major constraints, it is in single ownership and controlled by a house builder and is available and deliverable within 5 years; pre-application discussions are ongoing with West Lindsey; contest score relating to land contamination supported by a phase 1 environmental report; transport assessment shows no adverse impacts; and landscape assessment supporting the neighbourhood plan shows site is among the most suitable in Cherry Willingham.
- **CL1181 – Land east of Thornton Way, Cherry Willingham** – support allocation as a logical extension to the village; it has no major constraints, it is in single ownership and controlled by a house builder and is available and deliverable within 5 years; pre-application discussions are ongoing with West Lindsey; contest score relating to land contamination supported by a phase 1 environmental report; transport assessment shows no adverse impacts; and landscape assessment supporting the neighbourhood plan shows site is among the most suitable in Cherry Willingham.
- **CL4433 – Land east of Rudgard Avenue, Cherry Willingham** – support allocation as a logical extension to the village; it has no major constraints, it is in single ownership and controlled by a house builder and is available and deliverable within 5 years; pre-application discussions are ongoing with West Lindsey; contest score relating to land contamination supported by a phase 1 environmental report; transport assessment shows no adverse impacts; and landscape assessment supporting the neighbourhood plan shows site is among the most suitable in Cherry Willingham.
- **CL4667 – Land south of Fen Road, Heighington** – site has outline approval with reserved matters to be submitted soon; and the site is suitable, sustainable and deliverable.



- **CL906 – Land at Top Farm, Navenby** – objection to site; too much on the site; support for the allocation, but it can deliver a minimum of 140 dwellings and will deliver additional affordable housing too; no major constraints on the site; local facilities have capacity to accommodate and there are no traffic implications of 160 dwellings on the site; and the site is suitable, sustainable and deliverable.
- **CL4660 – Land north of Deepdale Lane, Nettleham** – support allocation as it is allocated in neighbourhood plan and a planning application is being prepared; consultation has been undertaken with the community on the site for 50 homes and over-55s development; site owners working with house builder and as such is sustainable and deliverable; and the site boundary is incorrect and does not match the neighbourhood plan which was amended to allow for suitable access.
- **CL1432 – Land at Church Lane, Saxilby** – site has outline approval and reserved matters are expected to be submitted soon; and site is suitable, sustainable and deliverable.
- **CL4671 – Land off Grantham Road, Waddington** – the site is part of the green wedge and area of great landscape value and development is not appropriate here.
- **CL1490 – Land at the Hardings, Welton** – site is allocated for 50 dwellings in line with permission 130995, but the allocation area is larger than this permission as such the allocation has potential for additional development; wider allocation area has more defensible boundaries than the permitted site and wider site would make better use of land; Welton is sustainable village with services within walking distance; there is suitable access for the wider site; and the site is available and can be delivered within 5 years.
- **CL1491 – Land east of Prebend Lane, Welton** – site area is incorrect and should be 28.2ha; outline permission granted under 131681 for up to 350 dwellings and a large open space; village has good range of services within walking distance; allocation should be more flexible to allow for better use of land on the site to be made (currently 12dph) and proposed access has additional capacity; and the site is available and deliverable within 5 years.
- **CL2091 – West Street, Billinghay** – support allocation which has a recommendation to grant planning permission subject to S106; and site is suitable, sustainable and deliverable.
- **CL4571 – Land off Waterside, Billinghay** – support allocation as a sustainable site; the landowner is actively pursuing development on the site and an application is being prepared.
- **CL875 – Land opposite the cemetery, Boston Road, Heckington** – not the most suitable site in Heckington; and there is no detail assessment of the impact of this site on the conservation area.
- **CL1305 – Land at Church Lane, Keelby** – concerns about access to the site which should not be along Church Lane but should be through or next to neighbouring site to Stallingborough Road; and concerns about lack of capacity in sewage treatment works.
- **CL1307 – K2 Stallingborough Road, Keelby** – site should be referred to as “K2/K4 Stallingborough Road, Keelby” or “Stallingborough Road, Keelby” as site was labelled K2 and K4 in the West Lindsey Local Plan.
- **CL4710 – Field 8, Lincoln Road, Ruskington** – development at the site would have a greater visual impact than CL959; support allocation of the site as a natural extension to other proposed allocations; limited impact on the countryside landscape; site can deliver a range of housing; no technical planning constraints on the site; and site is available, suitable and deliverable.
- **CL957 – Land off Lincoln Road, Ruskington** – development at the site would have a greater visual impact than CL959; and development on the site should be low rise as neighbouring houses are bungalows.
- **CL958 – Land north of Ruskington** – development at the site would have a greater visual impact than CL959; support allocation as has been promoted throughout the local plan process and the owner is actively pursuing development; background studies have been produced in support of the site; and site is available now, suitable for development and can be delivered within 5 years.
- **CL960 – Land south of Poplar Close east of railway line, Ruskington** – site should not be allocated as it is a windfall development.



- **CL965 – Land at Whitehouse Road, Ruskington** - development at the site would have a greater visual impact than CL959.
- **CL1892 – Land south of Winchelsea Road, Ruskington** - development at the site would have a greater visual impact than CL959.
- **CL1456 – Land to the East of North Moor Road, Scotter** – objections to the site and concerns about drainage and sewerage and the impact on neighbouring estates' sewerage; concerns about traffic and road safety; concerns about combined impact with neighbouring developments at The Lakes; loss of distance views; selection of site is not most appropriate for mitigating flood risk; if Scotter Bypass proceeds this site cannot be built on; location of site in relation to services will encourage car usage; and concerns about lack of capacity in local infrastructure.
- **CL4674 – North Moor Road, Scotter** – objections to the site and concerns about drainage and sewerage and the impact on neighbouring estates' sewerage; concerns about traffic and road safety; loss of distance views; selection of site is not most appropriate for mitigating flood risk; if Scotter Bypass proceeds this site cannot be built on; concerns about lack of capacity in local infrastructure; and impact on wildlife.

In addition to comments against the proposed allocation sites, the following sites were proposed as additional or alternative allocations:

- **CL4007 – Manor Farm Phase 3, Bardney** – site was granted at appeal in April 2016 so should be allocated.
- **Land north of Station Road, Bardney** – there is not adequate growth in the plan for Bardney; this site is suitably located close to services; and site is available for development beyond 5 years.
- **CL4363 – Bleak House Farm, Cherry Willingham** – site should be allocated to meet growth needs and to ensure a viable and deliverable supply of housing; eastern part of the site could deliver 300 dwellings, promote sustainable travel; the site is not constrained and has direct access to the road network; and it is in single ownership and can be delivered quickly.
- **Part of CL1189 – Market Rasen, Dunholme** – Dunholme is a sustainable settlement and site is near to services; part of site promoted for 90 dwellings across 3 hectares; flood risk on part of the site, but this can be dealt with in design and layout; pedestrian access opportunities; and site is available and can be delivered within 5 years.
- **CL1189 – Market Rasen Road, Dunholme** – alternative submission for site for self-build plots in response to need identified in the SHMA and West Lindsey's Vanguard Status; site is well located for access to village centre and amenities; alternative option to affordable housing for which there will be a shortfall; and owner has had discussion with neighbourhood plan group, The Community Land Trust and Potton Homes all of whom have indicated support.
- **CL1384 – Land at Nettleham off Mill Hill, Nettleham** – site is sustainably located; well-related to the built area; near to amenities; there are no physical constraints; and it is suitable and deliverable.
- **CL4702 – Land off Larch Avenue, Nettleham** – sites have been ruled out solely because they were not in the neighbourhood plan; this does not take provide any contingency for any non-delivery.
- **CL4729 – Land to the west of Lancaster Way, Skellingthorpe** – site is suitable and should be allocated and owners have incurred significant expense since receiving positive pre-application feedback.
- **CL4732 – Land off Woodbank, Skellingthorpe** – site is suitable and should be allocated and owners have incurred significant expense since receiving positive pre-application feedback.
- **CL4701 – Land at Tinkers Lane and Millers Road, Waddington** – there is not enough development for Waddington and site should be allocated for approx. 180 dwellings; site is adjacent to existing allocation; could deliver significant woodland screening, a range of homes, removal of unsightly buildings and two access points; and site is sustainable and deliverable.



- **Land east of Grantham Road, Waddington** – site is in a sustainable location adjacent to two allocations and can be judged similarly to CL4496; and it is available and can be delivered by 2019 subject to planning permission.
- **Land to the north of Kyme Road, Heckington** – site is adjacent to a site being developed for 22 affordable units; and site is sustainable, deliverable and is free of constraint.
- **CL876 – Land at Kyme Road, Heckington** – site is an appropriate allocation and is equal to or better than proposed allocation CL875; there is adequate capacity in facilities to accommodate this site; sites in Heckington are more sustainable than others given the level of provision in the village; and recent application has highlighted that the education authority would accept financial contributions for development here.
- **CL1020 – Land off Howell Road, Heckington** – site is an appropriate allocation; there is adequate capacity in village for additional sites; sites in Heckington are more sustainable than in other villages; and the site should either be considered as an allocation or a broad location for future growth.
- **CL4521 – Land north of Old Gallamore Lane, Middle Rasen** – site is the most sustainably located in Middle Rasen as it is nearer the shops and facilities in Market Rasen; site is viable and available and can be delivered within 5 years; application only refused on green wedge grounds and revised scheme has addressed inspector's concerns; development would not harm character of settlement break; majority of site in flood zone 1 and EA accept flood risk assessment and drainage strategy; and the site can deliver 47 dwellings.
- **CL4711 – Land at Brook Cottage, Middle Rasen** – site should be allocated.
- **CL959 – Land off Fen Road, Ruskington** – site should be allocated as it has substantial buildings on the site that are vacant with no realistic chance for reuse; there is existing access onto Fen Road, it is adjacent to an employment site; site is better than others in Ruskington; no constraints on the site are insurmountable; no issue with access; and site is suitable, available and deliverable.
- **CL962 – Land at Leasingham Lane, Ruskington** – site scores better than those proposed for allocation; it relates better to the village and development would be infill; and the site is served by an existing village distributor road.
- **Land at Ruskington, site 1 (south of Westcliffe Road)** – site is better than proposed allocation sites; suitable access available; no known technical constraints; sites in Ruskington are more sustainable than in other villages; and site is available, suitable and deliverable for 60 dwellings.
- **Land at Ruskington, site 2 (south of Westcliffe Road)** – site is better than proposed allocation sites; suitable access available; no known technical constraints; sites in Ruskington are more sustainable than in other villages; and site is available, suitable and deliverable for 250-300 dwellings.
- **CL4013 – Priory Road, Ruskington** – site should be allocated; flood risk assessment is being undertaken and most of site is outside flood zone 3; no detrimental impact on listed alms houses; close to the station; and little impact on the landscape.
- **CL1454 – Land south of Westcliffe Road, Scotter** – site should be allocated for 120 dwellings and can deliver some open space; it is well located for access to facilities; there are no major constraints; it is more suitable than selected sites for allocation in relation to reducing and mitigating flood risk; it is better than the proposed sites in Scotter; site has suitable direct access; and site is in single ownership, being promoted by a house builder and is deliverable within 5 years.
- **CL1455 – Gainsborough Road, Scotter** – it is more suitable than allocation sites in relation to reducing and mitigating flood risk.
- **CL4127 – Land off Becks Lane, Scotter** – site scored similarly to those selected for allocation but was subjectively dismissed; and site is more suitable than allocation sites in relation to reducing and mitigating flood risk.
- **CL4361 – Land off Gainsborough Road, Scotter** – site scored similarly to those selected for allocation but was subjectively dismissed; and site is more suitable than allocation sites in relation to reducing and mitigating flood risk.

In addition to comments on individual sites some comments were made about individual villages:

- Billingham – there is no explanation of why Billingham is receiving such a high growth level; and there is inadequate infrastructure to meet the level of growth proposed.
- Cherry Willingham – the overall quantum for Cherry Willingham is broadly accepted, but there is concern about the potential for a current application for 300 homes to be approved in addition to the proposed allocations.
- Middle Rasen – concern about lack of growth in village which must grow to maintain and enhance its role; only allocating sites in Market Rasen does not accord with the spatial strategy; Middle Rasen could accommodate a greater level of growth than other large villages because it is close to Market Rasen; and one of the ‘reasonable alternatives’ in the IIA should be allocated.
- Navenby – should have a 15% growth cap with only incremental growth allowed.
- Nettleham – sites were only considered if in the neighbourhood plan which does not allow for any contingency for any non-delivery in the village.
- Saxilby – growth level for Saxilby is too low and as such a sentence about taking positive decisions on future applications should be added.
- Scotter – the village is at capacity with a strain on services and traffic issues; there are drainage issues in the village; sites should be identified away from the river; the bypass is important to Scotter’s future and should not be abandoned; and development in the village is taking away from its quaint character.

Policy LP53 Residential Allocations – Medium and Small Villages

Summary of issues raised

The following sites received comments during the consultation:

- **CL22 – Nocton Park, Nocton** – Nocton Park is a significant green space and should be protected and Nocton does not qualify for significant further development.
- **CL4673 – Land at Hemswell Cliff** – level of growth from this site is broadly appropriate; preference for development in area to occur north of the A361.

In addition to comments against the proposed allocation sites, the following sites were proposed as additional or alternative allocations:

- **CL4731 – Land to the east of Lincoln Road, Bassingham** – site has no planning constraints and a planning application and appeal supported by documents that confirm this; and proposed scheme would not have a material intrusion into the wider countryside.
- **CL1075 – Land at Thurlby Road, Bassingham** – site is suitable and sustainable as demonstrated by planning officers’ recommendation of approval on applications; and the site is available and deliverable now.
- **Field to the north of A361, Hemswell Cliff** – most appropriate location for residential development in Hemswell Cliff.
- **CL1399 – Land west of High Street, Newton on Trent** – site has support of parish council; proposals are sustainable rural development; and site is deliverable for 350 dwellings as demonstrated in the current application.
- **Land east of High Street, Marton** – site has all services and there is an urgent need for low-occupancy housing for elderly residents along with employment use and solar panels.
- **Part of CL1339 – Former Railway Goods Yard, Stow Park** – suitable for housing with all services on the site and potential to re-establish railway access for passengers.
- **Site part of OS 5166 farm, Marton** – farm has no dwelling and this is needed.
- **Part of CL4410 – Willows Garden Centre, Gainsborough Road, Glentham** – development needed to support existing services in Glentham which are all within walking distance of this site; site is near to employment growth in Hemswell Cliff; site is free from constraints; and site is in single-ownership, available and deliverable for 25 dwellings.



- **CL2177 – Land off Moor Lane, Swinderby** – site is a redundant brownfield site – one of the few around Central Lincolnshire and the only one in Swinderby; and it should be allocated for 100-120 dwellings.
- **CL4497 – Burton Waters** – site has permission for an extra care facility of 100 units and additional lodges for elderly people and so should be allocated; and Burton Waters has good range of facilities and good connectivity.
- **CL433 – Land at Manor Farm, College Road, Cranwell** – site previously had permission for 27 dwellings; site is sustainable and is a brownfield site; and it is vacant and can deliver 25 dwellings.
- **Land to the north of Fiskerton** – site is being pursued through the neighbourhood plan and can deliver 200 dwellings sustainably, including recreational land, open space and two access points from the east and south.
- **CL4627 – Thorpe Road, Ewerby** – site would be infill development; close to services in Sleaford; can deliver 30 dwellings; and there are no known constraints, it is in single ownership and can be delivered in the short term.
- **CL1095 – Manor House Farm, Meadow Lane, South Hykeham** – South Hykeham is well located for access to services; development of site will help support local services; sustainable location in the village, it contains disused farm buildings and residential development will be a positive improvement; and residential development would relate well to surroundings.
- **CL1283 – Land off Bishop Norton Road, Glentham** – site can deliver 25-30 dwellings with land for landscaping, village green, preservation of archaeological potential and flood risk management; site is suitable and deliverable.
- **CL4507 – Southern Lane, Morton, Swinderby** – site should be allocated to offer a more balanced approach to growth in the area and to help local employment; there are no constraints on the site; and the site is available and deliverable early in the plan period.
- **Part of CL2082 – Prestons Farm, Eagle Hall Lane, near Eagle** – site should be allocated in addition to others to help the area grow sustainably; and would deliver houses early in the plan period.
- **CL938 – Land at Besthorpe Road, North Scarle** – site should be allocated in addition to others to help the area grow sustainably; and would deliver houses early in the plan period.
- **Part of CL857 / CL858 – Land at Eagle Moor, Eagle** – site should be allocated in addition to others to help the area grow sustainably; and would deliver houses early in the plan period.
- **Part of CL1042 – Land at Eagle Farm, Swinderby** – site should be allocated in addition to others to help the area grow sustainably; and would deliver houses early in the plan period.
- **CL1088 – Land at High Street, Welbourn** – site has been put forward in phases but entire site could be available.

Policy LP54 Remaining Capacity on SUEs and Broad Locations for Future Growth

Summary of issues raised

The following sites received comments during the consultation:

- **CL1001 – Land at Quarrington, Sleaford** – the site should be allocated for development during the plan period; if retained as a broad location for growth the criteria for bringing this site forward should be extended to provide more flexibility to tackle non-delivery as the wording of LP54 only allows CL1001 to come forward if certain targets are reached; and the site is in single ownership and is deliverable.

In addition to comments against the proposed allocation sites, the following sites were proposed as additional or alternative allocations:

- **CL1020 – Land off Howell Road, Heckington** – site is appropriate for allocation or a broad location for growth; and sites in Heckington are more sustainable than in other villages.

LP55 Development in Hamlets and the Countryside

Summary of issues raised

- One respondent gave high level support for the policy, however most comments were made in objection to the policy.
- The majority of respondents felt that the policy is legally compliant, but those objecting felt that the policy is not positively prepared, justified, effective or consistent with national policy.
- The reasons stated by those who felt that the policy is not positively prepared, justified or effective included:
 - Objections raised against Part D, non-residential development in rural areas: comments that the policy creates a ‘presumption against development’ that restricts development outside settlement boundaries;
 - Concern raised that the policy is inconsistent with LP2 at Part E (a), which, without any clarification, could encompass all the developments restricted in policy LP2. As such some transport related development which may be permitted under Policy LP2 would not be permitted under LP55.
- The following amendments were proposed to make the policy positively prepared, justified and effective:
 - Part D to be reworded to read: “*Development in the Open Countryside adjacent to existing settlements will be permitted provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of development*”;
 - Add “uses” as well as “businesses” to Part E (a) to remove inconsistency with LP2.
- The reasons stated by those who felt that the policy is not consistent with national policy included:
 - One respondent felt Part A (c) goes beyond the requirements of the NPPF, objecting to the building being of notable architectural or historic merit before it can be converted;
 - Concern raised against Part G, namely that it goes beyond the requirements set out in paragraph 112 of the NPPF.
- The following amendments were proposed to make the policy consistent with national policy:
 - Part A (c) should be amended to read: “*The building is worthy of retention in its setting*”;
 - The policy should be amended to permit development on the Best and Most Versatile land if the benefits of development outweigh the harm, including the loss of Best and Most Versatile.

LP56 Gypsy and Traveller Allocations

Summary of issues raised

- Over 130 representations were received in relation to this policy.
- No specific objections, or expressions of support, were made to sites CL4738 (Westrum Lane Brigg) or CL4675 (Washingborough Road Lincoln).
- Many objections to site CL1377 (Trent Port Road Marton) were raised, as summarised below. There was no express support for this proposal.
- General comments made included:



- Allocation of 14-17 sites fails to meet National guidance: a five year supply requires allocation of 18 permanent pitches (3.6 X 5) and 4 stopping places.
- Criteria f is too restrictive.
- Policy should adequately express the need for small, locally connected sites at larger and inherently more sustainable locations.
- Fully appreciate that there are pressures to provide sites.
- Object to requirement for Gypsy and Traveller sites to come forward in the Sustainable Urban Extensions: the SUEs are not the appropriate place for such provision as they are key sites necessary to contribute to significant housing need and this requirement will add to the already significant financial burden.

Objections to site CL1377 Marton:

- Appears to be a lack of research into alternative sites and as such I would like to understand what other potential sites have been looked into.
- No amenities in Marton, limited capacity at primary school, no secondary school, limited health facilities: location not sustainable.
- Likely to be an issue with waste collection.
- Marton is classed as a medium village and has no site allocations: there will be limited growth in medium villages to support their function and the allocation of a Gypsy and Traveller site will not help its sustainability.
- Access road is too narrow- single lane.
- The site is agricultural: the applicant has used this fact to obtain planning permission for various buildings with a proviso by the council that they are used only for agricultural purposes.
- Site would be better used to provide starter homes or affordable homes for young people of the village.
- Site should be split: previous application sought to provide local residents with low cost homes on part of the site and provide the north of the site for Traveller use.
- Previous application for housing on the site was refused for various reasons including flooding.
- Whilst the majority of the site is not in a flood area, the entrance to the site is, which would cause access issues.
- Development would be out of character with village.
- Unacceptable impact on the amenity of nearby residents, including (but not limited to) visual and acoustic privacy and overlooking.
- Hope that all the necessary bat and ground nesting bird surveys are done.
- Site is of archaeological interest.
- Establishment of traveller site here would have major environmental impact by reason of its appearance, noise and movement of vehicles and people.
- Disruptive effect on adjoining cemetery: the two uses are incompatible.
- Land may be contaminated by cemetery.
- Would result in increased traffic noise on Trent Port Road.
- There is a 60mph speed limit on the main road which Trent Port Road joins- dangerous access.
- Site has no mains electricity, gas, water or sewerage.
- Broadband and mobile telephone connections are limited.
- Existing Gainsborough Summergangs Lane site could be extended.
- There are three existing sites near Marton that are not fully occupied: Gainsborough, Upton and Washingborough.
- Many Gypsy and Traveller families are opting for houses.
- No local need for a Gypsy and Traveller site in Marton.
- Needs of the village and residents have not been taken into account: bias towards Gypsies and Travellers.

- Proposal does not comply with the recommendations of the West Lindsey District Council 'Guidance on Locations for Additional Residential Gypsy and Traveller Pitch Provision and Site Assessment Criteria in West Lindsey' (2010) which identified a number of zones within 2.5km of major centres that were considered appropriate for Traveller sites.
- The likely appeal of a site in Marton can be judged with reference to the site near Beckingham (having similar distance from services). According to the 2013 Gypsy and Traveller Accommodation Needs Assessment it was decided that this site would not be expanded due to dissatisfaction of the residents with the distance from services.
- There are areas in Central Lincolnshire which have less Gypsy and Traveller provision than West Lindsey.
- Brownfield sites belonging to the councils or County Council have not been sufficiently explored.
- A property on Trent Port Road has the only slipway between Goole and Newark which is used by Lincolnshire Fire and Rescue to launch rescue boats: increased traffic and parking on Trent Port Road may cause issues with access to the slipway.
- 25% of travellers prefer to be at least 250 meters away from residences, 41.4% prefer to be 1km: this site is within 5 meters of neighbouring houses.
- Site is private and given the amount of adjacent land owned by the landowner there will always be the possibility of unauthorised expansion.
- Objections based on Department for Communities and Local Government Planning Policy for Traveller Sites (2015):
 - National policy requires authorities to pay particular attention to the early and effective community engagement of both the settled and traveller communities- this has not been done with the settled community in Marton.
 - The 2013 Gypsy and Traveller Accommodation Needs Assessment (GTANA) does not establish a robust base for establishing need: there has been some significant under reporting of available pitches at some sites.
 - Para 14 states that the scale of sites in rural areas should not dominate the nearest settled community: the proposed CL1377 site is larger than any other recent developments within the village.
 - Given the change to the definition of Gypsies and Travellers, the 2013 GTANA should be revised to meet the current definition and need be recalculated.

LP57 Ministry of Defence Establishments

Summary of issues raised

- Only one representation was received in relation to this policy.
- The comments made on behalf of the Ministry of Defence noted that the amendments made to Policy LP57 appear to have been made in line with the comments provided on behalf of the MOD during the previous round of consultation in 2015 and are therefore supported.

Chapter 11 Previous 'Saved Policies', Implementation and Monitoring

Summary of issues raised

- Only two comments were logged against Chapter 11.
- The first, from Heighington Parish Council, expressed concern that this section does not identify how implementation and monitoring will take place. The parish council commented that it is of no use checking that actions have taken place without any judgement of impact: other local plans identify milestones.
- The second comment on behalf of the Woodland Trust noted that whilst monitoring is taken into account in the Local Plan, effective monitoring needs to be put in place so as to highlight any effective delivery. Maintaining a high quality natural environment should be defined as a

measurable objective: currently there is no indicator of biodiversity proposed, or any other environmental targets. Measuring indicators such as development within the Green Belt and planning decisions that affect climate change and the impact of a development on the landscape should be taken into account.

Appendix A Neighbourhood Planning

Summary of issues raised

- No representations received.

Appendix B Growth Levels in Villages

Summary of issues raised

- Included in summary of LP4.

Appendix C Open Space Provision Standards

Summary of issues raised

- Two comments were registered against this Appendix. Whilst the respondents logged their comments under Appendix C, they are mostly relevant to policies LP23/ LP24/ LP30/ LP51. The comments have, therefore, been summarised in this document under Appendix C and policies LP23/24/30/51 as applicable. The two comments are summarised below:
- Caistor housing allocations CL1888 and CL2093 will encroach on land which should be allocated green space. The suggested 500 dwellings in Caistor will increase the requirement for close and accessible green space.
- The development of Greetwell Hollow/ Quarry would result in a failure to comply with the open space provision standards for the North and North East of Lincoln.

Appendix D Glossary

Summary of issues raised

- No representations received.

3. Summary of Integrated Impact Assessment comments raised during Proposed Submission consultation

Integrated Impact Assessment

Summary of issues raised

- The majority of respondents felt that the Integrated Impact Assessment (IIA) is legally compliant, although some did not.
- The reasons stated by those that felt that the IIA is not legally compliant included:

- In relation to LP4, the IIA does not assess the impact and sustainability of the 10% target or any alternative higher or lower figure. It cannot justify why 10% is appropriate;
 - Concern that the IIA does not robustly appraise the relative pros and cons of a policy that identifies areas suitable for wind energy development based on proportionate evidence.
 - Inconsistencies exist between the IIA site assessment conclusions and those set out in the Residential Allocations Report for LP48 – LP54;
 - Objection to Western Growth Corridor SUE. Look at areas north of Lincoln which are not flood sensitive or agriculturally valuable.
- There were various general comments and objections in relation to the IIA, including:
 - One respondent submitted general comments on the Sustainability Appraisal process and requirements;
 - Building 68 dwellings will have a big impact on Lea, including pressure on existing infrastructure;
 - In relation to CL1305, concern regarding access to the site via Church Lane;
 - Objection to no sites being allocated for residential development in Middle Rasen. Sites CL4521 and CL4711 should be allocated for residential;
 - Concern expressed around the residential allocations in Scotter (CL4674 and CL1456) – impact on quality of life for existing residents and undermine sustainability of the community. Consider CL1454 to be a more sustainable alternative.