

Central Lincolnshire Local Plan

Regulation 19

Proposed Submission Consultation

List of responses – sorted by respondent



Introduction

This document is an extract of all responses received at the Regulation 19 Proposed Submission Consultation. In this document the responses are sorted in plan order.

At the regulation 19 consultation there were 1,091¹ responses from 214 individual respondents. In the tables below all comments against each policy or other part of the document or other submission documents are provided with details of the response.

During the consultation people were either able to submit their response directly against policies in the plan or via a questionnaire or they were able to send their responses to the Local Plan Team who input responses on their behalf. The vast majority of responses are included as questionnaire responses, but there were 86 responses submitted as comments. In the tables below it states whether the submission was a comment or a questionnaire response. There are slightly different links to follow to view the responses depending on whether they are a comment or a questionnaire response within the consultation portal. These are provided below:

View comments at:

<https://central-lincs.inconsult.uk/CLLP.Proposed.Submission./listRepresentations>

View questionnaire responses at:

<https://central-lincs.inconsult.uk/CLLP.Proposed.Submission./listRespondents>

Some representations had to be summarised due to their length and some also included the submission of maps, documents, or other evidence to support the comments being made these are all stored and can be viewed in the consultation database at the above links.

Where additional files have been submitted or where comments have been summarised a link has been provided in the final column to go direct to the full response.²

¹ Please note that within the consultation portal it states that there are a total of 888 responses (between 802 questionnaire responses and 86 comments), but some of these are against multiple parts of the plan so appear against each policy in this document.

² Where there is a reference to previous responses in the Reg 18 consultation, these can be viewed by following this link - <https://central-lincs.inconsult.uk/CLLP.Draft.Local.Plan/listRespondents>

Contents

Introduction	1
Individual respondents	8
Mike Airey	8
Richard Alford	8
Martin Bandy	9
Dr Steve J Barton	9
David and Vera Barwick	10
Stuart Blackbourn	10
L Boulton	12
Robert Boulton	12
Charles Campion	13
Tony Close	14
David Crees	14
Tim Croydon	15
Councillor Chris Darcel	15
Fiona Dawson	16
Philip H Dawson	17
John Dixon	18
David Eastwood	19
G W & S H Elkington	20
Dr Michael Elliott	23
Kim Enderby	26
Paul Forman	27
Graham and Karen Foster	28
James Gallagher	29
Dave Gilbert	32
Hugh Gilfedder	35
Richard and Helen Grays	36
John and Judith Green	36
Roy Grundy	39
Dr and Mrs EG Hale	39
David and Amelia Harding	41
Richard and Deneice Harwin	41
R Hayward	43
Elizabeth Head	43
Cllr C Hill	44
Martin Hocking	44
DG Holroyd	44
Simon Hubbard	45
D Hustler	45

Anthea Jepson	62
Nigel Johnson	64
Lucy and Percy Jokhi	65
Joan Kelway	65
Jane Lewington	65
D Lockey and L Pearce	66
Ben Loryman	67
Margaret Lundy	67
Duncan Mackay	74
Lee and Priti Mackrill	75
Brian Maddison	75
Dr Vanessa Majer	76
JR and SJ Marsh	78
Lee Mason	79
Roger Mitchell	79
Mowbray Mountain	79
John Mulhall	80
Graham Nicholls	81
Marketa Omran	82
Cllr Peter Overton	83
Michael Rathbone	85
Isobel Reynolds	85
Caroline and Bob Ridge	86
PJ Rodgers	87
Julia Ross	89
Andrew Sayer	90
Chris Scott	91
Sally Scott	93
Claire Smith	94
Helen Smith	95
Mark Smith	95
Cllr Thomas Smith	97
Tony Smith	101
Trevor Smith	104
Niall Southwell	104
Mark Suddaby	106
Alastair and Teresa Sutherland	108
WK and E Swallow	109
Linda Taylor	109
Sam Taylor	110
Alison Thomas	110

Chris Thomas.....	113
J B and D Thompson.....	117
P Thompson and S Coney	120
Brian Thorpe	121
Adrian Walker.....	121
Steve Waller.....	122
Giles, Edward and Ian Walter	122
Elaine Wells	122
Tim Wells	123
Cllr Angela White.....	125
Margaret Wilson	127
T and Dr H Wordley.....	127
Grace Wright	132
Jennifer Wright	132
Richard Wright.....	132
Organisations.....	133
Anglian Water Services Ltd	133
Beal Developments Ltd	142
Boston Borough Council.....	150
Boyer.....	150
Bracebridge Heath Parish Council.....	150
British Sugar Plc.....	151
Brown & Co	155
Brown & Co JHWalter.....	156
C Ottewell and Sons.....	160
Castle Square Developments	161
Cereform Ltd	162
Chestnut Homes.....	165
Church Commissioners	167
City of Lincoln Council	172
Cliff Cluster Villages	176
CN Overton Ltd and Wellingore Farms Ltd	178
Coleby Parish Council	180
Collingham Parish Council	182
Corringham Parish Council.....	183
Cyden Homes Limited	183
Day Farms.....	189
Deers Leap Properties Ltd.....	189
Defence Infrastructure Organisation (DIO)	190
Dennis Estates	198
Eagle Hall Farm Estates Ltd.....	200

East Lindsey District Council	207
Ecotricity.....	207
Egdon Resources UK Limited.....	208
Environment Agency	212
Evans McDowall Architects Ltd	217
Fiskerton Developments Ltd.....	217
Fiskerton Parish Council.....	219
Fiskerton Residents Group	219
Fort Farming Limited	221
Furrowland Holdings	221
Gladman.....	234
Gleeson Homes.....	239
GPS Planning and Design Ltd	240
Greater Lincolnshire Nature Partnership	240
Historic England	244
Holdingham Farm LLP.....	248
Home Builders Federation	251
Horizon Park Ltd.....	264
IGas Energy PLC	271
J F Dean 1989 Settlement.....	276
J H Baxter and Sons	279
Jockey Club Racecourses Ltd	280
Leafbridge Ltd	281
Leasingham and Roxholme Parish Council	282
Leasingham Hall Ltd.....	284
Leasingham Steer Group	285
LEDA Properties Limited	288
Lincoln Diocesan Trust and Board of Finance	291
Lincolnshire Agricultural Society.....	292
Lincolnshire County Council	300
Lincolnshire Independents.....	305
Lincs Wolds Joint Advisory Committee	312
Lindum Group Ltd.....	315
Lindum Homes	319
Lockwood Estates	327
M C Mountain & Sons.....	334
Marine Management Organisation.....	335
McCarthy Stone / Churchill Retirement Living	335
National Grid	340
National Highways.....	341
National Trust.....	342

Natural England.....	345
Nettleham Parish Council	345
Network Rail.....	345
Newton on Trent Parish Council	348
NHS Lincolnshire.....	348
Nocton Parish Council	349
North Kesteven District Council	350
North Lincolnshire Council.....	355
Obsidian Strategic Asset Management Ltd.....	356
Omnivale Ltd	362
Peel L and P	367
Pennells Holdings Limited	369
Persimmon Homes (South Yorkshire)	370
Persimmon Homes & Charles Church (South Yorkshire).....	377
Persimmon Homes East Midlands.....	378
Quintor UK LLP	382
Reepham Parish Council.....	384
Rhubarb Theatre	384
RJ Vickers	384
Robert Nelstrop Farms Ltd & Robert F. Nelstrop	392
Ryland Residents Group	395
Savills (UK) Ltd.....	395
Scampton Heritage Group	399
Scothern Parish Council	399
Severn Trent Water Ltd	400
South Hykeham Parish Council	403
Sport England	403
St Modwen Developments.....	405
Stirlin Developments Ltd.....	406
Strawson Holdings Limited	409
Stuart Cadzow Consulting Ltd	414
Studio-G Associates LLP.....	417
Sturton by Stow Parish Council	419
Swinderby Parish Council.....	420
Tarmac Trading Ltd	422
Taylor Lindsey Ltd	426
Temple Bruer Airfield.....	428
The Benjamin Gamble Will Trust	428
The Mottram Family Trust	429
The Original Fiskerton Neighbourhood Plan Group	429
Theatres Trust.....	431

Thonock and Somerby Estate	431
Thurlby Parish Meeting.....	435
Tinsley (Branston) Farms Ltd	436
Tom Barton Farms Ltd.....	441
TS Land (Sturton) Ltd.....	450
Turley Farms Ltd	452
United Kingdom Onshore Oil and Gas.....	452
Venari Fuel Ltd.....	457
Vistry Homes Limited.....	459
Welbourn Parish Council	463
Welton-by-Lincoln Parish Council	464
West Lindsey District Council	464
Western Power Distribution	469

Individual respondents

Mike Airey

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101854	S80	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Further to the release of the various documents relating to the Local Plan Review, and having noted that comments are to be welcomed until the deadline, I would like to submit the following:</p> <p>WL/NHAM/011. This proposed new development adjoins a further new development which about to be constructed directly behind our property (WL/NHAM/018). Consideration was given to the fact that new properties were to be in very close proximity to our own, amongst others, which are all ground floor bungalows, Strong local resistance over a number of years to the development of the whole field (i.e. to include WL/NHAM/011) are well documented.</p> <p>The following extract is taken from the schedule:</p> <p>The north of the site abutts the Nettleham Beck, and is in flood zones 2 whilst the lay of the land was significant in causing flooding to property along Brookfield Avenue in the summer floods of 2007.</p> <p>Site appears to be 'land locked' with no obvious access points. Details of proposed access points required to enable the Highways Authority to make further comment. Site at risk of surface water flooding.</p> <p>There are significant issues at stake here which were the subject of a meeting of the Nettleham Local Plan meeting held in 2021, in particular the issue of flooding, which does not seem to carry any weight in the schedule.</p> <p>I regret that I am not qualified to determine the legality of the plans or the appraisal, but have written as a concerned member of the public, as suggested by the publication of the Local Plan.</p> <p>I assume that the Adoption of the Local Plan will be in the public domain and will be passed to local Parish Councils for comment / adoption into their Neighbourhood Plans.</p> <p>If this is the case, then I do not require to be notified of any further submissions and do not wish to participate in any oral examinations.</p> <p>I have since noted the environmental survey of flood risk which attempts to address the issue of flood concerns as a desk top exercise, but does not comment on previous flooding problems, local concerns, access to the site or the impact of the new existing developments.</p>			No

Richard Alford

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101482	S80								I am objecting to the proposed planning application on Eastfield Lane Welton. I feel it is totally wrong to have a housing estate on a very narrow Road. I have lived here for many years and Eastfield Lane leading to to Market Rasen Road is totally unsuitable for heavy vehicles .			No

Martin Bandy

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100060	S80								<p>I wish to object to the inclusion of land to the north of Eastfield Lane Welton (WL/WELT008A) in the proposed CLLP.</p> <p>WL/WELT008A does not meet the test of sustainability, for four main reasons:</p> <ul style="list-style-type: none"> • it would further extend the built-up area of Welton into hitherto undeveloped agricultural land, intruding into the open countryside; • there would be significant loss of wildlife habitat – more damaging than has been acknowledged in the CLLP analysis; • its poor location at the eastern extremity of existing development would entrench car dependency, add to noise and pollution levels and funnel traffic through the centres of Welton and Dunholme or eastwards along what is essentially a country lane, increasing accident risks to young and vulnerable road users and congestion levels in the village centres; • it would exacerbate pressures on local services and public facilities which are already stretched beyond the limits of their capacity, before absorbing prospective demands from the pipeline of new housing already approved but not yet built. <p>There are already a number of new housing developments in Welton, which already run the risk of overwhelming the centre of the village including the primary and secondary schools and the Welton surgery.</p> <p>The junction of Eastfield Lane and Ryland Road is on a blind bend and very dangerous when turning right into Eastfield Lane from Dunholme.</p> <p>Some of the distances in the developers application are questionable.</p> <p>I hope you will exclude WL/WELT008A from the CLLP.</p>			No

Dr Steve J Barton

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101552	S80								<p>Housing development WL/WELT/008A</p> <p>I wish to register my strong opposition to the above development being incorporated into the CLLP.</p> <p>This site has already been rejected as unsuitable on two previous occasions and it is far from clear what factors have altered for that decision to be reversed other than a change in political climate that appears to favour the interests of developers above those of the local community and on reading through the submissions there are questions to be answered as to whether there have been attempts to circumvent due process in the interests of the developer.</p> <p>Information for the public has been minimised or withheld despite direct questioning with the result that opposition has been muted until last moment but is now very much in evidence as the consequences of this proposed development are brought into focus.</p>			No

									<p>The repercussions are many but my overriding concern is that as a retired general practitioner who served the community for over 35 years in a practice that was recognised as providing high quality care and training for aspiring GPs, they are now struggling to cope with an impossible work load and unable to recruit or retain staff. This circumstance was foreseen and warned of many years ago and ignored and development allowed to continue unchecked.</p> <p>The disadvantaged and elderly are bearing the brunt of this but all sectors of the community are affected and still the drive for more development continues without adequate provision of resources.</p> <p>The disadvantages of the proposed site are many and I list but a few.</p> <p>1 It lies outside the village footprint and encroaches into good quality agricultural land.</p> <p>2 The only access road is narrow and less than the statutory width for two way traffic and simple measures to address this are not possible.</p> <p>3. The road is at the quieter end of the village and regularly used for leisure purposes like dog walking, horse riding and cycling with the family in open countryside-if it became an access road for 109 dwellings it's character would change completely with the prospect of 200+ extra car journeys/day minimum.</p> <p>4. The road has many blind bends with hazardous junctions at both ends.</p> <p>5. There is no possibility of getting a bus service to this site and it is too far from schools/shops/medical centre for all but the fittest to walk which encourages car use into an already congested centre.</p> <p>6. The development is neither needed nor desired-Welton has already contributed more than its fair share of new build in the locality and it's character is already irreversibly altered-we do not want what remains to be obliterated.</p> <p>Please do not incorporate this proposal into the CLLP</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

David and Vera Barwick

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101656	S80								<p>We wish to submit the following objections to the above element of the Central Lincolnshire Plan relating to land north of 77 Eastfield Lane, Welton.</p> <p>1. The development is too far from the centre of the village for its amenities - shops, surgery and schools - to be accessed on foot and a long way from the nearest bus stop. It will result in many more car journeys on unsuitable narrow roads. Already, the village centre experiences far too much traffic made worse by the lack of car parking. The road system within the village was never designed to cope with the amount of traffic generated by these developments.</p> <p>2. The access to the proposed site on Eastfield Lane is on an unsighted S bend. Eastfield Lane is a narrow country lane. The approach from the A46 involves an awkward junction. The lane is unsuitable for heavy vehicles and barely wide enough to allow two cars to pass.</p> <p>3. This development will result in a loss of amenity including an impact on flora and fauna. This area is also popular with walkers, cyclists, horse riders etc.</p> <p>4. Welton is being required to absorb more than its fair share of housing development in the area and this is changing detrimentally the character of this pleasant village. Already we have seen major housing developments off Cliff Road and Prebend Lane and more recently the development off Hawks Road has been approved.</p> <p>4. In 2016, development north of Eastfield Lane was considered as part of the Central Lincolnshire Local Plan and rejected. We do not think that since then circumstances have changed materially to justify this proposed development.</p>			No

Stuart Blackburn

Rep ID		Q2: Legal Compliance	Q3: Tests of Soundness	Q4: Please give details.			
--------	--	----------------------	------------------------	--------------------------	--	--	--

	Comment on	Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate		Q5: What change(s) do you consider are necessary	Q6: Take part in the EIP?	Additional files
1101556	S80								<p>The proposed new development of houses on Eastfield Lane is wholly inappropriate. Eastfield Lane and the area of Ryland has an innate character because of its narrow width especially at points where it is well below 4m wide all along the road. With its bends that means it is already a challenge to get two cars alongside without mounting the kerbs or having to give way. Not to mention issues with cyclists and horse riders. This can be seen right outside our house where the kerbs and grass have been mounted and the damage can regularly be seen. You can't park on the road outside our house without blocking the road, it is that bad! Cars have to park half on the path which causes conflict with pedestrians, which there are far more now than ever before and again there will be far more if the development goes ahead. Not only for general traffic It is suggested that site traffic use the A46 onto Eastfield Lane for access – this will be dangerous as it is winding and narrow with high hedges reducing visibility. It is not built for this traffic with soft verges and deep ruts on the edge of the road where cars and larger vehicles have had to go off the road because of lack of road width to pass safely. The road measures below 4m in width at points with many areas just over 4m which does not meet the recommended road widths. This would be impossible for a car and a HGV to pass even with the stable verges and will lead to damaged cars and accidents.</p> <p>The road is also used extensively for recreation and even more so following the lockdowns where the route is used by walkers, cyclists and horse riders which would be severely negatively affected by this proposed development.</p> <p>The addition of this number of houses will exacerbate the issues on the road to a point where it will be dangerous and cause many more accidents / incidents. There may not be many accidents reported to the police however local knowledge can confirm that this area and particularly the 90 degree z bends is a regular spot for issues.</p> <p>On one of the planning documents it is suggested that the bend for the access to the new development is a "slow bend". In a 60 mph zone I can assure you that this is not treated as a "slow bend" by motorists. This area is used as a run off area currently where cars get too close. I have on numerous occasions had to take extreme avoidance action to avoid a collision. If it becomes a junction this will not be possible and it will inevitably end in increased collisions and injuries.</p> <p>The surface flooding of the road at the bottom of Eastfield Lane is regular and with houses on the roadside the increased traffic will increase the detrimental impact on these residences. We are also affected by the backing up of drains in wet periods and this development will negatively affect this problem and increase the demand on the pumping station which won't handle it and I don't believe has been looked at properly.</p> <p>I don't believe the local community has been consulted properly about this development with the required notices etc not being correctly posted and therefore should be denied. I for one had not seen anything or been notified until local people noticed a surveyor on the land. The process used by the CLLP for allocation of these development sites seems underhand and not transparent with more focus on the developers than the local community that will be affected.</p> <p>Welton has already been a focus of extensive development however this latest development takes it to nearly 50% increase which is well beyond what is reasonable and inappropriate for the village.</p> <p>Eastfield Lane is an old part of the village with Grade II listed buildings and its character should be protected however this development will have a severe detrimental effect. The</p>			No

									development plan should consider more appropriate areas to use to fill the housing need within Lincolnshire without impacting so negatively on Welton and its history.			
--	--	--	--	--	--	--	--	--	--	--	--	--

L Boulton

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1096660	S81	Don't know	Don't know	Don't know	No	Don't know	No	No	NK/LEAS/001 & NK/LEAS/006: The sites are not suitable due to flood risk and their provision of land run off for the local fields. If built on this would exacerbate the situation, as road, property and driveway restrict the natural pathways. The proximity of the local sewage works is also an issue and the proposal does not allow for the division of space between houses and the works (Meadow Lane). Additional properties will also put more pressure on the local doctors surgery's, which are already difficult to get into. No provision for local school capacity or additional footpaths. Road conditions around these areas are already in a poor state of repair and building works will again only increase the issues of poor road maintenance in the village.	Removal of the plan to build on NK/LEAS/001 & NK/LEAS/006.	No	No

Robert Boulton

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100749	S80								<p>I have recently been made aware of the Draft Central Lincolnshire plan and have taken some time to read the report.</p> <p>Firstly, I must object strongly to the lack of information coming out to residents about this process, in particular from Lincolnshire County Council and West Lindsey District Council. There is a Neighbourhood plan in place for Welton and I don't see this has taken any aspect of that plan into account. At no point have I received information about this plan or the ability to comment, only finding out through a third party.</p> <p>The sites identified in the plan will effectively double the size of Welton Village from today's housing numbers and population, Welton already has a population larger than the town of Market Rasen with far less by way of services, facilities, and amenities. The health centre is already struggling to cope with population increases, led by housing development, in Welton, Dunholme, Scothern and surrounding villages.</p> <p>The Welton/Dunholme plans has no identification of sites recently completed or currently under development, some 700 houses are therefore absent: giving a misleading view to those considering this information.</p> <p>A valuable historic site is included within one of the marked sites – to me this demonstrates some lack of detailed thought, or laziness.</p> <p>I am not sure what process is used to identify potential housing sites but many of those indicated for Welton are taking up valuable agricultural land which I find unacceptable. If volume housing is needed why is there no consideration of township developments of Kirton Lindsey and/or Scampton ex military bases where housing and other facilities can be sympathetically designed and built.</p> <p>I became aware of this plan when objecting to a planning application for Eastfield Lane in</p>			No

									<p>Welton, shown on your map as WL/WELT/008A and I have a number of objections to development of this specific area.</p> <ol style="list-style-type: none"> 1. It's taking up perfectly good agricultural land for speculative housing development. 2. It will encourage the use of motor vehicle use with associated environmental damage. Being a 15 minute walk to the village centre services most people will use a car, the nearest bus stop is a 10 minute walk so again people will use a car. With the lack of employment opportunities in the village all householders will commute to work generating a significant amount of vehicle movements through the centre of the village or along Eastfield Lane onto a major road (A46) at a dangerous junction. 3. The shown access onto Eastfield Lane is dangerous. Putting a road access on a narrow double bend is not responsible 4. The estate access/egress is onto Eastfield Lane – a road that is not even up to estate standards. 5. Improvements to the road would need to be all the way to the A46 junction at the Coffee Shop and junction improvements to reduce the risk of serious accidents. 6. Eastfield lane is currently too narrow to cope with two way traffic, cars being forced to move onto the roadside edge to let others pass. 7. Eastfield lane is currently a social amenity area for the village, one which I and many families, with children, walk this route to the coffee house or to access countryside walks. 8. Eastfield lane is not suitable for heavy vehicles, deliveries of Concrete/building materials would therefore have to come through the village centre, past schools and residential areas. 9. Eastfield lane is currently a rat run from the A46, with this development it will become heavily used by commuter traffic and delivery vehicles making it far more dangerous without a major upgrade along its entire length. 			
--	--	--	--	--	--	--	--	--	--	--	--	--

Charles Campion

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100097	S65; Map	No		No	No	No	No	No	The plan is not in line with two previous Planning Inspectors advice. NKDC have not taken into consideration the opinions and recommendations of previous CLLP Planning inspectors and therefore the plan is flawed. I have attached 6 pages of evidence within this document.	The CLLP should be corrected with the removal of the IOS on land B at Swaton as per the recommendation of the Planning inspector in 2007. The present reason given by the CLLP team that the area is important to the setting of the Church (Grade 1 listed) and Swaton Court (NKDC non designated heritage asset) is in total contrast to the Appeal Planning Inspector who says its Neutral. This plan is therefore in breach of two Planning Inspectors opinions.	Yes	Yes
1100103	S65; Map	No		No	No	No	No	No	The plan is not acceptable because paragraph 11.6.1 is not correct. This Paragraph is not correct and should be addressed. It states that IOS's have been identified by the Central Lincolnshire Authorities. This is not correct. Most of the IOS's were originally identified by Parishioners, Parish Councils or Landowners and were democratically applied for, consulted upon and approved as Visual Amenity Areas (VAA). Under the NPPF guidance the CLLP renamed these VAA's as Green Spaces (GS) or Important Open spaces. (IOS). The problem here is that the CLLP has considered that by renaming some of VAA's to	I believe that the paragraph should be amended or a new one added to make sure IOS status cannot be removed in house by the CLLP. It must be democratically considered and approved by Elected Councillors. My suggestion below. 11.6.1. In addition to Local Green	Yes	No

									<p>IOS's, the CLLP now has total control of the fate of that IOS's as it considers the CLLP has identified them. That is not correct, they have just re named them as per NPPF advice. This does not mean the CLLP has unilateral control of their fate. By this I mean that in the present CLLP there are 365 IOS's. In the draft plan 65 of those are to be removed without any consultation with the interested parties such as Parish Councils, Parishioners, or the landowners. The IOS at Swaton is the only IOS in the plan where the CLLP team have had a request for removal. Considering how hard it was for those interested parties to produce applications go through consultation and get approval (see how much time was put in for LP24), it cannot be democratically right that a couple of officers in CLLP can just decide to remove them without any consultation. It may be that some of them do not meet the new updated criteria. If that is the case, then at least the applicant who requested the original designation plus the landowner and Parish Council and local Councilor should be informed of the potential to remove the status and their opinion considered. This is not the case here. The CLLP team have proposed to remove 65 IOS's under this Draft plan without any consultation with interested parties. If any IOS no longer fits the criteria, it should be flagged up by officers and go to consultation and then the results of that consultation go to the Elected Planning Committee for approval or refusal.</p> <p>As a matter of reference. IOS 297 contains a Medieval Moat. That IOS would have been put forward by an interested party for a reason and under this plan will be removed. I have asked NKDC if any interested parties have been informed about their IOS removal and have had no reply. I consider there are many more of the 65 IOS's being removed whose removal is questionable and others which have not been removed even though they do not meet the criteria. The process must be fair and comparative. This does not look to be the case here. Removal of an IOS should need Elected Councillors approval.</p>	<p>Space (LGS) designations, this Local Plan also protects other existing Important Open Spaces (IOS). These open spaces are different to LGSs, in that LGSs are previously known as Visual Amenity Areas (VAA) which were specific areas of Playing Fields and functional amenity areas, whereas IOSs are other previously known as VAA's which were open spaces important to the settlement in which they are located. IOS's can be reassessed to see if they meet the criteria but would need consultation by Interested parties and approval by the Planning Committee.</p>		
--	--	--	--	--	--	--	--	--	--	---	--	--

Tony Close

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100053	S65	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know		Good afternoon, I was hoping to make a comment on the land in Keelby known as Caddle Beck, this section of land needs to have its designation changed from open green space to something a bit more realistic. The owner of the land as put in a substantial access road and utility services in the hope of developing this area, some thing our village is in need of. More new housing. This seems to be held up by the title this land is currently designated. Infill would be more appropriate, I hope these comments can be considered.		No

David Crees

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				

1100088	S80	Yes	Yes	Don't know	No	No	Don't know	No	<p>WL/WELT/008 - Proposed Eastfield Lane Development Objections</p> <p>I object to the proposed development on the basis that:-</p> <p>1) Eastfield Lane cannot safely cope with a large increase in traffic as it has several narrow bottlenecks especially at the Eastern section between TF 024 802 to TF 024 803 and from there to Welton Hill plus at TF 013 801 by the old chapel. When farming activity is in full swing many very large farm vehicles use the lane.</p> <p>2) The pavement is single sided and alternates from one side of the road to the other thus requiring multiple pedestrian crossings, it is also dangerously surfaced and narrow.</p> <p>3) The junction with Ryland Road at TF 019 801 is very dangerous and has had a number of accidents.</p> <p>4) The footpath at TF 021 801 is very narrow and has steep steps down to Eastfield Lane so it is not a viable path for any significant number of pedestrians.</p> <p>5) During periods of heavy rain the existing sewage pumping station at TF 204 802 cannot cope and sewage water has backed up into toilets of houses on South side of Eastfield Lane, it cannot cope with any extra waste water from the proposed development.</p> <p>6) Welton centre by the Co Op already regularly jams up due to heavy traffic congestion, no improvements to the Welton infrastructure have been made over the last 40 years despite the huge increase in population.</p>	Omit this site from the plan for the reasons set out in Q4 above.	No	No
---------	-----	-----	-----	------------	----	----	------------	----	---	---	----	----

Tim Croydon

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
11946293	S81	Y			No				<p>A recent development was rejected for 34 houses in Weir Farm Paddock in Scothern. This was based on breaking the increase in population by 10% rule. On this basis, how can two subsequent developments within months of the previous rejection be approved for planning some 94 houses? (WL/SC/003 and 004). Please justify this change of policy to allow greater than 10% of the populace to grow? We have no infrastructure and amenities to support such a proposal.</p> <p>I wish my previous attachment/correspondence to be used for this new consultation. Moreover, greater detail on the risk to public health by smoke inhalation must be considered given the close proximity of a bio mass burner (30 yards fro WL/SC/003).</p>	Justify an increase by more than 10% of the population in Scothern.	Yes	Yes
11946325	S81	Y			No				Please see my earlier comments regarding the 10% only increase in populace and to justify a huge increase in new houses when 35 have already been built at Cathedral View (see attached). Weir Paddock Farm development was rejected based on housing numbers exceeding 10% and a lack of amenities. To me, this reversal to allow 94 dwellings is illogical. Please explain your reasoning to permit WL/SC/003-004?		No	Yes

Councillor Chris Darcel

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1104145	S81		Don't know		No				<p>Please see t the Parish Council submission in 2019.and the attached letter, the appendix and suggested changes in Q5 to make the Plan represent the results of village surveys.</p> <p>Our concerns are...</p> <p>S47 Transport.,</p> <p>S64. The Paddock is shown as open green space</p>	<p>S47 Transport. Locating the houses to the east of the village adds some 2.5km to each car journey to Cherry Willingham or Lincoln compared to the preferred location to the west of the village,</p> <p>Siting the development to the east of the village will also add extra car journeys to the High St,</p>	Yes	Yes

									<p>but it is not available for recreational use to the village.</p> <p>S51 Sport. There is no usable recreational land for football or cricket, as shown in the attached village space audit.</p> <p>S4 Housing, Why has 8.1 3ha been allocated for 120 new homes when at 25d/ha just 4 ha would be required?</p> <p>S14, Renewable Energy. Over 15% of the parish's land area is already due to be covered with solar panels.</p> <p>S21 Flooding. In 1993 the water meadows to the south of Ferry Rd were badly flooded with flood water from the North Delph and nearly every year gardens on Ferry Rd get flooded by run off from the higher ground to the north.</p> <p>S66, The woodland area to the north of Ridings Close is not open to the public and valueless for health or recreational purposes.</p> <p>S81 WL/Fisk 001 A would be better replaced with our own Fisk 003: it would better reflect the Parish's recorded responses collected in December 2019.</p>	<p>Blacksmiths Rd and Plough Lane. Please see the alternative plan, attached.</p> <p>The land to the west is available. Please see the letter from the land owner., the Church Commissioners, to WLDC dated October 2016.</p> <p>S64. The Paddock is shown as open green space but it is not available for recreational use to the village. Since 2014 it has been residents' preferred location for a sports field.</p> <p>S4 Housing, Why has 8.13ha been allocated for 120 new homes when at 25d/ha just 4 ha would be required?</p> <p>S51 Sport. There is no usable recreational land for football or cricket, as shown in the attached village space audit. If the Paddock is unavailable could some of the proposed 8.13ha be dedicated for a football and cricket pitch.</p> <p>S14, Renewable Energy. Over 15% of the parish's land area is already due to be covered with solar panels. They are on land that previously grew wheat, barley and rape. No more solar panels please.</p> <p>S21 Flooding. In 1993 the water meadows to the south of Ferry Rd were badly flooded with flood water from the North Delph and early every year gardens on Ferry Rd get flooded by run off from the higher ground to the north.</p> <p>S66, The woodland area to the north of Ridings Close is not open to the public and valueless for health or recreational purposes.</p> <p>S81 WL/Fisk 001 A would be better replaced with our own Fisk 003: it would better reflect the Parish's recorded responses.</p>		
--	--	--	--	--	--	--	--	--	---	---	--	--

Fiona Dawson

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100732	S80								<p>WL / WELT008A</p> <p>My reasons for strongly objecting to this proposed development.</p> <p>Eastfield Lane is a country lane, unclassified by Ordnance Survey and is very narrow in places.</p> <p>The proposed entrance is on a dangerous bend and is not suited to the proposed numbers using it.</p> <p>The infrastructure is not in place to support an increase in population. The doctors are overwhelmed, schools oversubscribed and there are few retail outlets with restricted parking. Also poor public transport.</p>			No

									Eastfield Lane is prone to flooding in heavy rain. The pumping station cannot cope and when reporting our toilet backing up, we are told that our help comes after they have dealt with flooding.			
--	--	--	--	--	--	--	--	--	---	--	--	--

Philip H Dawson

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101466	S80								<p>WL/WELT008A</p> <p>I wish to strongly object to this proposed development.</p> <p>WL/WELT008 (about the same piece of land) was rejected 2016 – access proposals for 008a unchanged. The existing road is too narrow and upgrading to the correct standard is difficult. No room to increase width within the curtilage of the village whilst the lane going eastwards towards the A46 cannot be widened without taking farmland all the way . It seems strange that the developer has already rejected using the wider western access road as being too narrow.</p> <p>The lane is used for recreational walking, cycling and horse riding – all sharing the existing narrow and pot-holed tarmac. There are several blind bends with two 90 degree bends right by the proposed access point. Cars already have to partially drive off the road to pass and as for a farm vehicle – forget it!</p> <p>At the village end of Eastfield Lane, where it joins Ryland Road with a junction on a completely blind band, we have a notorious accident black spot – and that is with the relatively light traffic at present.</p> <p>The eastern exit onto the A46 is also on a bend where existing traffic is often well in excess of the national speed limit – coming from Market Rasen and turning right into the lane is particularly difficult – especially at night.</p> <p>Eastfield Lane is subject to flooding and our toilet backs up because the pumping station cannot cope. Does the developer propose to pay for the pumping station upgrade?</p> <p>We are set to lose even more green field sites which could at least be rewilded to woodland for biodiversity. There is a brown-field site available 3 miles up the road at Scampton air base which the RAF are vacating soon. It is right by the A15 where the existing ex-forces houses already have a clear entrance/exit with safe refuge markings on the road. Drive down the road, park and ride and shop in Lincoln.</p> <p>Welton has already had to endure roughly a 50% increase in housing since I moved into the area in 1993. Whereas once parking was easy, the schools had spaces and you could actually get to see a doctor, that has all gone and further developments (there are already a couple of approved plans in the pipeline) will just make the situation completely unsustainable.</p> <p>Will the developers just take their profit and leave the residents of Welton to deal with the fallout because our existing infrastructure cannot sustain any further loading?</p> <p>I get the impression that there was very little publicity given to some of the lead up</p>			No

									meetings (under the umbrella of COVID perhaps) – has due process been given full attention?			
--	--	--	--	--	--	--	--	--	---	--	--	--

John Dixon

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103631	S1	Yes		Yes	Yes				<p>1. These representations are prepared by Globe Consultants on behalf of Mr John Dixon and Mr James Pickwell. These representations have been prepared to support the general narrative of emerging Policy S1: The Spatial Strategy and Settlement Hierarchy and Policy S80: Housing Sites in Large Villages) of the Central Lincolnshire Local Plan Proposed Submission Draft (March 2022) 'Proposed Submission Draft CLLP' (Regulation 19 Consultation). Specifically, these representations also support the draft allocation of 2 no. sites as Housing Sites within Policy S80: Housing Sites in Large Villages – these sites are as follows: WL/NHAM/010 and WL/NHAM/011.</p> <p>2. The above 2 no. Housing Sites are identified on the Policies Map (54 – Nettleham) – an extract from the Policies Map is reproduced below at Figure 1.</p> <p>3. Representations were also made by Globe Consultants at the Regulation 18 stage. These representations were submitted to the Central Lincolnshire Joint Strategic Planning Committee ('CLJSPC') on 20 August 2021 and formally supported emerging Policy S79: Housing Sites in Large Villages of the Consultation Draft Central Lincolnshire Local Plan (June 2021).</p> <p>4. There is support for the recognition that Nettleham, as a large village offering a range of local services and facilities and also enjoying close proximity to the City of Lincoln with good transport connections, is a sensible location to receive additional housing growth.</p> <p>5. If viewed as a development segment, these draft allocations (WL/NHAM/018 having planning permission (Outline planning permission Ref 138494) provide the basis for a comprehensive place-making opportunity within the land bounded by Brookfield Avenue, Ridgeway/The Hawthorns, the Beck and the lane serving the sewage works.</p> <p>6. We are mindful that a corridor south of the Beck sits within a flood zone and that would suggest that a proportion of the draft allocation WL/NHAM/011 will not accommodate housing – as confirmed by the site specific requirements listed in the final column of Policy S80. There is scope for additional limited development immediately east of that allocation and north of sites 018 and 010 which would sit alongside an environmental corridor of open space, adjacent to the Beck. This would provide public amenity, landscape and biodiversity enhancements as well as sustainable drainage opportunities which help to alleviate surface water flooding elsewhere in the village. By planning this part of the growth aspirations in this way a comprehensive approach can be taken with the willing landowners to invest in the area between the draft allocations and the lane servicing the sewage works for further ecological and amenity purposes in partnership with the local community. The land east of WL/NHAM/010 is unviable for farming purposes and yet could become a valued community asset with woodland planting and other ecological/landscape investment.</p> <p>7. An aspirational and creative review of these opportunities might offer a variation in the precise housing development allocation in favour of further housing within the 'infill' segment, acknowledging the flood risk constraint within WL/NHAM/011 but also the substantial opportunities to deliver large areas of community open space with a heavy bias towards ecology and biodiversity. Such an approach would also enable a much more integrated and effectively connected neighbourhood for all residents.</p> <p>8. Technical matters that might be considered to constrain the delivery of the above have all been considered in detail at previous planning stages including review by a Planning Inspector (Appeal Decision APP/N2535/W/19/3233948). Questions relating to matters such</p>	Not applicable in this instance.	Yes	No

									as 'odour' associated with the sewage facility have been thoroughly answered and allow all parties to be confident these are not constraining factor.			
1103632	S80	Yes		Yes	Yes				<p>1. These representations are prepared by Globe Consultants on behalf of Mr John Dixon and Mr James Pickwell. These representations have been prepared to support the general narrative of emerging Policy S1: The Spatial Strategy and Settlement Hierarchy and Policy S80: Housing Sites in Large Villages) of the Central Lincolnshire Local Plan Proposed Submission Draft (March 2022) 'Proposed Submission Draft CLLP' (Regulation 19 Consultation). Specifically, these representations also support the draft allocation of 2 no. sites as Housing Sites within Policy S80: Housing Sites in Large Villages – these sites are as follows: WL/NHAM/010 and WL/NHAM/011. 2. The above 2 no. Housing Sites are identified on the Policies Map (54 – Nettleham) – an extract from the Policies Map is reproduced below at Figure 1. 3. Representations were also made by Globe Consultants at the Regulation 18 stage. These representations were submitted to the Central Lincolnshire Joint Strategic Planning Committee ('CLJSPC') on 20 August 2021 and formally supported emerging Policy S79: Housing Sites in Large Villages of the Consultation Draft Central Lincolnshire Local Plan (June 2021). 4. There is support for the recognition that Nettleham, as a large village offering a range of local services and facilities and also enjoying close proximity to the City of Lincoln with good transport connections, is a sensible location to receive additional housing growth. 5. If viewed as a development segment, these draft allocations (WL/NHAM/018 having planning permission (Outline planning permission Ref 138494) provide the basis for a comprehensive place-making opportunity within the land bounded by Brookfield Avenue, Ridgeway/The Hawthorns, the Beck and the lane serving the sewage works. 6. We are mindful that a corridor south of the Beck sits within a flood zone and that would suggest that a proportion of the draft allocation WL/NHAM/011 will not accommodate housing – as confirmed by the site specific requirements listed in the final column of Policy S80. There is scope for additional limited development immediately east of that allocation and north of sites 018 and 010 which would sit alongside an environmental corridor of open space, adjacent to the Beck. This would provide public amenity, landscape and biodiversity enhancements as well as sustainable drainage opportunities which help to alleviate surface water flooding elsewhere in the village. By planning this part of the growth aspirations in this way a comprehensive approach can be taken with the willing landowners to invest in the area between the draft allocations and the lane servicing the sewage works for further ecological and amenity purposes in partnership with the local community. The land east of WL/NHAM/010 is unviable for farming purposes and yet could become a valued community asset with woodland planting and other ecological/landscape investment. 7. An aspirational and creative review of these opportunities might offer a variation in the precise housing development allocation in favour of further housing within the 'infill' segment, acknowledging the flood risk constraint within WL/NHAM/011 but also the substantial opportunities to deliver large areas of community open space with a heavy bias towards ecology and biodiversity. Such an approach would also enable a much more integrated and effectively connected neighbourhood for all residents. 8. Technical matters that might be considered to constrain the delivery of the above have all been considered in detail at previous planning stages including review by a Planning Inspector (Appeal Decision APP/N2535/W/19/3233948). Questions relating to matters such as 'odour' associated with the sewage facility have been thoroughly answered and allow all parties to be confident these are not constraining factor.</p>	Not applicable in this instance.	Yes	No

David Eastwood

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				

1087940	S2	Don't know	Yes	Yes	No	No	Yes	Don't know	<p>With regards to the policy of housing allocation. There is no justification to building on Greenfield sites which are prime agricultural land. With food prices increasing we must be utilising our existing farmland to grow more at home. Farming subsidies will change over time and if we keep building homes on prime farmland, we will have nowhere to grow our own foods. There is no justification to building on greenfield land when there is an abundance of brownfield sites available.</p> <p>The existential growth of small to medium villages is changing the fabric of our neighbourhoods. This policy wants to increase existing communities putting strain on local services and cohesion. Why not create new villages/communities on brownfield land instead of increasing already established areas?</p> <p>The consultation is positively prepared because there is a spin that the plan will bring benefits to areas and communities. When the reality is a stretch on local services and disharmony amongst residents.</p> <p>People do not want building sites of 100, 200, 300+ new houses added to their communities and building on vital greenbelt near their homes.</p>	<p>I replied no because I believe there is no justification for building on prime agricultural land. I replied no to being effective, because the growth rate outlined for housing is huge for what are rural communities. It seems the plan wants Sleaford to become a conurbation doubling in size with no guarantee of public services, but perhaps a few new shops and enterprise park.</p> <p>Outlying villages are growing exponentially and have done for 20 years not just now. The fabric of communities are being torn apart by new arrivals into small communities. Public services are already hugely stretched, yet the answer is to build build build on prime land.</p> <p>The plan should be effectively utilising land that needs redevelopment...Bass Maltings as just one example.</p>	No	No
---------	----	------------	-----	-----	----	----	-----	------------	--	---	----	----

G W & S H Elkington

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102623	S1	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Re: Land North of White House Road, adjacent Railway, Ruskington – NK/RUSK/013</p> <p>It is our view that the above Policies (S1,S4, S5 & S80) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages.</p> <p>S1 states that growth will be allowed in large villages (such as Ruskington) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be.</p> <p>The site is situated adjacent to the village of Ruskington which is identified as a Large Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated April 2022.</p> <p>The site was previously identified as a “reasonable alternative” and it has now been rejected. It is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/RUSK/013) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022) – Page 102.</p> <p>The site is also adjacent to an Allocated and Consented site at White House Road (NK/RUSK/018). The reason for rejection of the site is noted as a constraint on access from the adjacent site (NK/RUSK/018), however, we would point out that both sites are owned by the same landowners and that lack of access would not in any way be a constraint to this site.</p>	n/a	No	No

									It is also our view that by allocating this site as natural extension to the village would be created which would clearly define the northern extent of the village.			
1102618	S4	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Re: Land North of Fen Road, Opposite No. 52, Ruskington – NK/RUSK/012</p> <p>It is our view that the above Policies (S4, S5 & S80) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages.</p> <p>The site is situated adjacent to the village of Ruskington which is identified as a Large Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022.</p> <p>The site was previously identified as a “reasonable alternative” and has now been excluded from the Proposed Submission Local Plan and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/RUSK/012) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022). Page 100.</p> <p>The site is located opposite long established residential development to the east of the village and is very well positioned for use of the local services and facilities.</p>	See above	No	No
1102624	S4; S80	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Re: Land North of White House Road, adjacent Railway, Ruskington – NK/RUSK/013 It is our view that the above Policies (S1,S4, S5 & S80) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. S1 states that growth will be allowed in large villages (such as Ruskington) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be. The site is situated adjacent to the village of Ruskington which is identified as a Large Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated April 2022. The site was previously identified as a “reasonable alternative” and it has now been rejected. It is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/RUSK/013) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022) – Page 102. The site is also adjacent to an Allocated and Consented site at White House Road (NK/RUSK/018). The reason for rejection of the site is noted as a constraint on access from the adjacent site (NK/RUSK/018), however, we would point out that both sites are owned by the same landowners and that lack of access would not in any way be a constraint to this site. It is also our view that by allocating this site as natural extension to the village would be created which would clearly define the northern extent of the village.</p>	n/a	No	No
1102619	S5	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Re: Land North of Fen Road, Opposite No. 52, Ruskington – NK/RUSK/012 It is our view that the above Policies (S4, S5 & S80) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. The site is situated adjacent to the village of Ruskington which is identified as a Large Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. The site was previously identified as a “reasonable alternative” and has now been excluded from the Proposed Submission Local Plan and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/RUSK/012) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022). Page 100. The site is located opposite long established residential development to the east of the village and is very well positioned for use of the local services and facilities.</p>	See above	No	No

1102625	S5	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Land North of White House Road, adjacent Railway, Ruskington – NK/RUSK/013 It is our view that the above Policies (S1,S4, S5 & S80) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. S1 states that growth will be allowed in large villages (such as Ruskington) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be. The site is situated adjacent to the village of Ruskington which is identified as a Large Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated April 2022. The site was previously identified as a “reasonable alternative” and it has now been rejected. It is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/RUSK/013) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022) – Page 102. The site is also adjacent to an Allocated and Consented site at White House Road (NK/RUSK/018). The reason for rejection of the site is noted as a constraint on access from the adjacent site (NK/RUSK/018), however, we would point out that both sites are owned by the same landowners and that lack of access would not in any way be a constraint to this site. It is also our view that by allocating this site as natural extension to the village would be created which would clearly define the northern extent of the village.	n/a	No	No
1102617	S31	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Employment Land, Fen Road, Ruskington Whilst being generally supportive of Policy S31 - Local Employment Areas (LEA), it is noted that LEAs are not specifically identified in the Tiers 1-6 of the Settlement Hierarchy of the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022, Policy S1 (Small Villages and above). At Fen Road Ruskington there is a long-established Industrial Estate comprising a purpose built multi-occupied range of employment units, which is not specifically identified or referred to. In addition on this site there is a further 2.5 acres (1.0 hec) approximately of serviced employment land in our Clients’ ownership available for development in two parcels, positioned either side of the estate’s service road and having a direct frontage to the same. It is our view that the balance of this site (2.5 acres/1.0 hec) along with others located within Tier 1-6 Settlements should be formally recognised as an established employment sites. This would enable rural businesses actively seeking to expand or relocate to identify non-core locations which may be more suited to the operation of their businesses. Adoption of this proposed strategy could positively assist in the expansion of the range of employment opportunities provided by larger villages and also create other benefits such as a reduction in travel to work times and environmental matters. To this end, if Policy S31 was site specific for the larger Settlements as well as being generic as currently drafted our Clients would be supportive of this policy.	See above	No	No
1102620	S80	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Land North of Fen Road, Opposite No. 52, Ruskington – NK/RUSK/012 It is our view that the above Policies (S4, S5 & S80) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. The site is situated adjacent to the village of Ruskington which is identified as a Large Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. The site was previously identified as a “reasonable alternative” and has now been excluded from the Proposed Submission Local Plan and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set	See above	No	No

									out in the initial proposals put forward and as specified in the documents (NK/RUSK/012) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022). Page 100. The site is located opposite long established residential development to the east of the village and is very well positioned for use of the local services and facilities.			
1102626	S80	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Land North of White House Road, adjacent Railway, Ruskington – NK/RUSK/013 It is our view that the above Policies (S1,S4, S5 & S80) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. S1 states that growth will be allowed in large villages (such as Ruskington) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be. The site is situated adjacent to the village of Ruskington which is identified as a Large Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated April 2022. The site was previously identified as a “reasonable alternative” and it has now been rejected. It is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/RUSK/013) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022) – Page 102. The site is also adjacent to an Allocated and Consented site at White House Road (NK/RUSK/018). The reason for rejection of the site is noted as a constraint on access from the adjacent site (NK/RUSK/018), however, we would point out that both sites are owned by the same landowners and that lack of access would not in any way be a constraint to this site. It is also our view that by allocating this site as natural extension to the village would be created which would clearly define the northern extent of the village.	n/a	No	No
1102627	S80	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Land North of White House Road, Ruskington – NK/RUSK/018 The site is situated adjacent existing recent development to the village of Ruskington which is identified as a Large Village within the Central Lincolnshire Local Plan Review - Proposed Submission Local Plan dated 16 April 2022. The site is identified as an “existing allocation with permission” and it is our view that the site should continue to be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/RUSK/018) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan(April 2022) – Page 112. We are aware of ongoing discussions with Developers over this site.	n/a	No	No

Dr Michael Elliott

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102547	S1; App 1			No	No	Don't know	No	Don't know	Policy S1 states that growth will be allowed in large villages (such as Heckington) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be. Appendix 1 of the draft plan provides a list of housing targets, which can be used to guide Neighbourhood Plans (As required by paragraph 65 of the NPPF). This figure, however, is derived from adding dwellings, completed since the start date of the plan, sites with extant planning permission and sites allocated in the Local Plan. This approach does not result in a target for growth to be met by a Neighbourhood Plan. Nor does it provide a context for considering windfall developments There is no evidence to suggest the growth targets have taken into consideration	The derivation of settlement targets for different settlements should be based on an assessment of demand and the role of the individual settlements. This target should then be used to inform the choice of	Yes	No

									<p>evidence of local housing need or the population for the area, as required by paragraph 67 of the NPPF, which requires targets to be set based on an assessment of demand and the role of the settlement.</p> <p>There is, therefore, no justification for setting growth targets for individual settlements. It is left for the reader to conclude that the “appropriate” level is that which is already built, permitted or allocated, rather than an assessment of any “need” for growth to support the settlement, not any capacity of the settlement to support growth.</p> <p>This approach may well be pragmatic but does not provide any justification for why specific sites are allocated. What role do the settlements play? How will growth assist in meeting that role? Could other smaller or larger sites be allocated just as readily, and better meet the needs of the settlement? Paragraph 66 of the NPPF requires Strategic policy making authorities to set targets to provide a minimum target to be met by a Neighbourhood Planning process.</p> <p>Setting targets based on existing commitments (past development, current permissions and local plan allocations) is not providing guidance for the Neighbourhood Plan process, contrary to Paragraph 66 of the NPPF.</p> <p>Policy S4 sets criteria for windfall sites in large villages, including a cap of 10 dwellings (because allocations are over 10 dwellings) and sites must be within the developed footprint of the settlement. Neither of these reasons are justified. It is not unreasonable to expect windfall sites within the same village to accommodate more than 10 dwellings. An arbitrary cap can lead to an inefficient use of land.</p> <p>Restricting development to the developed footprint may lead to ‘town cramming’ by directing development into a settlement, or may, alternatively, prejudice developments, all or part of which may need to be outside the footprint - this could include a new access, drainage attenuation, open space, landscaping and not just new dwellings or commercial properties</p> <p>The approach to the distribution of growth across individual settlements, and henceforth the justification for the allocation of sites within or adjacent to these settlements is not justified. Without a clear growth target for a settlement such as Heckington it is not clear why site HEC/004 was chosen to be allocated rather than, for instance, our clients land at Cameron Street (HEC/011) or Boston Road, (HEC/012).</p> <p>The plan has failed to demonstrate how it is positively prepared, as settlement targets are restricted to the capacity of previous development, current consents and allocated sites. The growth targets for each settlement have not been justified. The Plan is not consistent with national policy because it fails to set a target for growth to be met through the Neighbourhood Plan process. The targets that are set are not based on an assessment of local demand and the role of individual settlements.</p> <p>The choice of allocations is not justified in policy S80, nor are the restrictions imposed on windfall developments in large villages in policy S4.</p>	<p>allocations. If no further target is identified to be met through a Neighbourhood Plan process this position should be clarified, and guidance provided for any potential Neighbourhood Planning Group.</p> <p>The process of allocations in large villages, as identified in policy S1, should be informed by the growth target. The draft plan appears to set the target based on past consents, previous development and allocations already identified.</p>		
1102548	S4			No	No	Don't know	No	Don't know	<p>Policy S1 states that growth will be allowed in large villages (such as Heckington) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be. Appendix 1 of the draft plan provides a list of housing targets, which can be used to guide Neighbourhood Plans (As required by paragraph 65 of the NPPF). This figure, however, is derived from</p>	<p>The criteria for windfall sites set out in Policy S4 should be amended to remove the arbitrary</p>	Yes	No

									<p>adding dwellings, completed since the start date of the plan, sites with extant planning permission and sites allocated in the Local Plan. This approach does not result in a target for growth to be met by a Neighbourhood Plan. Nor does it provide a context for considering windfall developments There is no evidence to suggest the growth targets have taken into consideration evidence of local housing need or the population for the area, as required by paragraph 67 of the NPPF, which requires targets to be set based on an assessment of demand and the role of the settlement. There is, therefore, no justification for setting growth targets for individual settlements. It is left for the reader to conclude that the “appropriate” level is that which is already built, permitted or allocated, rather than an assessment of any “need” for growth to support the settlement, not any capacity of the settlement to support growth. This approach may well be pragmatic but does not provide any justification for why specific sites are allocated. What role do the settlements play? How will growth assist in meeting that role? Could other smaller or larger sites be allocated just as readily, and better meet the needs of the settlement? Paragraph 66 of the NPPF requires Strategic policy making authorities to set targets to provide a minimum target to be met by a Neighbourhood Planning process. Setting targets based on existing commitments (past development, current permissions and local plan allocations) is not providing guidance for the Neighbourhood Plan process, contrary to Paragraph 66 of the NPPF. Policy S4 sets criteria for windfall sites in large villages, including a cap of 10 dwellings (because allocations are over 10 dwellings) and sites must be within the developed footprint of the settlement. Neither of these reasons are justified. It is not unreasonable to expect windfall sites within the same village to accommodate more than 10 dwellings. An arbitrary cap can lead to an inefficient use of land. Restricting development to the developed footprint may lead to ‘town cramming’ by directing development into a settlement, or may, alternatively, prejudice developments, all or part of which may need to be outside the footprint - this could include a new access, drainage attenuation, open space, landscaping and not just new dwellings or commercial properties The approach to the distribution of growth across individual settlements, and henceforth the justification for the allocation of sites within or adjacent to these settlements is not justified. Without a clear growth target for a settlement such as Heckington it is not clear why site HEC/004 was chosen to be allocated rather than, for instance, our clients land at Cameron Street (HEC/011) or Boston Road, (HEC/012). The plan has failed to demonstrate how it is positively prepared, as settlement targets are restricted to the capacity of previous development, current consents and allocated sites. The growth targets for each settlement have not been justified. The Plan is not consistent with national policy because it fails to set a target for growth to be met through the Neighbourhood Plan process. The targets that are set are not based on an assessment of local demand and the role of individual settlements. The choice of allocations is not justified in policy S80, nor are the restrictions imposed on windfall developments in large villages in policy S4.</p>	cap on the capacity of windfall sites and restriction on development outside the settlement footprint.		
1102550	S80			No	No	Don't know	No	Don't know	<p>Policy S1 states that growth will be allowed in large villages (such as Heckington) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be. Appendix 1 of the draft plan provides a list of housing targets, which can be used to guide Neighbourhood Plans (As required by paragraph 65 of the NPPF). This figure, however, is derived from adding dwellings, completed since the start date of the plan, sites with extant planning permission and sites allocated in the Local Plan. This approach does not result in a target for growth to be met by a Neighbourhood Plan. Nor does it provide a context for considering windfall developments There is no evidence to suggest the growth targets have taken into consideration evidence of local housing need or the population for the area, as required by paragraph 67 of the NPPF, which requires targets to be set based on an assessment of demand and the role of the settlement. There is, therefore, no</p>	The process for selecting sites to be allocated in Large Villages (under Policy 80) should be revisited to take into consideration the needs and capacity of each settlement.	Yes	No

									<p>justification for setting growth targets for individual settlements. It is left for the reader to conclude that the “appropriate” level is that which is already built, permitted or allocated, rather than an assessment of any “need” for growth to support the settlement, not any capacity of the settlement to support growth. This approach may well be pragmatic but does not provide any justification for why specific sites are allocated. What role do the settlements play? How will growth assist in meeting that role? Could other smaller or larger sites be allocated just as readily, and better meet the needs of the settlement? Paragraph 66 of the NPPF requires Strategic policy making authorities to set targets to provide a minimum target to be met by a Neighbourhood Planning process. Setting targets based on existing commitments (past development, current permissions and local plan allocations) is not providing guidance for the Neighbourhood Plan process, contrary to Paragraph 66 of the NPPF. Policy S4 sets criteria for windfall sites in large villages, including a cap of 10 dwellings (because allocations are over 10 dwellings) and sites must be within the developed footprint of the settlement. Neither of these reasons are justified. It is not unreasonable to expect windfall sites within the same village to accommodate more than 10 dwellings. An arbitrary cap can lead to an inefficient use of land. Restricting development to the developed footprint may lead to ‘town cramming’ by directing development into a settlement, or may, alternatively, prejudice developments, all or part of which may need to be outside the footprint - this could include a new access, drainage attenuation, open space, landscaping and not just new dwellings or commercial properties The approach to the distribution of growth across individual settlements, and henceforth the justification for the allocation of sites within or adjacent to these settlements is not justified. Without a clear growth target for a settlement such as Heckington it is not clear why site HEC/004 was chosen to be allocated rather than, for instance, our clients land at Cameron Street (HEC/011) or Boston Road, (HEC/012). The plan has failed to demonstrate how it is positively prepared, as settlement targets are restricted to the capacity of previous development, current consents and allocated sites. The growth targets for each settlement have not been justified. The Plan is not consistent with national policy because it fails to set a target for growth to be met through the Neighbourhood Plan process. The targets that are set are not based on an assessment of local demand and the role of individual settlements. The choice of allocations is not justified in policy S80, nor are the restrictions imposed on windfall developments in large villages in policy S4.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

Kim Enderby

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101662	S80								<p>I believe that planning consent should be refused for this particular site for the reasons outlined below. I also believe that it should be excluded permanently from the Central Lincolnshire Local Plan as most of the obstacles cannot be overcome.</p> <p>1. It would damage the distinctive character of Ryland area and Welton Village as a whole. Eastfield Lane currently marks the end of the village at this point, to extend it further with modern housing would totally alter and change the aspect of the village as it merges into the neighbouring countryside.</p> <p>2. Eastfield Lane is completely unsuited for heavy construction traffic- whether it enters from the junction with Ryland Road or from the A46. Once past Musgraves Orchard it becomes virtually a single carriageway.</p> <p>3. The increased traffic from 109 new properties will have a dramatic effect on the area. The increased volume will cause more noise, greater pollution and effect public</p>			No

								<p>safety. The junction of Eastfield Lane with Ryland road is already dangerous, with traffic having to turn across a blind junction when coming from the direction of Dunholme. The increased traffic from the proposed development is far more likely to take this route, so adding to the risk associated at this junction. Nothing is offered to mitigate this risk. There has previously been a serious accident at this location.</p> <p>4. Eastfield Lane outbound towards the A46 becomes at some points single carriage way, with passing places on the verge side. The hazards presented to road users by both heavy construction traffic and then increased traffic volume following completion are obvious. This part of EastField Lane is also popular with walkers - there is no footpath along the road. Increased traffic presents a danger to walkers using this route, with nothing in the proposals to mitigate this risk once past the site of the proposed houses towards the A46.</p> <p>5. The existing footpaths on Eastfield Lane are narrow and uneven, not at all suitable for wheelchairs or pushchairs as the proposal claims. There is also the additional risk because there is not one single footpath on both sides of the road. Currently to walk on any existing pavement you have to repeatedly cross from one side of the road to the other. With increased traffic flow being inevitable from 109 new properties there is an increased risk to pedestrians. Once again this has not been identified or mitigated by the developers.</p> <p>6. The proposed development is inaccessible for public transport. The proposal states it is only 2km from local services. But in reality it is obvious the location is too remote from local services (schools, shops, doctors etc) for walking. Householders will drive to use local services and will drive to take children to school. They will not walk, they will not use public transport as none is available at that location. Nor will they use public transport to commute to and from work - they will use private vehicles. In all likelihood the route chosen will be Eastfield Lane to Ryland Road. The impact of 109 households, owning at least one or two vehicles would be dramatic to local residents. Although the proposal has stated that Welton has a range of amenities and services, what it doesn't state is the parking capacity for these services. Parking is very limited making it extremely difficult to access them. An obvious example of this is the regular congestion seen around Welton Coop and neighbouring Health Practice. There are regularly issues entering and exiting their car parks, which then backs up traffic along Ryland Road and Cliff Road, even worse at school pick up times. There are clear road safety concerns already without the additional vehicles which will come with the proposed development. Currently there is very little traffic flow along Eastfield Lane, 109 new properties will make the roads busier at peak times and is environmentally damaging. Due to its inaccessibility house owners will drive from that location as there are no other options available to them.</p> <p>7. I do not believe the local community has been properly consulted in relation to this development. It clearly shows no regard for there concerns or attempts to reduce the impact of 109 houses in a quiet rural location.</p> <p>8. This development places increased pressure on local services (education, healthcare) without bringing any obvious advantages/improvements - other than profit for the developers. Welton and Dunholme are growing at an unsustainable rate, there are existing sites with permission yet to be fully developed, with over 1,000 mores homes targeted over the next 5 years. Development on this scale is damaging and reckless, totally changing the character of the village.</p>			
--	--	--	--	--	--	--	--	--	--	--	--

Paul Forman

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				

1100692	S81	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Fiskerton needs growth .It is too small to generate the facilities that many of the residents would like to see. The proposal WL/ FISK/001 for 160 houses North of Corn close represents an appreciable development that may be able to help address some of the above problem. It is preferable to WL/FISK/001A because it is larger than the 122 houses suggested. The larger site will not significantly increase the disruption during development and should provide for more flexibility in the provision of, for example, affordable housing		No	No
---------	-----	------------	------------	------------	------------	------------	------------	------------	---	--	----	----

Graham and Karen Foster

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101634	S80								<p>I should like to register an OBJECTION to WL/WELT/008A, an application to develop land adjacent to Eastfield Lane, Welton for the following reasons:</p> <p>POOR ACCESS: Eastfield Lane as a point of access; main or otherwise; is entirely inappropriate. It is effectively a single track lane, already used by heavy goods vehicles and commuters, in addition to agricultural vehicles, cyclists, pedestrians, dog walkers, joggers and equestrian users. The proposed access would afford traffic little or no view of approaching traffic, giving rise to a high risk of an accident being caused. At this current time Eastfield Lane is in a poor state of repair, with numerous potholes and poorly defined edges. It is not uncommon for vehicles which cannot pass safely to mount the verge and when travelling at excessive speed (also common) to end their journey parked in a ditch. As a local community we should be able to continue to enjoy our rural environment, not live in fear of being thrown from a horse or knocked off a bicycle or run down whilst walking the dog by passing traffic. The Lane simply cannot accommodate any increase in traffic that a development would bring, whilst under construction nor afterwards. You'll note that these objections don't even take into account the access onto Eastfield Lane at each end - this being another subject in itself and should be subject to a full and thorough risk assessment.</p> <p>TRAFFIC: Eastfield Lane is narrow; it is after all a rural lane; and offers practically no scope for widening, let alone traffic calming measures as the lane will continue to be used by agricultural vehicles that are incompatible with road narrowing schemes to reduce vehicle speed. Parking is already an issue. Any vehicle parked outside of a property results in reduced road width, often meaning that vehicles mount verges to pass which in itself is unsafe to pedestrians, causes damage to the verge and also the footpaths which are not designed for continued use by HGV's. This in itself is why Eastfield Lane is already in a poor state of repair, which would only worsen.</p> <p>DRAINAGE: This is already an issue, not only to ourselves but also neighbouring properties. The proposal for this development is to discharge both foul and surface water into an existing network, which regularly fails to cope with the current demand. We have seen road flooding in recent years and perhaps more disturbing is the foul stench created when our toilets / drains back-up. A proposal for an additional pumping station to divert yet more waste matter into an already congested network / system seems entirely illogical. From what I can gather, Anglian Waters response considers merely the requirements for a development as an entity in its own right, not how it may coexist in</p>			No

								<p>an area that has expanded far beyond any vision or planning several decades ago.</p> <p>LOCAL SERVICES: Welton currently struggles to support its existing residents, especially with regards to our GP Surgery. This is before all those new build properties that are currently being built become sold and inhabited, let alone another 100+ proposed dwellings coming to market. The GP surgery is clearly unable to expand, this is a physical impossibility and that's before considering resource levels, another major issue. No amount of funding, even if it was made available will resolve that particular issue. It is not ethical to subject an already struggling service with further demand and forcing them to offer an unsatisfactory level of service to the local community. Perhaps take a look at the available shops, which are clearly unable to support the community at present, so additional vehicle movements would occur as people will have an obvious need to travel by car for basic provisions.</p> <p>SCHOOLS: The local schools as I understand are already at capacity. Parking is already an issue and any child residing at this proposed development will not be expected to walk to school as its simply too far. This means yet more vehicle movements and yet more congestion due to the unavailability of on-school parking.</p> <p>VISUAL IMPACT: Eastfield Lane historically wasn't even a part of Welton; it was Ryland; the two have simply merged as Welton has expanded. The lane is reputedly part of what is described as a scenic zone, so to build any new development will only serve to scar what is currently an enjoyable place to live. Developers often promote applications by promising green open space, which in reality means they reduce open space and offer back a small green area, meaning a small play ground, something that we don't need. The impact of losing what is already green open space is the loss of wildlife as it simply cannot coexist. Digging a suds pond or two is not a solution, whilst it may serve as a temporary aid to surface water drainage, for the most part they sit empty and serve as a dumping ground and are rarely maintained. We certainly don't require a local fly-tip !</p> <p>CONCLUSION: The mere nature of this development proposal is at odds with the existing Welton Neighbourhood Plan, which as I understand is to be revised. The outcome of this revised plan and any recommendations should to my mind be based upon the communities consultative participation and so for this frankly to be ignored I feel is highly unethical.</p> <p>Welton has already expanded well beyond what it can already support and any further development will only be to the detriment of the local community. This proposal offers no improvement to the local area, none whatsoever.</p> <p>For the reasons given above, I should like to register my formal OBJECTION to this proposal.</p>			
--	--	--	--	--	--	--	--	--	--	--	--

James Gallagher

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				

1101912	General								Drive thrus. There should be a policy on drive thrus. An increasing number of fast-food restaurants offer a drive through option. The drive thru element causes problems. Drive thrus encourage people to drive rather than walk to their nearest fast-food restaurant (counter to the general policy in the local plan). They generate traffic jams; for example, despite the County Council recently enhancing the Holdingham roundabout, the queue of cars backs up and blocks access to and exit from Sleaford. Idling engines in the queue contribute to global heating. Drive thrus also lead to littering as drivers and passengers eat as they drive and then throw litter out the window. There should be a presumption against any drive through, requiring applicants to explain why a drive thru element is needed in addition to the restaurant, and applicants must address the specific issues that I have raised.			No
1101887	Vision								Para 1.4.1 (vision) says "Central Lincolnshire will grow by 29,150 new homes" - this is portrayed as a statement of fact rather than a vision - my vision is for a less excessive growth bearing in mind the previous high growth that occurred and need to concentrate new development in more sustainable locations than sparsely populated Lincolnshire. As importantly, growth must be denser reducing the demand on agricultural land. The policy needs reshaping accordingly.			No
1101885	S1	No							The draft plan is not sound in that it does not meet objectives set out in 1.5, particularly having regard to the lessons of the Ukraine conflict, the plan should: <ul style="list-style-type: none"> • preserve agricultural land to minimise our dependence upon uncertain and expensive foreign imports of food and only allow conversion for non-agricultural use in exceptional circumstances • reduce energy consumption so that we can meet climate change targets and reduce NATO imports of expensive fossil fuels from undemocratic regimes. 			No
1101889	S1								There is limited brownfield land in settlements 1-7 and so new development will invariably be on agricultural land and so developers should be required to demonstrate they have minimised building on agricultural land (e.g. estate layouts that minimise the area covered by roads, a shift to smaller starter homes rather than executive estates - see housing comments below). In settlement 8 (countryside), it is proposed to permit development for all outdoor recreation. What is happening is that such developments (e.g. the new Lincoln City FC training ground) are being located in the countryside rather than the periphery of the major population centres leading to increased travel compared to a location in the SUEs. The outdoor recreation should be limited to that which can take place only in the countryside for reasons of amenity, health or safety (e.g. hot air ballooning)			No
1101890	S2								developers should have to demonstrate that no land is available in a higher tier before permission is granted for development (e.g. no land in the SUE before building estates in other settlements).			No
1101892	S5								Policy S5 refers to non-residential development in the countryside to enhance the rural economy - this would allow, for example, new retail outlets such as farm shops. The reality is that very few farm shops sell produce from local farms but generally make money from the sale of fancy goods, alcohol etc. and so serve to abstract revenue from established shopping areas. The policy refers to accessibility but it should be clearer (e.g. reference to public transport) as such developments invariably serve car borne customers who could have obtained similar goods in a more sustainable location. Policy S5 in general, but particularly Part F (Agricultural diversification) should be amended so development would be allowed only when it can be undertaken only in a rural area (e.g. farm holidays) and demonstrate it does not run counter to other policies (e.g. retail).			No
1101893	S7								Policy s7 clause three (viability) is too wide an exemption - most new estates in Sleaford, for example, would be as viable as in Lincoln. This policy will make it more profitable for developers to build in Sleaford and Gainsborough with unintended planning consequences	I would prefer clause 3 removed (or, as a minimum, allow a case-by-		No

										case viability argument to be made in these towns).		
1101894	S14								ignores RAF Barkston Heath - an active RAF airfield - and private strips (such as Temple Bruer).			No
1101895	S14								there should be a presumption against solar panels on grade 3 b (moderate quality) land as well as BMV (which is 1-3a) as we need to prioritise domestic food production and achieve climate goals by other measures.			No
1101896	NS18								Policy NS 18 ignores problems in other areas with charging cables being strung out from houses across pavements (e.g. tripping the visually impaired); although I understand illegal, enforcement is not undertaken. The policy should prevent running cables across pavements (e.g. a condition that there be a covenant on each property prohibiting it) and that underground ducting be provided if charging is to take place on the public highway. Another problem is charging for visitors' cars - I think any development of more than 5 dwellings should have a requirement for sufficient roadside charging points for visitors.			No
1101897	S22								Policy s22 part 2 - "specialist housing for older people" is far too vague a term; what is an older person? what about care homes for the disabled?). In my opinion, it would be better rewording it by reference to use classes. Given the problems faced by care homes and hospitals, C2 properties developed by a CQC registered provider for CQC registered use occupation should not have to make an affordable home contribution. Paragraph 4.2.9 states "Where such specialist accommodation is provided as private provision, an affordable housing contribution will be expected in accordance with Policy S22". Private is not mentioned in policy s22 and, anyway, what is private (e.g. the NHS commissions private sector bodies to build and maintain premises)? Delete this sentence and refine policy 22.			No
1101900	S23								Policy s23. refers to mix and s25 to subdivision .There should be a recognition that too much new development is of "executive homes" that are under-occupied and take up large areas of land and there is an undersupply of what could be termed small homes (e.g. homes for single people not needing gardens). This is driving the demand for sub-division and multi-occupation. I think it would be helpful if the Policy included, alongside affordable housing, a view on the mix between small and large homes (certainly in Lincoln and its SUEs).			No
1101902	S26								park homes should be subject to the same requirements as other dwelling in relation to affordable housing , energy efficiency etc.			No
1101904	S28								Section 5 employment. Dispersed employment sites generate excessive car traffic since the vast majority of the workers do not walk cycle or use the bus but drive cars from beyond walking distance. There should be prioritisation to employment expansion in areas well served by public transport. and particularly offices to be located in Lincoln city centre rather than other employment sites (as Lincoln has good sustainable transport links and this would help sustain the cultural and retail offer in the city centre) or other areas well served by public transport.			No
1101905	S45								Para 8.09 says "The level of healthcare provision within Central Lincolnshire is currently adequate to serve the existing population of the area". This is not the case - for example, there is no provision for new residents to access NHS dentistry and the emergency ambulance service is overwhelmed (in large part because the hospitals do not have the necessary beds).			No
1101906	S45								Policy s45 extends funding to cover primary and secondary education but only primary healthcare - the exclusion of secondary healthcare is not justified. Also, it would be helpful to be specific that developers will be expected to pump prime new services where			No

									necessary (e.g, a bus service in a SUE is not likely to be self-financing until the SUE is finished by which time residents will have become car dependent).			
1101907	S49								Policy s49 has a fundamental omission. Most new developments outside London suffer from pavement parking which is unsightly and an obstacle to pedestrians, leading to HMG having consulted on banning pavement parking. Policy s49 should have an explicit requirement for developers to explain how their design will prevent pavement parking by residents and visitors (including the increasing number of delivery vans).			No
1101908	S67								Policy s67 - protection should also be extended to 3b land (see above). One ha is too large an area to lose and can be easily circumvented (e.g. by submitting sequential applications). The one ha limit should be removed and the tests applied to all loss of agricultural land from 3b up.			No
1101909	S68								Policy s68 - my comment about pump priming investment (e.g. in buses) should be explicitly recognised (for SUEs, the increase in land value from agricultural should obviate the need for trigger points).			No
1101910	NS73								Policy NS 73 - The Gainsborough riverside setting should enable good quality high density development (e.g. a policy that no new no riverside building to be of less than 4 storeys).			No
1101911	S75								Policy s75 -the master plan should address specific issues previously encountered at ex-MOD sites (e.g. unadopted roads).			No

Dave Gilbert

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103057	S80			No					<p>WL/WELT 001A, 003, 007, 008A, 011</p> <p>I write in connection to the above proposed developments which are detailed in the draft CLLP and to register my objection to them all on the following grounds:</p> <p>Lack of transparency</p> <p>There has been no meaningful public consultation regarding these developments and indeed the draft CLLP has not been published on the West Lindsey District Council website at all. I only became aware of it by chance in discussion with other villagers and had to search on other district councils' websites to find any evidence of the plan. I, like all my fellow villagers, have a right to be consulted and to comment upon the plans but it would appear that there has been a concerted effort to stifle due process by failing to properly inform the residents of the village, or to enter into consultation. This is as cynical as it is unacceptable.</p> <p>Every person in the village would be affected by the proposed schemes were they to be adopted and therefore every person in the village has a right to know about them and to be consulted. This so obviously has not happened.</p> <p>Overdevelopment.</p> <p>Welton has unfortunately become the 'building site of choice' for West Lindsey District Council in the past decade and has already borne the brunt of many hundreds of new homes. Whilst its obvious proximity to Lincoln may make it an attractive proposition for developers, the village simply cannot sustain continued development at these levels without significant loss of amenity to the villagers already in residence.</p> <p>Welton received more than 25% of WLDC's allocation of housing development from the 2017 CLLP and the latest proposal increases that to almost 50%. This is clearly disproportionate to the population of the village relative to other settlements in the</p>	I believe that the above reasons indicate overwhelmingly that due process has not taken place and that these developments must not be adopted into the CLLP under any circumstances. I strongly oppose any development in Welton beyond that which is already planned and I believe that all the proposed sites must be removed from the CLLP before submission to central government.		No

									<p>district and cannot be justified.</p> <p>The primary schools in Welton and Dunholme and the secondary school in Welton are already beyond their reasonable capacity. Furthermore, the doctors' surgery is finding it impossible to recruit more doctors and is considering applying to the NHS to stop taking new patients.</p> <p>The roads are inadequate for the number of vehicles already using them and further development on the proposed scale will inevitably make matters worse. This will naturally increase the risk of road accidents too.</p> <p>Positioning. The distance of some of the proposed developments from the village centre (particularly WL/WELT001A and WL/WELT008A) would regrettably mean that many of the residents would drive to the village centre amenities (especially considering the road safety issues mentioned below), giving rise to further strain on village centre parking, increased pollution and leading to excessive road usage contrary to environmental requirements. I note that this aspect was quoted as one of the main reasons for rejecting scheme CL2175 (now WL/WELT008A) in 2016 and I cannot see that the situation has changed at all. To the contrary in fact.</p> <p>Both of these proposed developments occupy edge of settlement locations currently in agricultural use. As a result, the developments, if allowed to go ahead, would create a very abrupt and unacceptable transition from countryside to village, in stark contrast to the current situation.</p> <p>Road Safety. The entrance to proposed development WL/WELT008A is off Eastfield Lane, which is much too narrow to support a development of this kind, especially considering the recent changes to legislation on overtaking distances. Furthermore, it has no footpaths and it is not possible to widen the road AND provide footpaths within the distance between hedgerows. The current road width makes it illegal (under recent legislation) to overtake a pedestrian, bicycle or horse in vehicles of widths exceeding 1.7m. This includes most vehicles.</p> <p>The road is inadequately maintained for its current traffic volumes and has many potholes and damaged edges.</p> <p>The entrance to the proposed development is on a sharp bend with limited visibility due to the hedges and removing the hedges would not be an environmentally sustainable course of action.</p> <p>Given the width of the road, it would not be possible to safely (or legally) provide bus stops for the residents, making it more likely that they will use cars to travel to work and local amenities, contrary to current legislation.</p> <p>Environmental Considerations. The loss of provision of many acres of agricultural land with carbon mitigating properties in favour of dwellings which will emit large amounts of carbon is not an acceptable proposition during a climate emergency.</p> <p>It is likely that the majority of the increase in adult residents will be employed in</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

								<p>Lincoln, or travel further afield still, and would therefore need to access either the A46 or A15, placing further unacceptable strain on the road system and attendant increase in pollution, not to mention climate damage.</p> <p>The lack of adequate provision of doctors' surgery and school places will drive new residents away from the village to meet education and healthcare needs, further increasing the amount of traffic, risk of accidents and pollution.</p>			
1103059	S80							<p>I write with reference to the above application to erect 109 dwellings off Eastfield Lane, Welton and to register my objection to it, on the following grounds:</p> <p>Rejection at CLLP level. I note that this development was earlier rejected under scheme CL2175 of the Central Lincolnshire Local Plan (CLLP) so I am at a loss to understand why the proposed development is even open for consideration. The justification for this rejection was that Eastfield Lane was unsuitable unless widened. This is self evidently the case, yet the applicant appears to have disregarded this observation, whilst providing nothing by way of mitigation.</p> <p>Positioning. The proposed development is an edge of settlement location currently in agricultural use. The loss of provision of several acres of agricultural land with carbon mitigating properties in favour of 109 dwellings which will emit large amounts of carbon is not an acceptable proposition during a climate emergency. The development will also create a very abrupt and unacceptable transition from countryside to village, in stark contrast to the current situation.</p> <p>Overdevelopment. Welton has unfortunately become the 'building site of choice' for West Lindsey District Council in the past decade and has already borne the brunt of many hundreds of new homes. Whilst its obvious proximity to Lincoln may make it an attractive proposition for developers, the village simply cannot sustain continued development at these levels without significant loss of amenity to the villagers already in residence.</p> <p>The primary schools In Welton and Dunholme and the secondary school are already beyond their reasonable capacity, the doctors' surgery is finding it impossible to recruit more doctors and is considering applying to the NHS to stop taking new patients and the roads are inadequate for the number of vehicles already using them.</p> <p>The distance of this development from the village centre would regrettably mean that many of the residents would drive to the amenities (especially considering the road safety issues mentioned below), leading to further strain on village centre parking, increased pollution and excessive road usage contrary to environmental requirements. This aspect was also given in the justification for rejecting scheme CL2175.</p> <p>Road Safety. The entrance to this proposed development is off Eastfield Lane which is much too narrow to support a development of this kind, especially considering the recent changes to legislation on overtaking distances. Furthermore, it has no footpaths and it is not possible to widen the road AND provide footpaths within the distance between hedgerows. The current road width makes it illegal to overtake a pedestrian, bicycle or horse in vehicles of widths exceeding 1.7m. This includes most vehicles. I note with alarm that road widening is not mentioned in this application.</p>			No

									<p>The road is inadequately maintained for its current traffic volumes and has many potholes and damaged edges.</p> <p>The entrance to the proposed development is on a sharp bend with limited visibility due to the hedges and removing the hedges would not be an environmentally sustainable course of action.</p> <p>Environmental Considerations. Given the width of the road, it would not be possible to safely (or legally) provide bus stops for the residents, making it more likely that they will use cars to travel to work and local amenities, contrary to current legislation.</p> <p>It is likely that the majority of the residents will be employed in Lincoln, or travel further afield, and therefore need to access either the A46 or A15. It is highly unlikely that they would gain access to the A46 by travelling in the wrong direction (towards the Seven Districts café), meaning that they will travel through the village, placing further unacceptable strain on the road system.</p> <p>Absence of Energy Plan. I note with concern that no energy plan appears to have been submitted as part of this application and it is therefore impossible to judge the developer's plans to mitigate gas and electricity usage. I trust that WLDC will not entertain this development without prior sight of the developer's intentions. Such considerations must form part of the initial scope of works and not be an afterthought. They should therefore be presented by the developers at the outset. An estate built 'on the cheap' by simple provision of gas boilers is no longer acceptable.</p> <p>Frankly, we have had enough. Please find another village to overdevelop.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

Hugh Gilfedder

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100697	S80								<p>I would make the following comments on the Local Plan with regard to the twin villages of Welton and Dunholme.</p> <p>There is nothing that I can see in the plan to address the current service monopolies in the villages: Co-op stores; Family Health Centre; Black Bull pub</p> <p>There is nothing to address the current restrictions in the villages: Parking in the village centre; primary and secondary schools over-subscribed</p> <p>The excess of housing in the overall is disproportionately allocated to the twin villages of Welton and Dunholme.</p> <p>Approving this plan for adding to the stock of housing without ensuring the additional infrastructure to support the population growth would be negligent of the West Lindsey District Council.</p>			No

Richard and Helen Grays

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101632	S80								<p>OBJECTION TO SITE DESIGNATION WL/WELTO08A</p> <p>We are residents of Welton and wish to register our strong objection to the further development of Welton village and the Eastfield Lane site in particular.</p> <p>Our grounds for objecting are:-</p> <p>As local residents, we were not properly consulted about the use of this land for yet more housing.</p> <p>Eastfield Lane is not suitable for two way traffic on the lane towards the A46 (already a dangerous road and junction). This country lane is used regularly by pedestrians and cyclists and is not wide enough for the new Highway Code rules to be complied with. It does not have any white lines because it is what it says - a Lane! Eastfield Lane from the proposed development into the village is very narrow in parts and is not able to be widened due to buildings. The proposed entrance from the proposed development onto Eastfield Lane is on a blind, very narrow Z bend with a field entrance for farm vehicles next to it. This is a country lane and not intended to be used by the increased amount of traffic the development would bring together with delivery and contractor's vehicles. If the entrance to the development was taken out the other way it would be through several new family house developments already heavy with vehicles and exiting onto an already busy village road. The site is also inaccessible for public transport and a long walking distance for amenities which will result in more car journeys every day.</p> <p>The junction of Eastfield Lane onto Ryland Road is already dangerous with incidents happening weekly. It is also a blind corner and large vehicles such as buses need to cross over the middle of the road when taking the corner. When turning into Eastfield Lane from Ryland Road you take your life in your hands as visibility is nil and there is also a big risk of being hit from behind. The extra anticipated 500,000 journeys per year would only exacerbate the situation.</p> <p>Taking into account the number of new houses already approved and waiting to be built/sold, Welton and Dunholme have already reached the allocation of new housing and we cannot understand why more are being proposed when those we already have are already overwhelming the services within the village such as schools being oversubscribed and the Health Centre publicly stating that they are struggling to cope with demand on their services. These services cannot expand any further. Traffic in the village centre is often blocking the roads, areas are frequently congested and there is not enough parking space. Furthermore, proposed development on this land was rejected, but none of the reasons for rejection at that time seem to have been taken into account in this new proposal.</p> <p>More of our countryside will be covered in concrete, reducing our wildlife habitat and destroying the local environment, which is enjoyed by many of the local population. This development will also have further impact on drainage which is already insufficient on Eastfield Lane with one side of the road regularly flooding and drains backing up.</p>			No

John and Judith Green

Rep ID		Q2: Legal Compliance	Q3: Tests of Soundness	Q4: Please give details.			
--------	--	----------------------	------------------------	--------------------------	--	--	--

	Comment on	Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate		Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
1103478	S1	Yes	Yes	No	No	Yes	Yes	Yes	<p>The landowner considers the Local Plan is consistent with national policy and in compliance with the Duty to Co-Operate. Furthermore, we also consider that Policy S1 (The Spatial Strategy and Settlement Hierarchy) has being positively prepared, justified, effective and consistent with national policy.</p> <p>Policy S1 The landowner continues to be supportive of Policy S1 given that it continues to promote housing allocations within small villages. The policy allows for the CLLP and respective Council's to promote appropriate residential development within the settlements, primarily through allocations in the plan in order to achieve a balance between ensuring the vitality of villages, such as Glentham, whilst maintaining their rural character. Furthermore, it is also considered that this policy meets the requirements of paragraphs 68 and 69 of the National Planning Policy Framework (NPPF) July 2021, given the policy identifies land available for housing via allocated sites whilst also supporting the development of windfall sites.</p>		No	No
1103482	S82; Policies Map	Yes	Yes	No	No	Yes	Yes	Yes	<p>However, the landowner considers Policy S82 (Housing Sites in Small Villages) and Policies Map 30 (Glentham) has not been positively prepared and justified.</p> <p>Policy S82 (Housing Sites in Small Villages) Although the landowner supports allocations in small villages, we consider the policy has not been positively prepared and justified. Policy S82 highlights 14 allocated sites in small villages across Central Lincolnshire but 11 of these sites already have planning permission or have planning permission and under construction. This means there is a large reliance on existing allocations and sites already with permission. Therefore, the vast majority of development in small villages across Central Lincolnshire will be from developments that already have permission and only three of the small villages of Leadenham (ref: NK/LEAD/001), Martin (ref: NK/MART/008) and Corringham (ref: WL/COR/002A) which have allocations without planning permission will experience new growth, if the Proposed Submission Local Plan is adopted in its current form. All the other villages will only experience growth from small ad-hoc developments of up to 5 dwellings in "appropriate locations" as per policy S1, Part 6 (Small Villages). Therefore, it is considered that further sites should be allocated which do not already have planning permission to meet future housing needs and ensure the vitality of small villages across the Central Lincolnshire districts over the lifetime of the Local Plan.</p> <p>The plan has previously allowed, and still allows, large;</p>	<p>[Representation summaries due to length. See attachments for full representation]</p> <p>In light of our response to question 4, the landowner considers changes are required to the Local Plan in form of a promoting an additional site for potential residential allocation in Glentham. The site in question is land immediately to the west of Bishop Norton Road. As stated earlier in this document, the land was originally promoted during the "Call for Sites" Consultation in July 2019 and during the Draft Local Plan Consultation in July/August 2021.</p> <p>As shown on the accompanying plan, the land is situated on the western side of Bishop Norton Road immediately to the north of the core of the village. The site is not within a designated Local Green Space, nor is it within an Area of Outstanding Natural Beauty (AONB), Area of Great Landscape Value (AGLV) or Green Wedge.</p> <p>For the reasons set out above, it is considered and stressed that this site should be allocated as an additional housing site in the village of Glentham, as part of the CLLP Review process. This site would be ideal for allocation and would be an appropriate "infill" development</p>	No	Yes

									<p>medium; and small villages to promote land for development and their inclusion in the plan as nominated villages based on their sustainability clearly separates them from other settlements and rural areas. It is, therefore, considered imperative that the plan continues to promote allocations for residential development to help steer appropriate development within these identified sustainable locations.</p> <p>This is particularly the case for the village of Glenthams which has an allocated site that already has outline permission and reserved matters approval, meaning no future development has been given to the village other than one which already has approval. We consider that further sites should be allocated in villages, such as Glenthams, which have existing services and facilities and are situated in popular locations. It is considered that the site being put forward as part of this response is situated in a highly sustainable location on a current undeveloped “infill” site within the settlement. It would allow the village to grow via a single well-planned development rather than the potential for a number of smaller ad-hoc developments. Therefore, by not considering this site further as part of the production of the Submission Draft Local Plan and allocating a site which already has planning permission without allocating further sites in Glenthams, it is considered that Policy S82 and the Policies Map 30 (Glenthams) does not meet the “tests of soundness” as set out in the NPPF of not being positively prepared and justified.</p> <p>Furthermore, the Residential Allocations Document, published as part the Draft Local Plan Consultation summarised the site as land to the west of Bishop Norton Road with properties to the south and east of the site and farm buildings to the north. The document concluded the site is constrained by flood zone 3, Glenthams is a small village with limited services and the CLLP proposed not to allocate the site. As clearly demonstrated in the representation submitted as part of the previous consultation in July 2021 and detailed later in this document, the site could be developed without any dwellings being within the flood risk area. The village of Glenthams also has a number of services and facilities, which a scheme on the site could help, together with the other allocated site, the vitality of such services and facilities. Given the site continues not to be allocated and the CLLP Policy Team have not provided further reasoning for why this is the case, we consider Policy S82 and Policies Map 30 has not being fully justified.</p>	<p>site with road frontage within the heart of the village. The allocation of this site could also provide a number of benefits to the local community, including creating additional recreational space in the village, provide much needed vehicular parking for the village hall and provides an opportunity to reduce potential future flooding in the village near the bridge along Bishop Norton Road. Furthermore, given the landowner considers the site to be an appropriate “infill” development site, it is considered to have “fall-back” position of being “supported” by policy S4 for development of up to 5 dwellings, if not allocated for a larger development as detailed in this response.</p> <p>It is considered that approximately 15 dwellings could be accommodated within the areas of land the landowner is proposing for housing (the site’s southern section). Given the area identified for housing is approximately 0.9 hectares, the Central Lincolnshire Local Plan Review Housing Site Assessment Methodology document (dated June 2019) suggests 24 dwellings could be accommodated. However, given the size of the village and its rural character, the landowner feels a lower density scheme would be more in-keeping with the village’s rural character.</p> <p>To summarise, the landowner considers the Local Plan and Sustainability Appraisal are both legally compliant together with the Local Plan being consistent with national policy and in compliance with the Duty to Co-Operate. Furthermore, the landowner considers Policy S1 (The Spatial Strategy and Settlement Hierarchy) have being positively prepared, justified, effective and consistent with national policy. However, the landowner considers policy S82 (Housing Sites in Small Villages) and Policies Map 30 (Glenthams) has not being positively prepared and justified for the reasons set out above and suggests a further site, on the western side of Bishop Norton Road in Glenthams, should be an additional allocated site to the one already allocated in the village.</p>		
--	--	--	--	--	--	--	--	--	---	---	--	--

Roy Grundy

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101453	S80								<p>WL/WELT/008A</p> <p>I WISH TO SUBMIT MY OBJECTION TO THE PROPOSED SITE W/WELT/008A for 109 HOUSES.</p> <p>I Live at Eastfield Farm on Eastfield Lane and have done so for almost 20 years. I am situated on the lane midway between the 7 coffee shop and the "s" bend as you enter the village of Welton. I own the white farm cottage and garden with its own stable and paddock plus the attached holiday let accommodation - the olde barn. I also own on the farm a small private equestrian facility with stabling, menage, paddocks and grazing for both miniature and larger horses (10 maximum). Over the years i have specialised with the miniature horses and encouraged children (including those with disabilities) to use the facilities. I would not want to see my years of hard work and love of the country side being ruined by poorly thought out housing developments.</p> <p>My concerns to the proposed development are predominantly related to the total unsuitability of EASTFIELD LANE to accommodate the increase flow of traffic resulting from the 109 Houses proposed development.</p> <p>The lane is currently in a bad state of repair and has been for some time. It is used by pedestrians, dog walkers, cyclists, motor cyclists, cars, lorries, vans and horses. It is far too narrow for this traffic and is littered with pot holes. It is a lane and not a road. It is UNSAFE and it is a miracle more accidents have not been recorded. Also there are blind corners and a 60 MPH speed limit which is totally unrealistic. Vehicle drivers who use the lane and notably those going past my farm on the "straight run " many often reach speeds which are far too high for safety. The respect shown by many users is often poor and all are therefore at risk of fatal accidents. Horse riders are particularly at risk if traffic does not slow down. The thought of having larger construction vehicles using the lane during the development phase of this proposal and potentially for that of WL/WELT/003 as well fills me with dread. From my long time of experience of living on Eastfield Lane I am extremely worried that not enough thought has been given to the suitability of the lane for the proposed housing development. The proposed site entrance onto Eastfield Lane looks to be in a dangerous position with the road being particularly narrow by the bend where the entrance is planned.</p> <p>On a more general basis it would appear that the infrastructure in Welton can currently hardly cope with what's being built today and it certainly wouldn't cope with even more houses being built. The GP surgery has said that it may have to stop taking on new patients the schools are apparently full to capacity. Not a good state of affairs for the future of Welton.</p>			No

Dr and Mrs EG Hale

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100455	S80								<p>STATED AIM: "TO HELP CREATE PLACES THAT ARE SUSTAINABLE AND ATTRACTIVE TO LIVE IN"</p> <p>In our opinion the LLP fails to achieve it's aims for the following reasons.</p> <p>1. Welton is currently an attractive place to live. However it has recently been subjected to, and is currently being threatened by, further large scale housing developments. These are</p>			No

									<p>identikit housing estates, which add nothing to the character and attractiveness of Welton. They also fail to be sustainable in any way. What the LLP plans will do is to turn Welton into nothing more than a commuter hub for Lincoln. New residents will have no sense of belonging or affinity to the the place where they live. The community of Welton will be severely diminished. UNATTRACTIVE</p> <p>2. Many, if not all, of the proposed development sites would swallow up greenfield sites, which are currently what makes Welton, such an attractive place to live. These greenfield sites also contain public footpaths, which are essential for the health and wellbeing of the community to access such places. These will become footpaths through identikit housing estates. UNATTRACTIVE</p> <p>3. Swallowing up the greenfield sites also takes land out of agricultural production. In the current climate of food shortages this can hardly be considered sustainable. UNSUSTAINABLE</p> <p>3. The current population of Welton is already larger than that of Market Rasen, which is classified as a Town and has the advantage of extensive business, retail, and leisure facilities. Welton is still classified as a large village, purely by population, and there are very few facilities in Welton, by comparison. UNSUSTAINABLE</p> <p>4. The GP surgery already caters for not only Welton, but Dunholme, and residents from several of the outlying villages. There is insufficient capacity for them to take on thousands more patients. UNSUSTAINABLE</p> <p>5. William Farr Secondary School is full. There is no capacity to increase the intake. As a result more children would be travelling to secondary schools further away either by car or school bus. UNSUSTAINABLE</p> <p>6. When new towns are planned, all the necessary infrastructure and facilities are included in the plan. What is being attempted here is to create what is in effect a new town in Welton, but only by increasing the number of houses. The result would be that Welton would have a substantial small town population, but without any of the supporting infrastructure. UNSUSTAINABLE.</p> <p>6. There are very few employment opportunities in Welton. Most residents have to travel for wok into Lincoln. Obviously the plan is to turn Wleton into one big housing estate for the benefit of the Council and the Economy of the City of Lincoln. UNATTRACTIVE AND UNSUSTAINABLE</p> <p>7 ."Sustainable" surely means ensuring that ALL new builds have very high levels of insulation, and at the very least have solar panels, and heat pumps. Retro-fitting brand new properties in a few year's time cannot be regarded as "sustainable". UNSUSTAINABLE</p> <p>8. When people have to use motor vehicles to travel for work, leisure facilities, shopping, etc. that is not "sustainable". UNSUSTAINABLE</p> <p>9. As no viability assessments have been carried out on any of the proposed sites this whole process does seem to be a bit of a mockery. There are some steep slopes on at least one of the proposed sites, which make any new buidling problematic if not impossible. In addition, access to some of the sites will be logistically difficult, not to mention unsafe. UNSUSTAINABLE</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

David and Amelia Harding

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102143	S80								<p>Objection to site designation WL/WELT008A</p> <p>We are writing to express our objection at the proposed plans to build a housing estate on Eastfield lane in Welton. There are numerous reasons why, specifically:</p> <ul style="list-style-type: none"> - the traffic and congestion implications, and safety risk this poses as well as environmental impacts - the impact on wildlife and countryside - the air and noise pollution that will be generated - the impact on local health and education establishments, which already cannot cope with demand <p>There are already several large developments underway in and around the village of Welton, and the impacts of those are not yet fully understood as they are still in development phase- we feel it would be unwise to opt for further developments until the current ones are completed and the impact can be properly realised.</p>			No

Richard and Deneice Harwin

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102209	S80								<p>I wish to object in the strongest terms to WL/WELT/008A (109 new houses behind Eastfield Lane) & its baffling inclusion in the CLLP.</p> <p>My objections cover the following areas: Procedural This site was previously rejected as a 'logical' site for very good reasons and nothing has changed since. Nobody on the planning team has even attempted to explain the change in reasoning.</p> <p>It was not included in the CLLP initially – a process which, to my limited understanding, is supposed to provide guidance for district council plans & therefore ensure proper consultation & consideration by local residents.</p> <p>I'm not clear the reasons for continuing to try to push this through surreptitiously without listening to residents directly impacted, ignoring highways issues and the stated targets for planning in the area (r.g. Distance to amenities).</p> <p>However, I'm quite sure someone is getting very rich in the process at our expense.</p> <p>Over Development - where does it stop? West Lindsey is already exceeding its building targets and, overall, the target for Central Lincolnshire has been reduced. Welton & Dunholme have contributed significantly to the supply of new housing with still another 1,000 more to come over 5 years. It's just too much.</p> <p>As so many residents have already mentioned, the issue is not only the number of houses themselves but the abject failure to provide the necessary infrastructure improvements that</p>			No

								<p>MUST accompany such a large-scale increase in people & traffic. The location of this site</p> <p>This may be the most inappropriate location possible for a development of this scale. Accessed from the East via a dangerous junction off the A46, onto a narrow, winding LANE with barely width for 2 cars to pass, never mind HGV's & construction vehicles. A popular walking LANE with increased pedestrian, cycle and horse traffic in recent times due to Seven Districts coffee house.</p> <p>Highways advised in the previously rejected proposal that it would be impractical to widen it. They are still to comment on the revised application currently in the CLLP but it's impossible to see what could have changed. It is still narrow, with blind spots and ditches either side with</p> <p>How on earth does this support the recent changes to the Highway Code requiring drivers to provide extra width to higher risk users such as pedestrians, bikes & horses? Access to the development itself via a dangerous 60mph blind S bend, on a road which does not get gritted in winter. It also shares access to a field. What could possibly go wrong?</p> <p>The site is over 2km the WRONG side of the congested village centre from the local, oversubscribed Secondary school.</p> <p>Completely the wrong side of the twin villages to access the newly improved roundabout junction with the A46 to the South-West. The majority of the extra traffic generated will wash through the congested village centre to this junction or the A15. A village centre which has zero pedestrian crossings incidentally.</p> <p>The junction of Eastfield Lane, Ryland Road & Northfield Road is also poorly designed & hated by local residents due to the need to 'nose out' into the road to see & this will also have to carry yet more traffic.</p> <p>It's too far for most people to walk to the village centre shops, doctors, church & pub but there is inadequate parking for those that will resort to driving anyway.</p> <p>Impact on local services The closest Primary school in Dunholme is oversubscribed with no physical space for expansion. Welton St Marys has a fraction of the places needed for the growth expected due to sites already approved & yet to even commence building. A doctors practice already struggling to cope and unable to recruit additional GP's & who have also objected to this latest unnecessary expansion of the 'village'.</p> <p>Local character Eastfield Lane is a beautiful lane with some lovely stone built historical buildings, wide grass verges & mature trees. If this development is to go ahead, this will no longer be the first impression on arriving via the East. Instead, visitors will be confronted by yet another large, modern housing estate.</p> <p>Do the planners have no care for the heritage & beauty of this country?</p> <p>Environment As others have commented, it is nearly impossible for a layman to understand the conclusions & mitigations of the water & environment bodies that have been consulted.</p> <p>I will simply echo the sentiments of others that losing yet more greenfield when other local</p>			
--	--	--	--	--	--	--	--	--	--	--	--

									brownfield sites are available close by (Scampton for example) makes no sense to me given the state of climate emergency we face.			
--	--	--	--	--	--	--	--	--	---	--	--	--

R Hayward

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102098	S80				No				<p>The site was submitted to CLLP in 2021 and is considered to represent a good development opportunity due to its proximity to the existing village, including the community facilities which are immediately adjacent to the north west. The full detail of the site's opportunities are included within Appendix 1.</p> <p>The site assessment for NK/NAV/008 published as part of the evidence base to support the current consultation (CLLP SA Appendix 5.2 - Housing Site Allocations– North Kesteven) demonstrates that that there are no technical reasons for the site being discounted. However, the conclusion to the assessment notes: "The site would have impacts upon the characters of the villages, resulting in the loss of an important open space between Navenby and Wellingore. Other sites are preferable."</p> <p>This conclusion is not accepted and is considered that the site remains an appropriate location for growth for the following reasons:</p> <ul style="list-style-type: none"> • Location outside of AGLV unlike other allocation in this area. • Proximity to existing services. • Potential to retain a landscape buffer around any development which would be secured alongside any new development and therefore prevent future development or perceived wider encroachment into the countryside. <p>It is therefore considered that that approach to omit NK/NAV/008 as a housing allocation for the Boothby Graffoe, Navenby and Wellingore area is insufficiently justified.</p>	<p>It is considered that site NK/NAV/008 should be included within the emerging Local Plan as a further allocation in the Large Village of Navenby/Wellingore. The case in relation to the site is set out within the attached representations made to the previous consultation in 2021 and this remains the position of our client.</p> <p>The site is approximately 12.8 hectares in size and is generally flat and on the same level as the adjoining land. Its development could provide approximately 250 dwellings over the plan period, or could be brought forward in phases.</p> <p>The scale of the site is such that it would be possible to create a landscape buffer which could be secured through any planning permission and therefore safeguard this from further development.</p>	Yes	No

Elizabeth Head

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100454	S81								<p>I would like to register an objection to the site on leasingham NK/LeasD06 which is adjacent to Deepdale Drive.</p> <p>The objection is that any development of this land would increase traffic along Deepdale drive which is already too narrow with parked cars and insufficient driveway space.</p> <p>The area is low lying with an active beck/ stream. Any new development would seriously impact on the drainage and increase flood risk.</p> <p>These would be loss of grazing space and rural amenity.</p> <p>The road structures in the area are insufficient to bear extra cars and traffic.</p>			No

Cllr C Hill

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1104147	S81		Don't know		No				Please see the Parish Council submission in 2019 and the attached letter, the appendix and suggested changes in Q5 to make the Plan represent the results of village surveys. Our concerns are... S47 Transport., S64. The Paddock is shown as open green space but it is not available for recreational use to the village. S51 Sport. There is no usable recreational land for football or cricket, as shown in the attached village space audit. S4 Housing, Why has 8.13ha been allocated for 120 new homes when at 25d/ha just 4 ha would be required? S14, Renewable Energy. Over 15% of the parish's land area is already due to be covered with solar panels. S21 Flooding. In 1993 the water meadows to the south of Ferry Rd were badly flooded with flood water from the North Delph and nearly every year gardens on Ferry Rd get flooded by run off from the higher ground to the north. S66, The woodland area to the north of Ridings Close is not open to the public and valueless for health or recreational purposes. S81 WL/Fisk 001 A would be better replaced with our own Fisk 003: it would better reflect the Parish's recorded responses collected in December 2019.	S47 Transport. Locating the houses to the east of the village adds some 2.5km to each car journey to Cherry Willingham or Lincoln compared to the preferred location to the west of the village, Siting the development to the east of the village will also add extra car journeys to the High St, Blacksmiths Rd and Plough Lane. Please see the alternative plan, attached. The land to the west is available. Please see the letter from the land owner., the Church Commissioners, to WLDC dated October 2016. S64. The Paddock is shown as open green space but it is not available for recreational use to the village. Since 2014 it has been residents' preferred location for a sports field. S4 Housing, Why has 8.13ha been allocated for 120 new homes when at 25d/ha just 4 ha would be required? S51 Sport. There is no usable recreational land for football or cricket, as shown in the attached village space audit. If the Paddock is unavailable could some of the proposed 8.13ha be dedicated for a football and cricket pitch. S14, Renewable Energy. Over 15% of the parish's land area is already due to be covered with solar panels. They are on land that previously grew wheat, barley and rape. No more solar panels please. S21 Flooding. In 1993 the water meadows to the south of Ferry Rd were badly flooded with flood water from the North Delph and early every year gardens on Ferry Rd get flooded by run off from the higher ground to the north. S66, The woodland area to the north of Ridings Close is not open to the public and valueless for health or recreational purposes. S81 WL/Fisk 001 A would be better replaced with our own Fisk 003: it would better reflect the Parish's recorded responses.	Yes	No

Martin Hocking

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101478	S80	No	Don't know	Don't know	No	No	Don't know	Don't know	I would like to object to the inclusion of Land off Pre-Bend Lane, Welton (ref WL/WELT/001A) being included in the local plan for possible future development on the basis that the site is prime agricultural land with known drainage problems and susceptible to flooding. I own property to the east of this site on the outskirts of Welton & am very concerned at the rate of development that Welton has seen over recent years with the lack of local infrastructure to service it.	Remove ref WL/WELT/001A from the plan for future development.	Yes	No

DG Holroyd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				

1100453	S80								<p>After reading the latest May (2022) Welton News magazine, I can't believe that there are yet even more houses being proposed for the village. All previous objections to planning permission have failed to stop any of the current developments.</p> <p>Welton is already over developed to the point of capacity and beyond. The infrastructure of the village can't cope with anymore demand on its services. Schools, Medical Practice are already oversubscribed and stretched to accommodate the needs of families already living in Welton.</p> <p>You must already know this, you have all the same statistic that I have seen. As a resident I have seen the impact the additional housing has already had on the village. However, according to a draft from Central Lincolnshire Local Plan there is sufficient capacity to build yet another 471 houses.</p> <p>Its time to say enough now, Welton has already contributed more than its fair share without another 471 houses.</p>			No
---------	-----	--	--	--	--	--	--	--	--	--	--	----

Simon Hubbard

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101289	S81	Don't know	No	No	No	No	No	No	Sites NK/LEAS/001 and NK/LEAS/006 are not the identified sites on the Neighbourhood Plan for development in the village. Site 006 has mains gas and possibly water and mains sewage pipes running across. Documents are difficult to navigate and understand. There is poor indication of what development is being planned with little discussion about village needs e.g. affordable housing for local people.	Identified sites on the Neighbourhood Plan are nearer a main road thus less cars through the village. Development of 006 is beyond the curtilage of already established village boundaries. Site 001 is liable to flooding which is contained within the grazing land, keeping the drains which surround 006 and 001 from flooding into existing properties. As the proposed sites are in close proximity to the sewage works an flooding would inevitably include these. Because of climate change there is a necessity to preserve these flood buffers especially as Leasingham is prone to flooding and has already lost some of these areas to planning permission increasing the risk of flooding.	No	No

D Hustler

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100197	S1	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The landowner continues to be supportive of Policy S1 given that it continues to promote housing allocations within small villages. The policy allows for the CLLP and respective Council's to promote appropriate residential development within the settlements, primarily through allocations in the plan in order to achieve a balance between ensuring the vitality of villages, such as Thorpe on the Hill, whilst maintaining their rural character. Furthermore, it is also considered that this policy meets the requirements of paragraphs 68 and 69 of the National Planning Policy Framework (NPPF) July		No	No

									2021, given the policy identifies land available for housing via allocated sites whilst also supporting the development of windfall sites.			
1102201	S28	Yes	Yes	No	No	Yes	No	Yes	<p>The landowners consider the Local Plan is effective and in compliance with the Duty to Co-Operate. However, the landowner consider that the Local Plan is not positively prepared, justified or consistent with national policy.</p> <p>Positively Prepared Paragraph 35 of the NPPF (2021) provides guidance on the ‘soundness’ of examining Local Plans. To be ‘Positively Prepared’ the plan should be “providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development”.</p> <p>The Proposed Submission Plan through Policy S28 (Spatial Strategy for Employment) sets out the strategy for employment provision within the Central Lincolnshire Area. The policy aims to ‘strengthen the Central Lincolnshire economy offering a wide range of employment opportunities focused mainly in and around the Lincoln urban area and the towns of Gainsborough and Sleaford’. The policy states that land has been made available in appropriate locations in the plan to meet the strategic needs, through Strategic Employment Sites, existing Important Established Employment Areas (IEEA), SUE’s and non-designated employment proposals. It is clear from S28 and subsequent relevant policies, that the plan intends to create a variety of employment sites. However, it is considered that both within the strategy, and within the execution of the strategy, there is a significant ‘gap’ for allowing smaller strategic sites and expansion of existing employment areas beyond the tiering system within the Settlement Hierarchy.</p> <p>Appendix 4 of the Sustainability Appraisal Report details the options and the decisions which have informed the policy making. In regard to Policy S28 (Spatial Strategy for Employment), the following options were considered for this policy:</p>	<p>In light of the response to question 4, the landowners consider changes are required to the Local Plan in form of:</p> <ul style="list-style-type: none"> • Provision of additional allocations for employment land, of a more varied scale and in different locations. • Increased flexibility with employment in the countryside, where appropriate and when adjacent to existing employment • The allocation of the land at Old Haddington Lane (Figure 1), as, or within, a Strategic Employment Site. • The area surrounding Old Haddington Lane to be considered as an established employment area <p>As shown on Figure 2, the land at Old Haddington Lane is surrounded by piecemeal employment land and itself contains a building that could be converted to commercial use under Permitted Development rights. It is considered that this site is a prime location for further employment land in the area.</p> <p>The following provides the justification for why this area of land is suitable for being allocated:</p> <p>Appropriate Location for Employment Development The landowner considers that this is an appropriate location for employment, situated directly off the A46 carriageway between Lincoln and Newark. As shown on Figure 2, the northern side of the A46 is already in commercial/employment use and has recently expanded further. This demonstrates that this area is able to accommodate employment land, promote inward investment in this area and further employment land would not be out of character with the surrounding land and uses as this part of the A46 is more akin to roadside commercial frontage, rather than the open countryside.</p> <p>The positioning of the site is within the Lincoln Strategy Area and is located on a strategic route on the A46 between Lincoln and Newark. This means that B2 and B8 uses would be ideally located in a prominent position with convenient access to the A46 which connects Cleethorpes to the A1 at Newark and beyond to Leicester. The location of the site has convenient access to the northern and southern carriageway to the A46, via the direct access off Old Haddington Lane and via the A46 flyover.</p> <p>Policy S28 of the Proposed Submission Plan states ‘The strategy is to strengthen the Central Lincolnshire economy offering a wide range of employment opportunities focused mainly in and around the Lincoln urban area and the towns of Gainsborough and Sleaford, with proportionate</p>	No	Yes

									<ul style="list-style-type: none"> • Option 1: A spatial strategy for employment aligned to the overall spatial strategy and distribution of growth for Central Lincolnshire. • Option 2: A spatial strategy that is different to the overall spatial strategy and distribution of growth more evenly across smaller settlements • Option 3: No local based strategic policy and rely on national policy <p>As highlighted in bold, Option 1 was the preferred option to steer the policy. Option 2 proposed a different approach via distributing the growth more evenly across smaller settlements. The commentary to the option stated that this option would disperse growth across more settlements and as such there would likely be more travel and distribution required to other employment sites. It is however acknowledged that it could increase employment opportunities wider.</p> <p>The plan-making process in regard to Policy S28 fails to provide a 'hybrid option', which still supports the general distribution of growth (Option 1) but would allow, where applicable and suitable, further allocations in smaller settlements where the requirement for travel and distribution was acceptable. A hybrid approach is considered to be more 'positively prepared' than the current strategy proposed.</p>	<p>employment provision further down the Settlement Hierarchy'. The land to the west of Old Haddington Lane and the surrounding land is considered to be within an area that conforms to this general strategy. As shown in Figure 4 below, the land is only 1.5km from the Lincoln Urban Area, which is considered to comply with the locational definition as 'in and around the Lincoln Urban Area.</p> <p>Access and Highway Safety As discussed above, the site is located in an ideal position in regard to the A46 carriageway. The site has frontage onto the A46 and naturally lends itself to be a 'roadside' employment use. The benefit of the site is that it has 3 existing accesses from Old Haddington Lane (Figure 4), which means that the site does not need a new access from the A46 highway to be accessed. With the combination of the flyover providing access to the northern carriageway, this is considered to be a 'major positive effect' of the site in regard to access and highway safety.</p> <p>Landscape and Character The A46 is a strategic highway network and it is not uncommon on the A46, between Newark and Lincoln to see commercial and employment uses on its roadside. By its very nature and its ease of access, the character of dual carriageways like this is an appropriate location for proportionate commercial land. This area by the A46 flyover at Haddington has seen commercial growth over time and it is considered to be an important 'hub' for employment to the south-west of the Lincoln Urban Area.</p> <p>Further controlled growth in this location is considered to be wholly appropriate and the current parcels of land already lend themselves conveniently for a contained and controlled allocation within an area already in commercial character. It is anticipated to see further growth along the A46, especially over time with the construction of the southern bypass.</p> <p>The land already contains two agricultural buildings and a residential property and is therefore not completely greenfield in character. The land is considered to be partly brownfield land and the character of the parcel of land is of built development.</p> <p>Controlled Growth As evidenced within Figure 2 and 3, there is already existing employment surrounding the site at Old Haddington Lane, and it is not the case that this is an isolated speculative promotion for employment land. The nature of the area has changed over time and has seen an increase in commercial employment land. The landowner of the parcel within Figure 1, is now promoting the land specifically for employment as part of this plan,</p>		
--	--	--	--	--	--	--	--	--	--	---	--	--

										<p>with the hope that the CLLP will be able to allocate sufficient and appropriate employment allocations in this area to help enable further controlled employment growth.</p> <p>Flood Risk The site is located in Flood Zone 1. Flood Zone 1 is an area least likely to flood based on publicly available Environment Agency flood risk maps.</p> <p>Ecology & Biodiversity A search of publicly available records suggests the site and the land immediately surrounding the site is located within the following areas:-</p> <ul style="list-style-type: none"> • Nitrate Vulnerable Zones 2017 • Objective 2 Area • Higher Level Stewardship Themes • Woodland Priority Habitat Network – Lower Spatial Priority • Farm Wildlife Package Areas • Countryside Stewardship Water Quality Priority Areas – Medium Priority • Phosphate Issues Priority – M • Woodland – Water Quality – Lower Spatial Priority • National Historic Landscape Characterisation – Enclosed Agriculture <p>Historic Environment A search of Historic England’s database identifies one heritage asset on the land. The record states:</p> <ul style="list-style-type: none"> • Cross Ways Farm, Aubourn with Haddington – Redeveloped 19th century farmstead. Row. The farmhouse was attached to a range of working buildings. Located within or in association with a village. Large modern sheds are located on the site. <p>Farmstead records like this are relatively common and infer that Lincolnshire HER acknowledge that there is a historic farmstead in the location. This record is not considered to preclude development on the site.</p> <p>Residential Amenity The site is detached from the ‘main core’ of residential development of Haddington on Sky Lane. There are some dwellings to the east of Old Haddington Lane, however it is not considered that this would preclude commercial development. The surrounding area already has employment uses surrounding and it considered that further development in this location would in fact complement the existing surrounding uses.</p> <p>Summary Overall, the landowner considers that the plan is not positively prepared, justified or consistent with national</p>		
--	--	--	--	--	--	--	--	--	--	---	--	--

										<p>policy and thus stresses that the following changes are needed in order to make the plan 'sound':</p> <ul style="list-style-type: none"> • Increased SES allocations • Increased flexibility of LEA growth and expansion, particularly within the countryside • Allocation of the land west of Old Haddington Lane for employment <p>It is considered that the plan in its current form does not provide sufficient flexibility to deliver a range of employment opportunities and stresses that the plan should take account of areas such as the land at Old Haddington Lane, which can strategically be grown for further inward commercial investment.</p>		
1102410	S29	Yes	Yes	No	No	Yes	No	Yes	<p>Policy S29 concerns the Strategic Employment Sites (SES) and in Appendix 4 of the Sustainability Appraisal Report the following options were considered:</p> <ul style="list-style-type: none"> • Option 1 – Retain the allocated strategic employment sites in the adopted Central Lincolnshire Local Plan 2017 • Option 2 – Allocate further strategic employment sites above those already allocated • Option 3 – No local policy allocating Strategic Employment Sites – rely on a criteria-based windfall employment policy, national policy and other Local Plan policies <p>The current proposed SESs within Policy S29 are:</p> <ul style="list-style-type: none"> • Teal Park, North Hykeham – 36 hectares (28.85ha undeveloped) • Lincoln Science and Innovation Park – 11.5 hectares (5ha undeveloped) • St Modwen Park, Witham St Hughs – 22.3 hectares (11.72ha undeveloped) • Somerby Park, Gainsborough – 11.6 hectares (11ha undeveloped) • Sleaford Enterprise Park – 14.7 hectares (14.7ha undeveloped) • Hemswell Cliff Business Park Extension – 26 hectares (26ha undeveloped) <p>Total 122.1 hectares (97.27ha undeveloped)</p> <p>Option 1, as highlighted in bold, was selected as a preferred option. In regard to the Economic objective of 'Employment', Appendix 4 states that retaining the existing strategic employment allocations are considered to enable the delivery of employment land to meet the need identified within the ENA and will provide</p>	<p>In light of the response to question 4, the landowners consider changes are required to the Local Plan in form of:</p> <ul style="list-style-type: none"> • Provision of additional allocations for employment land, of a more varied scale and in different locations. • Increased flexibility with employment in the countryside, where appropriate and when adjacent to existing employment • The allocation of the land at Old Haddington Lane (Figure 1), as, or within, a Strategic Employment Site. • The area surrounding Old Haddington Lane to be considered as an established employment area. <p>As shown on Figure 2, the land at Old Haddington Lane is surrounded by piecemeal employment land and itself contains a building that could be converted to commercial use under Permitted Development rights. It is considered that this site is a prime location for further employment land in the area.</p> <p>The following provides the justification for why this area of land is suitable for being allocated:</p> <p>Appropriate Location for Employment Development The landowner considers that this is an appropriate location for employment, situated directly off the A46 carriageway between Lincoln and Newark. As shown on Figure 2, the northern side of the A46 is already in commercial/employment use and has recently expanded further. This demonstrates that this area is able to accommodate employment land, promote inward investment in this area and further employment land would not be out of character with the surrounding land and uses as this part of the A46 is more akin to roadside commercial frontage, rather than the open countryside.</p> <p>The positioning of the site is within the Lincoln Strategy Area and is located on a strategic route on the A46 between Lincoln and Newark. This means that B2 and B8 uses would be ideally located in a prominent position with convenient</p>	No	Yes

									<p>greater certainty for business looking to invest in Central Lincolnshire. In consideration of allocating further sites, the commentary states that allocation of further land of strategic employment, beyond the adopted Local Plan would allow greater choice for businesses and inward investment, however the commentary also states that additional allocations could flood the market with land available which may result in uncertainty and lower investment.</p> <p>The landowner disagrees with the option selected and the reasoning behind. Whilst it is understood that retention of allocated strategic employment sites is important to delivery of employment land, and to make the policy 'effective', it is considered that this option provides a restrictive approach to planning and employment growth</p> <p>The justification for not selecting Option 2 is considered to evidence how the policy is not positively prepared. The plan assumes that the existing strategic allocations of Teal Park, Lincoln Science and Innovation Park, St Modwen Park, Somerby Park, Sleaford Enterprise Park and Hemswell Cliff Business Park are the only sites for strategic employment and does not offer or incentivise any further investment outside of these locations for 'strategic' employment. The justification that further allocations 'may result in uncertainty and lower investment' lacks foresight for potential investment, especially given that these allocations have been adopted since 2017 and since adoption, the market has dramatically altered and is still in a period of uncertainty. It is not purely the amount of employment allocation which evidences how the plan is not positively prepared, but the lack of variety and scale. It is considered that it should not be the role of planning to dictate and predict the market, but instead the policy should be flexible enough to allow for further growth when made available. Furthermore, employment and growth are considered to be a positive for the local economy and for local authorities. Further strategic growth can lead to increased employment rates, increased business rates, CIL tax and developer contributions all for the benefit of the local authority. It is therefore considered to be</p>	<p>access to the A46 which connects Cleethorpes to the A1 at Newark and beyond to Leicester. The location of the site has convenient access to the northern and southern carriageway to the A46, via the direct access off Old Haddington Lane and via the A46 flyover.</p> <p>Policy S28 of the Proposed Submission Plan states 'The strategy is to strengthen the Central Lincolnshire economy offering a wide range of employment opportunities focused mainly in and around the Lincoln urban area and the towns of Gainsborough and Sleaford, with proportionate employment provision further down the Settlement Hierarchy'. The land to the west of Old Haddington Lane and the surrounding land is considered to be within an area that conforms to this general strategy. As shown in Figure 4 below, the land is only 1.5km from the Lincoln Urban Area, which is considered to comply with the locational definition as 'in and around the Lincoln Urban Area.</p> <p>Access and Highway Safety</p> <p>As discussed above, the site is located in an ideal position in regard to the A46 carriageway. The site has frontage onto the A46 and naturally lends itself to be a 'roadside' employment use. The benefit of the site is that it has 3 existing accesses from Old Haddington Lane (Figure 4), which means that the site does not need a new access from the A46 highway to be accessed. With the combination of the flyover providing access to the northern carriageway, this is considered to be a 'major positive effect' of the site in regard to access and highway safety.</p> <p>Landscape and Character</p> <p>The A46 is a strategic highway network and it is not uncommon on the A46, between Newark and Lincoln to see commercial and employment uses on its roadside. By its very nature and its ease of access, the character of dual carriageways like this is an appropriate location for proportionate commercial land. This area by the A46 flyover at Haddington has seen commercial growth over time and it is considered to be an important 'hub' for employment to the south-west of the Lincoln Urban Area.</p> <p>Further controlled growth in this location is considered to be wholly appropriate and the current parcels of land already lend themselves conveniently for a contained and controlled allocation within an area already in construction of the southern bypass.</p> <p>The land already contains two agricultural buildings and a residential property and is therefore not completely greenfield in character. The land is considered to be partly brownfield land and the character of the parcel of land is of</p>		
--	--	--	--	--	--	--	--	--	---	---	--	--

								<p>remiss of the Plan to constrain any further allocated growth.</p> <p>Therefore, the justification not to allocate any further sites for strategic employment is considered to demonstrate why this policy is not positively prepared. The NPPF clearly states in Paragraph 81 that ‘Planning policies and decisions should help create conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development’.</p> <p>It is considered that for Policy S29, Option ‘2’ should be selected as the preferred approach and should allow for smaller scale strategic sites.</p> <p>Justified Paragraph 35 of the NPPF (July 2021) provides guidance on the ‘soundness’ of examining Local Plans. To be ‘justified’, plans must provide ‘an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence’.</p> <p>As discussed in the section above, the Proposed Submission Plan does [not] propose any reasonable alternatives for sites in the countryside, nor any reasonable further allocations for SESs.</p> <p>The current proposed SESs within Policy S29 allocates 122.1 hectares of SES land, 97.27 hectares of which is undeveloped, meaning just over 20% has been built out. The plan when adopted was expected to last until 2037. The policies within the plan are to setup the decision making until then. The 2017 adopted plan included the land at Lincolnshire Showground and originally totalled 203.1ha. From the 2017 plan to the Proposed Submission Plan, the gross site area has reduced by 79.8ha with the reduction of the Lincolnshire Showground. Taking a straight-line approach to delivery, discounting the Lincolnshire Showground, the remaining SESs are expected to deliver 122.1 hectares over 20 years. This calculates to 6.1 hectares per year. These SES’s have delivered 24.8 hectares in 5</p>	<p>built development.</p> <p>Controlled Growth As evidenced within Figure 2 and 3, there is already existing employment surrounding the site at Old Haddington Lane, and it is not the case that this is an isolated speculative promotion for employment land. The nature of the area has changed over time and has seen an increase in commercial employment land. The landowner of the parcel within Figure 1, is now promoting the land specifically for employment as part of this plan, with the hope that the CLLP will be able to allocate sufficient and appropriate employment allocations in this area to help enable further controlled employment growth.</p> <p>Flood Risk The site is located in Flood Zone 1. Flood Zone 1 is an area least likely to flood based on publicly available Environment Agency flood risk maps.</p> <p>Ecology & Biodiversity A search of publicly available records suggests the site and the land immediately surrounding the site is located within the following areas:-</p> <ul style="list-style-type: none"> • Nitrate Vulnerable Zones 2017 • Objective 2 Area • Higher Level Stewardship Themes • Woodland Priority Habitat Network – Lower Spatial Priority • Farm Wildlife Package Areas • Countryside Stewardship Water Quality Priority Areas – Medium Priority • Phosphate Issues Priority – M • Woodland – Water Quality – Lower Spatial Priority • National Historic Landscape Characterisation – Enclosed Agriculture <p>Historic Environment A search of Historic England’s database identifies one heritage asset on the land. The record states:</p> <ul style="list-style-type: none"> • Cross Ways Farm, Aubourn with Haddington – Redeveloped 19th century farmstead. Row. The farmhouse was attached to a range of working buildings. Located within or in association with a village. Large modern sheds are located on the site. <p>Farmstead records like this are relatively common and infer that Lincolnshire HER acknowledge that there is a historic farmstead in the location. This record is not considered to preclude development on the site.</p> <p>Residential Amenity The site is detached from the ‘main core’ of residential</p>		
--	--	--	--	--	--	--	--	---	--	--	--

									<p>years, equating to 4.9 hectares per year which is slight shortfall in delivery.</p> <p>It is considered that what Policy S29 does not achieve, is a balance of smaller strategic employment sites. Policy S32 acknowledges 'Local Employment Areas' but these areas are required to be existing and within Tiers 1-6 of Policy S1. The tiering system in Policy S1 is based on the number of dwellings as of April 2018 within each settlement and has no bearing on employment area. It is understood that employment and residential are linked in some ways, due to accessibility to employment and sustainability, but the rhetoric behind intrinsically linking the two and dictating employment land to residentially driven hierarchical tiers is considered remiss of the plan.</p> <p>To be 'sound' in regard to justification, the plan must provide an appropriate strategy taking into account reasonable alternatives, however the current minimum area for current SESs is 11.5 Hectares, which is a particularly large area for employment zones. It is considered that further smaller allocations, up to around 10 hectares should be identified as alternatives to the main SESs to provide a stronger variation and flexibility to the SES allocations. Rather than restricting allocations to prevent 'market uncertainty and lower investment', it is considered that the actual restriction of the SES allocated areas via the limitation of sizes and numbers of allocations may impose the potential lower investment as businesses are restrained by locations in which to be able operate from. It is shown via the delivery since 2017 that there has not been an immediate boom in built-out employment sites on the existing SES allocations. It is considered that a larger number of allocated sites of differing sizes and scales would allow for increased scope for businesses to grow depending on their needs.</p> <p>Taking the example of the land surrounding Old Haddington Lane, there is currently approximately 7 hectares of existing employment land surrounding the A46 junction (See Figure 2 overleaf). Under the current policy, this land is not an SES or a Local Employment Area, despite being more</p>	<p>development of Haddington on Sky Lane. There are some dwellings to the east of Old Haddington Lane, however it is not considered that this would preclude commercial development. The surrounding area already has employment uses surrounding and it considered that further development in this location would in fact complement the existing surrounding uses.</p> <p>Summary Overall, the landowner considers that the plan is not positively prepared, justified or consistent with national policy and thus stresses that the following changes are needed in order to make the plan 'sound':</p> <ul style="list-style-type: none"> • Increased SES allocations • Increased flexibility of LEA growth and expansion, particularly within the countryside • Allocation of the land west of Old Haddington Lane for employment <p>It is considered that the plan in its current form does not provide sufficient flexibility to deliver a range of employment opportunities and stresses that the plan should take account of areas such as the land at Old Haddington Lane, which can strategically be grown for further inward commercial investment.</p>		
--	--	--	--	--	--	--	--	--	---	---	--	--

									<p>commercially active than others. The landowner considers that the lack of justification for areas such as this, not being considered as an employment use, demonstrates how the policy is not justified and the plan is not considered to be sound.</p> <p>Consistent with National Policy As discussed above, Paragraph 81 of the NPPF (2021) states that “Planning Policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”. It is considered that the current Proposed Submission Draft does not achieve this as the policy is restrictive of growth of employment outside of SESs and SUEs that are not within Tiers 1-6 of the settlement hierarchy and have existing employment. In the situation of the land at Old Haddington Lane, the policy does not allow for expansion in what is a clear area for strategic employment growth. It is therefore considered that the Policy is not consistent with ‘creating conditions’ in which businesses can invest, expand and adapt. Conversely, the policy is more supportive at the current time of small commercial sites in Small Villages expanding, rather than an area on a strategic highway network adjacent to existing employment.</p> <p>Paragraph 82 (d) states that policies should “be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to change in economic circumstance”. The allocation sites for SESs remain unchanged since 2017, which considering the change in economic circumstance since 2017, it is considered wholly not to be consistent with the NPPF. The Proposed Submission Plan does not provide sufficient flexibility to allow for smaller-scale strategic locations such as at Old Haddington Lane, of sizes up to around 10ha’s.</p> <p>See attachment for remaining representation</p>			
1102411	S32	Yes	Yes	No	No	Yes	No	Yes	<p>Concerning Local Employment Areas (LEA), Policy S32 states that LEAs are defined as sites sized 0.5ha or more within Tiers 1-6 of the Settlement Hierarchy. In consideration of the policy, the following options were considered:</p>	<p>In light of the response to question 4, the landowners consider changes are required to the Local Plan in form of: • Provision of additional allocations for employment land, of a more varied scale and in different locations. • Increased flexibility with employment in the countryside, where</p>	No	No

								<ul style="list-style-type: none"> • Option 1: A defined policy defining what a Local Employment Area (LEA) is and setting out criteria for proposals within or adjacent to a LEA. • Option 2: No definition of what a LEA is and retain the existing policy wording from policy LP5 within the adopted Central Lincolnshire Local Plan (April 2017). • Option 3: No local based approach to smaller employment sites set out in the Local Plan and rely on national policy and other Local Plan policies <p>Option 1, as highlighted in bold, was the preferred option for the policy. The Policy relies on existing sites in Tiers 1-6 of Policy S1, which is a tiering system based on number of dwellings. Whilst it is acknowledged that employment and residential can function well together in the interests of sustainability, LEA growth should not be dictated solely by the existing number of residential dwellings. Old Haddington Lane and the surrounding area is considered to be a ‘countryside’ location in accordance with the Plan, but still contains 7ha of employment land, including Lincoln Enterprise Park, B1, B8 uses and is strategically located on the A46 in an extremely desirable location between Lincoln and Newark. The policy disregards sites such as this based on the number of dwellings located nearby. To emphasise this further, some allocations in large, medium and small villages have been scored as having ‘major negative effect’ on employment, based on their location to employment sites, however they would be able to see growth of employment allocations within their existing village. On the other hand, an existing ‘hub’ of employment use on the A46 (Figure 2) is not considered to be a LEA based on lack of dwellings surrounding the area. It is considered remiss of the Plan to intrinsically link residential numbers to employment growth areas based on the semantics of residential hierarchical numbers.</p> <p>Overall, the lack of alternatives to employment areas is considered to demonstrate how the plan has not adequately justified its overall employment promotion. This area on the A46, specifically on the land highlighted within Figure 1 to the west of old Haddington Lane, is in a prime location for diversification for</p>	<p>appropriate and when adjacent to existing employment • The allocation of the land at Old Haddington Lane (Figure 1), as, or within, a Strategic Employment Site. • The area surrounding Old Haddington Lane to be considered as an established employment area. As shown on Figure 2, the land at Old Haddington Lane is surrounded by piecemeal employment land and itself contains a building that could be converted to commercial use under Permitted Development rights. It is considered that this site is a prime location for further employment land in the area. The following provides the justification for why this area of land is suitable for being allocated: Appropriate Location for Employment Development The landowner considers that this is an appropriate location for employment, situated directly off the A46 carriageway between Lincoln and Newark. As shown on Figure 2, the northern side of the A46 is already in commercial/employment use and has recently expanded further. This demonstrates that this area is able to accommodate employment land, promote inward investment in this area and further employment land would not be out of character with the surrounding land and uses as this part of the A46 is more akin to roadside commercial frontage, rather than the open countryside. The positioning of the site is within the Lincoln Strategy Area and is located on a strategic route on the A46 between Lincoln and Newark. This means that B2 and B8 uses would be ideally located in a prominent position with convenient access to the A46 which connects Cleethorpes to the A1 at Newark and beyond to Leicester. The location of the site has convenient access to the northern and southern carriageway to the A46, via the direct access off Old Haddington Lane and via the A46 flyover. Policy S28 of the Proposed Submission Plan states ‘The strategy is to strengthen the Central Lincolnshire economy offering a wide range of employment opportunities focused mainly in and around the Lincoln urban area and the towns of Gainsborough and Sleaford, with proportionate employment provision further down the Settlement Hierarchy’. The land to the west of Old Haddington Lane and the surrounding land is considered to be within an area that conforms to this general strategy. As shown in Figure 4 below, the land is only 1.5km from the Lincoln Urban Area, which is considered to comply with the locational definition as ‘in and around the Lincoln Urban Area. Access and Highway Safety As discussed above, the site is located in an ideal position in regard to the A46 carriageway. The site has frontage onto the A46 and naturally lends itself to be a ‘roadside’ employment use. The benefit of the site is that it has 3 existing accesses from Old Haddington Lane (Figure 4), which means that the site does not need a new access from the A46 highway to be accessed. With the combination of the flyover providing access to the northern carriageway, this is considered to be a ‘major positive effect’ of the site in regard to access and</p>		
--	--	--	--	--	--	--	--	--	---	--	--

									<p>employment, however the policy at the moment does not recognise this or provide sufficient variety of allocation to promote the land.</p> <p>Consistent with National Policy As discussed above, Paragraph 81 of the NPPF (2021) states that “Planning Policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development”. It is considered that the current Proposed Submission Draft does not achieve this as the policy is restrictive of growth of employment outside of SESs and SUEs that are not within Tiers 1-6 of the settlement hierarchy and have existing employment. In the situation of the land at Old Haddington Lane, the policy does not allow for expansion in what is a clear area for strategic employment growth. It is therefore considered that the Policy is not consistent with ‘creating conditions’ in which businesses can invest, expand and adapt. Conversely, the policy is more supportive at the current time of small commercial sites in Small Villages expanding, rather than an area on a strategic highway network adjacent to existing employment.</p> <p>Paragraph 82 (d) states that policies should “be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices and to enable a rapid response to change in economic circumstance”. The allocation sites for SESs remain unchanged since 2017, which considering the change in economic circumstance since 2017, it is considered wholly not to be consistent with the NPPF. The Proposed Submission Plan does not provide sufficient flexibility to allow for smaller-scale strategic locations such as at Old Haddington Lane, of sizes up to around 10ha’s.</p> <p>Paragraph 83 (d) of the NPPF states that “Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and</p>	<p>highway safety. Landscape and Character The A46 is a strategic highway network and it is not uncommon on the A46, between Newark and Lincoln to see commercial and employment uses on its roadside. By its very nature and its ease of access, the character of dual carriageways like this is an appropriate location for proportionate commercial land. This area by the A46 flyover at Haddington has seen commercial growth over time and it is considered to be an important ‘hub’ for employment to the south-west of the Lincoln Urban Area. Further controlled growth in this location is considered to be wholly appropriate and the current parcels of land already lend themselves conveniently for a contained and controlled allocation within an area already in construction of the southern bypass. The land already contains two agricultural buildings and a residential property and is therefore not completely greenfield in character. The land is considered to be partly brownfield land and the character of the parcel of land is of built development. Controlled Growth As evidenced within Figure 2 and 3, there is already existing employment surrounding the site at Old Haddington Lane, and it is not the case that this is an isolated speculative promotion for employment land. The nature of the area has changed over time and has seen an increase in commercial employment land. The landowner of the parcel within Figure 1, is now promoting the land specifically for employment as part of this plan, with the hope that the CLLP will be able to allocate sufficient and appropriate employment allocations in this area to help enable further controlled employment growth. Flood Risk The site is located in Flood Zone 1. Flood Zone 1 is an area least likely to flood based on publicly available Environment Agency flood risk maps. Ecology & Biodiversity A search of publicly available records suggests the site and the land immediately surrounding the site is located within the following areas:-</p> <ul style="list-style-type: none"> • Nitrate Vulnerable Zones 2017 • Objective 2 Area • Higher Level Stewardship Themes • Woodland Priority Habitat Network – Lower Spatial Priority • Farm Wildlife Package Areas • Countryside Stewardship • Water Quality Priority Areas – Medium Priority • Phosphate Issues Priority – M • Woodland – Water Quality – Lower Spatial Priority • National Historic Landscape <p>Characterisation – Enclosed Agriculture Historic Environment A search of Historic England’s database identifies one heritage asset on the land. The record states:</p> <ul style="list-style-type: none"> • Cross Ways Farm, Aubourn with Haddington – Redeveloped 19th century farmstead. Row. The farmhouse was attached to a range of working buildings. Located within or in association with a village. Large modern sheds are located on the site. Farmstead records like this are relatively common and infer that Lincolnshire HER acknowledge that there is a historic farmstead in the location. This record is not considered to preclude development on the site. <p>Residential Amenity The site is detached from the ‘main</p>		
--	--	--	--	--	--	--	--	--	--	---	--	--

									<p>in suitably accessible locations". The current SESs only allow for 6 locations of growth in 3 'scales' of size; these being 2 sites over 30 hectares, 2 around 25 hectares and 2 sites at 11 hectares. It is considered that this variety of scale and size does not constitute enough variety, particularly at the smaller scale of up to 10ha. This level of allocation would allow for a different type of employment growth, rather than on the larger-scale strategic sites, which in turn would be more consistent with Paragraph 83 and the flexibility required within 82(d).</p> <p>It is clear that the NPPF promotes flexibility for employment sites and promotes a range of scales and locations. It is considered that the Proposed Submission Plan does not conform to this and is therefore not consistent with National Policy. The 'options' within Appendix 4 discussed above, do not offer sufficient 'alteration' of the plan – the options broadly suggest keeping the policy the same, dramatically altering the policy or not having a policy and reverting back to the NPPF. To be consistent with the NPPF, it is considered that the options to help dictate plan-making should adopt a 'hybrid' approach to allow for flexibility. With this in mind, it is considered that small-scale strategic employment sites should be considered and development in all areas, including the countryside, should be supported for employment development where appropriate. A generalised 'blanket approach' is not considered to be sufficient when it comes to strategic allocation, especially in the case of a particular area of Haddington being missed from consideration, and that a more thorough but flexible approach should be taken.</p>	<p>core' of residential development of Haddington on Sky Lane. There are some dwellings to the east of Old Haddington Lane, however it is not considered that this would preclude commercial development. The surrounding area already has employment uses surrounding and it considered that further development in this location would in fact complement the existing surrounding uses. Summary Overall, the landowner considers that the plan is not positively prepared, justified or consistent with national policy and thus stresses that the following changes are needed in order to make the plan 'sound':</p> <ul style="list-style-type: none"> • Increased SES allocations • Increased flexibility of LEA growth and expansion, particularly within the countryside • Allocation of the land west of Old Haddington Lane for employment <p>It is considered that the plan in its current form does not provide sufficient flexibility to deliver a range of employment opportunities and stresses that the plan should take account of areas such as the land at Old Haddington Lane, which can strategically be grown for further inward commercial investment.</p>		
1102412	S34	Yes	Yes	No	No	Yes	No	Yes	<p>Policy S34 concerns Non-designated Employment Proposals in the Countryside and Appendix 4 details the following options considered for this policy:</p> <ul style="list-style-type: none"> • Option 1: A specific policy for non-designated sites employment proposals in the countryside. • Option 2: No local based policy for employment proposals in the countryside. Rely on national policy and other Local Plan policies. <p>Option 1 was selected as the preferred policy based on the control of the use and sustainability. Option 2, whilst considered to have 'major positive effects' on employment was also considered to have harmful effects in</p>	<p>In light of the response to question 4, the landowners consider changes are required to the Local Plan in form of:</p> <ul style="list-style-type: none"> • Provision of additional allocations for employment land, of a more varied scale and in different locations. • Increased flexibility with employment in the countryside, where appropriate and when adjacent to existing employment • The allocation of the land at Old Haddington Lane (Figure 1), as, or within, a Strategic Employment Site. • The area surrounding Old Haddington Lane to be considered as an established employment area. As shown on Figure 2, the land at Old Haddington Lane is surrounded by piecemeal employment land and itself contains a building that could be converted to commercial use under Permitted Development rights. It is considered that this site is a prime location for further employment land in the area. The following provides 	No	No

									<p>relation to the environmental SA objectives. The landowner considers that these two options do not present the policy as ‘positively prepared’, as there are locations within the countryside of the existing employment, with strong transport links, that have not been considered via this process. It is therefore considered that there should be a third option that outlines a specific policy for non-designated employment proposals but does not restrict the uses wholly to agri-food sectors and are not restricted to purely expansion of existing uses. Using the landowners’ example at Old Haddington Lane, there is surrounding employment use to the north and south of the A46, albeit in the countryside, but in a strategic accessible location. The preferred policy does state the development proposals must not impact unacceptably on the local and/or strategic network. Employment at Old Haddington Lane would benefit from excellent highway connections to a strategic highway network. It is considered that the policy should accommodate wording to allow for areas such as this to be able to expand further into larger scale employment sites within the countryside. It is considered that this option would present a more ‘positively prepared’ plan.</p>	<p>the justification for why this area of land is suitable for being allocated: Appropriate Location for Employment Development The landowner considers that this is an appropriate location for employment, situated directly off the A46 carriageway between Lincoln and Newark. As shown on Figure 2, the northern side of the A46 is already in commercial/employment use and has recently expanded further. This demonstrates that this area is able to accommodate employment land, promote inward investment in this area and further employment land would not be out of character with the surrounding land and uses as this part of the A46 is more akin to roadside commercial frontage, rather than the open countryside. The positioning of the site is within the Lincoln Strategy Area and is located on a strategic route on the A46 between Lincoln and Newark. This means that B2 and B8 uses would be ideally located in a prominent position with convenient access to the A46 which connects Cleethorpes to the A1 at Newark and beyond to Leicester. The location of the site has convenient access to the northern and southern carriageway to the A46, via the direct access off Old Haddington Lane and via the A46 flyover. Policy S28 of the Proposed Submission Plan states ‘The strategy is to strengthen the Central Lincolnshire economy offering a wide range of employment opportunities focused mainly in and around the Lincoln urban area and the towns of Gainsborough and Sleaford, with proportionate employment provision further down the Settlement Hierarchy’. The land to the west of Old Haddington Lane and the surrounding land is considered to be within an area that conforms to this general strategy. As shown in Figure 4 below, the land is only 1.5km from the Lincoln Urban Area, which is considered to comply with the locational definition as ‘in and around the Lincoln Urban Area. Access and Highway Safety As discussed above, the site is located in an ideal position in regard to the A46 carriageway. The site has frontage onto the A46 and naturally lends itself to be a ‘roadside’ employment use. The benefit of the site is that it has 3 existing accesses from Old Haddington Lane (Figure 4), which means that the site does not need a new access from the A46 highway to be accessed. With the combination of the flyover providing access to the northern carriageway, this is considered to be a ‘major positive effect’ of the site in regard to access and highway safety. Landscape and Character The A46 is a strategic highway network and it is not uncommon on the A46, between Newark and Lincoln to see commercial and employment uses on its roadside. By its very nature and its ease of access, the character of dual carriageways like this is an appropriate location for proportionate commercial land. This area by the A46 flyover at Haddington has seen commercial growth over time and it is considered to be an important ‘hub’ for employment to the south-west of the Lincoln Urban Area. Further controlled growth in this</p>		
--	--	--	--	--	--	--	--	--	--	---	--	--

										<p>location is considered to be wholly appropriate and the current parcels of land already lend themselves conveniently for a contained and controlled allocation within an area already in construction of the southern bypass. The land already contains two agricultural buildings and a residential property and is therefore not completely greenfield in character. The land is considered to be partly brownfield land and the character of the parcel of land is of built development. Controlled Growth As evidenced within Figure 2 and 3, there is already existing employment surrounding the site at Old Haddington Lane, and it is not the case that this is an isolated speculative promotion for employment land. The nature of the area has changed over time and has seen an increase in commercial employment land. The landowner of the parcel within Figure 1, is now promoting the land specifically for employment as part of this plan, with the hope that the CLLP will be able to allocate sufficient and appropriate employment allocations in this area to help enable further controlled employment growth. Flood Risk The site is located in Flood Zone 1. Flood Zone 1 is an area least likely to flood based on publicly available Environment Agency flood risk maps. Ecology & Biodiversity A search of publicly available records suggests the site and the land immediately surrounding the site is located within the following areas:-</p> <ul style="list-style-type: none"> • Nitrate Vulnerable Zones 2017 • Objective 2 Area • Higher Level Stewardship Themes • Woodland Priority Habitat Network – Lower Spatial Priority • Farm Wildlife Package Areas • Countryside Stewardship • Water Quality Priority Areas – Medium Priority • Phosphate Issues Priority – M • Woodland – Water Quality – Lower Spatial Priority • National Historic Landscape Characterisation – Enclosed Agriculture Historic Environment <p>A search of Historic England’s database identifies one heritage asset on the land. The record states:</p> <ul style="list-style-type: none"> • Cross Ways Farm, Aubourn with Haddington – Redeveloped 19th century farmstead. Row. The farmhouse was attached to a range of working buildings. Located within or in association with a village. Large modern sheds are located on the site. Farmstead records like this are relatively common and infer that Lincolnshire HER acknowledge that there is a historic farmstead in the location. This record is not considered to preclude development on the site. <p>Residential Amenity The site is detached from the ‘main core’ of residential development of Haddington on Sky Lane. There are some dwellings to the east of Old Haddington Lane, however it is not considered that this would preclude commercial development. The surrounding area already has employment uses surrounding and it considered that further development in this location would in fact complement the existing surrounding uses. Summary Overall, the landowner considers that the plan is not positively prepared, justified or consistent with national policy and thus stresses that the following changes are needed in order to make the plan</p>		
--	--	--	--	--	--	--	--	--	--	---	--	--

										<p>‘sound’: • Increased SES allocations • Increased flexibility of LEA growth and expansion, particularly within the countryside • Allocation of the land west of Old Haddington Lane for employment It is considered that the plan in its current form does not provide sufficient flexibility to deliver a range of employment opportunities and stresses that the plan should take account of areas such as the land at Old Haddington Lane, which can strategically be grown for further inward commercial investment.</p>		
1100204	S82; Policies Map	Yes	Yes	No	No	No	Yes	Yes	<p>Although the landowner supports allocations in small villages, we consider draft Policy S82 has not been positively prepared, justified and effective. Draft Policy S1 identifies a hierarchy of settlements and Thorpe on the Hill is identified as a “Small Village” with such villages being defined as those with between 50 to 249 dwellings as of 1st April 2018. The plan states that well connected or well served small villages may receive some limited growth, primarily through allocations in the Local Plan to achieve a balance between ensuring the vitality of the village and the rural character. In consideration of this, Thorpe on the Hill is considered to be a sustainable location, within the Lincoln Strategy Area that is well connected and well served to and from Lincoln. Therefore, it is considered that development in Thorpe on the Hill conforms to the sustainable strategy as planned by the CLLP as a whole, but draft Policy S82 has not provided any allocations to the village. This means it is considered that draft Policy S82 does not enforce the provisions of Policy S1 by not allocating any site(s) within the village and, therefore, is not positively prepared as it provides no allocations to Thorpe on the Hill.</p> <p>Draft Policy S82 does list 14 allocated sites in small villages across Central Lincolnshire but 11 of these sites already have planning permission or have planning permission and under construction. Small Villages in the original 2017 Local Plan did not receive allocations, and whilst it is considered somewhat positive that they now do, it is considered remiss of the Local Plan to revert predominately to sites that already have permission. Only three of the small villages of Leadenham (ref: NK/LEAD/001), Martin (ref: NK/MART/008) and Corringham (ref: WL/COR/002A) which have allocations without planning permission will experience new growth, if the Proposed Submission Draft Local Plan is adopted in its</p>	<p>In light of our response to question 4, the landowner considers changes are required to the Local Plan to make it positively prepared, justified and effective by increasing the number of allocations in Small Villages, particularly in well-connected and sustainable village such as Thorpe on the Hill. In relation to allocating sites in Thorpe on the Hill, the landowner is promoting his site, land to the south of Sempers Close, as a suitable site for a residential allocation.</p> <p>As shown on the accompanying plan, the land is situated to the south of Sempers Close immediately to the north of the main “core” of the village. As stated earlier in this document, the land was originally promoted during the “Call for Sites” Consultation in July 2019. The site is not within a designated Local Green Space, nor is it within an Area of Outstanding Natural Beauty (AONB), Area of Great Landscape Value (AGLV) or Green Wedge.</p> <p>In response to the CLLP Policy Team not providing any allocations in Thorpe on the Hill and not specifically allocating the landowner’s site, the following sets out why it is considered the site is an appropriate location for a residential allocation.</p> <p>Appropriate Location As already stated, previous assessment by the CLLP Policy (included in the Sustainability Appraisal report for the Central Lincolnshire Local Plan Proposed Submission Draft (March 2022), Appendix 5.2) as part the Proposed Submission Draft does not provide any reasoning for why the site was not allocated but described it as a “reasonable alternative”. Although this is the case, the landowner considers the site is a suitable and appropriate location for a residential development and should be allocated for such use.</p> <p>An assessment of the village form has shown that the village has a main “core” which is predominately rectangular in shape. There are two areas where linear development has occurred, extending away from the main core. These include development running southwards along Fosse Lane and north/north eastwards along Little Thorpe Lane. The site runs along the western side of Fosse Lane and the site has existing housing to the north and east with a potential</p>	No	Yes

									<p>current form. This means there is a large reliance on existing allocations and sites already with permission and the policy only provides allocated growth for 3 of the 87 Small Villages listed. It is considered that a positively prepared plan would in fact be selecting further allocations for growth to help shape and steer the settlements for the duration of the plan period. Whilst it is accepted that by their nature, the Small Villages can vary, Thorpe on the Hill in particular is a sustainable, well-connected village and is in a strategically sustainable location to Lincoln. Furthermore, the Plan nor the evidence documents provide any justification for the lack of allocations within Small Villages and also fails to make any differentiation as to why certain sites are 'prepared' and some are not within such villages. Therefore, the landowner considers the Local Plan and specifically draft Policy S82 is, not only not positively prepared, but also not justified.</p> <p>In consideration of this, the landowner wishes to stress that amongst the Small Villages within the plan, there is no consistency for sustainable development moving forward, with such a small percentage of villages being afforded allocations. Only one (Leadenham – NK/LEAD/001) of the new allocations for Small Villages within the Plan is within the Lincoln Strategy Area and it is considered that further controlled and allocated growth should be given to villages such as Thorpe on the Hill, which is within the Lincoln Strategy Area, to encourage and provide for increased consistency of sustainable development within well-connected villages.</p> <p>Furthermore, the landowner considers that the plan fails to be effective over the plan period due to a lack of allocation and controlled growth. Under the Policy Provisions of Draft Policy S4, Small Villages are allowed growth of 10 units or more on allocated sites, or on unallocated sites in appropriate locations within the developed footprint of the village, typically development of up to 5 dwellings is supported. As already discussed, draft Policy 82 has only allocated 3 new sites without permission. These 'allocations' already had planning permission before the Draft Plan granted them allocation status. If these sites were to come forward now,</p>	<p>access point in the site's north eastern corner from Sempers Close. This means the site is bordered on two sides by residential development and the land appears to create a predominately rectangular area, which if allocated for development and extends no further south than the farm track immediately adjacent it's southern boundary, would "square off" this section of the village. Given the site is a well contained site with defined field boundaries and, if any allocation extends no further southwards than the dwellings to the east of the site with extensive landscaping along its southern boundary, it is considered an appropriate location for development. Furthermore, it is considered that if significant landscaping occurs along the southern boundary, where none currently occurs together a low density of housing, it would allow the scheme to blend into the surrounding countryside and would not have an adverse impact on the settlement's character and appearance and not significantly harm the character and appearance of the surrounding countryside nor the rural setting of the settlement. Therefore, it is considered the site will meet the "appropriate locations" criteria of the CLLP policy and be an ideal location for future development to meet the growth requirements of the village whilst being situated in a sustainable location in the village.</p> <p>Biodiversity and Green Infrastructure Opportunities It is noted that the site is not situated within a designated wildlife site and the nearest is Whisby Nature Park LNR which is approximately 735m to the north. It is also envisaged by the landowner that any development of the site would incorporate landscaping and wildlife areas which allows the site to have opportunities to significantly enhance the biodiversity of the site. Therefore, the development of the site would meet the requirements of paragraphs 179 to 182 of the NPPF (July 2021). It would also meet the requirements of the Environment Act 2021 and draft Policy S61 (Biodiversity Opportunity and Delivering Measurable Net Gains) for the requirement of development proposals should seek to deliver wider environmental net gains and a minimum of a 10% biodiversity net gain.</p> <p>Built and Historic Environment A desktop search of the publicly available Heritage Gateway website shows there are no listed buildings within the site's boundary with the nearest being two listed buildings to the north east of the site. These include the Grade II Listed buildings of Hill Cottage and Church of St Michael and All Angels, which are situated approximately 90m and 130m, respectively. It is considered that any future development on the site would not cause harm to the significance and setting of these listed assets, given both are physically and visually separated from the site and due to</p>		
--	--	--	--	--	--	--	--	--	---	--	--	--

									<p>speculatively as they did before, the Plan in it's current form would not be supportive of them because they are far in excess of the 5 unit threshold for unallocated sites.</p> <p>The landowner considers it to be remiss of the plan to only provide for 3 allocated sites within Small Villages, especially not affording villages such as Thorpe on the Hill any allocation when it is located within the Lincoln Strategy Area and has considerable sustainability credentials when compared to other villages. The landowner also wishes to stress that 356 dwellings have been granted permission in Small Villages, which are now 'allocated', but this does not ensure that they are in fact deliverable. Whilst we cannot speculate on whether they will be delivered or not, if they cannot be delivered, it would take a large amount of speculative piecemeal 'up to 5 dwelling' applications to make up for the surplus. It is also stressed that if the allocations are not delivered, then by only allowing 5 dwellings in Small Villages, affordable housing would not come forward in the Small Villages as a result of the plan failing to be able to enforce affordable housing as part of applications. Therefore, it is considered that the soundness of deliverability may fail on the premise that it is not guaranteed that the allocations will be built out and the lack of other allocations will not be able to facilitate the shortfall. It is stressed that over-supply is better than under-supply which may lead to an eventual lack of controlled growth. Therefore, it is considered that the Local Plan and specifically draft Policy S82 will not be effective at delivering residential development.</p> <p>Finally, turning to the landowner's site specifically, the latest Sustainability Appraisal Report¹, published as part the Draft Local Plan Consultation March 2022, summarised the site as land to the south of Sempers Close with site reference NK/TOTH/005 and considered a "reasonable alternative". The assessment suggests the site has a number of positives for potentially allocating the site, including the following:-</p> <ul style="list-style-type: none"> • Site would produce a range of market and affordable housing to meet current and future housing needs for local people in the area; • The site is within 400m of existing open space, within 15km (15min) drive time of strategic 	<p>substantial intervening screening afforded by existing dwellings and mature vegetation on the boundary of the site's north eastern corner. Furthermore, it is also noted that there are no archaeological records on the site.</p> <p>Therefore, as stated in the Sustainability Appraisal Report for North Kesteven, development of the site can be designed to be sensitive to the nearby heritage assets and their setting through appropriate use of design, materials, layout, boundary treatments and landscaping. It is, therefore, considered by the landowner that the potential allocation and future development of the site would not have any adverse impacts on the historic environment and would meet the requirements of paragraph 197 of the NPPF (July 2021) and Draft Policy S57 (The Historic Environment).</p> <p>Flood Risk It is noted that the site is situated in Flood Zone 1 for flooding from rivers and sea, meaning the site is within a sequentially preferred location and meets the requirements of the CLLP and NPPF (July 2021) in terms of sea and river flood risk. The site has some surface water flooding risk in its southern half. However, as stated in the Sustainability Appraisal Report, it is considered that these areas are small and with an appropriate layout, the areas at risk of surface water flooding can be avoided.</p> <p>Sustainability In addition to the above, the site is easily accessible to the existing services and facilities within the village via non-car modes along lit segregated pavements along Main Street, Blacksmiths Lane and School Lane. The approximate distances to a number of the services and facilities are listed below:-</p> <ul style="list-style-type: none"> • St Michael and All Angels Church, Main Street 150m • Bus Stop, Fosse Lane 210m • Oliver Roper Parish Meeting Room (Village Hall), Main Street 360m • Locally Equipped Play Area (West Lane Play rea), Main Street 360m • Tennis Courts and Bowling Green, Main Street 390m • St Michael's Church of England Primary School, School Lane 445m <p>All the facilities listed above, except the Primary School are situated within the desirable walking distance, as defined by the Institution of Highways and Transportation (IHT) as recommended by the Department of Transport. Furthermore, the Primary School is situated just over the desirable walking distance as defined by the IHT.</p> <p>Therefore, it is stressed that the site is considered to have</p>		
--	--	--	--	--	--	--	--	--	--	---	--	--

									<p>parcs and gardens in Lincoln and the site is of a scale which could provide a small amount of new open space on site;</p> <ul style="list-style-type: none"> • The site is not within an AONB, AGLV or Green Wedge; • The site is located entirely within Flood Zone 1; • The site is within close proximity to sustainable modes of transport with the nearest bus stop being within 250m of the site and Hykeham railway station is 4.6km away; and • The nearest primary school to the site is within 450m of the site and the nearest secondary school is located in North Hykeham, approximately 3.8km away from the site. <p>Although it is noted that the assessment suggests there are some neutral or negative impacts, there is no reasoning provided why the land has not been allocated. Furthermore, as demonstrated later in this document, the landowner disagrees with some parts of the CLLP Policy Team's assessment of the site and it is a suitable location for a residential allocation. As stated earlier in this letter, Thorpe on the Hill is a sustainable, well-connected village, situated in a strategically sustainable location to Lincoln; has a number of services and facilities; and is situated within a popular location to live as demonstrated by the village being significantly over its 10% growth allocation in the current adopted CLLP. Given the site has not been allocated and the CLLP Policy Team have not provided further reasoning for why this is the case, we consider Policy S82 and Policies Map 86 have not being fully justified.</p>	<p>good levels of sustainability and, given the site's location immediately adjacent the southern edge of the village's main "core", all the services and facilities can be easily accessed by non-car modes. Furthermore, as stated earlier in this letter, the village is also well-connected and is in a strategically sustainable location to Lincoln.</p> <p>For the reasons set out above, it is considered and stressed that this site should be allocated as a housing site in the village of Thorpe on the Hill, as part of the CLLP Review process. This site would be ideal for allocation and would be an appropriate development site in close proximity to the main "core" of a sustainable and well-connected village in a strategically sustainable location to Lincoln.</p> <p>Therefore, the landowner proposes the site should be included as an allocation in the village of Thorpe on the Hill and the following information for the site's allocation should be included in policy S82:-</p> <p>Site Name Land to the south of Sempers Close, Thorpe on the Hill.</p> <p>Site Area 2.58ha (6.37 acres)</p> <p>Planning Status None</p> <p>Indicative dwellings during plan period (2018-2040) 40 dwellings</p> <p>Site Specific Requirements</p> <ul style="list-style-type: none"> • Design to be in-keeping with the vernacular of the area. • An appropriate layout designed to avoid those areas at most risk of surface water flooding and include a suitable drainage and water management strategy to limit the impacts on surface water. • Development should use appropriate SUDs, layout and drainage strategies to ensure surface water is managed. • Development should be sensitive to nearby heritage assets and their setting through appropriate use of design, materials, layout, boundary treatments and landscaping. • Where possible, provide new linkages for walking and cycling between new development on the site and facilities outside of the site area. 		
--	--	--	--	--	--	--	--	--	---	--	--	--

Anthea Jepson

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				

1104544	S1	Don't know	Don't know	No	No	Don't know	Don't know	Don't know	We are fully supportive of Policy S1 and specifically to the development in the Lincoln Urban Area.		No	No
1101233	S69	Don't know	Don't know	No	No	Don't know	Don't know	Don't know	<p>The policy promotes an area of 133.5 hectares on the edge of the Lincoln Urban Area to be included in the SWQ SUE, for the principle focus for development in Central Lincolnshire. The policy promotes a mixed-use development of approximately 2,000 dwellings and 5 hectares of land for employment (B and E Use Classes) expanding the Boundary Lane Enterprise Park together with leisure, cultural and transport facilities.</p> <p>Although we are fully supportive of the SWQ SUE allocation on the land at Grange Farm, Hykeham (NK/NHYK/001), we feel there should be further land included in the allocation. The proposed boundary of the development area cuts through a greenfield site, currently used for low grade agricultural means. This leaves a small area of land making it far less suitable for agricultural use. Our representation refers to this land on Long Lane, South Hykeham, LN6 9NX (as outlined on the enclosed plan). The western section of the land has been included in the SWQ SUE, however on reviewing the examination documentation (Call to Sites) the eastern half has not been assessed. Considering all policies, it is difficult to understand why the eastern half is not included as it meets the same criteria as the western half.</p> <p>Appropriate Location The area identified for the allocation of the SWQ SUE suggests the eastern half of the land is ideally suited and an appropriate location to be included in the SWQ area. The land is immediately adjacent the south western corner of the area identified for allocation, meaning the land immediately to the north and west of the land being within the SWQ and leaves a rectangular area of land not included. Considering the local plan, the allocated area to the north is closer to south Hykeham village than the eastern half of this site. We have carefully considered the shape and extent of the land to be promoted for potential inclusion in the identified SWQ allocation area. The area identified, as shown on the accompanying plan, would extend no further eastwards than the area identified to the north and no further southwards than the current southern boundary of the identified area to the west. We feel that the inclusion of this area would still allow a “buffer area/break” to the existing developed area of South Hykeham village to ensure the SWQ does not merge with the village.</p> <p>Controlled Growth The SWQ SUE boundary clearly abuts built development on the majority of its boundary, however on the south-eastern corner adjacent South Hykeham this strip of land has been unallocated. By not allocating this land, it would mean that in the space of approximately 150m between the SUE and South Hykeham there will be several different areas of policy consideration. We feel the SWQ SUE should incorporate this land, rather than having a strip of uncontrolled ‘countryside’ land between the SUE and South Hykeham village. We wish to protect the setting and identity of South Hykeham village, and believe the inclusion of the rest of this land within the SUE boundary will help maintain, control and facilitate this as it could then be planned as part of the wider SUE.</p> <p>Flood Risk The land is situated in Flood Zone 1 and, therefore, in an area at least probability of flooding from rivers and surface water. It means the land is in within a sequentially preferred location for development and meets the requirements of</p>	we would like it to be known that reference to NK/NHYK/001 (HOU011) refers to information from landowners to help form a trajectory for housing delivery in the SWQ SUE: as landowners we have not been approached or asked for any comments in regards to any of the development. Overall, we ask for this parcel of land to be considered as part of the SWQ SUE. We do not believe the site has been assessed fully and consider it to have the same merits as the western half that is included, and also the land to the north of this site. It is an ideal and an appropriate area of land to be included in the SWQ SUE. Furthermore, it is considered that housing on this land would allow the Central Lincolnshire authorities to meet housing need as part of a larger, well-planned urban extension with all the necessary supporting infrastructure, rather than by smaller developments which do not have the supporting infrastructure in other less sustainable settlements	No	Yes

								<p>the CLLP and NPPF in terms of flood risk.</p> <p>Heritage A search of publicly available information (Heritage Gateway Website) suggests there is no known heritage assets nor archaeological records on this land. The search also shows the nearest heritage assets to the site are the Grade II Listed buildings of St Michael and All Angel's Church and Church Farmhouse, both situated on Meadow Lane. The inclusion of the land within the SWQ area would have no significant adverse impact on these listed buildings, due to intervening screening afforded by the properties on Wath Lane and significant vegetation screening along the boundaries of these properties to the north east of the site.</p> <p>Biodiversity and Ecology Publicly available information shows the site is outside any biodiversity and ecological designations and the land is used for arable agriculture. Therefore, the potential inclusion and development of the land within the SWQ is considered unlikely to have any adverse impacts on ecology and biodiversity. Furthermore, it is considered that if the land were to be included in the SWQ, there is scope to include open space/wildlife areas on the site.</p> <p>Landscape We feel the inclusion of the land within the SWQ area is considered to be acceptable from a landscape impact perspective. The land is situated outside any landscape designations, including the Green Wedge/Settlement Break. If this land is included in the SWQ, there is scope to provide significant vegetation planting onto the land's eastern and southern boundaries to minimise the impact on the neighbouring landscape. The vegetation planting, together with leaving a "break" between the land and South Hykeham village will minimise any adverse impacts of including the land in the SWQ on South Hykeham village.</p> <p>Transport and Accessibility There is an existing access to the land directly off Long Lane along the site's northern boundary. This access has good visibility splays in both directions (east and west) along Long Lane and could be utilised and upgraded as part of its inclusion with the SWQ. The land, as previously stated, is immediately bordering the identified area for the SWQ, which means if the land is included in the SWQ area, any development on the land could also be easily accessed from the west.</p> <p>Sustainability In addition to the above, the site has high levels of sustainability to the existing services and facilities near to the site via non-car modes. These include a place of worship, primary school and bus stop within South Hykeham village. The site is also within a short cycle distance to the services and facilities found in North Hykeham, including primary school, garden centre, service station, numerous shops and numerous places of employment. As we are proposing that the land is included within the area allocated for the SWQ SUE, immediately bordering the site, it will form part of a large mixed-use development which would include numerous shops, numerous places of employment, primary school, cemetery, sports facilities and open space. Therefore, the land would have high levels of sustainability.</p>			
--	--	--	--	--	--	--	--	---	--	--	--

Nigel Johnson

Rep ID		Q2: Legal Compliance	Q3: Tests of Soundness	Q4: Please give details.			
--------	--	----------------------	------------------------	--------------------------	--	--	--

	Comment on	Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate		Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
1100434	S80								<p>I wish to object to this proposed planning application off Eastfield Lane in Welton</p> <p>Development at this site would destroy countryside and wildlife habitat, swamp Eastfield Lane with traffic, boost carbon emissions, air pollution and noise, increase road accident risks (especially to vulnerable road users) and swamp local healthcare and education services, which can't cope with the new homes already built or approved.</p>			No

Lucy and Percy Jokhi

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102226	S80								<p>We wish to offer our objections to the above proposed plan.</p> <p>Site is at end of village down narrow country road (difficult for 2 cars to pass each other) and development would cause - increased traffic noise and pollution. This is also a potential site for accidents especially to vulnerable users and mobility scooters. The pavements already on Eastfield Lane are not suitable for scooters and roads are frequently used.</p> <p>More building on this site - which is now a beautiful field of Rapeseed crop - would reduce the wildlife diversity in the immediate area.</p> <p>The healthcare facilities are already swamped with the present population and most people have many concerns regarding this and also the schools. The drainage along Eastfield lane is poor and there are often problems.</p> <p>The current building works in the village are not complete and we have yet to see the full impact of this. I believe that many of these houses remain unsold.</p> <p>Whilst the overall picture is for people to use their cars less, however the pavements are poorly maintained and the bus services are underused, and the bus stops from this site are not convenient. Most will use their car for town and even going to the local shops.</p>			No

Joan Kelway

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1090227	S82	Yes	Yes	Yes	Yes	Don't know	Yes	Don't know			No	No

Jane Lewington

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1088379	S79	Don't know	Don't know	No	No	No	Don't know	Don't know	I have examined the site allocations for Caistor (page 104 onwards). The site allocations include over 400 houses on Navigation lane or North Kelsey Road.	The plan needs to set out how the impact on NHS	No	No

									<p>The designation of these sites totally ignores the inadequate infrastructure in Caistor to support this scale of development. The allocations only state how close they are to the local GP surgery - there is no acknowledgement nor plan to address the inadequate primary care provision in Caistor, this relates to both the premises and the amount of general practice workforce. Has the Council entered into formal discussions with NHS England regarding the need to expand NHS provision to meet the needs of this growing population in the town. Secondly the site allocations in Caistor make no reference to the impact of this increased housing on road usage. Particularly the increased volume of traffic travelling up and down North Kelsey Road, Caistor AND Caistor Road, North Kelsey Moor. By focussing the vast majority of housing developments on or near North Kelsey Road, Caistor the Council is generating a volume of traffic that this "C" Road cannot cope with safely. There should be no further housing developments in Caistor until a link road has been built from North Kelsey Road, Caistor to Brigg Road, Caistor. I would be keen to understand what traffic census work has been done by the Council on this four mile stretch of road and what the results were. The development plan only looks at the impact on the immediate areas adjacent to the sites, it pays no attention to the impact on other communities due to more people needing to travel to work, taking children to school etc.</p>	<p>services of this continued population growth in the town of Caistor will be managed, setting out the additional facilities and capacity that will be put in place. Equally there need to be clear traffic management plans that don't just address the impacts on Caistor residents of the increased traffic flowing from these site allocations but also the effects on all the communities living on the main access routes into the town - particularly North Kelsey Moor.</p>		
--	--	--	--	--	--	--	--	--	---	--	--	--

D Lockey and L Pearce

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101307	S4; S80	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Re: Mill Lane, Billingham – NK/BIL/003</p> <p>The site is situated adjacent existing recent development to the village of Billingham which is identified as a Large Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022.</p> <p>The site is identified as an “existing allocation” and it is our view that the site should continue to be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/BIL/003) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022) – Page 84.</p> <p>We can confirm that negotiations are at an advanced stage with prospective Developers for the bringing forward of this Allocated site.</p>	n/a	No	No
1101308	S5	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Re: Mill Lane, Billingham – NK/BIL/003 The site is situated adjacent existing recent development to the village of Billingham which is identified as a Large Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. The site is identified as an “existing allocation” and it is our view that the site should continue to be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/BIL/003) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022) – Page 84. We can confirm that negotiations are at an advanced stage with prospective Developers for the bringing forward of this Allocated site.</p>	n/a	No	No
1101310	S80	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Re: Mill Lane, Billingham – NK/BIL/003 The site is situated adjacent existing recent development to the village of Billingham which is identified as a Large Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. The site is identified as an “existing allocation” and it is our view that the site should continue to be allocated for development on the basis that it is immediately available for development</p>	n/a	No	No

									as set out in the initial proposals put forward and as specified in the documents (NK/BIL/003) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022) – Page 84. We can confirm that negotiations are at an advanced stage with prospective Developers for the bringing forward of this Allocated site.			
--	--	--	--	--	--	--	--	--	---	--	--	--

Ben Loryman

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100432	S14								I have just been scanning through the draft plan. I was impressed by the ambition to help achieve net zero, and interested by your comments on proposed solar and wind sites. I have one constructive suggestion to make, if I may? I think it might be worthwhile specifically including a statement saying you expect any proposed large scale renewable energy generation projects to connect to the grid by unobtrusive cables rather than by pylons. Forgive me if it's already in there and I missed it. I went to a meeting in Upton Village Hall recently where Sir Edward Leigh MP was discussing his concerns about the Cottam Solar Project. During the meeting he reiterated his view that the proposals should be subject to a planning process. He also suggested that the Cottam Solar project might need pylons to connect to the power station, as opposed to the cable that features in the published plans. I don't know whether the this is true, but I don't doubt it would be deeply unpopular. If he succeeds in getting the proposals to be subject to a planning process, I wonder if it might be sensible to state that pylons wouldn't be an acceptable part of such projects in the Central Lincolnshire Plan? Keep up the good work!			No

Margaret Lundy

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102699	S1	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The land that this Representation is subject to is the Land to the South of North Kelsey Road, Caistor. The site is already allocated within the Central Lincolnshire Local Plan (April 2017) and is still an allocation within the Proposed Submission Draft (See Figure 1). The allocation reference is WL/CAI/001 and is 5.9 hectares with an indicative number of 135 dwellings. The reasonings as to why the landowner considers the plan to be positively prepared, justified, effective, consistent with national policy and in compliance with the Duty to Co-Operate are listed below:- Positively Prepared Paragraph 35 of the NPPF (2021) provides guidance on the 'soundness' of examining Local Plans. To be 'Positively Prepared', plans are sound if they provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development. Policy S1 sets out the Spatial Strategy and Settlement Hierarchy for sustainable growth for Central Lincolnshire. The policy states that development should provide the scale and mix of housing types and range of new job opportunities that will meet the identified needs of Central Lincolnshire in order to secure balanced communities. In order to execute this, Policy S1 sets out a settlement hierarchy with methodology for guiding development throughout the Central Lincolnshire area and specifically within each tiering of the hierarchy. The hierarchy outlines a hierarchy of: 1. Lincoln Urban Area 2. Main Towns 3. Market Towns 4. Large Villages 5. Medium Villages 6. Small Villages	Considering the points made in Question 4, the landowner considers no changes are necessary, however wishes to reinforce the following:- • The landowner is in support of the Plan and specifically Policies S1 & S79; • The landowner continues to support the allocation of WL/CAI/001; • The indicative number of 135 dwellings is still considered to be suitable; • The site is actively being marketed and is therefore considered to be an	No	Yes

									<p>7. Hamlets 8. Countryside Caistor is located within Tier 3 (Market Towns) alongside Market Rasen. The Policy states that market towns will be the focus for significant but proportionate growth in housing and this growth will primarily be through sites allocated in the Local Plan and any applicable neighbourhood plan. Policy S2 outlines the growth levels and distribution of the housing requirement for Central Lincolnshire. The policy is clear that 3,498 of the total homes will be needed to come forward in settlements away from the Lincoln strategy area, Gainsborough or Sleaford. The policy states that outside of these areas, housing elsewhere will primarily be located at the market towns and in well-connected villages. Caistor is one of two market towns and is therefore considered to be a 'primary location' for helping supply the housing requirement. Policy S79 identifies the allocations of housing sites in Market Towns and identifies that the land subject to this representation is allocated for 135 dwellings on 5.9 hectares. The reference is WL/CAI/001. The landowner is in full support of this allocation and considers that the Plan has been positively prepared in that it has:</p> <ol style="list-style-type: none"> 1. Identified housing growth needed 2. Provided a settlement hierarchy and methodology 3. Identified the areas of sustainable growth for allocations 4. Allocated suitable sites for allocated and proportionate housing growth <p>For these reasons, the landowner is in support that the plan is positively prepared. Paragraph 35 of the NPPF (2021) provides guidance on the 'soundness' of examining Local Plans. To be 'Justified', plans are sound if they are an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. As referred to in the 'Positively Prepared' section above, the landowner considers that the strategy for identifying and allocating housing sites has been justified. The policy is clear that a certain number of dwellings are required and subsequently distributes the growth across the hierarchy, allocating 13 sites within Market Towns which make up the primary focus for housing outside of the Lincoln Strategy Area, Gainsborough or Sleaford. It is also understood that the Plan and policies have been through a thorough exercise of site selection and sustainability objectives. The landowner therefore considers that subsequent from the policies outlining the spatial strategy, the reasoning behind the site allocations has been justified. Effective Paragraph 35 of the NPPF (2021) provides guidance on the 'soundness' of examining Local Plans. To be 'effective', plans are sound if they are deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. The landowner considers that the Plan is effective as the Plan has identified and allocated the land as a residential site and the site is available to be deliverable as a residential allocation. The landowner wishes to make it clear to the CLLP Team that they are supportive of the allocation and have launched the site onto the open market as a residential development opportunity. This demonstrates the landowners intentions to help market the residential development opportunity in attempt to help delivery contributing towards the housing supply. Consistent with National Policy The National Planning Policy Framework (2021) promotes the delivery of a sufficient supply of homes to support the Government's objective of significantly boosting the supply of homes. To do this, the NPPF (2021) requires sufficient amount and variety of land can come forward where needed to meet the needs of groups with specific housing requirements. Section 5 of the NPPF outlines how policies within Development Plans can help provide houses through strategic policy-making. Paragraph 23 of the NPPF (2021) supports the designations and allocations within Local Plans and Paragraph 28 of the NPPF (2021) states that non-strategic policies should be used by local planning authorities and communities to set out detailed policies for specific areas, neighbourhoods, or types of development, which can include allocating sites. The CLLP Proposed Submission Plan</p>	effective, available and deliverable site		
--	--	--	--	--	--	--	--	--	--	---	--	--

									is clear in its hierarchy within S1 and the subsequent policies relating to the tiers of the hierarchy that allocations are available for helping to deliver growth. The Plan acknowledges the primary part of the delivery that Market Towns can contribute and subsequently allocates proportionate housing growth within those allocations. The landowner considers that the Local Plan is consistent with National Policy. In Compliance with the duty to Co-Operate It is considered that the Plan and The Central Lincolnshire Joint Strategic Planning Committee (CLJSPC) is in compliance with the duty to co-operate, however this representations focus regards the continued promotion of WL/CAI/001, rather than the detail of the duty to co-operate.			
1102698	S79	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>The land that this Representation is subject to is the Land to the South of North Kelsey Road, Caistor. The site is already allocated within the Central Lincolnshire Local Plan (April 2017) and is still an allocation within the Proposed Submission Draft (See Figure 1). The allocation reference is WL/CAI/001 and is 5.9 hectares with an indicative number of 135 dwellings.</p> <p>The reasonings as to why the landowner considers the plan to be positively prepared, justified, effective, consistent with national policy and in compliance with the Duty to Co-Operate are listed below:-</p> <p>Positively Prepared Paragraph 35 of the NPPF (2021) provides guidance on the ‘soundness’ of examining Local Plans. To be ‘Positively Prepared’, plans are sound if they provide a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.</p> <p>Policy S1 sets out the Spatial Strategy and Settlement Hierarchy for sustainable growth for Central Lincolnshire. The policy states that development should provide the scale and mix of housing types and range of new job opportunities that will meet the identified needs of Central Lincolnshire in order to secure balanced communities.</p> <p>In order to execute this, Policy S1 sets out a settlement hierarchy with methodology for guiding development throughout the Central Lincolnshire area and specifically within each tiering of the hierarchy. The hierarchy outlines a hierarchy of:</p> <ol style="list-style-type: none"> 1. Lincoln Urban Area 2. Main Towns 3. Market Towns 4. Large Villages 5. Medium Villages 6. Small Villages 7. Hamlets 8. Countryside <p>Caistor is located within Tier 3 (Market Towns) alongside Market Rasen. The Policy states that market towns will be the focus for significant but proportionate growth in housing and this growth will primarily be throughsites allocated in the Local Plan and any applicable neighbourhood plan.</p> <p>Policy S2 outlines the growth levels and distribution of the housing requirement for Central Lincolnshire. The policy is clear that 3,498 of the total homes will be needed</p>	<p>Considering the points made in Question 4, the landowner considers no changes are necessary, however wishes to reinforce the following:-</p> <ul style="list-style-type: none"> • The landowner is in support of the Plan and specifically Policies S1 & S79; • The landowner continues to support the allocation of WL/CAI/001; • The indicative number of 135 dwellings is still considered to be suitable; • The site is actively being marketed and is therefore considered to be an effective, available and deliverable site 	No	Yes

									<p>to come forward in settlements away from the Lincoln strategy area, Gainsborough or Sleaford. The policy states that outside of these areas, housing elsewhere will primarily be located at the market towns and in well-connected villages. Caistor is one of two market towns and is therefore considered to be a 'primary location' for helping supply the housing requirement.</p> <p>Policy S79 identifies the allocations of housing sites in Market Towns and identifies that the land subject to this representation is allocated for 135 dwellings on 5.9 hectares. The reference is WL/CAI/001.</p> <p>The landowner is in full support of this allocation and considers that the Plan has been positively prepared in that is has:</p> <ol style="list-style-type: none"> 1. Identified housing growth needed 2. Provided a settlement hierarchy and methodology 3. Identified the areas of sustainable growth for allocations 4. Allocated suitable sites for allocated and proportionate housing growth <p>For these reasons, the landowner is in support that the plan is positively prepared.</p> <p>Paragraph 35 of the NPPF (2021) provides guidance on the 'soundness' of examining Local Plans. To be 'Justified', plans are sound if they are an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>As referred to in the 'Positively Prepared' section above, the landowner considers that the strategy for identifying and allocating housing sites has been justified. The policy is clear that a certain number of dwellings are required and subsequently distributes the growth across the hierarchy, allocating 13 sites within Market Towns which make up the primary focus for housing outside of the Lincoln Strategy Area, Gainsborough or Sleaford. It is also understood that that The Plan and policies have been through a thorough exercise of site selection and sustainability objectives.</p> <p>The landowner therefore considers that subsequent from the policies outlining the spatial strategy, the reasoning behind the site allocations has been justified.</p> <p>Effective</p> <p>Paragraph 35 of the NPPF (2021) provides guidance on the 'soundness' of examining Local Plans. To be 'effective', plans are sound if they are deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>The landowner considers that the Plan is effective as the Plan has identified and allocated the land as a residential site and the site is available to be deliverable as a residential allocation.</p> <p>The landowner wishes to make it clear to the CLLP Team that they are supportive of the allocation and have launched the site onto the open market as a residential development opportunity. This demonstrates the landowners intentions to help market the residential development opportunity in attempt to help delivery contributing towards the housing supply.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

									<p>Consistent with National Policy</p> <p>The National Planning Policy Framework (2021) promotes the delivery of a sufficient supply of homes to support the Government's objective of significantly boosting the supply of homes. To do this, the NPPF (2021) requires sufficient amount and variety of land can come forward where needed to meet the needs of groups with specific housing requirements. Section 5 of the NPPF outlines how policies within Development Plans can help prove deliver houses through strategic policy-making.</p> <p>Paragraph 23 of the NPPF (2021) supports the designations and allocations within Local Plans and Paragraph 28 of the NPPF (2021) states that non-strategic policies should be used by local planning authorities and communities to set out detailed policies for specific areas, neighbourhoods, or types of development, which can include allocating sites.</p> <p>The CLLP Proposed Submission Plan is clear in its hierarchy within S1 and the subsequent policies relating to the tiers of the hierarchy that allocations are available for helping to deliver growth. The Plan acknowledges the primary part of the delivery that Market Towns can contribute and subsequently allocates proportionate housing growth within those allocations.</p> <p>The landowner considers that the Local Plan is consistent with National Policy.</p> <p>In Compliance with the duty to Co-Operate</p> <p>It is considered that the Plan and The Central Lincolnshire Joint Strategic Planning Committee (CLJSPC) is in compliance with the duty to co-operate, however this representations focus regards the continued promotion of WL/CAI/001, rather than the detail of the duty to co-operate.</p>			
1102732	S79	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>The land that this Representation is subject to is the Land to the North of North Kelsey Road and West of Moor Lane, Caistor. The site is not allocated in the CLLP Proposed Submission Plan, but the landowner would like to promote this land for residential allocation. (See Figure 1). The site is 1.3 hectares and has the capability to accommodate approx. 30 dwellings.</p> <p>The landowner considers that the Local Plan is positively prepared, justified, effective, consistent with national policy and in compliance with the Duty to Co-Operate.</p> <p>However, whilst supportive of the plan as a whole, the landowner would like to take this opportunity at the Reg 19 consultation stage to promote another site for potential allocation within Caistor. This site is the one highlighted in Figure 1.</p> <p>The reasonings as to why the landowner considers the plan to be positively prepared, justified, effective, consistent with national policy and in compliance with the Duty to Co-Operate are listed below:-</p> <p>Positively Prepared</p> <p>Paragraph 35 of the NPPF (2021) provides guidance on the 'soundness' of examining Local Plans. To be 'Positively Prepared', plans are sound if they provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.</p>	<p>Considering the points made in Question 4, the landowner is fully supportive of the Proposed Submission Plan, however wishes to reinforce the following and make the following comments:-</p> <ul style="list-style-type: none"> • The landowner is in support of the Plan; • The landowner would like to make the CLLP aware that the land to the north of North Kelsey Road and West of Moor Lane (Figure 1) is also available for allocation in addition to the already existing allocations; • The landowner considers that further allocations of small & medium sized sites would complement the 	No	Yes

								<p>Policy S1 sets out the Spatial Strategy and Settlement Hierarchy for sustainable growth for Central Lincolnshire. The policy states that development should provide the scale and mix of housing types and range of new job opportunities that will meet the identified needs of Central Lincolnshire in order to secure balanced communities.</p> <p>In order to execute this, Policy S1 sets out a settlement hierarchy with methodology for guiding development throughout the Central Lincolnshire area and specifically within each tiering of the hierarchy. The hierarchy outlines a hierarchy of:</p> <ol style="list-style-type: none"> 1. Lincoln Urban Area 2. Main Towns 3. Market Towns 4. Large Villages 5. Medium Villages 6. Small Villages 7. Hamlets 8. Countryside <p>Caistor is located within Tier 3 (Market Towns) alongside Market Rasen. The Policy states that market towns will be the focus for significant but proportionate growth in housing and this growth will primarily be through sites allocated in the Local Plan and any applicable neighbourhood plan.</p> <p>Policy S2 outlines the growth levels and distribution of the housing requirement for Central Lincolnshire. The policy is clear that 3,498 of the total homes will be needed to come forward in settlements away from the Lincoln strategy area, Gainsborough or Sleaford. The policy states that outside of these areas, housing elsewhere will primarily be located at the market towns and in well-connected villages. Caistor is one of two market towns and is therefore considered to be a 'primary location' for helping supply the housing requirement.</p> <p>Policy S79 identifies the allocations of housing sites in Market Towns and identifies four sites in Caistor as allocations, these are:</p> <ol style="list-style-type: none"> 1. WL/CAI/001 – 5.9 hectares – 135 dwellings (same ownership as this representation) 2. WL/CAI/002 – 2.7 hectares – 60 dwellings 3. WL/CAI/007 – 5.48 – Under construction 151 (51 remaining) 4. WL/CAI/008 – 2.12 – 69 dwellings <p>The landowner is in full support of the allocations above and considers that the Plan has been positively prepared in that it has:</p> <ol style="list-style-type: none"> 1. Identified housing growth needed 2. Provided a settlement hierarchy and methodology 3. Identified the areas of sustainable growth for allocations 4. Allocated suitable sites for allocated and proportionate housing growth <p>However, the landowner would also like to propose an additional allocation on the land to the north of North Kelsey Road and West of Moor Lane, as identified in Figure 1 and the accompanying Location Plan.</p> <p>The landowner considers that the proposed allocation would complement the existing allocations and contribute toward the overall strategy of the plan by:</p> <ul style="list-style-type: none"> • Introducing a 'smaller scale' allocation to complement with the existing allocations 	existing larger allocations and help delivery of small and medium sites in accordance with Paragraph 69 of the NPPF (2021)		
--	--	--	--	--	--	--	--	---	--	--	--

									<p>without competing against them;</p> <ul style="list-style-type: none"> • Further reinforce the west of Caistor as a location for new development in addition to WL/CAI/001and WL/CAI/007; • Allows for further options for the CLLP Team to help deliver growth <p>For the reasons listed above, the landowner is in support that the plan is positively prepared and would like to propose a further additional allocation for consideration.</p> <p>Justified Paragraph 35 of the NPPF (2021) provides guidance on the ‘soundness’ of examining Local Plans. To be ‘Justified’, plans are sound if they are an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>As referred to in the ‘Positively Prepared’ section above, the landowner considers that the strategy for identifying and allocating housing sites has been justified and the allocations that have already been selected have been through a thorough site selection and sustainability appraisal exercise.</p> <p>The landowner therefore considers that subsequent from the policies outlining the spatial strategy, the reasoning behind the site allocations has been justified.</p> <p>However, as mentioned, the landowner would like to propose the additional site to be considered for allocation. The site is of a smaller scale to the existing allocations and for that reason is considered to appropriately complement the existing allocations in offering a ‘different type’ of allocation to help sustain Caistor as a Market Town.</p> <p>Effective Paragraph 35 of the NPPF (2021) provides guidance on the ‘soundness’ of examining Local Plans. To be ‘effective’, plans are sound if they are deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>The landowner considers that the Plan is effective as the Plan has identified and allocated land to be delivered as residential allocations and wishes to make clear to the CLLP Team that they are supportive of the allocations already proposed.</p> <p>To help delivery further, the landowner would like to propose the site to the north of North Kelsey Road and West of Moor Lane as an additional allocation. It is considered that the further allocation would not impede on the deliverability of the plan or the other allocations but would help reinforce and support the deliverability of residential development within Caistor.</p> <p>Consistent with National Policy The National Planning Policy Framework (2021) promotes the delivery of a sufficient supply of homes to support the Government's objective of significantly boosting the supply of homes. To do this, the NPPF (2021) requires sufficient amount and variety of land can come forward where needed to meet the needs of groups with specific housing requirements. Section 5 of the NPPF outlines how policies within Development Plans can help deliver houses through strategic policy-making.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

									<p>Paragraph 23 of the NPPF (2021) supports the designations and allocations within Local Plans and Paragraph 28 of the NPPF (2021) states that non-strategic policies should be used by local planning authorities and communities to set out detailed policies for specific areas, neighbourhoods, or types of development, which can include allocating sites.</p> <p>Paragraph 62 of the NPPF (2021) puts emphasis on delivering a sufficient supply of homes and assessment of the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Paragraph 69 of the same section also states that ‘Small and medium sized sites can make an important contribution to meeting the housing requirement of an area’.</p> <p>The CLLP Proposed Submission Plan is clear in its hierarchy within S1 and the subsequent policies relating to the tiers of the hierarchy that allocations are available for helping to deliver growth. The Plan acknowledges the primary part of the delivery that Market Towns can contribute and subsequently allocates proportionate housing growth within those allocations. For this reason, the landowner supports that the Proposed Submission Plan is consistent with National Policy.</p> <p>To support the consistency further, the landowner would like the CLLP Team to Paragraph 69 of the NPPF which highlights that small and medium sized sites assist with delivery of growth. Policy S3 already allows this via speculative applications within Market Towns, however, it is considered that additional allocations of small and medium sized sites would help with controlled growth and sufficient supply.</p> <p>Overall, the landowner is in support of the Proposed Submission Plan being consistent with the NPPF, however would like to make a suggestion that further additional smaller sites being allocated, in addition to those already allocated, would further reinforce the consistency with the NPPF. It is acknowledged that Proposed Submission Plan already does this via speculative applications, however it is considered that allocations would help the CLLP control growth.</p> <p>In Compliance with the duty to Co-Operate It is considered that the Plan and The Central Lincolnshire Joint Strategic Planning Committee (CLJSPC) is in compliance with the duty to co-operate, however this representations focus regards the continued promotion of a specific site, rather than the detail of the duty to co-operate.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

Duncan Mackay

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101450	S80								<p>WL/WELT008A</p> <p>The above site, previously rejected, represents as bad a choice for housing development in Welton as it is possible to make.</p> <p>The location is beyond walking distance from village facilities, has no public transport provision and is never likely to have, and the resulting car journeys will have to be made using Eastfield Lane, a narrow lane which is totally unsuitable for increased traffic. It is so narrow that vehicles frequently need to mount the verges to pass each other, it lacks</p>			No

									<p>continuous footpaths, has two right angle bends, and is hazardous for cyclists. I am at a loss to understand how this fits with the plan objectives “to reduce the need to travel by car”, and “to ensure that all journeys are undertaken by the most sustainable travel modes”.</p> <p>The information provided by the developer is not accurate. The road width is less than claimed, and the claimed accident record ignores the regular incidents where vehicles fail to take the right angle bends, and end up in the ditches and hedges. They are then privately recovered and do not show in official statistics. In addition Eastfield Lane is an old country lane with houses built immediately adjacent to the road, and vehicles emerging from drives have limited visibility. At the western end the junction with Ryland Road is already a dangerous junction where there has been at least one serious accident, and increased traffic will exacerbate the problem.</p> <p>Given the number of better alternatives in the area, why on earth would anyone choose this remote location with serious access issues to build a large number of houses with a consequential increase in traffic volumes? A good question.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

Lee and Priti Mackrill

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101471	S80								<p>Please consider this email a formal objection to the CLLP proposal that intends to allocate the site WL/WELT/008A into the CLLP.</p> <p>I live at 77 Eastfield Lane, Welton, and my property borders the lane that is being considered for extension. I am not happy with this potential intention, and will not permit such works any access to my property. I have young children and am very concerned that this proposal will put them at risk. The road of Eastfield Lane is not wide enough and was never designed to accommodate the traffic that will be bestowed on it by this and other proposals. To consider widening a small part of it seems like a gesture by the developer to tick a box and get the proposal over the line? Surely the fact that this road is just not suitable means it is impossible for it to be considered?</p> <p>Further to this, I am not sure that those involved in making this decision are aware of the number of accidents that go unreported on the corner that is proposed for access. At least 4 vehicles per year find themselves within the hedge or field, due to wet or icy conditions. To propose a point of access is at best reckless and dangerous.</p> <p>I have grave concerns regarding the validity and need for another proposal of this type to take place in our village. Targets for development have been disproportionately accepted in the Welton area, creating significant issues for local health care, traffic, schooling, health and safety, flooding and the general environment. Quotas for planning have been exceeded and exhausted in this area.</p> <p>I hope that once in receipt of the full facts and information regarding our area, the correct decision will be made by those who have the authority to make them.</p>			No

Brian Maddison

Rep ID		Q2: Legal Compliance	Q3: Tests of Soundness	Q4: Please give details.	Q5: What change(s) do you consider are necessary		
--------	--	----------------------	------------------------	--------------------------	--	--	--

	Comment on	Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate			Q6: Take part in the EiP?	Additional files
1101483	S81	Don't know	No	Don't know	Don't know	Don't know	Don't know	No	The Local Plan produced does not comply with process of community involvement. The Neighbourhood Plan has identified sites to develop within Leasingham. A broad brush approach has been made to allocate sites - green areas. Meadows and old chicken farm. Gas mains runs across site 006 and sewage works are close to site 001. There as been a poor consultation process format and forms are not easy to complete. Access and understand.	Regarding site 001 there is no access and egress to the site. It is also liable to severe flooding and is in close proximity to sewage treatment works. Site 001 is utilised by dog walkers, walkers and people who like to observe the horses. The only potential access/egress to site 001 is via Deepdale Drive which is a cul de sac and not suitable for heavy traffic. Flooding is also an issue that could effect the rest of village if building occurs.	No	No

Dr Vanessa Majer

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101535	S81	Don't know	Don't know	No	Don't know	Don't know	Don't know	No	<p>NK/LEAS/001 and NK/LEAS/006</p> <p>Compliance with Duty to Co-Operate:</p> <p>Local plan produced does not comply with the process of Community involvement.</p> <p>Village undertook innumerable consultations before drawing up a Neighbourhood Plan (NP), which was submitted. NP identified sites for sustainable growth and development within village. Sites NK/LEAS/001 and NK/LEAS/006 unallocated by NP. Plan has been drawn up with no preliminary process where discussion, negotiation and compromise could have been sought. Democratic process has been totally ignored.</p> <p>Inadequate consultation process</p> <p>Publicity regarding consultation process was scant. Access to consultation documentation is difficult, as website is cluttered. Documents, response form and guidance on completion of response form are not readily comprehensible. It is a consultation in name only.</p> <p>Positive preparation of plan</p> <p>It is not adequate, nor professional, to apply a broad sweeping methodology based upon generalised assumptions when developing proposals regarding the allocation of sites. "Positive preparation" implies thorough assessment of sites with all necessary studies completed e.g., water flow, biodiversity, capacity of sewage work. Sites have not been rigorously investigated prior to publication of plan to identify potential difficulties e.g., Gas main site NK/LEAS/006, is not identified on plan. It is not professional for plans to be drawn up which identify areas requiring studies. Further "positive preparation" intimates a degree of community engagement. Communities have not been engaged in the allocation of sites.</p> <p>Adherence to Policies: In respect of NK/LEAS/001 and NK/LEAS/006. In my opinion the plan fails to adequately meet :</p> <p>Policy S21 (a) Development should not affect integrity of existing flood defences</p>	<p>Flooding risk</p> <p>Adequate Flood Buffer Zones need to be provided and maintained (NK/LEAS/001 and NK/LEAS/006).</p> <p>Necessary studies particularly water flow, biodiversity, capacity of sewage works urgently require completion. These should also take into consideration effects of building construction (20/0577/FUL) which has not yet been completed.</p> <p>Given the changing climate there is an even greater need for the preservation of flood zones. There exists an obligation; a duty of care, to protecting the low lying parts of Leasingham and also villages further downstream from flooding.</p> <p>Biodiversity enhancement</p> <p>11.2.5: Development at sites NK/LEAS/001 and NK/LEAS/006 must be mindful to prevent damage to stream; to maintain normal water levels; preserving biodiversity, in particular the population of migratory Sand Martins.</p> <p>Retention of the hedgerows</p>	No	No

									<p>NK/LEAS/001 and NK/LEAS/006 Flood Zone 2 and 3.</p> <p>1) Loss/reduction of Buffer zones</p> <p>Following sustained periods of heavy rainfall flooding frequently occurs to roads, gardens and occasionally properties themselves within the lower lying areas of the village.</p> <p>Site NK/LEAS/001 regularly floods and remains flooded, acting as a buffer zone by holding water and reducing risk of flooding to properties and villages further downstream. Several buildings, St Andrew's C of E School and Duke of William Community Public house, have automatic pumping systems installed to reduce risk of damage to property, these systems move water downstream towards sites NK/LEAS/001 and NK/LEAS/006 .</p> <p>The land off Spring Lane, a flood zone and source of stream, has planning permission (20/0577/FUL) with the mature trees on the site to be removed. In periods of heavy rainfall, the combination of a reduction in porous land and tree loss, and the increase in run off from these buildings and roads, will further increase the volume of water flowing into the stream and cause water levels within the stream to rise, necessitating an increase in the size/capacity of the buffer zone at site NK/LEAS/001 and to some extent site NK/LEAS/006 rather than a reduction in buffer size.</p> <p>Given the changing climate there is an even greater need for the preservation of flood zones, not only to protect the low lying parts of Leasingham but also the villages further downstream from flooding. The County Council has an obligation, a legal duty of care; to ensure new developments do not have the potential to cause harm.</p> <p>2) Capacity of Sewage works</p> <p>In respect of NK/LEAS/001 and NK/LEAS/006. Plan presumes sewage works will have capacity to cope with the new building. However, there has been an increase in the number of buildings since sewage works installed.</p> <p>Policies S60 and S61</p> <p>Development should minimise adverse effect of development not result in loss/reduction of Biodiversity:</p> <p>Sites NK/LEAS/001 and NK/LEAS/006</p> <p>Both sites are frequented by a number of wild animals. Egret and Kingfisher can be occasionally observed in the stream. Red Kite, Peregrine and Buzzards can frequently be seen and in Summer Sand Martins and Swallows hunt over fields. Small eared Owls and Woodpecker observed in Trees (Site NK/LEAS/001). Munjac Deer, Badgers and Foxes observed (Site NK/LEAS/006) and frequenting the stream.</p> <p>Downstream from both sites, past the footbridge, is a large sandy stream bank which for many years has hosted a migratory colony of Sand Martins. Increased water levels within the stream, due to loss of buffer zones, increase in surface water; run off from building work, and building themselves would have an adverse effect on the sandy bank and on the colony itself. Given the reduction in numbers of returning migratory birds these developments could have a deleterious effect on this population.</p> <p>Policy S22:</p> <p>NPPF 4.1.1 Plan should deliver size, type, sizes and tenure of housing.</p> <p>In respect of Sites NK/LEAS/001 and NK/LEAS/006. Previous developments</p>	<p>and trees on both sites and along stream to provide a wildlife corridor.</p> <p>Preservation/enhancement of village character</p> <p>Provision for retention of the hedgerows and trees along Moor lane site NK/LEAS/006 and the trees and hedgerows along stream (Sites NK/LEAS/001 and NK/LEAS/006).</p> <p>Size, type, sizes and tenure of housing</p> <p>Parish council should be consulted upon type, size and tenure of buildings required by the local community.</p> <p>Range of housing types need to be provided (Sites NK/LEAS/001 and NK/LEAS/006). Particularly affordable starter homes and retirement homes for local residents.</p> <p>Road Safety</p> <p>During construction, construction traffic should be prohibited from accessing village from A15 entrances to reduce/limit queuing thus reducing possible traffic collisions (Sites NK/LEAS/001 and NK/LEAS/006).</p> <p>30mph zone extended beyond site NK/LEAS/006.</p> <p>Footpaths along Moor lane site NK/LEAS/006 provided before construction commences.</p> <p>Adequate consultation</p> <p>Policy needed to establish a better consultation process.</p> <p>Website should be cleared of all old cluttering documentation to allow easy access to new documents.</p> <p>In the initial stages parish councils, parishioners and landowners should be involved to identify suitable land for</p>		
--	--	--	--	--	--	--	--	--	--	---	--	--

									<p>have been predominantly within value bands C and D. Building has not matched the percentages required for different bands of housing. Lack of dialogue between planning and village not serving present requirement; smaller affordable homes for local community; affordable retirement homes for local community.</p> <p>Site NK/LEAS/001 proposes building close to sewage work, with the potential to reduce saleability of properties.</p> <p>Preservation /enhancement of character of village: Policy S4 2(a): Development should enhance or preserve character of village. Entrances to the village are lined with trees and hedgerows. These give the village its distinctive character. NK/LEAS/006 would see these removed. Site NK/LEAS/001, Meadow lane, is utilised for recreation; with its hedgerows and wildlife enjoyed by walkers, dog walkers and wildlife enthusiasts. Access to site via Meadow lane would see this amenity lost.</p> <p>Road Safety Increased vehicular activity could result in queues at entrances to and on the A15, with the increased risk of road traffic collisions. Roads between both sites and the A15 are narrow having three sharp bends, some walled. There have been numerous collisions on these bends resulting in damage to walls and vehicles. Village roads are also used by agricultural vehicles. Construction vehicles using narrow roads within village increase risk of collisions. There is a high volume of traffic through the village at peak commuting times with is used as a 'short cut' to the A17 and A15. Access to site NK/LEAS/006 on Moor lane within 60mph zone on this 'short cut' presenting an increased risk of traffic collisions.</p>	<p>building and identify potential difficulties. Neighbourhood plans should be consulted. All necessary studies should be carried out prior to development of plans and used to inform in the preparation of plans and the publication of consultation documents. It is not adequate for plans to be drawn up which identify areas requiring risk assessment and further studies. Further, it is not adequate, nor professional, to apply broad sweeping methodology based upon standard allocation formulas using sweeping percentages and generalised assumptions.</p> <p>Clear English Consultation documents should be published and written in such a way that is understandable by general public. As should both the response form and guidance documents.</p>		
--	--	--	--	--	--	--	--	--	---	---	--	--

JR and SJ Marsh

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101356	S77								<p>I have just received further mail from our Planning Consultant, Mr Michael Braithwaite of Robert Doughty Town Planning Consultants. I would like you to please note the following:</p> <p>ONE - With reference to the land known as Four Acres, Station Road, Waddington which indicates the reluctance of the Council to allocate this land as suitable for development.</p> <p>TWO - Of course, we understand that the proposed Southern Bypass blights the north east corner of this land although the extent of this has yet to be decided.</p> <p>THREE - The Council's main concerns indicate that this land is an area of great landscape value. Could I be as bold as to ask where the boundaries of the A G L V are?</p> <p>FOUR - PLEASE NOTE that planning permission was granted for the building of three substantial houses to the south east of our land. The footings for these properties were laid, only for the land to then be re-purchased by the Council at considerable cost to the Tax payer.</p> <p>FIVE - Development is also taking place alongside the western side of this land. Could you please explain, therefore WHY our land is noted as an area of great landscape value BUT the land to the left and right of our land IS NOT.</p> <p>SIX - I also note that land previously known as Hillside Nursery, Station Road is being considered as suitable for 65 dwellings, and yet its position high up on the escarpment commands outstanding views to the west. Surely this land is even more in an area of outstanding natural beauty?? Four Acres lays at the bottom of the escarpment surrounded</p>			No

									by mature hedges and is out of sight when viewed from Brant Road. SEVEN - Perhaps I could please urge the Council and Planning Department to reconsider the land known as Four Acres as being suitable for development. Many thanks for your help.			
--	--	--	--	--	--	--	--	--	--	--	--	--

Lee Mason

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102234	S80								Like many residents in Welton and Dunholme I would like to express my disappointment at the planned housing proposals for our villages. The number of agreed and planned developments has spiralled out of control and the villages are losing their identity. It is well known that the infrastructure is not in place to support these plans. Whilst I understand development is always required there seems no explanation as to why our villages are expected to take on such vast numbers of developments. I hope consideration can be given to retaining our green space and identity.			No

Roger Mitchell

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100427	S80								I hereby object strongly to the proposed housing development WL/WELT008A in that the area it would be approached from on East field Road is totally unsuitable in every way, tight corners, narrow road, on the farthest side of the village from the route to Lincoln where most vehicles will be travelling most days! Welton has seen vast enlargement in recent years and has lost almost all recognisable village characteristics, this development would be the final nail in its coffin! I personally live in the village centre on Ryland Road and regularly see the junction adjacent to the co-op grid locked with cars trying to get into and out of the co-op and doctors car parks whilst others are turning towards the A15 route to Lincoln, the village centre has become very busy and noisy with traffic. Since there is no longer a crossing attendant to the junior school at Ryland Road the volume of traffic makes school times extremely dangerous and it will get much worse as the existing planned housing gets built! The village centre does not have anything like enough parking! The doctors surgery is over subscribed and struggling to expand partly due to lack of availability of doctors but more because of village expansion! There is no real employment in or close around Welton so all these cars will be travelling to Lincoln each day, this is not only dangerous traffic levels on local roads but will forever be an environmental disaster in as much as these houses should be built close around Lincoln to reduce daily mileage of hundreds of cars! Please remove this and all future housing developments from your plans for Welton.			No

Mowbray Mountain

Rep ID		Q2: Legal Compliance	Q3: Tests of Soundness	Q4: Please give details.			
--------	--	----------------------	------------------------	--------------------------	--	--	--

	Comment on	Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate		Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
1103873	S78	Yes	Yes	No	Yes	Yes	No	Yes	<p>We believe our clients site south of Town Road Quarrington should have been considered for inclusion in Policy S78 (Main Town Developmen)t asit accorded wih national policy for housing being adjacent to the developed footprint of greater Sleaford, certainly as much so as NK/SLEA/1016 close by being a greenfied site under construction</p> <p>The proposed site is also of course brownfield land and should be given preverance to greenfiel sites</p> <p>We believe some of the sites included in S76 & S78 are not deliverable in the true sence of the word, the south part of NK/SLEA/017 for one and of course NK/SLEA/015 Sleaford West SUE is again not deleverable in the forseeable future if at all.</p> <p>For identification purposes a plan of the proposed site is shown on the covering email as I dont see a method of including a plan with this document. on the CLLP interactive Policies map the site centre is where the 'rr' is in Quarrington shown indication the village part of Sleaford.</p>	<p>We believe my clients site should be given consideration by the Inspector and included in Policy S78, or identified as suitable for development in another part of the plan as this site is immediatly deleverable and would be built out within a year of gaining permission.</p> <p>overall I thikk the Submission Draft of the plan is a very good effort by all those involved and will be an improvement on the current Local plan we are using.</p>	Yes	Yes

John Mulhall

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100426	S80								<p>As a resident of the village of Welton, living in Eastfield Lane for 37 years as a family of four, local company director and employer of local labour and active community sports volunteer for youth and adults for most of that period, I and many of my neighbours in Welton, seriously object to this badly thought-out plan for more unplanned new housing, adding to our current excessive population, both young or elderly.</p> <p>An extra 109 new Houses in addition to the hundreds already planned, accepted and being built without supporting facilities.</p> <p>More daily traffic loaded on poor narrow lanes and dangerous bends and junctions, overloading all local facilities such as schools, health care, parking, sports and leisure facilities.</p> <p>The commercial greed and reduction of long standing arable or green land and forestation does not fit into the World's needs or our UK promises of saving the decline of our climate changes bringing us all into fear of the future.</p> <p>The retention of this land within the scope of agriculture needs or pleasure, sports and social activities would be more suitable and be welcomed, even if it requires government/ LCC subsidy or less profit for the owners and agents or middle men.</p> <p>Local Ownership, Public Participation in its use and Long Term Preservation are more important than profit for the already rich.</p>			No

Graham Nicholls

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103097	S80								<p>Process issues</p> <p>The development of the current draft plan occurred at the height of a national emergency and yet this appears not to have had any impact on the consultation methods adopted in summer 2021, beyond a short extension to the statutory consultation period. The number of consultation responses suggests that this had little penetration beyond the world of planners and developers. In Welton, Lincolnshire, the parish council did not respond to the consultation and I have yet to learn of any member of the public who was aware of it. It was only when I and others became aware of surveying activity on a nearby field in late 2021 that we began, retrospectively, to learn about the CLLP draft and the specific content relating to Welton. It seems surprising that no specific notice about consultation on the draft plan is given to those presently living within 100 metres of a proposed site.</p> <p>While I fully appreciate the need for strategic planning processes, there is no doubt that the forms and methods of consultation in current use are not fit for purpose and add to the downward spiral of public confidence in public decision-making and local democracy. While I am not aware of any minimum standard in relation to public participation in this process, below which the process itself is invalid, I have no doubt that, while the planning team will point to its communication strategy, there is very little evidence that this resulted in meaningful community engagement on this occasion. This is borne out by the very small number of responses from individual members of the public. A real commitment to public engagement would have pointed towards a greater range of communication methods, face to face participation events and focused presentation materials bespoke to individual communities. In the absence of any of these, I consider that the process by which this plan has been developed to be so flawed that the result has no democratic mandate.</p> <p>Specific objections in relation to site WL/WELT/008A</p> <p>This site was considered for the current CLLP and rejected. It has now been accepted in the 2022 draft plan, with the result that the developer has already made an outline planning application to West Lindsey District Council.</p> <p>In the current plan other sites were considered preferable to this one, not least due to its position at the extremity of the current settlement and the access difficulties onto the existing, very narrow, Eastfield Lane at a dangerous corner. Since neither of these factors have changed, it suggests that the planning team has now decided to reduce its site quality threshold. This is surprising, given that projections for the number of new houses across the area covered by the CLLP are already in excess of the number required and that Welton's proportionate development is well above that of most other communities in the area. Rejecting this site would have no impact on the overall performance of the plan. To that extent the proposal is inconsistent with the requirements of policies S1 and S2 in the plan: this development is not appropriate or sensitive, nor is it necessary to deliver the required overall housing outcomes of the plan.</p> <p>WL/WELT/008A concerns a development at the extreme edge of current settlement in Ryland, a former hamlet historically separate from Welton but now subsumed into it. Eastfield Lane is, as the name suggests, a former farm track that follows field boundaries. As such, it is narrow, less than 5.5 metres in width for much of its length, and with two ninety-degree turns in close proximity as it leaves the settlement on its way to a junction with the A46. It is on these two bends that access to the 109 houses of WELT/008A is proposed. Lincolnshire County Council's Highways Department's response to this, as stated in the draft CLLP, is negative, stating that</p>			No

									<p>any access junction would require major remodelling and widening. This is recorded in the draft plan with a 'red' marker, indicating an insoluble problem. However, I gather that this was an 'administrative error' and should have been graded amber, still suggesting that major work would be required to provide safe access. Those of us who use Eastfield Lane on a regular basis consider that the original grading was correct: Eastfield Lane is not suitable for any additional traffic. It is used by cyclists, walkers and horses (there is an equestrianism centre just before the site of the proposed access junction) and, from just before the access site to the A46 junction, is narrow and has no footpath or refuges. The extent of the development is more than two kilometres from the village centre of Welton and even further from William Farr school. While lifestyles may change, there is every indication that a distance of this magnitude is likely to result in residents using their cars, rather than other means of transport, to make those short journeys. The village centre is already choked with vehicles and under-provided with public parking. This appears to place the site in conflict with policies 47 and 48 in the draft CLLP.</p> <p>Accessing Eastfield Lane as envisaged in the site plan cannot be managed safely without the support of other landowners. Even with that support, the access will remain at the most dangerous point on a dangerous lane. The developer proposes to bring heavy vehicles on to Eastfield Lane from the A46 in order to avoid them travelling through the narrow and intentionally restrictive roads of the neighbouring Hawks Road development, planning permission for which has already been granted, despite the concerns of local residents about just such road safety issues. The Eastfield Lane development would create a rat run potentially between the A46 and A15.</p> <p>The impact of development in Welton on services such as health and education has already been considerable and would be increased by this proposed site. Welton Family Health Centre has already registered its objection to the development of the site in relation to the current planning application due to the serious risk that it will be unable to recruit staff to meet the additional demand. The position of William Farr Academy is different: it is able to control its intake by reducing its catchment but this has the consequence that children in nearby villages who would have attended William Farr as their nearest school will then have to travel further afield, probably to Cherry Willingham, so increasing road and car use. The impact of these factors, which is highlighted in Appendix 7 of the sustainability assessment report, is therefore contrary to policies 45 and 54.</p> <p>Summary</p> <p>The development process for the draft Central Lincolnshire Local Plan was insufficiently inclusive to have the confidence of the public.</p> <p>The inclusion of WL/WELT/008A as a suitable site should not be ratified, in view of the difficulties posed by its location. Excluding it would have no negative impact on other aspects of the CLLP, notably its ability to deliver government planning priorities.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

Marketa Omran

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101560	S80								<p>OBJECTION TO SITE DESIGNATION WL/WELT008A</p> <p>Housing development on this site was already once rejected by West Lindsey District Council in 2016 (Ref. CL2175).</p> <p>We all need to address the negative externalities associated with sprawling developments. Three main consequences arise from when new properties get constructed in the suburbs,</p>			No

									<p>they go as follows:</p> <p>Firstly, the economic concept of externalities can be summarised by the notion, where the items we purchase usually are worth more than the price we pay. By continuing to further develop, construct, and expand modern suburban dwellings on relatively cheap land within greenfield sites, we are prioritising short term savings over that in the long-term, where there is an increased cost for municipalities’ – and therefore for the taxpayers- due to these areas bringing in little to no basic services and infrastructure.</p> <p>Secondly, the residential housing brought along by this potential development, would further increase the reliance on private cars for transport (regardless of trip length) hence leading to an increased rate of climate-change, in addition to negative health effects such as obesity amongst the population.</p> <p>Finally, there will be environmental damaged due the approval of the housing development. There will be the destruction of wildlife habitat, and consequently a decrease in biodiversity within the area, which supports human and social needs.</p> <p>It seems the only winner in this scenario is the property developers, hence this application per se should be rejected.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

Cllr Peter Overton

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103076	General								There are also good things to support and to strengthen. For example, the encouragement of dwellings being built to reduce carbon emissions in future, open spaces, tree protection and the inclusion of biodiversity net gain.			No
1103070	S1								<p>We aim to reach the target of net zero emissions by 2030, and by 2050 to meet the Government target. Consultants to the Central Lincolnshire Local Plan Panel (CLPP) state, “Under current practices after seven years, Central Lincolnshire would have a carbon debt...” explaining that this plan does not reach the 2030 target. Even these targets are now deemed inadequate by the Intergovernmental Panel on Climate Change (IPCC). Building over a thousand new dwellings every year will inevitably increase carbon emissions, both in their construction and in their occupation. We therefore need a much slower rate of construction to give time for technology to overcome what the IPCC state is already a dangerous expected outcome. Although technology is moving fast and new low carbon opportunities will no doubt arrive, we do not have the ability to build at this proposed rate without substantially increasing carbon emissions.</p> <p>The policies calling for higher building standards, charging points etc. are all subject to the viability assessments. These are already compromised in the largest developments as evidenced by lower Community Infrastructure Levy (CIL) requirements in the Sustainable Development Extensions of Sleaford Gainsborough and Lincoln. The plan does not go far enough in its environment ambitions to off-set the increased environmental impact of increased development. We believe that the building should be ‘back end’ rather than ‘front end’ loaded to try to tackle this failing. Thus a phasing or ‘capping’ mechanism is required. For these reasons the plan is not sound and not effective.</p>			No
1103071	S2								We welcome the reduction in the number of new dwellings required, noted at between 1,060 and 1,325 every year. However, the vision target and Policy S2 state 29,150 total which calculates out at 1,325 every year for 22 years. To tally, the lower range figure of 23,320 dwellings based on the lower figure of 1060 new homes, needs to be included for clarity. We support the addition in 2.2.8 that the lower figure will be used in the calculation of the five-year			No

									land supply. The higher figure is used to fulfil “economic ambition”, where in the interests of sustainability, we must instead necessarily require economic, environmental, and social wellbeing and meet the carbon emission targets. For these reasons the plan is not sound and not justified.			
1103072	S4								<p>We object to the heavier pressure on villages which have fewer or minimal facilities and little capacity to provide the community services and facilities needed to support an increasing population. This pressure is created by two policies, removing the maximum growth cap on villages and by allowing First Time and affordable homes to be built outside the current village footprint. Small and medium villages only take up to 5 or 10 dwellings per application which do not attract 106 monies nor affordable housing. It does attract CIL monies but these are limited in what they can be used for and small sums, relative to the need. Yet these small developments create a cumulative impact on the character of the area and the pressure on facilities, infrastructure such as roads and services, which is not sustainable. The cap of 10% maximum growth over the life of the plan needs to be reapplied. This is the key mechanism for controlling the rate of growth to a sustainable level. both of which are much needed in all our village and town communities.</p> <p>To date, the cap has been lifted where there was clear local support, so the policy has been effective. A clearer definition of local support needs to be reworked.</p> <p>In both urban and rural areas, the continued requirement for more dwellings, without any guarantee of matching services and facilities, is highly controversial. The rate of development needs to be slower to combat the adverse impact of increased traffic levels on air pollution, carbon emissions and quality of life.</p> <p>Whilst a gradual increase in new electric vehicles is taking place, there is no likelihood that existing use of fossil fuels in vehicles or household heating will decrease significantly before 2030, according to Government guidance.</p> <p>For these reasons the plan is not sound and not effective.</p>			No
1103074	S14								<p>The U-turn on wind turbines from being a general presumption against, to a general presumption in favour, is highly controversial. We note the definition between small scale and large-scale developments but even turbines up to 40m have a significant impact on industrialising the open countryside. The invitation to much larger turbines, although “local” support is required, could involve support from just a small village, while the impact covers a much greater area.</p> <p>The definition of local support over such a wide area would be very hard to define, especially where proposed wind farm developments are by necessity in rural areas and could impact on communities that do not have a say in their development.</p> <p>For example, the former Nocton wind farm proposal was in Nocton parish but geographically much closer to Bardney which is in a different district council area. It is also worth noting that many objections to the Nocton wind farm proposal came from Lincoln some 10 miles away because of the potential loss of views towards and away from Lincoln Cathedral.</p> <p>There is sufficient potential for energy production in Central Lincolnshire from solar and anaerobic digestion without the use of these wind turbines. (Appendix A of the Task C: Emissions Reductions Targets evidence report)</p> <p>The challenges of gaining planning permission for commercial scale wind turbines are well documented. We recognise the necessity to ensure a guaranteed increase in renewable energy generation within the district, to be delivered in a relatively short time. There is a very real likelihood that wind power will fail to deliver its share of the required increase in power generation. Therefore, large-scale wind turbines should be taken out of the plan as they are not deliverable. For this reason, the plan is not sound because it is not effective.</p>			No

									There is sufficient energy production in Central Lincolnshire without the use of these turbines. Large turbines should be taken out of the plan.			
--	--	--	--	--	--	--	--	--	--	--	--	--

Michael Rathbone

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100347	S80								The proposed building site off Eastfield Lane would have access and egress onto a narrow winding section of the lane making passing precarious. It is already a very necessary careful exit from Musgraves Orchard as traffic builds up speed onto the straight section. Vehicles travelling at high speed on this section is common. Parking in the village is already difficult with cars queuing to enter the co-op car park and blocking approach roads. The available parking sites are often occupied by those using them as park and ride facilities. The local schools are full and the health centre is also struggling to cope with demand. This proposed development should be scrapped.			No

Isobel Reynolds

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100345	S80								<p>I am writing to object to the proposed building of 100 plus dwellings on agricultural land to the rear of Eastfield Lane.</p> <p>This is yet more housing in our already over-developed and underfunded village. The village is already poorly served with amenities for the present population; schools and medical services are finding it hard to cope with current numbers, let alone absorbing new residents from housing already being built.</p> <p>The village centre remains pretty much the same as it has been for the last 47 years of my residency here, with no available land to accommodate a vastly increased number of vehicles, or it seems with no imagination or interest in tackling this problem by developers past and present.</p> <p>In this time of increased awareness of the dangers facing our planet and the pressing need to be more self sufficient on many fronts, not least in food production, surely it is inadvisable to concrete over yet more precious Lincolnshire farmland. Not only do we lose the crops grown there , but we add to the high incidence of flooding to the properties on the corner by the beck. The flooding has gradually increased pro rata as houses have been built all around the area of Eastfield Lane in the last 20 years or so.</p> <p>When entering Eastfield Lane from the Ryland Road exit, the lane is a good width albeit with no footpath on the left hand side initially.</p> <p>I live in the cottage on the bend where the road narrows considerably and at several points measures only 4.5 metres wide. Any visitors to our cottage, parked outside our property, make it impossible for anything larger than a car to pass. In the past we have been asked by drivers of farm vehicles to move a car to allow them to get by.</p> <p>In addition to this, a previous development on our eastern boundary of 3 dwellings in what was originally a large garden, already have to negotiate entry to the lane on what is virtually a blind bend.</p> <p>We have a fair amount of walkers, runners, dog walkers and cyclists using the lane to access the</p>			No

									<p>countryside. Their safety will be seriously compromised by the increased number of vehicles and heavy plant during any building process.</p> <p>There is already little protection from traffic using the eastern end of the lane where there are no footpaths at all and people often have to take evasive action on the grass verges.</p> <p>Anyone walking past the totally impractical access to this land, situated on a sharp bend, and beyond, would be in danger.</p> <p>In conclusion, I cannot overstate the potential dangers of increasing traffic in this area and the overcrowding of the village of Welton can only result in a vast reduction of the current residents' wellbeing.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

Caroline and Bob Ridge

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102252	S80								<p>I am writing to register my formal objection to the proposal to allocate site WL/WELT/008A into the CLLP.</p> <p>As a resident of Welton it concerns me that yet another large housing development is being proposed for a village which is already stretched to beyond capacity with regards to schooling, healthcare and the road infrastructure. As a resident of Eastfield Lane, Welton, I am particularly troubled. I have lived here for many years and am therefore acutely aware that at various 'pinch points' down the lane it is actually an impossibility for 2 normal width cars to pass each other. When a larger vehicle is involved, one or the other has to actually stop and climb the kerb. My property is 66 Eastfield Lane, directly on the bend where the proposed site access will be. There is therefore probably no person greater qualified to warn you of the dangers of this corner. Too often I have seen cars come round the tight bend and swerve when they meet another car coming the other way. A lot of these cars either end up in the ditch or crashing into my gate wall and fence. I have recently had renovation work done to my property and have lost count of the number of times I have had to redo work because it has been damaged by cars going wide on the bend and using my driveway entrance as a run-off area. Will the developer pay for the increased repair costs when this goes from a monthly occurrence to a daily one? Of even greater concern though is the safety of my 2 young children who have to cross this road on the bend to access the pedestrian pavement opposite.</p> <p>I also maintain the drainage dykes surrounding my property and despite them being in a very good state there is still flooding on the road on this corner as the drains can't cope with the surface run off from the agricultural fields. I dread to think how magnified this problem will be if the agricultural field were to be replaced with vast volumes of concrete.</p> <p>One of the absolute joys of living on Eastfield Lane is the feeling of the countryside and being in the open. I myself have horses and Eastfield Lane is probably the one remaining road in Welton that I can hack on without a constant stream of traffic. Since the opening of a popular coffee shop (at the A46 end of Eastfield Lane) there has been a sharp increase in the number of walkers and cyclists who are also enjoying the quiet and rural walk.</p> <p>I can only assume that the authorities involved in making decisions on CLLP proposals have not been fully informed of the required and necessary facts in this case. I hope that once in receipt of them then the proposal will be recognised as unwanted, invalid, and more importantly an unnecessary danger to human life.</p>			No

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100342	S80								<p>In April 2016 a Residential Allocations Evidence Report was produced as part of the Central Lincolnshire Local Plan 2012 to 2036, when WL/WELT008A was designated CL2175. It was considered for development and it was 'rejected'.</p> <p>The report concluded that the site was "not a logical extension to the village" and "the likely access road would need significant works to achieve widths required to serve a development here". The report went on to say "There are no major constraints on this site, but there is a substantial level of growth in Welton from sites with planning permission. There are better sites available".</p> <p>With regard to access and growth nothing has changed, so why has the decision been changed? On 28 February 2022, a report was presented to the Central Lincolnshire Joint Strategic Planning Committee, in which CL2175 had been designated WL/WELT/008A. It extends further north, and links onto WL/WELT/003. WL/WELT/003 is described as "Land at The Hardings" where planning permission was recently granted for 49 houses.</p> <p>With regard to WL/WELT/008A, it is noted that "the site is to be phased back after WL/WELT/0001A and WL/WELT/007" which presumably means that the 195 houses to the north of Heath Lane and the 104 houses to the east of Prebend Lane will be built before work starts on the 109 houses proposed for WL/WELT/008A to the north of Eastfield Lane.</p> <p>With further regard to WL/WELT/008A: The revised Local Plan states "Access preferred via development at adjoining allocation to the west. If access has to be achieved through Eastfield Lane adequate visibility splays will be required and road widening and footway provision may be required".</p> <p>The 'adjoining allocation to the west' is WL/WELT/003 for which (as previously mentioned) planning permission for 49 houses has already been granted with access from Hawks Road.</p> <p>Alternative access from Eastfield Lane is strongly opposed, because the land is flanked by two right angled bends which are the scene of numerous minor accidents, and there are two farm gates, which have separate ownership.</p> <p>Using this junction for access to WL/WELT/008A with 109 houses is a dangerous option. But if this is then linked to WL/WELT/003 with the 49 houses already approved it would be unthinkable, because it does not end there.</p> <p>There are 50 houses on Hawks Road with continuous links to Hampden Close, The Eshings, Swan Close, Halfpenny Close, Northfield Road, Farm View, The Hardings, Stewart Close, and (via Hackthorn Road) to Cowpasture Way. This means that the proposed access, will provide an alternative route to over 550 houses which lie to the east of Hackthorn Road, and have been built within the bounds of the forgotten hamlet of Ryland, within the last 20 to 25 years.</p> <p>Outside Gainsborough, Welton is the largest community in West Lindsey, and Eastfield Lane provides direct access to the A46. But it is still a lane, which is too narrow for large vehicle to pass, and for that reason, there is no bus service, and the County Council does not clear or grit the lane during the winter.</p> <p>The decision taken in 2016 was the right decision. WL/WELT008A is "not a logical extension to the village", there are still "better sites available", and there is no demonstrable need for</p>			No

								<p>housing at this point.</p> <p>WL/WELT/011 has permission for 288 properties with 261 still to be built; WL/WELT/001A and WL/WELT/007 have been designated for 299 dwellings with no issues regarding access, and WL/WELT/003 offers a further 50 houses. This is a total of 610 dwellings without involving WL/WELT/008A.</p> <p>Of note, and in response to a recent outline planning application the Welton Family Health Centre 'objected' because it cannot cope with any more patients. Furthermore, the County Council indicated that there are no vacancies in the local secondary school, and there are only 20 places available in local primary schools.</p> <p>WL/WELT/008A may well be needed before the current plan concludes in 2036; but there is a need for a great deal of investment in local services and infrastructure before then.</p>			
1101786	S80							<p>There is something very troubling about WL/WELT/008A, and the way in which the site has been hastily singled out for development, in advance of the publication of the revised CLLP, which is yet to be finalised. This is agricultural land and is currently carrying a crop.</p> <p>In 2016/17 the site was 'rejected' during the CLLP process, and yet it was subsequently acquired and offered up for housing development purposes. Then, within days of the 2022 draft plan being presented to the Joint Strategic Planning Committee, an outline planning application (PA No 144526) for 109 houses was presented to West Lindsey District Council with documentation that pre-dated the submission of the draft to the JSPC.</p> <p>The outline planning application attracted raft of objections, which included the Parish Council, the Family Health Centre, and all three District Councillors. Apart from its green site location at the extremities of the village, concerns have been expressed about the chosen access from a country lane on one of two right angled bends. As a consequence of the objections, the application has been called in and will not reach the Planning Committee before 23 May 2022.</p> <p>The CLLP draft tacitly accepts the fact that there is no immediate need for development on the site, and subordinates it to the development of 299 houses at WL/WELT 001 and WL/WELT/007 at the opposite end of the village where there is suitable road access. The draft also acknowledges that access from Eastfield Lane is unsuitable and indicates that access should be from an adjacent site (WL/WELT/003) for which has planning permission for 49 houses has already been granted.</p> <p>With WLDC PA No 144526 still in progress, residents were horrified to discover a report by WLDC's Assistant Director of Planning and Regeneration which was presented to the Prosperous Community Committee on 3 May 2022, and (at the foot of page 100) a challenge the CLLP comments on WL/WELT/008A which contradicts the statement on phasing, and carried statement that "following consultation with LCC highways the categorisation is incorrect" and should be changed from Red to Amber. It is not explained how or why the consultation took place.</p> <p>The report goes on to say that access should be available from the adjacent site as well as Eastfield Lane, thereby creating a new village thoroughfare with access to the 500 houses that have been built in the (now vanished) hamlet of Ryland over the last 20 to 25 years. And this from a country lane and a junction that is totally unsuitable. Having persuaded LCC Highways to shift their stance, the WLDC officer acknowledges that Eastfield Lane would require road widening and culverting which "is reliant on agreement with 3rd party landowners" (plural). So how can this be taken for granted when seeking a change to the draft?</p>			No

									<p>What is disconcerting is that these changes would bring the CLLP into line with the exact requirements of the outline planning application, which is still in progress, and by voting to allow the WLDC response to be sent under delegated authority, the Prosperous Communities Committee has pre-empted the decision of the Planning Committee, and effectively recommended changes that can only benefit the applicant.</p> <p>The best outcome would be for the CLLP to heed the multiple planning concerns of the Welton and Ryland communities and revert to the rejection that affected WL/WELT/008A in 2016/17; but adhering to the draft statement would be better than changing the conditions in favour of an outline planning application which is now in progress and has now been endorsed in the amendments proposed by the WLDC Prosperous Communities Committee through the delegated powers of an officer.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

Julia Ross

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101752	S80								<p>My comments relate to the 'village' of Welton where I have been resident for the last six years having bought a property dating from the 1970s. I am sure my comments on the proposals for an extra allocation of 400+ houses in addition to those already in the 2017 plan for Welton will have been made by many residents, but I will add mine to the list.</p> <p>In the six years I have been here development has taken place off Cliff Road, with a proposal for further housing, as I understand, on the opposite side of Cliff Road, and a large development is in process between Prebend Lane and Poacher's Rest. These houses have been built on greenfield sites in fact on productive farmland. Future developments will also be making use of productive farmland at a time when food and fuel security is a key issue in this country's economic development.</p> <p>As a volunteer with the CSW I know that traffic movements in the village can be as high as 400+ vehicles per hour. The infrastructure of the central part of the village hasn't changed to accommodate the increased traffic flow.</p> <p>Many of the village roads are narrow and cannot be widened. The parking of cars adds to this problem especially around school run times. This already presents a hazard to those crossing the roads and a potential hazard to emergency vehicles such as fire engines needing to pass. Working on an average of two cars per household, the number of cars using the village roads is likely to increase by a 1,000 if the plans for expansion go ahead.</p> <p>The primary school in its present location does not have space to expand to accommodate the children of families moving into the new houses. Similarly the secondary school would need to build upwards in order to expand to take in pupils from the increased catchment area.</p> <p>The Health Centre is struggling to recruit staff to care for the residents already registered with the practice. Despite its recent expansion, the consulting rooms and administration areas are also limited as is the parking for those unable to walk to the surgery.</p> <p>There is a lack of diversity in the housing being provided by the new developments. The largest element of the new housing is four bedroom detached houses starting at £250,000. In my eight bungalow cul de sac I know two families who have grown up children living at home because there is no affordable rented accommodation or first-time-buyer accommodation in the local area. Similarly there is a lack of one or two bedroomed houses and bungalows for families wishing to downsize.</p> <p>Finally, as someone who uses the A15 every day, I must point out that the access to the village from this road is inherently dangerous since there is no 'box' for traffic turning to Welton to sit in. If there is to be a larger number of vehicles coming into the village, access needs to be greatly improved.</p> <p>Overall, if the expansion of Welton on such a large scale goes ahead, I believe there must be a</p>			No

									large part of the funding allocated to making the infrastructure and village facilities safer and more usable and attractive for all.			
--	--	--	--	--	--	--	--	--	---	--	--	--

Andrew Sayer

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101462	S80								<p>WELT008A</p> <p>Firstly I am writing to you now because I was not aware that the piece of land directly behind my property was included in the Local Plan until we saw some soil testing a few months ago. Given the direct link that has been made in the planning application to this draft, it's critical that you fully consider the local residents input and why this piece of land should be excluded from the plan. I am amazed that whoever reviewed the initial plan didn't actually think that something may have gone wrong with the consultation process when there were no objections to the piece of land been included. This clearly is not the case and we ask that you now do the right thing and fully consider the local residents input and their first hand experiences and not the obvious incentive to support the inclusion of this piece of land from the landowners and supporting reports that don't take into account the residents experience and concerns.</p> <p>Below are my objections to the inclusion of WELT008A in the local plan:</p> <ul style="list-style-type: none"> • Welton has had a disproportionate amount of the houses designated to the Lincoln area in a very short period of time – 25% in the CLLP of 2017 and nearly 50% in the latest proposal, that can't be right. It shouldn't be based on first come first served. The very desirability of the village will be lost if you continue to keep building at the pace that is happening. Other areas should take their share as well. • Services are creaking – The village is far too busy to accommodate any further developments. Anyone making these decisions needs to be in the centre of the village at school starting, finishing and lunchtimes when there is complete congestion, no parking and an accident waiting to happened. To put more houses into the plan makes no sense and sadly we run the risk of a major accident. We cannot see a Doctor anymore and the schools are at capacity. It's possible by the time all the building has finished that living in Welton will no longer guarantee you a place in William Farr or a place at the Doctors, and devaluing the properties of the long suffering residents of Welton. • This site is not the most suitable one in the village or the wider area within the plan. There are many other sites along Hackthorn road and Cliff road that will have limited impact on residents in the village and elsewhere as Welton has had more than its share of building. The access to the site is totally inappropriate, positioned directly on a narrow bend and we are concerned at the potential increase of accidents, particularly to vulnerable road users due to how narrow the road is. We overlook the bend where the proposed access is and we have lived her for 12 years and we have probably seen a car in the ditch at the point of this access at least once each winter. This level of accidents did not appear in the Transport document which accompanied the planning application for the site recently. I can only imagine that this report was produced from a desk top and didn't include genuine research at the site and feedback from residents about their lived experiences. Eastfield lane is a narrow lane and with two 90 degree S bends with poor visibility at this point of the lane and not suitable to an increase in traffic if this piece of land were to be developed. With drainage ditches running along both sides of the road taking off rainwater from the fields and excess water running onto Eastfield lane, considerable work would need to be undertaken to widen this road and make it safe to handle the increased traffic. • We are also concerned about the impact it will have on the local wildlife, including but not limited to the Hares, Rabbits, Foxes and many varieties of birds including sparrows who return each year to nest in the hedge. 			Yes

									<ul style="list-style-type: none"> • Eastfield Lane has an attractive character as you drive into and out of the village. There are a mix of old buildings, high end properties and a genuine village feel of the curtilage of the village and to put a large estate at this point will be completely out of character. It doesn't make sense to plonk a modern estate of 109 houses in this location when there must be more suitable sites if the houses are required in Welton at all. This site is too far outside the centre for most residents to walk into the village, so they will have to take their cars, increasing the traffic and pollution levels with no chance of parking other than on the road once you get there. • My wife and I do a lot of walking and we walk out of our house down the lane to the coffee shop at the end or to cut through to Mill Lane. This is a very popular route for walkers, cyclists and joggers and given the narrowness of Eastfield Lane I fear there may be an accident with the increase in traffic as the road cannot be widen in many places. When we turn out of our property we have a blind bend to our left which will now become significantly busier given most of the vehicles will now be driving out of the proposed site through Welton. I have attached a pic I took on Friday driving out of the village on Eastfield Lane highlighting the number of different road users on this very narrow lane. • When there is heavy rain the ditch behind our property fills up as does the ditch on the bend in question on Eastfield Lane and we get flooding on the road. If there are any large downpours the drains along Eastfield Lane quickly back up and flood the road. We also get smells and water backing up from time to time in the toilets. Its clear that the current drainage system cannot handle the current level of properties let alone any further increase. I am concerned that if the drainage survey has been miscalculated then the impact of these extra houses will negatively impact all the current properties linked to the same system. • Finally this site is high quality agricultural land. Why is it necessary to concrete over this when I am sure in West Lynsey there are brownfield sites that could be better utilised in order to accommodate the extra housing required in the long term plan. <p>In summary the process to get this piece of land put in the CLLP is flawed and a full consultation process has not taken place. It is clear that we have developers who clearly have a vested interest in developing the site can make a one sided case with desk top reports that don't give a full picture of the situation. On the other hand residents who are not familiar with the process and where to look cannot compete with the resources. We therefore rely on the planning process to be fair to all and ensure that the right outcome is reached. When I look at the weight of reasons for not including this site once the residents have had their input and there has been due process, I cannot believe that it will be included in the plan. I hope the right decision after due assessment is taken to not include this site WL/WELT/008A into the final CLLP.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

Chris Scott

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103149	S1; S82	Yes	Yes	No	No	No	Yes	Yes	<p>[Representation summarised due to length. Please see attached for full representations]</p> <p>Whilst the Spatial Strategy and Settlement Hierarchy within Policy S1 and the methodology of delivering residential dwellings within Policies S2-S4 and S76-S82 is acknowledged, it is considered that the lack of consistency for achieving sustainable development though lack of residential allocations is the reason as to why the Local Plan is not considered to be fully 'positively prepared' in regard to Policies S1 and S82.</p> <p>Thorpe on the Hill is considered to be a sustainable location, within the</p>	<p>Considering the points made in Question 4, the landowner considers that changes are required to the Local Plan in the form of identifying and promoting further additional allocations for residential development in Thorpe on the Hill.</p> <p>Specifically, the site that the landowner would like the Plan to include as an allocation within the Plan is the land to the south of</p>	No	Yes

									<p>Lincoln Strategy area that is well connected and well served to and from Lincoln. Therefore, it is considered that development in Thorpe on the Hill conforms to the sustainable strategy as planned by the CLLP as a whole.</p> <p>In light of this, the landowner considers that the Local Plan is not positively prepared as Policy S1 and Policy S82 do not provide any allocation to Thorpe on the Hill. To be positively prepared, the Plan must be consistent in achieving sustainable development and the lack of allocations is considered to showcase how this is not the case. The landowner wants to be clear that the overall strategy of Policy S1 is supported, however it is considered that Policy S82 does not enforce the provisions of Policy S1 by not allocating site(s) within Thorpe on the Hill.</p> <p>Policy S82 lists the following sites that are allocated primarily for residential development within Small Villages. Only three of the allocations within Small Villages have no planning status – either are not either under construction or already have planning permission. Small Villages in the original 2017 Local Plan did not receive allocations, and whilst it is considered somewhat positive that they now do, it is considered remiss of the Local Plan to revert predominantly to sites that already have permission to be used as allocations. It is considered that a ‘Positively Prepared’ plan would in fact be selecting further allocations for growth to help shape and steer the settlements for the duration of the plan period.</p> <p>There are 87 Small Villages within Policy S1, therefore, Policy S82 in its current form only provides new allocated growth for 3 small villages out of 87. Whilst it is accepted that by nature, the Small Villages can vary, Thorpe on the Hill in particular is considered sustainable, well-connected and is in a strategically sustainable location to Lincoln. The Plan does not provide any justification for the lack of allocations within Small Villages.</p> <p>The landowner considers that the lack of allocation is not justified for the following reasons:-</p> <ul style="list-style-type: none"> • The Reg 19 Sequential Test HOU006 document states for all Thorpe on the Hill sites that there are ‘other sites preferable’, however none are allocated and only 3 Small Villages have new allocations across the whole of WLDC and NKDC; and • Within the Reg 18 Consultation, the landowner proposed 2 other alternatives for sizes of the allocation, however only one has been considered and therefore the reasonable alternatives have not been considered. <p>The landowner considers that the plan fails to be effective over the plan period due to lack of allocation and controlled growth.</p> <p>The landowner considers it to be remiss of the plan to only provide for 3 allocated sites within Small Villages, especially not affording villages such as Thorpe on the Hill any allocation when it is located within the Lincoln Strategy Area and has considerable sustainability credentials</p>	<p>Westfield Lane, Thorpe on the Hill which has already been promoted during the ‘Call for Sites’ Consultation in July 2019 and during the Draft Local Plan Consultation in July/August 2021.</p> <p>As shown by the accompanying plans, and described below, the landowner is proposing the allocation but is also proposing two alternatives for the council’s discretion. The representations put forward are the following:-</p> <ol style="list-style-type: none"> 1. NK/TOTH/006 2. NK/TOTH/006-2 (alternative) 3. NK/TOTH/006-3 (alternative) <p>The allocation of this land is considered to have the following benefits:</p> <ul style="list-style-type: none"> • Thorpe on the Hill is a well-connected village to Lincoln within the Lincoln Strategy Area. • This site is available and deliverable for residential development and has the capability and capacity to accommodate affordable housing. • Inclusion of the allocation will increase supply and supply of Small Village allocations which will increase the merit as to how the plan is positively prepared, justified and effective. Further allocations to Small Villages will help provide sustainable controlled development in sustainable locations. <p>In summary, the landowner considers that the CLLP Proposed Submission Draft is changed as follows:</p> <ol style="list-style-type: none"> 1. Inclusion of allocation to Thorpe on the Hill. Specifically, allocation to the south of Westfield Lane as evidenced through this submission 2. Increased allocations within Small Villages as a whole 3. Increase the threshold of numbers in Small Villages allowed under speculative application on 		
--	--	--	--	--	--	--	--	--	--	---	--	--

									<p>when compared to other villages.</p> <p>The landowner also wishes to stress that 356 dwellings have been granted permission in Small Villages, which are now ‘allocated’, but this does not ensure that they are in fact deliverable. Whilst we cannot speculate on whether they will be delivered or not, if they cannot be delivered, it would take a large amount of speculative piecemeal ‘up to 5 dwelling’ applications to make up for the surplus.</p>	<p>unallocated land</p> <p>These changes will enable further growth within a sustainable, accessible village and provide more villages in the ‘Small Village’ category to benefit from growth allocations.</p>		
--	--	--	--	--	--	--	--	--	--	--	--	--

Sally Scott

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100366	S1; S81	Don't know	Don't know	Yes	Yes	Don't know	Don't know	Don't know	I support the spatial strategy and settlement hierarchy as set out in the plan. These are valid, tried and tested tools for planning settlement policies for future developments. I support the classification of Fiskerton as a medium village within the the hierarchy as it falls within the criteria set out in the policy. The village is well connected but needs growth to enhance the viability of the Primary School and to support the important continuation of the services and the social life connected with the Scouts and the clubs and other users of the village hall as well as the Church and the Carpenters Public House and restaurant.		No	No
1100381	S64	Don't know	Don't know	Yes	Yes	Don't know	Don't know	Don't know	I support the Manor Paddock, the Crescent (with its many trees listed under tree preservation orders) and the greed wedge alongside Jessamine Cottage as Local Green Spaces. All three are important to the village landscape and give the village a character lacking in the central cores of many villages. The Manor Paddock is the very important setting for the eighteenth century Manor House (Grad 2 Listed Building) and for St Clements church (Grade 1 Listed Building), both located at the south western end of the Paddock: the greed wedge is also an important setting for Jessamine Cottage (Grad 2 Listed Building, the only listed dwelling house in the village). It is good to see the importance of all three open spaces recognised as Local Green Spaces in the plan but they merit permanent protection from development.		No	No
1100375	S81	Don't know	Don't know	Yes	Yes	Don't know	Don't know	Don't know	I support the allocation of land North of Ferry Road for new housing in Fiskerton as shown in the current documents for Medium Villages. This location consolidates the footprint of the village and gives easy access to the Primary School, bus stops, village hall, where many activities take place and the Scout hut as well as being a short distance from the Carpenters pub and restaurant and St Clements church.. It does not encroach on the gap between Fiskerton and the villagers of Cherry Willingham and Reepham which is even more important now that development at Cherry Willingham will soon be reaching the parish boundary with Fiskerton and new housing in Reepham is creeping closer to the parish boundary. The site allows for flexibility for future development to the north beyond this plan period and for providing a green buffer zone between new and existing houses North of Ferry Road.		No	No
1100387	S81	Don't know	Don't know	Yes	Yes	Don't know	Don't know	Don't know	The site allocated for new housing in the plan does not affect any heritage asset in the village. However there are three important heritage assets in the village, namely St Clements church, the Manor House, and Jessamine Cottage, all listed buildings. All are located in the historic core of the village. The Manor House and the church are located on the immediate south west of Manor Paddock. The setting of all three is protected to some extent by the Local Green Spaces allocation in the Local Plan but this protection is time limited and does not protect them from future development in the longer term. Manor Paddock is an unlisted but important heritage asset: it not only provides the setting for for two Listed Buildings and forms a very important landscape feature but also has historic value as part of the demesne farm of the Manor of Fiskerton. It now lies between the the eighteenth century Manor House and the medieval substantial Manor House to the east - discovered in the 1999 excavations at the end of Nelson Road. An old name for the Manor Paddock is the Wadd Yard, or wood yard. Medieval manorial		No	No

									records for as far back as the 1300's set out manorial duties as including cutting wood, carting it and stacking it on the woodyard when instructed by the Reeve.			
--	--	--	--	--	--	--	--	--	---	--	--	--

Claire Smith

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100663	S80								<p>Please find below my objection to the proposed allocation for housing of the site to the west of the village off Heath Lane.</p> <p>I object to this allocation on the following grounds:</p> <p>1) This site is productive agricultural land and during times of international food insecurity and soaring prices, I disagree with sacrificing productive agricultural land for more housing. Especially when there are so many other brownfield and/or infill sites available in the CLLP area.</p> <p>2) Welton has grown hugely since we moved to the village in 2003 and there are already approved plans for hundreds more houses, our local village magazine indicated a total of 1274 additional houses will potentially be built. This is disproportionate to the allocations in other parts of the CLLP area, where existing infrastructure and amenities are far better. Crazy for a village, Welton already has a population larger than Market Rasen, a town with vastly superior facilities including a railway station, high street shops, market, bank, leisure centre, police and fire stations to name a few.</p> <p>3) I disagree with expanding settlements beyond their natural boundaries when there are so many infill sites and under-utilised premises available in the CLLP area?</p> <p>4) Having looked at the recent history of the CLLP, it seems that this proposed site appeared on the map last year, driven by the landowner/developer which suggests this is a money-making opportunity rather than the CLLP Planners identifying ideal sites as part of a strategic plan. I was interested to see that there was only one response to the consultation last year, from the landowners themselves – that is because no-one else knew about it!</p> <p>5) With regards to transport, how do all those extra people get to Lincoln? Public transport is unreliable, infrequent and expensive. The roads from Welton to the A15 and A46 are poor quality local roads, they are not suited to the extra volumes of traffic that additional housing will cause. There are already dangerous queues on the A15 northbound waiting to turn right onto Heath Lane, it is not a safe turning. The extra traffic will in turn cause extra noise and pollution in the area. There are no pedestrian and limited cycle facilities connecting the village to the main routes into Lincoln.</p> <p>6) Water supply – further development will add to the increase in mains water pressure in houses in the area which is resulting in leaks in some properties already.</p> <p>7) Power supply – we already get frequent power interruptions, once a month on average. They are not full outages, but blips that are enough to set off alarms, trip switches, and reset domestic appliances. Surely loading the system with additional properties can only further add to the problem.</p> <p>8) The site already suffers from a drainage problem, with a small lake appearing in the south-west corner after anything more than a day's rain. What is going to happen if all the natural</p>			No

									<p>absorption is covered in concrete and tarmac? The flow of the water will be out onto Heath Lane, which already suffers from substantial puddles across the road when it rains making for dangerous driving conditions. It will increase the flood risk to surrounding housing.</p> <p>9) The site is home to a large variety of small mammals, birds and essential pollinators. We cannot justify the destruction of their habitat.</p> <p>10) The road access from the site would be onto an inadequate local road where vehicles are approaching Welton at speed. There are no footpaths or cycle facilities to get people either into Welton or out to the main routes out of the village</p> <p>To conclude, the proposed allocation of the WL/WELT/001A site is strategically unnecessary. Welton cannot cope with the increased number of houses. William Farr School is full, St Mary's has limited spaces available and all other local primary schools are full. Trying to park your car in the village centre is a challenge now and as for getting an appointment to see a doctor in the village surgery? It is stretched to capacity already. Our agricultural land is being sold to developers to make money and the character of our village is being lost. I know more houses are needed but Welton is already contributing to more than its fair share without the need for the land on Heath Lane.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

Helen Smith

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100647	S80								<p>With reference to the Welton News about the proposed new housing developments.</p> <p>Welton is a picturesque and thriving village and I think it is a shame that so many new houses are going to be built. It had a poor Infrastructure with only one shop and pub. The schools and health centre are full to capacity. I have recently moved into the area and have had to enrol with a dentist in Market Rasen because the dentist is not taking on any new patients.</p> <p>MAYbe, the council could look at improving the Lincoln city centre and build new homes in that vicinity. Anymore buildings in Welton would destroy the flora and fauna as well as the wildlife. Maybe, solar panels or a wind turbine would be more beneficial due to the soaring costs of fuel.</p> <p>I have been a life long conservative supporter but with all this development you can no longer rely on my vote. I think the local people need to be listened to.</p>			No

Mark Smith

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102240	S80								<p>I object to this allocation on the following grounds:</p> <p>1) This site is productive agricultural land and during times of international food insecurity and soaring prices, I disagree with sacrificing productive agricultural land for more housing. Especially when there are so many other brownfield and/or infill sites available in the CLLP area.</p>			No

								<p>2) Welton has grown hugely since we moved to the village in 2003 and there are already approved plans for hundreds more houses, our local village magazine indicated a total of 1274 additional houses will potentially be built. This is disproportionate to the allocations in other parts of the CLLP area, where existing infrastructure and amenities are far better. Crazy for a village, Welton already has a population larger than Market Rasen, a town with vastly superior facilities including a railway station, high street shops, market, bank, leisure centre, police and fire stations to name a few.</p> <p>3) I disagree with expanding settlements beyond their natural boundaries when there are so many infill sites and under-utilised premises available in the CLLP area?</p> <p>4) Having looked at the recent history of the CLLP, it seems that this proposed site appeared on the map last year, driven by the landowner/developer which suggests this is a money-making opportunity rather than the CLLP Planners identifying ideal sites as part of a strategic plan. I was interested to see that there was only one response to the consultation last year, from the landowners themselves – that is because no-one else knew about it!</p> <p>5) With regards to transport, how do all those extra people get to Lincoln? Public transport is unreliable, infrequent and expensive. The roads from Welton to the A15 and A46 are poor quality local roads, they are not suited to the extra volumes of traffic that additional housing will cause. There are already dangerous queues on the A15 northbound waiting to turn right onto Heath Lane, it is not a safe turning. The extra traffic will in turn cause extra noise and pollution in the area. There are no pedestrian and limited cycle facilities connecting the village to the main routes into Lincoln.</p> <p>6) Water supply – further development will add to the increase in mains water pressure in houses in the area which is resulting in leaks in some properties already.</p> <p>7) Power supply – we already get frequent power interruptions, once a month on average. They are not full outages, but blips that are enough to set off alarms, trip switches, and reset domestic appliances. Surely loading the system with additional properties can only further add to the problem.</p> <p>8) The site already suffers from a drainage problem, with a small lake appearing in the south-west corner after anything more than a day's rain. What is going to happen if all the natural absorption is covered in concrete and tarmac? The flow of the water will be out onto Heath Lane, which already suffers from substantial puddles across the road when it rains making for dangerous driving conditions. It will increase the flood risk to surrounding housing.</p> <p>9) The site is home to a large variety of small mammals, birds and essential pollinators. We cannot justify the destruction of their habitat.</p> <p>10) The road access from the site would be onto an inadequate local road where vehicles are approaching Welton at speed. There are no footpaths or cycle facilities to get people either into Welton or out to the main routes out of the village</p> <p>To conclude, the proposed allocation of the WL/WELT/001A site is strategically unnecessary. Welton cannot cope with the increased number of houses. William Farr School is full, St Mary's has limited spaces available and all other local primary schools are full. Trying to park your car in the village centre is a challenge now and as for getting an appointment to see a doctor in the village surgery? It is stretched to capacity already. Our agricultural land is being sold to developers to make money and the character of our village is being lost. I know more houses</p>			
--	--	--	--	--	--	--	--	---	--	--	--

									are needed but Welton is already contributing to more than its fair share without the need for the land on Heath Lane.			
--	--	--	--	--	--	--	--	--	--	--	--	--

Cllr Thomas Smith

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103498	Intro	Yes		Yes		No	Yes	Yes	would gently suggest that an amendment is made to this paragraph as (Royal Air Force) RAF Scampton is no longer an active RAF base			No
1103499	S1	Yes		Yes		No	Yes	Yes	The Hamlet policy is to restrictive as the term clustered together is a relative term and open to too much interpretation, a more commonsense approach to infill development should be considered, secondly 1 dwelling within 22 years is not sufficient to ensure the continued vitality of hamlets in the case of Linwood the previous allocation of 3No Dwellings was a reasonable amount for the hamlet of Linwood given its proximity to both the market town of Market Rasen and to the small village of Lissington.			No
1103500	S2	Yes		Yes		No	Yes	Yes	Section D development elsewhere should consider allowing well connected hamlets the ability to grow at a small level to keep them vibrant and so those who currently reside in these places and wish to to do so in their own property are able to do so.			No
1103501	S4	Yes		Yes		No	Yes	Yes	Fully support this policy it enables a sufficient balance between supporting development in large and medium villages whilst also protecting their intrinsic character and setting whilst also complying with rural exemption sites and first time buyers sites.			No
1103502	S5	Yes		Yes		No	Yes	Yes	With respect to part A of this policy this seems to not be an appropriate place for it as the matters part A contains are in relation to Class Q of the general permitted development order 2015 and as such should be considered accordingly and not put in policy S5 in the submission draft of the local plan. The remainder of the policy I have no objection to and think that it is proportionate.			No
1103503	S6	Yes		Yes		No	Yes	Yes	Point four & five is totally unreasonable and totally unrealistic for a rural county such as Lincolnshire properties will require either oil bottled gas or mains gas for years to come and that is just a fact of life other technology is simply not a viable stage to be considered for rural Lincolnshire. Additionally, this is an unrealistic expectation for large developments and will add additional costs to any new dwelling making home ownership even harder for people who currently don't own their own home.			No
1103504	S7	Yes		Yes		No	Yes	Yes	This is totally unrealistic for the majority of development in Lincolnshire as this will undermine other areas that require monies form S106 agreements and also cause new dwellings to increase in sales cost which means more and more people will be frozen out of the housing market this should be avoided at all cost. Furthermore, matters of energy efficiency should be for developers to determine as they can then market them accordingly. Furthermore, HM government has already set out requirements for new builds around energy the LPA does not need to enhance these further otherwise they will force out more people form the housing market			No
1103505	S8	Yes		Yes		No	Yes	Yes	Would urge the LPA not to add further hurdles for businesses to jump through surviving as a business due to COVID and other matters is hard enough having them jump through a further hoop should then want to expand into new premises is not an action of a LPA or council who wants to support businesses.			No
1103507	S11	Yes		Yes		No	Yes	Yes	Fully support the intention of this policy however, I can see several test cases on this matter due to what it is attempting to do			No
1103508	S12	Yes		Yes		No	Yes	Yes	I have no objection to the principles contained in this policy as it makes sense to re-use as much of our water resource as we can and the requirements within this policy are a reasonable in terms of cost benefit analysis for most individuals who would buy such a property and for developers to build them.			No

1103509	S14	Yes		Yes		No	Yes	Yes	With regards to proposals for ground based photovoltaics there should have to be clear local community support and that the restriction of BMV should be enhanced to include grade 3B to protect these vital sections of land for their intended use which is for food production especially in Lincolnshire (the nation's bread basket) Additionally, with regards to proposals for medium wind turbines there should have to be clear local community support for the principle not just in respect of planning judgment terms, ideally wind turbines of a medium and large nature should be confined to somewhere remote on land and be used primarily off shore where it has been proven where they are more effective. I do however, welcome the final sentence stating clearly that any proposal for a large or medium sized wind turbine outside of a board area should be refused. I also welcome the decommissioning requirement set out in the policy.			No
1103510	S16	Yes		Yes		No	Yes	Yes	Fully support this policy this a practical policy that addresses the issues that we currently face around the issue of the national grid not having sufficient capacity or very near capacity and with the ever-growing demand for electricity this policy is of vital importance to ensure the grid has sufficient infrastructure to cope.			No
1103511	NS18	Yes		Yes		No	Yes	Yes	No comment to make as this policy is merely following incoming legislation that will require such apparatus on new developments.			No
1103512	S19	Yes		Yes		No	Yes	Yes	Object to this policy in the strongest possible terms this is a matter of the MPA (mineral planning authority) not the LPA's of central Lincolnshire and this policy should be removed from the regulation 19 draft of the CLLP.			No
1103513	S20	Yes		Yes		No	Yes	Yes	Point six is totally unrealistic and unviable in a rural county like Lincolnshire when one could not get from one end of Lincolnshire to another on a single electrical charge and the simply fact is using public transport is simply not a viable option for many people as for example the last bus from Lincoln to market rasen which is one of the main market towns that the CLLP covers is 18:30 many people have not finished work by that time in some cases. Secondly this excludes the more rural areas such as a great limber who do not have a regular bus service of any description and say Linwood where the nearest bus stop is two miles walk there and back again which is simply not practical for many people for a number of reasons.			No
1103514	S21	Yes		Yes		No	Yes	Yes	No objection to this policy it makes perfect sense and is following what the policy has to be compliant with revised NPPF			No
1103515	S22	Yes		Yes		No	Yes	Yes	With regards to first homes and rural exemption sites single dwelling developments should be allowed if they are for the applicant themselves or a family connect of the applicant this will help individuals and families who can assist each other get on the property ladder this is something that should be encouraged.			No
1103516	NS24	Yes		Yes		No	Yes	Yes	Welcome that a policy on self-build is included in the new CLLP would welcome it being stronger to provide a stronger view on matters of self-builders building on land they already own if it is for the purposes of themselves or immediate family members.			No
1103547	NS27	Yes		Yes		No	Yes	Yes	Support the policy with the exception of the subsection around annex's being detached form the host dwelling often in the rural areas of Lincolnshire it makes more sense aesthetically to do this and also provides a more meaningful space for the individual who is living in the annex.		No	No
1103549	S33	Yes		Yes		No	Yes	Yes	I believe that the 5Km of the proposed employment site in identified settlement is excessive and that figure should be reduced to 2Km distance. Excluding that caveat I fully support the policy as worded.		No	No
1103550	S34	Yes		Yes		No	Yes	Yes	Neither support nor disagree with the policy.		No	No
1103551	S35	Yes		Yes		No	Yes	Yes	Whilst I appreciate the CLLP is governed by the NPPF the way people shop has changed and the current policy in S35 is outdated expect people to go to the city of Lincoln as the premier shopping destination in Lincolnshire in reality this no longer happens and people will either go further afield to a much larger shopping center or simply use online shopping services like amazon etc serious discussions need to be had around this and many other policies especially some of the newer ones around climate change for the reasons I have already alluded to.		No	No
1103552	S37	Yes		Yes		No	Yes	Yes	Subject to the comments I made in respect of policy S35 I have no objection to policy S37.		No	No

1103553	S40	Yes		Yes		No	Yes	Yes	Not with standing my comments in relation to policy S35 I support the policy of S40 in protecting vital village services ie shops for food and vital produce unless as the policy states its been marketed for 12 months and evidence of it being unviable can be presented.		No	No
1103554	S42	Yes		Yes		No	Yes	Yes	Support the intention of this policy.		No	No
1103555	S43	Yes		Yes		No	Yes	Yes	Support the intention of the policy to provide an appropriate level of protection of tourism assets.		No	No
1103557	S44	Yes		Yes		No	Yes	Yes	Fully support this policy it will protect this vitally important asset of Lincolnshire.		No	No
1103558	S45	Yes		Yes		No	Yes	Yes	This policy is long over due and is most welcome officers must make sure at this stage it is sufficiently strong enough to be able to refuse applications that undermine the wider infrastructural provision in the immediate and wider area, it is welcome that this policy allows the decision maker to take into account the impacts on communities further afield outside of the immediate locality where this is relevant as has been the case in the past. This policy has my full support.		No	No
1103559	S46	Yes		Yes	Yes	No	Yes	Yes	Is welcome this should however, be expanded to all areas where future infrastructure provision will be undermined this could easily be achieved by working closely with the county council as the lead highway and flood authority I would encourage this policy to be expanded in the manner I described so that it can have a fuller impact for the betterment of all of central Lincolnshire.		No	No
1103560	S49	Yes		Yes	Yes	No	Yes	Yes	It is most welcoming that parking provision and by extension parking standards are included in this version of the CLLP especially specific reference made to those who are disabled as well as those who use motor cycles as a means of transportation. That said the evidence documentation still falls short only providing two spaces for a 3 bed home and then 0.5 spaces after each bedroom following from that, the simple fact is in this day and age if there is a three bedroom house in most cases you can grantee 3 cars (that excludes visitors) as such it my view that it should be one space for each bedroom where this is practically possible, I appreciate that this may not be possible in all cases but other provision (other than on street parking) should be made available.		No	No
1103561	S52	Yes		Yes	Yes	No	Yes	Yes	A stronger tone of support to Riseholme collage should be given just as Lincoln University has this comes across as a two-tier approach which is not appropriate or acceptable.		No	No
1103562	S53	Yes		Yes	Yes	No	Yes	Yes	This policy has changed little since its previous iteration in the current CLLP in principle I have no objection to the content contained within this policy I do have reservations on how certain aspects of it could be interpreted especially the issue of the design codes, we are not the united states of America we (thanks to the Rt hon Michael Gove secretary of state don't have zonal planning and long may it stay that way and the design code should not try to bring this about by stealth that said that is matter for the planning process to determine.		No	No
1103563	S54	Yes		Yes	Yes	No	Yes	Yes	Support the policy just would urge a note of caution and that's in supporting sites with multi use functionality that such uses does not undermine the primary purpose which is for the facility to be a health facility I do however, appreciate that is a matter of interpretation for the decision maker to determine on a case by case basis.		No	No
1103564	S56	Yes		Yes	Yes	No	Yes	Yes	Support this common-sense and proportionate policy.		No	No
1103566	S57	Yes		Yes	Yes	No	Yes	Yes	Fully support this policy as it is vital that our listed buildings and other precious heritage assets are given the strongest level of protection possible from undesirable development either reducing their significance or totally destroying them.		No	No
1103567	S60	Yes		Yes	Yes	No	Yes	Yes	Fully support the protection of these habitats and the current wording allows local decision makes to make assessments themselves whilst being guided by the NPPF (this is how the two plans should work together through out planning).		No	No
1103568	S62	Yes		Yes	Yes	No	Yes	Yes	Fully support this policy it is vital that the AONB and AGLV's are given the strongest level of protection possible under the T&CPA 90.		No	No
1103569	S63	Yes		Yes	Yes	No	Yes	Yes	No substantial change in policy since the current CLLP's creation support the policy as it is a vital tool in protecting the unique character of settlements that have boundaries close to one and other.		No	No
1103570	S64	Yes		Yes	Yes	No	Yes	Yes	Fully support this policy it provides a stronger level of protection than was previously given to these cherished spaces for the local community.		No	No

1103571	S65	Yes		Yes	Yes	No	Yes	Yes	Support the protection of important open spaces and the policy does this whilst respecting the limitations placed on it by the NPPF PPG and other relevant planning considerations.		No	No
1103572	S66	Yes		Yes	Yes	No	Yes	Yes	Policy is very similar to the policy in the current CLLP as such I have no comment to make as that has already been deemed acceptable by the planning inspectorate and clearly provides appropriate levels of protection in accordance with planning legislation and case law.		No	No
1103573	S67	Yes		Yes	Yes	No	Yes	Yes	As I have already stated in my representation it is my believe that BMAL should be protected up to grade 3B currently this protection is only given to grade 3A Lincolnshire as the nation's bread basket must protect this vital land and events in the last several decades have shown us this type and quality of land is becoming ever more important as a source of food production and if we the UK fail to acknowledge this we are undermining our self-sufficiency in terms of food security and we do that at our own peril. As such whilst I support the protection of BMVAL in my view currently it does not go far enough to recognise the key contribution grade 3B land makes to our food chain and as such would urge the inspector to allow central Lincolnshire to be considered a special case in this regard.		No	No
1103574	NS73	Yes		Yes	Yes	No	Yes	Yes	A number of the objectives in this policy have previously been started namely by the LPA working with other agencies to fulfil these objectives I see no reason why this good work will not continue and this policy merely assist the council in its role as LPA to do this effectively in planning terms		No	No
1103576	S75	Yes		Yes	Yes	No	Yes	Yes	<p>It is most welcome that this plan requires any major development at the former RAF Scampton site to be accompanied by a master plan and that the air space is being protected this location as a site is of huge historic importance to the people of Lincolnshire it is one of the two most famous air bases in the whole United Kingdom. (the rights and wrongs of its closure as an air base are of course a matter of great debate although not for the planning process) any plans must protect the intrinsic character of the site by respecting its built form and character into and out of the site and throughout the site. To do this no development must undermine the wide-open nature of the site which has been given to it by the green space that it has been afforded, additionally its narrow road network is part of the sites character as all military bases are this should not be altered unless needed for safety reasons should the site become fully used for civilian purposes. With regards to the air space this must be protected as the Ministry of Defence (MOD) has made clear public statements and given categorical reassurances to the local MP and the wider public that the airspace will be used by the Red Arrows display team no proposal should be allowed to undermine this in any way shape or form and any proposal that would do so should be refused.</p> <p>Turning to subsections D, and E, addressing the latter first. Unless a timetabled bus service will be provided as a result of any proposed development to expect a modal shift away from the private car is frankly unrealistic and unachievable. With regards to subsection D this is clearly a matter of planning judgement of what constitutes a sufficient level of infrastructure, that said I would urge an addition to this subsection requiring local concerns requests etc to be considered and given significant weight in any determinations in this regard. Turning to subsection C, this in its current form fails to give in my view any level of protection to the historically important landscapes and forms of the site of RAF Scampton and these should be protected as much as possible whilst allowing new development to take place but not simply turning the former base into simply just another housing estate that is overspill for the city of Lincoln. I do take into account that contained in subsection F but would implore the inspector to categorically give stronger protection to the views throughout the whole of the site not just its areas where there are more historically assets as in my view in its current form the policy risk failing to protect the vital character aspects of the former RAF base and such a failure would be a travesty and the damage would not be able to be undone and would substantially harm the benefits of any deployment.</p> <p>With respect of subsections I, J,K,L,M,N, and O I implore the inspector to allow great weight to be attached to these subsections to give this nationally and internationally significant site the</p>		No	No

									<p>protection it deserves this site plaid a key role in the defence of this county and indeed all of Lincolnshire did especially with respect of bomber command we as its custodians must preserve it so that future generations can enjoy it in the same way we have and learn form it so that the same mistakes are not made again at the costs of millions of lives.</p> <p>Lastly turning to subsection G, this policy compliance must not undermine every other consideration and any future development must respect the existing style and form of development and be complimentary to it rather than uncomplimentary to it thus risk undermining the historical importance and character of the site in part or as a whole.</p>			
1103577	S79	Yes		Yes	Yes	No	Yes	Yes	Wish to record the following: that whilst preferred site WL/CAI007 is under construction and as a result it makes sense to allow WL/CAI002 to be built out but these two sites should be the last two sites to be built in this area of Caistor otherwise the LPA will wrongly extend the market town of Caistor into the more rural hinterland.		No	No
1103578	S80	Yes		Yes	Yes	No	Yes	Yes	Turning to the matter of land at Church Lane Keelby I wish to record the following. That I have concerns around the access arrangements for ingress and egress form the site and that the shape of the proposed site will make that part of the village built form look untidy and not appropriate for the area it should be squared off and the part of the proposed site that sticks out to the right hand side removed. Furthermore, no now applications should be allowed on the part of the map next to the green wedge as this will undermine its purpose furthermore, not additional sites should come forward from the western side of Keelby either for the same reasoning.		No	No
1103580	S80	Yes		Yes	Yes	No	Yes	Yes	I believe land to the south of Riby Road Dn41 8ER, should be allowed to have additional planning given on the site and the local plan would be an ideal place to give it preferred status as a possible rural exemption&/or self build site in Keelby this would nicely round of the site and do as the NPPF intended by making effective use of land for development.		No	No
1103579	S84	Yes		Yes	Yes	No	Yes	Yes	The strengthening of this policy compared to its previous iteration is most welcome this should help to prevent pervious issues that have befallen form RAF bases in West Lindsey and doubtless others across the country. That said I do think that the creation of appropriate infrastructure should be a consideration in all development that impacts on MOD sites that relate to communal housing and other communal areas so that the forces community equally benefit under this policy as a new civilian community would, currently the policy reads as if civilian communities get a better standard of treatment which I know will not be the intent behind such a policy.		No	No

Tony Smith

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100683	S80								<p>I wish to place my objections regarding the proposed designation of site WL/WELTO08A (North of Eastfield Lane) in the draft submission of the Central Lincolnshire Local Plan. In particular would like to comment on the following areas. They include reference to the documents on the Outline Planning Application (OPA) case number 144526 attached to the West Lindsey web-site</p> <p>Road Safety At best Eastfield Lane is poorly maintained and narrow. Entering Eastfield Lane from Dunholme direction on Ryland Road involves crossing a blind corner. Along the lane (especially at the aforementioned corner and near the Chapel), cars are regularly parked restricting the width further.</p> <p>The Lane thereafter leads to two blind corners with speed limit increasing from 30mph to 60mph. Eastfield Lane continuing to the A46 is in a worse state of maintenance, very narrow, uneven and mostly unsighted due to hedgerows. It is barely passable at some points for two</p>			No

								<p>vehicles with the only pull-ins being entry to fields. Eastfield Lane is untreated during the winter months.</p> <p>Many driveways have limited views onto the road resulting in potential hazards when exiting properties. There are no parking restrictions leading to further pinch points</p> <p>My Concerns</p> <p>The approach to the proposed site can currently be made at speeds of up to 60mph. The speed limit will clearly have to be decreased.</p> <p>Exit from the site is noted in the Transport Assessment of the OPA application describing visibility splays. The proposed solution appears to suggest the clearance of vegetation. This will lead to loss of habitat for local wildlife</p> <p>Pedestrian access is proposed through the extension of the current footpath. The roadside at this point is a narrow grass verge with drainage and hedgerows. Further hedgerows and habitat will be lost to construct this footpath</p> <p>Eastfield Lane is regularly used by pedestrians, cyclists and horse riders and increased traffic on this narrow country lane will pose further risk</p> <p>109 new homes will lead to at least that number of more vehicles using Eastfield Lane and roads within Welton. There is comment of the locality of local amenities. I would suggest walking will not be the main means of going to the village nor the 2km trip to William Farr School. It is inevitable that increased traffic (added to that pending from current building projects) will result in further congestion during peak hours and increased risk to all road users. To ensure on-going safety on Eastfield Lane the increase in traffic will require a reduction in the speed limit ; parking controls where housing exists and the road narrows; treatment to the road in winter months; and preferably some traffic calming measures</p> <p>Environmental & Health factors</p> <p>The physical construction of this site will inevitably lead to the increase in heavy vehicle construction traffic adding to medium term noise and air pollution plus the increase in large vehicle access to the already unsuitable Lane.</p> <p>The additional housing will greatly increase traffic levels. There will be an increase in noise and air pollution that can only lead to the detriment of both physical and mental health of residents</p> <p>The building site will abut directly to some of the current homes on Eastfield Lane, exacerbating the noise and pollution further for these residents</p> <p>There is no detail in any report I have read of the proposed appearance of the houses; the orientation on which they will be built; use of future proofing such as heat pumps, electric car charging points or solar energy. To be effective the houses will have to face overlook current homes for solar to be effective.</p> <p>As I have noted (and as is proposed in reports) there will have to be removal of much vegetation to both construct this site and to allow safe ingress / egress leading to loss of habitat for wildlife and open space for the residents of Welton</p> <p>The Prosperous Communities Committee meeting noted the need for widening of Eastfield Lane and use of culverts for the drainage to achieve road widening. This will also lead to the destruction of habitat and still not achieve a safe environment for other road users</p> <p>Once built the additional noise, air and light pollution created due to the number of homes will remain indefinitely</p> <p>Local Facilities</p> <p>The OPA notes numerous local services at new residents disposal. Despite the impression given by this and attached assessments the opposite is true.</p> <p>I returned to Welton a year ago having grown up here in the mid 70's to late 80's. Since I left the population must have at least doubled but the local facilities (save the expansion of William Farr) remain the same and in some respects (such as public transport) worse</p> <p>The local surgery already appears at capacity. I have personally required the need for health</p>			
--	--	--	--	--	--	--	--	---	--	--	--

								<p>checks and repeat prescriptions to which there have been lengthy delays. There is no indication in any documents I have read of proposals for increase in health facilities</p> <p>Public transport connections to / from Welton (on paper) appear adequate. In reality this is not the case. Through personal experience I have found the bus service sporadic and certainly not sufficient to enable its use for commuting to / from work leading to increased private vehicle use</p> <p>The veterinary practice is small and albeit offering an excellent service cannot provide sufficient for the pet population in this village. Again necessitating a car journey into Lincoln</p> <p>The plans note the numerous shops. Obviously you can walk, but should you wish to drive there is very limited parking to serve the current population, without the addition of more cars.</p> <p>30+ years-ago the services and roads for a small village were more than adequate.</p> <p>Unfortunately they have not expanded nor improved to serve the increase population and further investment is required in Welton's infrastructure before more housing is built</p> <p>Overall negative impact</p> <p>The 2016 'Village Character Assessment' speaks positively of the character of Eastfield Lane mentioning it containing, 'some of Welton's best preserved vernacular architecture'</p> <p>It continues, 'Buildings in this area are arranged in a particularly scattered fashion, with no consistent approach to their orientation or distancing from the roadside and sitting within plots of differing sizes and irregular shapes. The informal manner in which properties are arranged adds to the more rural, unplanned character of this area'</p> <p>The report notes the current developments in Welton being 'Poorly designed edge-of-village development' and continues this 'fails to properly integrate into its landscape setting and creates an unsatisfactory, overly hard edge to the village'</p> <p>The report suggested solutions to the current housings 'unsatisfactory relationship with the surrounding landscape' and 'stark' views they create when entering Welton. This includes the 'softening of those village edges through either the introduction of additional planting or better landscaped development of a more sensitive, less urban character'</p> <p>To date this has not occurred.</p> <p>The proposed development on Eastfield Lane will undoubtedly lead to the further degradation of the village character and lead to the inevitable decline in the unique characteristics of Eastfield Lane</p> <p>Planning Process</p> <p>I only became aware of the plans for Eastfield Lane after a neighbour happened across an individual surveying the field, stuck up a conversation with them and found out about the proposals.</p> <p>I have been advised the submission to the CLLP was held in 2021 with no representation save the applicant and thereafter added to the draft despite being rejected in 2016.</p> <p>Another neighbour made enquiries in January 2022 by email to members of the Council and Planning Department to elicit further information. No response was received.</p> <p>Thereafter I have not seen any planning applications posted on the land; I have not received any written notification of the proposals (albeit I am not within 20m of the proposed site, I am less than 100m away on the same side of the road so will clearly be adversely affected)</p> <p>I found the Planning Application only having been advised by a neighbour of the case number.</p> <p>Since I am aware there have been further meetings (last week the Prosperous Communities Committee) again with discussions about this site)</p> <p>In all I feel the process thus far has not allowed public comment (positive or negative) and gives the impression of being held behind closed doors with a lack of regard for democratic debate.</p> <p>In summary: taking account of the housing projects already underway (and those pending) I do not understand the need nor justification for further housing in Welton. Thus far I have only seen negatives to the proposal:</p>			
--	--	--	--	--	--	--	--	--	--	--	--

									<ul style="list-style-type: none"> • The project will lead to the loss of open countryside and destruction of wildlife habitat; • Attempts to widen the road are not possible without the destruction of further wildlife habitat; • There will be an increase in air and noise pollution to the detriment of residents mental and physical health; • Local infrastructure and facilities cannot currently cope without adding more pressure on services; • Eastfield Lane is not suitable for the increase in traffic. Safety to all road users is already concerning. This will make matters worse; and • The character of Eastfield Lane and the area of Ryland will be lost. <p>Unfortunately I have read nothing in the OPA nor CLLP, its reports nor consultee responses that highlight any benefits that will come from this proposed project.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

Trevor Smith

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100332	S80								<p>I am writing to complain about the proposed planning applications and the plan for a major increase in new housing in Welton.</p> <p>The infra-structure currently in Welton fails to support the present population.</p> <p>The Welton surgery does sterling work but struggles to keep up with the current demands; and will certainly not cope with potentially another 1000 properties in the catchment area as is being planned.</p> <p>It is not possible to sign up to the dentist in Welton, since it appears to be at capacity, even for private patients.</p> <p>Although the Coop stores in Welton and Dunholme provide a good service, there needs to be more shops to provide some level of competition.</p> <p>Currently, the main access road to Welton, passing William Farr school, becomes gridlocked twice a day, with no access in or out of the village.</p> <p>The speed limit of 30 mph only applies about 40 yards from the school gates. Equally there is no path or cycle lane along this road leading out of the village, thus encouraging parents to drive to take their children to school.</p> <p>William Farr school and the 2 primary schools in Welton and Dunholme are already at capacity , and an increase in population will be achieved at expense of the children in the village, suffering a decline in education standards.</p> <p>All these issues will be exacerbated if the proposed plan is enacted. The plan appears to have very little in the way of improving the facilities and infrastructure of the village to support the increase in population.</p> <p>There may well be a need for increased house building, but this burden has to be share fairly over the entire population. Welton has doubled in size over a relatively short period of time, It is not fair of the residents of Welton to take on such another major expansion when other parts of the region carry none.</p> <p>I object strongly to the proposed plan.</p>			No

Niall Southwell

Rep ID		Q2: Legal Compliance	Q3: Tests of Soundness	Q4: Please give details.			
--------	--	----------------------	------------------------	--------------------------	--	--	--

	Comment on	Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate		Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
1101955	S80								<p>I am writing to object to allocating the above site in to the Local Plan and I am also objecting to the Planning application number 144526 for 109 houses.</p> <p>Highways Issues I have reviewed the Transport Statement together with the attached Masterplan drawing and have the following comments</p> <ol style="list-style-type: none"> 1. The access provision is stated as being an 'existing field access' , however it isn't as the access serves the neighbouring field, which is to be retained and therefore compromises the junction. The title at this location sits in at least two ownerships and as such both parties would need to agree to improvement works to make this a workable entrance and exit. 2. The carriageway is mentioned as two way but glosses over the fact that the width for a two way highway at 4.5m in width is substandard. The road has a National Speed Limit and the TA suggests the limit could be reduced subject to a TRO. It doesn't recommend the speed along Eastfield Lane should either be reduced or any improvements made to the highway to facilitate this development. The report suggests the junction can be designed to accept vehicles as noted in 4 below but doesn't suggest any improvements need to be made to the existing carriageway to facilitate the proposed development 3. The report does not mention construction traffic in any form and should consider size of vehicles and numbers in constructing the 109 houses. There is general data available on this subject in terms of traffic counts and vehicle types, therefore a section on 'Construction Traffic' should be included within the TA 4. The provision of cyclists seems to suggest that other routes are available, however the carriageway serving the proposals should be suitable for ALL highway uses. The assessment should consider the highway width in accommodating all users, including and most importantly the provision of fire tenders and pantechnicons (used for both horse and furniture transport). 5. The geometry of the junction is questionable and has been derived from a Pro Map. This should be undertaken on a topographic survey and the vertical and horizontal alignments assessed. The TA implies that the junction is a standard T junction when in essence it isn't. 6. Street lighting is not mentioned within the report, I assume Eastfield Lane judging by its very nature is unlit? 7. Provision of any additional signage isn't mentioned 8. The entrance to Eastfield lane from the village side is on a sharp bend and a triangle type arrangement. This is the scene for a number of accidents and increasing traffic flow here will only increase that number. <p>The application is for an outline planning permission and the Developer has attempted to gloss over the substandard highway which provides access; both in terms of short term Construction Traffic and long term service. Clearly the developer will be restricted in terms of improving the highway leading up to and beyond the development owing to land ownership.</p> <p>I would like to place a simple objection to the development based on the fact that the TA does not adequately assess the width of Eastfield Lane in terms of ALL highway users during construction and thereafter 'in service' and the junction has been inadequately assessed in terms of its horizontal and vertical alignment; including both the provision and space for street lighting.</p> <p>I would also expect to see a Road Safety Audit accompany the application on the basis that the width of the carriageway is sub-standard and the number of accidents that have occurred in a 5 year window on a highway that has infrequent trip use, some of which appear to non-vehicle</p>			No

									<p>users owing to the absence of a pavement on either side.</p> <p>Too Many Houses in Welton and Dunholme From what I have learnt these two villages have already absorbed more than their fair share of new homes. Whilst there are national and local targets and allocations, surely these should be allocated more sensibly across the District. Our local facilities are being severely tested with schools and medical facilities under pressure. The doctors surgery are at full capacity and obtaining an appointment is next to impossible. Research by neighbours groups have established that there are proposals to build a further 471 homes across the two villages on top of 591 already planned and 212 already built. If all these homes are built then the village will have trebled in size within 25 years. The roads, service, facilities and general infrastructure cannot keep up with that scale of development. Why aren't other large market towns being considered for allocation..?</p> <p>Prematurity I am also concerned about the consultation process for the adoption of the site in to the local plan. The village residents only found out about the potential allocation when the planning application 144526 was submitted. Surely allocation of sites should include consultation with those who will be affected by it.</p> <p>My objection here is that it has been prematurely submitted ahead of Local Plan adoption and that the scheme is of such scale and significance that it cannot be considered for approval. Paragraph 49 of the National Planning Policy Framework (attached) states that Paragraph 49 However, in the context of the Framework – and in particular the presumption in favour of sustainable development – arguments that an application is premature are unlikely to justify a refusal of planning permission Other Than In The Limited Circumstances Where Both: a) the development proposed is so substantial, or its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan; and b) the emerging plan is at an advanced stage but is not yet formally part of the development plan for the area. I therefore request that this application is rejected as it is premature and that the consultation period should be revisited to allow representations by affected landowners and residents both in the direct vicinity of the development and in the wider village catchment.</p> <p>There are numerous other reasons why the land allocation and the application must be objected to including ecology, sustainability (the site is more that 1km for any amenity leading to much more car use), village character, building on greenbelt and health and wellbeing. Many of these have been covered in more detail by my fellow residents.</p> <p>I would also like an explanation as to why the site WL/WELT08A has been considered when the same site WL/WELT008 was rejected on highways grounds. What has changed?</p> <p>I urge the committee to reject this application and seriously reconsider the allocation of the site for ANY future development. Eastfield Lane is simply not a safe road for any increased traffic flow.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

Mark Suddaby

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100298	S80	Don't know	Don't know	Don't know	No	No	Don't know	Don't know	RE: Proposed allocation WL/WELT/001A I object to this allocation on the following grounds:	The one change I would like to	Yes	No

									<p>PRINCIPLES:</p> <p>1) This site is productive agricultural land. At these times of international food insecurity and soaring prices, it cannot be right that we are sacrificing perfectly good productive land for housing when there are so many other brownfield and/or infill sites available in the CLLP area.</p> <p>2) Fair shares – Welton has grown massively over recent years, and there are already approved plans for hundreds more houses. It is disproportionate to the allocations in other parts of the CLLP area, where existing infrastructure and amenities are far better. For example, Welton already has a population larger than Market Rasen, a town with vastly superior facilities (e.g. railway station, high street shops, market, bank, leisure centre, police and fire stations, etc.) – Welton has none of this.</p> <p>3) Enlargement of settlements – it seems wrong to be expanding settlements beyond their natural boundaries when there are so many infill sites and under-utilised premises available in the CLLP area?</p> <p>4) Who is driving this – looking at the recent history of the CLLP, it seems that this site popped up last year, driven by the landowner / developer spotting a money-making opportunity rather than by the CLLP Planners identifying ideal sites. It seems to be a financially-driven opportunity rather than a carefully considered strategic plan. It is interesting to note that when this appeared last year, there was only one response to the consultation, from the landowners themselves – that is because no-one else knew about it.</p> <p>INFRASTRUCTURE:</p> <p>5) Transport – if the rationale for growing Welton as a dormitory satellite for Lincoln, how do all those extra people get to Lincoln? Public transport is unreliable and expensive, and the last buses each way run at 18:20 and 18:44, hardly conducive to supporting employment, leisure and evening economy aspirations. The roads from Welton to the A15 and A46 are poor quality local roads, hardly suited to the extra volumes of traffic that all these developments will generate. There are already dangerous queues on the A15 northbound waiting to turn right onto Heath Lane. There are no pedestrian or cycle facilities connecting the village to the main routes into Lincoln. So the transport implications are more traffic, more congestion, more pollution.</p> <p>6) Water supply – local plumbers will tell you that an increasing proportion of their work is now fixing leaks in homes that have been exposed by the increased mains pressure that has been necessitated by the developments to date. Some are fitting pressure regulators in homes to avoid further damage. Further development will only add to this pressure and the misery it causes to those affected.</p> <p>7) Power supply – I’m not sure what the capacity headroom currently is, but I do know that we already get frequent power interruptions, once a month on average. They are not full outages, but blips that are enough to set off alarms, trip switches, and reset domestic appliances. This suggests that the current infrastructure is already flaky, and loading it further can only add to the problem.</p> <p>THE SITE ITSELF:</p> <p>8) Flood risk – the site already suffers from a drainage problem, with a small lake appearing in the south-west corner after anything more than a day’s rain. How will it cope if all that natural absorption is covered in concrete and tarmac? The natural flow will be out onto Heath Lane, which already suffers from dangerous pooling of water when it rains.</p> <p>9) Ecology & habitat - The site is home to mice, voles, rabbits, foxes, hedgehogs, blackbirds, robins, bluetits, chaffinches, dunnocks, skylarks, etc. and myriad essential pollinators. How can we justify the destruction of this habitat, pushing these species ever closer to endangerment or extinction.</p> <p>10) Transport – road access would be onto an inadequate local road. There are no footpaths</p>	see is that proposed allocation WL/WELT/001 A is removed from the CLLP.		
--	--	--	--	--	--	--	--	--	---	---	--	--

									or cycle facilities to get people either into Welton or out to the main routes into Lincoln.			
									In Summary: The proposed allocation of the WL/WELT/001A site is strategically unnecessary and inappropriate, operationally clunky and risky, environmentally damaging, ecologically destructive, and socially divisive.			

Alastair and Teresa Sutherland

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102258	S80								<p>I am writing to object to the site WL/WELT/008A (Land north of 77, Eastfield Lane, Welton) being included in the CLLP. The reason for my objections are:</p> <ol style="list-style-type: none"> 1. The impact of increased traffic along Eastfield Lane will have a significant impact on residents who live on or off Eastfield Lane and pedestrians who use Eastfield Lane as a walking route.. The corner where the access will be is blind and already cars drive too fast down it. Is the council going to take responsibility for the safety of the residents who live on Eastfield Lane when cars from the proposed development fly past (especially those that live towards the end near the site entrance)? 2. This is a route that is heavily used by walkers. The significant increase of traffic will make it dangerous and inaccessible. This is something that at present the whole of Welton and Dunholme benefit from. 3. Eastfield Lane is unsuitable for a large quantity of construction traffic. Who would be responsible for monitoring the vehicles and ensure they don't come down Eastfield Lane? In addition to that the road out towards Market Rasen is unsuitable and would be dangerous for vehicles if there was an increased amount of construction traffic. 4. Eastfield Lane is currently in a poor state of repair with several potholes. The increase of traffic will make this even worse and more dangerous. Is the council going to guarantee the continued repairs of the road if they give planning permission? The road is also narrow at parts and only one vehicle can pass through at a time on parts of the residential area of Eastfield Lane and the road out towards Market Rasen. Is the local council guaranteeing the safety of residents that already live on Eastfield Lane? 5. There has been considerable development already in Welton and Dunholme. The infrastructure in Welton and Dunholme does not support continued development. The Doctor's Surgery is already struggling to meet the demands of the residents that already live in Welton. There are few shops and other services and certainly not enough to sustain further development. It seems that the continual development of Welton and Dunholme is being completed without any regards for the residents and with little thought to the infrastructure required to support the significant increase in residents. 6. In addition to this there is the environmental impact on people having to travel to Lincoln to use services. There are bus routes but the cost of bus travel from Welton to Lincoln is excessively high compared to other cities. 7. The location of the development is at the North Eastern Edge of Welton, it is a significant way from any of the amenities within Welton and will likely lead to a significant amount of car use for the potential residents of the new development to be able to access any services, including schools or shops, further increasing traffic on Eastfield Lane and throughout Welton. This is not environmentally friendly. 8. Developing the site will lead to a loss of countryside and wildlife habitat. At present the area is a haven for a diverse range of wildlife. Our garden backs onto the proposed development and we regularly find grass snakes, lizards, deer, squirrels and a range of birds from the land that you are proposing to develop. <p>The application has disregard for current residents and their safety both while the</p>			No

									development is being built and in the longer term. This is especially dangerous for the residents that live towards the Market Rasen.			
--	--	--	--	--	--	--	--	--	---	--	--	--

WK and E Swallow

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100295	S80								We object to this proposed planning application due to Traffic increase on a small lane with poor visibility in several areas along its whole length which narrows in places where two vehicles cannot pass safely without going onto the verges. Sewage problems that have been going on for many years and reported to water authority. Schools, Doctors and also parking in the village is already under pressure and is not sufficient for the present population let alone more buildings. Why has this and any more proposed buildings in Welton and Dunholme been kept a secret or very hard to locate, been allowed to happen, all the new housing has an effect on the existing population and is detrimental to our wellbeing and safety.			No

Linda Taylor

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101324	S80								I wish to strongly object to the planning application: Site WL/WELT/008A in the draft CLLP for the following reasons. - The village of Welton has already been overdeveloped and is losing its identity as a village. It has had its fair share of new housing and many more are still being built having gained planning permission. - The VILLAGE population is currently 6,000 according to Welton Parish Council figures. The nearby TOWN of Market Rasen has a population of 4,000 (2021). Unlike a town Welton does not have infrastructure to meet the needs of the existing villagers and that is even before current house construction is complete. The Health Centre has stated it may close to new patients as they haven't the staff to cope with their current caseload. They have been unable to recruit GP's to the vacant posts. The schools have very few places to offer. There are very few safe parking spaces in the village centre for access to the Health Centre, Church, Shops. Further housebuilding will lead to increased traffic increasing the risk of traffic accidents. - The proposed building site is too far out to allow a convenient walk to village amenities and would lead to a considerable increase of road traffic. - The rural lane (Eastfield Lane) leading from the proposed site to the village is not suited to high traffic volume. It is narrow with bends and pinch points where large vehicles travelling in opposite directions would not be able to pass without pulling partially off road. This would endanger the regular walkers, dog walkers, cyclists and horse riders. - The proposed site would detrimentally impact the historic, charming area of the hamlet 'Ryland'. A newly developed housing estate would visually detract from the picturesque historic stone cottages and be out of character with the historic architecture. - The proposed site is on land currently farmed..... a greenfield site. This arable land should be saved for farming to reduce reliability on imports and cut down on 'food miles' which have an impact on climate change. I believe the focus for future house building in West Lindsey should be on the site of RAF			No

									<p>Scampton..... a Brownfield site. On that site there is space for housing, amenities and infrastructure.</p> <p>Site WL/WELT/008A is not suitable for any housing development and the planning application should be turned down as it was in the last CLLP.</p> <p>There has been no change in circumstances to make this unsuitable site suitable.</p> <p>THANK YOU for your consideration to the points I have raised.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

Sam Taylor

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101485	S80								<p>I object to the planning application Site WL/WELT/008A for the following reasons.</p> <ul style="list-style-type: none"> - Welton has already been over developed in relation to the available infrastructure. Welton has already had a large increase in housing with many still being built. - Houses in villages should be close to amenities in order to reduce traffic movements. The proposed site is too far away for convenient walking to reach shops, schools, health centre, church and would therefore create more traffic through the village and trying to find safe centre of village parking. - Eastfield Lane is not suitable for establishing a bus route as it is too narrow. - Greenfield sites should not be used for housing development. The nearby brownfield site of RAF Scampton is better suited for development. - The land on the site of the proposed development should be kept as valuable arable farmland. - The entrance planned for the proposed site on Eastfield Lane is on a dangerous narrow bend with poor visibility. Eastfield Lane has had multiple traffic incidents on the bends and at the junction between Eastfield Lane and Ryland Road. <p>I strongly believe this planning application should be rejected.</p>			No

Alison Thomas

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103870	S80; General								<p>[Representation has been summarised due to length. See attached for full representation]</p> <p>Firstly, as a general point, I feel that the whole process of identifying land for development is invisible to the people who are most affected by it. In this instance, we only became aware of this development because we saw surveyors on the proposed site and made enquiries at both our parish council and WLDC.... neither were forthcoming with any information! It was a neighbour who made us aware of HELAA which then led to the CLLP, by which time this site had been proposed for allocation! This lack of awareness is evidenced by the very few parish councils and</p>	<p>In summary WL/WELT/008A MUST BE REMOVED FROM THE DRAFT SUBMISSION OF THE 2022 CLLP because;</p> <p>There is an excess of housing supply. Welton has a disproportionate burden</p>		Yes

								<p>individuals that made representations in the initial phase of the process. In contrast there are very many representations by developers!!!! Is there a legal framework which guides the CLLP process to ensure that all parts of the community are fairly represented? I would very strongly assert that if there is a legal framework then the draft allocations in Welton failed to meet CLLP policies.</p> <p>This site has been rejected on two separate occasions. It was rejected in 2016 ref. CL 2175 the reasons being;</p> <p>‘There are small areas at risk of surface water flooding on this site, but this can be dealt with through layout and design. ACCESS IS NOT SUITABLE FOR DEVELOPMENT AND SITE IS NOT WELL CONNECTED WITH VILLAGE CENTRE. Sites with planning permission have provided adequate growth levels for Welton.’</p> <p>On the second submission WL/ WELT/008, the site was rejected. The conclusion was;</p> <p>‘The site would extend the built footprint into the countryside to the north. Other sites are preferable. See WL/WELT/008A.’</p> <p>Interestingly the highways comment and the location of the site was not cited at all for the rejection, even though NOTHING HAS CHANGED, with regards to the location or the access road. Highways did make a comment on WL/WELT/008 as follows;</p> <p>‘Eastfield Lane would need to be widened to a minimum of 5.5M with a 2M frontage footway to link to the existing footway on Eastfield Lane. The presence of roadside ditches on Eastfield Lane would make this difficult to achieve’.</p> <p>This comment was not present on WL/WELT/008A which, according to Rachel Hughes(Head of Policy and Strategy), was as I understand it, a technical ‘glitch’ with the spreadsheet!</p> <p>When WL/WELT/008A was proposed the only difference is that the developer has reduced the no. of houses from 124 to 109 and replaced the 15 houses with a small area of landscaping on the northern boundary. WL/WELT/008A has currently been proposed for allocation.</p> <p>I find it hard to understand how WL/ WELT/ 008A could be proposed when WL/ WELT/ 008 was rejected?</p> <p>WL/WELT/008A has subsequently received an outline planning application(144526), which although allowable, is both PREMATURE and PRESUMPTUOUS of the applicant. There has been CONSIDERABLE OBJECTION to the application.</p> <p>I would like to expand on the comments made in CL2175, and to information that was provided in WL/WELT/ 008 to emphasise why WL/WELT/008A should be removed from the draft CLLP. This supports the councils own findings that the site is NOT WELL CONNECTED with the village amenities and that the ACCESS IS UNSUITABLE.</p> <p>Using the CLLP’s Red, Amber and Green criteria the location of the site is</p>	<p>of allocations.</p> <p>Where development is allowed, marketable villages, like Welton, are always subject to that development within the identified period compared with, for example, Cherry Willingham.</p> <p>Comments made during the SA correctly identified major issues with WL/WELT/008 which must carry equal weight in WL/WELT/008A.</p> <p>I have only used Cherry W in these observations because of its similarities to Welton</p>		
--	--	--	--	--	--	--	--	---	--	--	--

									<p>unsuitable for the following reasons;</p> <p>RED with regard to distance from GP SURGERY(1.5KM) RED with regard to nearest PRIMARY SCHOOL(1.5KM) RED with regard to nearest SECONDARY SCHOOL(2KM)</p> <p>These criteria are relevant to the sustainability of the site, resulting in car dependency which would funnel traffic through Welton and Dunholme. Alternatively traffic would travel eastwards along what is essentially a country lane, which is frequented by walkers, cyclists and horse riders(as there is an equestrian centre part way along Eastfield Lane). One of the main reasons I believe that families wish to live in Welton is because of the excellent secondary school....which is already over subscribed, and has in recent years reduced its catchment area. As this site is on the furthest eastern point of the village, by the time it has been developed, children living here will be unable to attend! This again is completely UNSUSTAINABLE. There are no plans/ desire to expand William Farr - S106 payments cannot mitigate this!</p> <p>RED with regard to LIKELY SUITABLE ACCESS RED with regard to IMPACT ON HIGHWAY NETWORK RED with regard to IMPACT ON LOCAL ROAD NETWORK</p> <p>I can only support the above classifications because of the nature of Eastfield lane. It measures on average between 4.0 and 4.2 M, at its narrowest it is 3.6M and at its broadest(for a very brief stretch) it is 5.5M (near the Ryland Road junction). It is an untreated road and at either end can become very icy. A substantial length of the lane is 60mph. The proposed entrance to the site is on one of two 90* bends which is shared with farm traffic. A potential development would increase traffic movements along this lane by 500,000 plus. There have been numerous accidents along Eastfield lane, several reported and many unreported and as such I would deem it UNSAFE for a large development!</p> <p>The area of this proposed site, the hamlet of Ryland, was within living memory a distinct agricultural settlement of some antiquity. While not formally designated a conservation area, Ryland is the only part of Welton where one can see elements of the historic settlement preserved, apart from Welton village centre around St. Mary's Church. A large housing estate is not in character with the area of Ryland. Referring to Policy S57 I would draw your attention to one of its conclusions; ' Providing strong protection for the historic environment should ensure no incremental or cumulative loss of historic character and local distinctiveness across Central Lincolnshire.'</p> <p>I would like to offer a background to my objection by referencing the premature and presumptuous outline planning application which has already been submitted for this site- ref. 144526. I therefore have some knowledge of this site with regard to scale, location and the nature of the development. I should also point out that there has been considerable objection to this planning application and site allocation, culminating in the 'Ryland Residents Group', which represents some 30 residents in the locality. 70 residences in total and Welton Parish Council have objected to this application.</p> <p>It is very clear to see from the above two graphs that there is an over supply of housing compared with the higher target of 1325 houses per year. This results in a MATERIAL EXCESS OF 2,406 HOUSES. If the lower figure of 1,086 target is used this is a MASSIVE 3,601 ADDITIONAL UNNECESSARY HOUSES.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

									<p>Welton itself, along with Dunholme and Nettleham have a huge burden in terms of providing future housing, which I believe is as a consequence of flawed site assessments and is driven by marketability. It is also contrary to policy S80 which dictates that growth should be proportionate, sensitive and sustainable.</p> <p>The site has revised boundaries (to those proposed in WL/WELT/008) to better reflect the existing built line of the village to the north.</p> <p>The small area of landscaping is the ONLY DIFFERENCE between being REJECTED and SELECTED.</p> <p>The highways issues are extensive and have been commented upon in considerable detail in the objections to the planning application referred to earlier. The MAJOR NEGATIVE EFFECTS correctly identified in the Sustainability Appraisal in WL/WELT/ 008 are clearly of equal weight in WL/WELT/008A and should be given equal consideration.</p> <p>This area, now regarded as part of the village of Welton, historically was a hamlet in its own right.... the hamlet of Ryland . It is a ribbon development on the furthest eastern point of the village and is identified as area K in the village character assessment which links into the neighbourhood plan.</p> <p>WL/WELT/008A allocation is a proposed estate of 109 houses which will be built immediately to the north of Character Area K and which I believe is completely out of character with the vernacular of that area.</p> <p>Also identified are a number of threats from developments requiring planning permission, as would be the case with this site. They are;</p> <p>Poorly designed edge-of-village development which fails to properly integrate into its landscape setting and creates an unsatisfactory, overly hard edge to the village. Development at the edge of the area built at a higher density and with a more urban form.</p> <p>As we have already received an outline planning application for this site it is very clear to see that any development would negatively impact on the vernacular of this hamlet, and as such this site should be removed from the 2022 Draft CLLP.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

Chris Thomas

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103866	S80; SA								<p>[Representation summarised due to length. See attached for full representation]</p> <p>I'd like to object to housing site WL/WELT/008A being in the Central Lincolnshire Local Plan (CLLP) submission and request that it be removed from the plan for the reasons below.</p> <p>The developer for site WL/WELT/008A has already put forward a planning application to West Lindsey District Council (WLDC), application number 144526. As such all the comments that have been submitted by over 70 different residences as well as Welton</p>	I'd like to object to housing site WL/WELT/008A being in the Central Lincolnshire Local Plan (CLLP) submission and request that it be removed from the	Yes	Yes

								<p>Parish Council (WPC), the ward councillors and the health centre should be taken into account.</p> <p>This site has been rejected twice before. Once under CL2175 and more recently under WL/WELT/008. In the sustainability assessment report appendix 7 in the brief justification the site was rejected because “the site would extend the existing built footprint of the village into countryside to the north. Highways improvements would be required. The sustainability appraisal identified major negative effects in relation to access to services and facilities, employment and education.”</p> <p>Proposal WE/WELT/008 was amended by reducing the number of houses from 124 to 109 and resubmitted under WL/WELT/008A. By reducing the number of houses by 15 the brief justification is “The site has revised boundaries to those proposed in WL/WELT/008 to better reflect the existing built line of the village to the north.” and becomes selected. Somewhere in the process the other comments about the site have been removed from public view.</p> <p>Removing 15 houses to align the boundaries does not improve site access and does not change the major effects to services, employment and education. Whilst the village built line is improved, this hasn’t had sufficient improvements in material benefits to change it from being rejected.</p> <p>Our house abuts this proposal and we had no invite to respond to this draft plan. The communication and consultation part of the process does not perform its requirements to inform and communicate, even when asked.</p> <p>The requirement from the plan states that there is to be a total of 871 (Table A1.1 P209) houses from Welton. 404 of these houses are on 3 proposed new site allocations in this draft plan. Should these sites be allocated, this would increase the growth in Welton from 25% to 48%. This level of growth is one of the highest levels of growth anywhere in the CLLP. It is inappropriate for Welton to absorb so much growth. The services and infrastructure will be unable to cope with it. This level of development exceeds the vision laid out in the plan, Policy S1 and policy S4. It is not limited, appropriate or sensitive.</p> <p>The number of houses generated by the draft plan is a total of 21,113 (table 1 P169) from the LSA. This is 2,447 (13%) more than what is required at the high end of the forecast requirements. As hierarchy category (iii) is the category that should be built on last, the extra 2,447 houses have effectively fallen on villages like Welton and Dunholme.</p> <p>Whilst it is good practice to have contingency in a plan the impact of removing site WL/WELT/008A would have negligible impact on the overall deliverability of the plan. Similarly removing the other site locations in Welton would still leave in excess of 2,000 houses in the LSA area and over 3,000 houses in the overall plan. This is still over 10% contingency.</p> <p>Removing this site allocation, WL/WELT/008A, from the draft plan will have a positive impact on delivering the true benefits of urban regeneration and developing SUE’s and give Welton an opportunity to build on its already overstretched infrastructure to support what is already allocated and planned to be built, without impacting on the deliverability of the plan.</p>	<p>plan.</p> <p>I would also like to see the other proposed new sites in the draft CLLP for Welton and Dunholme removed or at least significantly reduced from the plan as many of the reasons are related.</p> <p>As the planning application has been submitted, I request that the planning comments are acknowledged and transposed from WLDC planning department into the CLLP process.</p>		
--	--	--	--	--	--	--	--	---	--	--	--

									<p>Welton (and Dunholme) are identified as dormitory villages. As identified above the need for this site allocation (WL/WELT/008A) and others in Welton has negligible impact on the deliverability of the plan, but has significant impact on the village of Welton. A growth rate of 25% in CLLP 2017 increases to a growth rate of 48% in the CLLP 2022. This level of growth is not necessary to support the role and function of Welton and has been demonstrated that removal of this site has no impact upon the plan.</p> <p>This proposal fails Policy S21 as it has not appropriately considered all the risks with this site allocation. A desk top analysis does not show what is happening in reality.</p> <p>Welton has little opportunity to drive growth in employment. The village centre was created in the 1900's and has little opportunity to expand. Welton is primarily a dormitory site for Lincoln. In the CLLP Sustainability Appraisal Report, Appendix 7 the GIS desktop based constraints check for site WL/WELT/008 states "the sustainability appraisal identified major negative effects in relation to access to services and facilities, employment and education.</p> <p>The removal of this site from the plan will have no impact on local employment.</p> <p>The phasing of developments should be controlled by the CLLP and not left to developers to say I want to build here and not there. This would ensure that the necessary infrastructure changes and funding required to support the growth are secured and ready in time. Regarding this site.</p> <p>Whilst I disagree that Welton should be burdened with even more extra houses, as identified above, I do agree with phasing of developments. The current plan suggests that WL/WELT/008A should follow on after WL/WELT/001 and WL/WELT/007. This gives the village more time to absorb the changes needed on infrastructure than developing all three sites at once. With the growth already seen to date, Welton's infrastructure is bursting at the seams today and there are no visible plans to show how it will improve to cope with the existing planned growth.</p> <p>As identified earlier, the location of this site has a major negative impact on access facilities, the health centre being one of those. The health centre has already objected to this planning application on the grounds that it cannot cope with the existing developments let alone the extra burden from the proposed new developments.</p> <p>The schools in and around Welton are at maximum capacity, with the exception of St. Mary's primary school. Based on the number of additional proposed new houses and LCC corporate property team pupil ratios, there is a need for 201 more Primary school places and 297 more secondary/6th form school places. The sustainability appraisal report appendix 7 for site WL/WELT/008 states the site will have MAJOR NEGATIVE effects in relation to access to services & facilities, employment and education. It will promote a culture of driving.</p> <p>The proposed site will significantly increase the number of vehicular movements by more than 1,000,000 per year (figures shown in developers transport assessment). The location of this site would extend the length of the village and increase the length of car journeys. It is too far from services and facilities, so promotes the use of cars to get anywhere. The sustainability appraisal report appendix 7 for site WL/WELT/008 recognises the site will have MAJOR NEGATIVE effects in relation to access to services & facilities, employment and education. Removing this site allocation from the plan will reduce vehicular movements by over 1,000,000 and have an overall positive impact on Policy S47 and the plan.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

									<p>Eastfield Lane is a relatively quiet, narrow country lane with built up hedgerows, blind bends, soft grass verges and no segregated footway. It varies between 4.0m and 4.2m wide for approximately 2.5km, narrowing to a minimum of 3.6m wide adjacent to the 90 degree bend where the site entrance is proposed to be located.</p> <p>Although most of the traffic movement is forecast to be towards Lincoln, it is difficult to confirm that this traffic will travel through Welton. As the congestion in the village builds up more vehicles will use Eastfield Lane to gain access to the A46. The location of this site, with 109 houses, could lead to a significant increase in vehicular movements along the lane, thus making it less safe and deterring residents from using it.</p> <p>The development will take prominent place when entering the village from Eastfield Lane. Its magnitude and design will dwarf and conflict with that of Ryland and take away the most scenic entrance into Welton.</p> <p>I would agree with the target of the policy to deliver a measurable net gain of 10%. One of the issues that I have seen come through with the planning application for this site is, the baseline does not include the biodiversity of the surrounding areas and residences. A development can have a negative effect on these, so they should be taken into account when determining the net effect.</p> <p>In the case of this application the developer, words are used to say that the net benefit will be achieved, but there are no substantive plans, it does not taking into effect the loss of biodiversity in the already built residences and is claiming benefits that have already been claimed by another development which has gained planning approval.</p> <p>This site allocation is unusual, in so much as, the developer has submitted a planning application to WLDC on 3/3/22 at a similar time to the draft CLLP was being put out for public consultation on 16/3/22.</p> <p>It is very confusing for the public to understand why their objections to WLDC planning application 144526, which is WL/WELT/008A in the draft CLLP, are not being taken into account in the CLLP process.</p> <p>There are numerous anomalies with this proposed sustainability appraisal carried out for this site (WL/WELT/008A). This assessment is flawed and needs reassessment.</p>			
1103864	SA; General	No	No	Yes	Yes	Yes	Yes	No	<p>I do not feel the plan was communicated clearly to the public. When I asked about a proposed development I was told there was none only to find out there was one included in the plan. This did not give me chance to object (or others to object), which is a legal part of the process.</p> <p>Information in the SA is incorrect and when I have asked for this to be corrected it has not been done. Thus the decisions are being made on incorrect information.</p>	Communication should be clear. Inviting only land owners and agents is biased. Communities and general public should be invited as well. Notifications like what are sent out in planning applications should be sent out for the CLLP. Legal requirement to communicate.	Yes	No

J B and D Thompson

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103883	S2								<p>[Representation summarised due to length. See attached for full representation]</p> <p>This representation is made on behalf of our clients, Mr J B and Mrs D Thompson, to submit these representations to the Central Lincolnshire Local Plan Review Regulation 19 Consultation (March 2022) in respect of Land South of Linga Lane, Bassingham. They wish to remind you of its availability for consideration as a residential allocation for circa 46 homes (see Appendix 1), further to previous representations to the Regulation 18 Consultation in June 2021.</p> <p>We agree with the economic case to provide a housing requirement in excess of the standard method in order to strengthen the growth of Central Lincolnshire and its vibrant economy. However, the use of a housing requirement 'range' causes confusion. Paragraph 66 of the Framework requires strategic policy-making authorities to establish a housing requirement figure [note – singular rather than plural] for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.</p> <p>Paragraph 11b requires strategic policies to, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. Paragraph 74 says that Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies. This requirement forms part of the test established by footnote 8 of the Framework deciding whether the policies which are most important for determining the application are out of date (paragraph 11d of the Framework). The strategy aims to secure and deliver 29,150 homes, yet Policy S2 attempts to utilise the lower housing requirement of 23,320 homes to determine whether the strategy is out of date.</p> <p>The Framework (11b, 11d, 66 and 74) provide a clear link between strategic housing policy, housing requirement and the supply of deliverable sites which should be one and the same figure. Paragraph 16 of the Framework requires plans to be positive, aspirational and deliverable and to contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. Policy S2 requires modification to establish a single housing requirement which informs the strategy and is also the basis for determining whether the strategy is being delivered.</p> <p>Central Lincolnshire's Settlement Hierarchy (Policy S1) is primarily based on physical size rather than any nuanced interrogation of service and facilities – either access to service and facilities or need to support and sustain them. Bassingham is identified as a Medium Village – those villages which had between 250 and 749 dwellings as defined on 1 April 2018.</p> <p>Policy S2 only looks to distribute 12% of development to areas beyond Lincoln Strategy Area, Sleaford, and Gainsborough – in other words only 3,498 homes are to be shared between the Market Towns of Caistor and Market Rasen (which will receive</p>	Policy S2 requires modification to establish a single housing requirement which informs the strategy and is also the basis for determining whether the strategy is being delivered.		Yes

								<p>significant, proportionate growth), the 20 Large Villages (appropriate growth), the 36 Medium Villages (some limited growth), the 86 Small Villages (some limited growth) and the myriad of Hamlets (settlements of 15-49 homes where single dwelling infill may be permissible).</p> <p>In our view, 88% of growth is too high an amount to take place in the Lincoln Strategy Area, Sleaford, and Gainsborough with such a small amount to be distributed to the remainder of the policy area. We would expect such a distribution to focus on the main towns and whilst that will arguably be too restrictive for growth at Caistor and Market Rasen, there will not be enough growth distributed to the Large Villages and even less to the Medium Villages.</p> <p>Such an approach will lead to a moratorium in some settlements, appears to take no account of the need for growth to sustain service and facilities and will ultimately lead to a sustainability trap whereby the villages will slowly see reduced access to service and facilities as their vitality is prejudiced by a lack of growth and stimulation from additional population. We note that in discussing growth, the vision says that the villages 'will not be left behind' and would suggest that there is something of a disconnect between this statement and the strategy presented in the plan.</p>			
1103885	S4							<p>Policy S4 goes on to say that Medium Villages "will experience limited growth to support their role and function through allocated sites of 10 or more dwellings in the Local Plan, sites allocated in neighbourhood plans, or on sites in appropriate locations within the developed footprint of the village that are typically up to 10 dwellings. The plan provides definitions for 'appropriate locations' and 'developed footprint' which all but excludes sites on the edge of the built form.</p> <p>In that respect, any sites seeking to delivery market housing adjoining a village and not allocated by the local plan will only come forward if they are allocated in a Neighbourhood Plan.</p> <p>Policy S4 Part 3 relates to proposals for residential development on unallocated greenfield sites immediately adjacent to the developed footprint, and supports proposals related to First Homes and for rural affordable housing exception sites. This support is caveated on the basis that any proposal that would result in an increase in the overall area of the developed footprint of the village, or an increase in dwelling numbers, of more than 10% would not be considered proportionate. This further limits the ability to delivery affordable dwellings and meet the delivery of circa 12,000 affordable homes within the plan period (Policy S21) and reduces any flexibility within Policy S4.</p>			No
1103886	S81; SA							<p>[Representation summarised due to length. See attached for full representation]</p> <p>The plan includes Table A1.1 which says that the housing requirement for Bassingham is 41 dwellings. Policy S80 'Housing Sites in Medium Villages' identifies the Bassingham Neighbourhood Plan (made in May 2021) allocation 'Land at Whites Lane' as an allocation for 35 homes. Planning permission (14/1580/FUL) for 35 dwellings was approved in 2016 but lapsed with no development commencing. Another full application (19/1089/FUL) for 41 dwellings was refused in 2021 due to a lack of community support.</p> <p>We note that the SA Report Appendix 5.2 sets out a matrix of sites to determine their suitability for allocation. The performance for Land at Whites Lane (NK/BAS/010) and Land South of Linga Lane (NK/BAS/009) is identical save for land at White Lane being found to have a potential negative effect on Biodiversity because it is within 500m of</p>	<p>The Land South of Linga Lane is suitable, available and achievable and our clients are committed to its promotion and willing to deliver homes in the short term. The site can be delivered well within the first 5 years of the Plan, therefore the site can positively contribute towards a</p>		Yes

								<p>the River Witham (whilst Linga Lane was neutral) and the land at White Lane having a negative effect on the historic environment due to proximity to a listed manor farmhouse and the conservation area (whilst Linga Lane was neutral). In addition, Linga Lane offers benefits through the early delivery of market and affordable homes. By explicit regard to the Council’s own evidence, there can, therefore, be no evidential basis for the selection of Whites Lane as a preferred allocation other than its identification by the Neighbourhood Plan.</p> <p>The lack of community support for land at White Lane and the refusal of planning permission suggests strongly that the allocation will be prevented from delivery.</p> <p>Notwithstanding the above, we note the plan sets a housing requirement for 41 homes at Bassingham. The plan says that Housing Requirements for Neighbourhood Areas are based upon “allocations in this plan; and extant planning permissions as at 1 April 2020. The requirement for Bassingham appears to be based upon the allocation for 35 homes at Land at Whites Lane, which interestingly has been pursued for 41 homes – the same number as the requirement. On this basis, no regard has been had to the suitability of Bassingham as a location for growth or the appropriate level of growth needed to support facilities and services. As a consequence, the housing requirement is not based upon evidence or a planned response to housing need, it is merely a reflection of a site which has been preferred.</p> <p>We note that the Neighbourhood Plan also proposed Land at Carlton Road/Tolgate Lane as a reserve site for 24 dwellings (NK/BAS/007 also set out in Table 1). No application has been submitted and it remains to be seen whether the site is achievable or suitable.</p> <p>The site was not assessed within the Interim SA, but has now been appraised in the SA Report with similar conclusions to the Land at Whites Lane site. Land at Carlton Road/Tolgate Lane performs better than Linga Lane in respect of a single objection (access to healthcare facilities), but scores lower for opportunities for healthy lifestyles. In our view, the Carlton Road/Tolgate Lane site similarly cannot be considered a preferred alternative to Linga Lane given the conclusions within the Council’s own SA.</p> <p>The reliance on two allocations, one of which is a reserve allocation, from the Bassingham Neighbourhood Plan without appropriately considering the merits of reasonable alternative sites within the SA does not align with Planning Practise Guidance (PPG) paragraph 001 (reference ID: 11-001-20190722)</p> <p>It is unclear how the SA has been used to inform the plan, as required by the PPG, given that the Neighbourhood Plan sites have been accepted without a clear consideration of alternative allocations. No evidence has been provided to demonstrate the availability or deliverability of NK/BAS/007 and suitable alternative sites must be sought. Similarly, the historic failure to deliver Land at Whites Lane, Bassingham (NK/BAS/010) following refusal of applications 14/1580/FUL and 19/1089/FUL must also be taken into account.</p> <p>Overall, our view is that Bassingham should continue to play a role as a sustainable location for new development in recognition of the services and facilities present which include; shops (one of which incorporates a Post Office), a primary school, a church, a health centre, a pre-school nursery, a mobile library, Hammond Hall and two public houses. These services and facilities are sufficient to meet many of the day to day needs of the existing community and to accommodate new residents. Indeed, growth in a Medium Village like Bassingham is not only sustainable when we consider the services and facilities that are available but, as mentioned above, will also help</p>	<p>five-year supply and as a result we respectfully request that Land South of Linga Lane is identified as a housing allocation under Policy S81 in the Regulation 19 Local Plan.</p>		
--	--	--	--	--	--	--	--	---	---	--	--

									sustain those service and facilities and ensure the community remains vibrant. Therefore, it is entirely appropriate for the Land South of Linga Lane to be allocated for residential development.			
--	--	--	--	--	--	--	--	--	--	--	--	--

P Thompson and S Coney

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101316	S1	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Re: Land to the South of Winchelsea Road, off Sleaford Road, Ruskington – NK/RUSK/001</p> <p>It is our view that the above Policies (S1,S4 & S80) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages.</p> <p>S1 states that growth will be allowed in large villages (such as Ruskington) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be.</p> <p>Policy S4 does not allow for unallocated sites adjacent to large villages to be brought forward for open market housing where there is a demonstrable demand. It is our view that it should.</p> <p>The site is situated adjacent to the village of Ruskington which is identified as a Large Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated April 2022.</p> <p>The site was previously identified as a “reasonable alternative” and has been rejected in the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022 and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/RUSK/001) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022) – Page 80.</p> <p>Our clients have recently advised NKDC that they would consider a partial allocation of this site if deemed appropriate.</p>	<p>Allocations in large villages of sites, as identified in policy S1, should be decided by the growth target. The draft plan appears to rely on sites with past consents, previous development and allocations already identified.</p> <p>The process for selecting sites to be allocated in Large Villages (under Policy 80) should be revisited to take into consideration the needs and capacity of each settlement.</p>	No	No
1101317	S4	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Re: Land to the South of Winchelsea Road, off Sleaford Road, Ruskington – NK/RUSK/001 It is our view that the above Policies (S1,S4 & S80) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. S1 states that growth will be allowed in large villages (such as Ruskington) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be. Policy S4 does not allow for unallocated sites adjacent to large villages to be brought forward for open market housing where there is a demonstrable demand. It is our view that it should. The site is situated adjacent to the village of Ruskington which is identified as a Large Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated April 2022. The site was previously identified as a “reasonable alternative” and has been rejected in the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022 and it is our view that the site should be allocated for</p>	<p>Allocations in large villages of sites, as identified in policy S1, should be decided by the growth target. The draft plan appears to rely on sites with past consents, previous development and allocations already identified. The process for selecting sites to be allocated in Large Villages (under Policy</p>	No	No

									development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/RUSK/001) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022) – Page 80. Our clients have recently advised NKDC that they would consider a partial allocation of this site if deemed appropriate.	80) should be revisited to take into consideration the needs and capacity of each settlement.		
1101319	S80	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Land to the South of Winchelsea Road, off Sleaford Road, Ruskington – NK/RUSK/001 It is our view that the above Policies (S1,S4 & S80) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. S1 states that growth will be allowed in large villages (such as Ruskington) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be. Policy S4 does not allow for unallocated sites adjacent to large villages to be brought forward for open market housing where there is a demonstrable demand. It is our view that it should. The site is situated adjacent to the village of Ruskington which is identified as a Large Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated April 2022. The site was previously identified as a “reasonable alternative” and has been rejected in the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022 and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/RUSK/001) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022) – Page 80. Our clients have recently advised NKDC that they would consider a partial allocation of this site if deemed appropriate.	Allocations in large villages of sites, as identified in policy S1, should be decided by the growth target. The draft plan appears to rely on sites with past consents, previous development and allocations already identified. The process for selecting sites to be allocated in Large Villages (under Policy 80) should be revisited to take into consideration the needs and capacity of each settlement.	No	No

Brian Thorpe

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100294	S80								Dear Sirs. Before any more houses are planned for Eastfield Lane Welton the state of the road should be considered. It is a Lane and hardly wide enough for two vehicles to pass safely without one having to “pull over”. Furthermore there are dangerous junctions at either end, more traffic more accidents! Add to this the village facilities which are over stretched at the moment, I don’t think a further large development down this Lane is what the village wants. I would register my objection to the plan.			No

Adrian Walker

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101731	S1; S2; S4; S81	No	Don't know	Don't know	No	Don't know	No	Don't know	Para 2.1.4 states smaller towns should deliver proportionate development, Para 2.4.3 states development in villages will be of modest scale, Policy S1 (5) states medium villages may receive limited growth, Policy S2 (d) states growth 'Elsewhere' will be around 12%, Policy S4 (1) states medium villages will experience limited growth. Throughout the CLLP talks about limited and proportional growth in medium villages yet of all the villages in that category Fiskerton seems to have been grossly over allocated. The attached document was previously submitted by Fiskerton Parish Council which shows how although the baseline number of dwellings has reduced for Fiskerton by the most the allocation of housing has risen by one of the highest amounts and is almost 2.5 times higher than the 12% quoted in policy S2. There is no justification in	To meet all the aspirations set out in the CLLP growth levels in Fiskerton should be reduced to equate closer to the 12% target set in policy S2.	No	Yes

									any of the literature to support such excessive growth levels. All of the policies and paragraphs highlighted above are in contradiction with the housing allocation placed on Fiskerton.			
--	--	--	--	--	--	--	--	--	---	--	--	--

Steve Waller

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101496	S80								<p>I wish to object to the proposed above plans affecting our village. I see there were originally 12 areas identified for building on of which 7 were this time turned down. A total of 2500 houses in all.</p> <p>Of the 5 that got the green light- 1 of them the Eastfield Lane project got a red light in the last review so it shows that all of the current red areas could be green lighted in future consultations.</p> <p>I honestly do not know how this village would cope with all the extra people and traffic. At times now it is difficult to get around -never mind with hundreds of more vehicles.</p> <p>The number of shops here has remained fairly static over the 40 years we have lived here - in fact I think there are less now than in 1980. The schools are either full or nearly full and the doctors surgery cannot cope with any more patients.</p> <p>If you include the plans for Nettleham and Scothern we are looking at around 10000 more houses- that is 25000 more people.give or take.</p> <p>Why can you not look at the former RAF Scampton site which is about to be closed down or maybe already has as the Red Arrows are going to Waddington. I feel sure there is plenty of room to build a new village there which could take the pressure of villages like Welton and Nettleham.</p> <p>I certainly hope that these plans do not proceed in any shape or form.</p>			No

Giles, Edward and Ian Walter

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100552	S29	Yes	Yes	No	No	Yes	No	Yes	<p>Please see accompanying documents, including:-</p> <ul style="list-style-type: none"> • Reg19 CLLP Consultation Response 	<p>Please see accompanying documents, including:-</p> <ul style="list-style-type: none"> • Reg19 CLLP Consultation Response • Reg19 CLLP Consultation Response – Location Plan • Reg19 CLLP Consultation Response – 3D Sketch-up • Reg19 CLLP Consultation Response – Indicative Mater-plan 	No	Yes

Elaine Wells

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100142	S81								<p>To whom it may concern, please note my objections to any building of 25 houses down meadow Lane. I am by no means against new houses being built but this lane is one of the only surviving “country lanes” in the village. Does not have planning permission which should be refused and there are far more suitable pieces of land at the edge of the village which would be more suitable. It should be retained for grazing and wild life and I use this Lane regularly to walk down every</p>			No

Tim Wells

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103060	S80	No	Don't know	No	No	No	No	No	<p>The site allocation assessment process has not been completed correctly.</p> <p>The original site allocation assessment for NK/RUSK/002 did not assess the correct land based on the information provided.</p> <p>The revised assessment on the correct land fails to take into account of information provided last year at consultation and other information available from a planning application. I have not been contacted for further details or clarification although stating this at every stage.</p> <p>The revised conclusion now states “There are still some constraints in relation to impact upon character in this edge of settlement location” but there are no further details as to what these constraints are.</p> <p>Addressing issues raised in the assessment document.</p> <p>Impact upon character in this edge of settlement location I refer back to my previous comments in last year’s consultation which show the location is suitable.</p> <p>“With regard whether it is an appropriate location I would reference the Landscape and Visual Statement (LVS) that was completed as part of the 2020 planning application. “The wider field is very enclosed to the eastern and southern boundaries, with mature wooded copses and hedgerows restricting views inwards and outwards in these directions [our emphasis]. Views will be available through the secondary access on Priory Road and the new residential units will be glimpsed by primarily road users and some walkers. This will be become more restricted over time as the tree planting matures. There will be an increased experience of the Park from the new units but for a very limited timeframe and will not detract from the approach to the village.</p> <p>From the north, the users of the PROWs and the recreation ground will glimpse views of the roofscape of a limited number of the additional units in the field. However, these units will be experienced in the context of the existing Park. The units are not located along the northern boundary and will not appear as an alien or incongruous feature in this location” The LVS concludes “will not appear as an encroachment into the countryside or change the character of the immediate landscape and setting of the village”.</p> <p>In addition and in assessing potential landscape impacts generally, I also refer to a recent Planning Inspector Report from 2021 “APP / R2520 / W / 21 / 3276672” stating</p> <p>24. ...I agree with the appellant that the field has a feeling of enclosure and protection and the focus is inwards rather than out to the countryside. 26. Taken together the low height of the park homes, their location largely away from the site boundaries, and the significant existing landscaping would allow the park homes to be assimilated into their surroundings over a relatively short period. This would be achieved without significant harm to the character and appearance of the settlement, surrounding countryside or setting of the settlement and without detriment to the shape and form of Ruskington in accordance with the definition of an ‘appropriate location’ in Policy LP2.</p>	NK/RUSK/002 added to the allocated sites.	Yes	No

								<p>28. Nevertheless, whilst I accept that the appeal site is an appropriate location as defined in Policy LP2 of the CLLP.....</p> <p>32. The absence of harm in relation to residential amenity, parking and highway safety, landscaping, ecology, and flood risk is a neutral matter in this appeal</p> <p>I would submit that the comments of the appointed Inspector in 2021, together with the 2020 Landscape and Visual Assessment (LVA) each provide material guidance and a positive conclusion to demonstrate that my proposed allocation will not be visually intrusive and will not raise any adverse landscape impacts.</p> <p>I struggle to see how the other locations around Ruskington would cause less impact on the character and surrounding countryside of Ruskington as they are surrounded by open fields. My proposed allocation is more acceptable in comparison.</p> <p>Highways</p> <p>The revised assessment has not been updated for information supplied re: access for both vehicular and pedestrian. Per previous comments.</p> <ul style="list-style-type: none"> • “I also note Highways did not object to either the planning applications in 2017 or 2020. o Vehicular access to the land can be either the southern boundary as per the 2017 application or through land owned by us to the west of the proposed land. Our proposals for the land would be an extension of the current residential park home site which limits cars to one per home and our current experience is only 66% of homes actually have a vehicle. o Pedestrian access can again be either via the southern boundary, the land through the eastern side or alternatively the bridal path on the northern boundary.” <p>For clarity the access to the land for vehicular and pedestrian can be made from the current two entrances to The Orchards Park near the Railway Bridge.</p> <p>The comment referenced for Highways will refer to Priory Road near the fishing lakes. Have the Central Planning team checked with Highways based on my previous comments and the actual location?</p> <p>I would strongly argue that my original submission has not been properly considered in highway terms and the option to provide access through the existing mobile home park (i.e. via the approved site entrance) thereby negating the need to provide a new point of access and creating additional site traffic to the south of the site.</p> <p>Provision of Park Homes for Retirement and Semi Retired</p> <p>The intention is to develop the land as an extension to the current Orchards Park which provides accommodation for the over 50’s.</p> <p>Given the Housing Needs Assessment has identified the need for Park Home Developments “4.5.4. The HNA identified that there is a modest increase in need for both houseboat moorings and caravans/park homes” I cannot determine which of the current allocated sites in Central Lincolnshire are being provided to fulfil the park home needs.</p> <p>The over 50s housing demographic that this allocation will serve is a material consideration in terms of the type of (park home) housing that will be provided for the retired and semi-retired market.</p> <p>Allocation of Homes in Ruskington</p> <p>The delivery of homes in Ruskington has reduced since the original plan was adopted in 2017</p> <ul style="list-style-type: none"> • Per Central Lincolnshire Five Year Land Supply Report 2020 stated that “CL1892 South of Winchelsea Road, Ruskington for 76 homes Site no longer available for development.” • This was then replaced by NK/RUSK/008 Land off Leasingham Lane, south of Moor Park, 			
--	--	--	--	--	--	--	--	---	--	--	--

									<p>Ruskington, for 56 homes but this has now been withdrawn in the current proposed plan due to Concerns raised by LCC Highways as to access. Unknown ability to deliver the site.</p> <p>No further sites have been allocated to compensate, have Ruskington needs reduced?</p> <p>Summary and Conclusion The proposed allocation on land to the east of The Orchards mobile home park presents a very sustainable location for housing as there is quick and convenient access to public transport (train and bus routes) with shops and local services all within walking distance of the site. This is demonstrated via the existing pattern of use by the current residents of The Orchards.</p> <p>By initially rejecting this proposed housing allocation, the Local Planning Authority did not give sufficient weight to the option to provide an alternative point of access to this land through the existing developed park home estate, by utilising the current site entrance. This option is a material consideration and provides a more beneficial position than by having to create a new entrance/access to the south.</p> <p>Furthermore, in rejecting my original submission the LPA has not actually clarified what the “constraints” associated with this site actually were.</p> <p>In terms of potential landscape impact the, LVA and the comments of the Inspector has recently as 2021 confirm that this land does not, in fact, raise any adverse visual impact and that it is acceptable in terms of its setting on the surrounding landscape. On a similar basis the land in question lies outside the define flood risk zone.</p> <p>In light of this, there are no apparent “constraints” in having regard to highway and access, landscape and visual impact or flood risk that would now justify the rejection of this site.</p> <p>These various land use issues are clearly supportive and weigh in favour of my proposed housing allocation. The acceptability of the land in these terms provides more than enough justification for its inclusion.</p> <p>In view the above, I would strongly submit that this housing allocation should be accepted. I am happy to provide any more information or clarification where required.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

Cllr Angela White

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101916	S80; General								<p>The comments choice online is binary: is it sound? Is it legally compliant?</p> <p>I do not have the expertise to make this judgement.</p> <p>However, there are several comments I would like to make:-</p> <p>The meetings of the Central Lincolnshire Joint Strategic Planning Committee were only advertised on the North Kesteven District Council webpage.</p> <p>I made this point to West Lindsey officers and the notice of meetings did not change.</p> <p>Even when a meeting took place in the Chamber of Lincolnshire County Council, that meeting was not on the calendar of meetings on the Lincolnshire County Council webpage.</p> <p>West Lindsey had representation from three councillors and their position was to represent West Lindsey, briefed by West Lindsey Planning Officers.</p> <p>The two occasions, of which I am aware, when there was any discussion in committee, were on July 29, 2021 and May 7, 2022. This was at the meetings of the Prosperous Communities Committee.</p>			No

								<p>As we were involved in the review of the 2016 Nettleham Neighbourhood Plan, we were probably more aware of the local plan review. Councillor John Evans, Chair of Nettleham Parish Council, was the only village representative to speak at the July 29, 2021 meeting. There is a reference to this in the report to the May 7, 2022 meeting:-</p> <p>3. Specific Comments and issues raised by Prosperous Communities Committee in July 2021 Housing Allocations in villages</p> <p>3.1. Following an address to committee by Councillor Evans of Nettleham Parish Council on allocations in the Lincoln fringe, there was support amongst Committee Members on the comments made, with particularly protecting the character of the villages and focusing on quality development.</p> <p>This is what is reported in the minutes of the July 29, 2021 meeting:-</p> <p>There was support amongst Committee Members for the comments from Councillor Evans during the public participations item regarding the allocation of new builds in rural locations. Members felt that it was important to protect Lincolnshire villages and avoid a creeping effect of over-development that would likely lead to loss of character across the district. It was suggested that the quality of development should be prioritised over quantity, and that villages should have a greater say. It was also felt that the impact of Neighbourhood Plans was in jeopardy and it was important for communities to maintain influence over their localities. Nettleham had asked for a planning officer to come to the village to discuss the issues raised in the review of the local plan. But, it had been decided that there would be no direct contact, partly because of the Covid situation, but also on the grounds that it would be too onerous to visit every part of the district.</p> <p>However, Councillor Evans and I did have an online discussion with an officer following the July 2021 meeting of the Prosperous Communities Committee.</p> <p>In the review of the Nettleham Neighbourhood Plan, there was a public meeting on July 27, 2021, following three open days in June 2021. So the community had the opportunity to say how they wanted the village to develop. At this stage, we asked where they thought future development should be. A member of the Review Committee had calculated walking distances of several possible sites, including those proposed by the Central Lincolnshire Joint Strategic Planning Committee.</p> <p>In June 2021, comments were submitted for the Regulation 18 Consultation on behalf of the Parish Council and by some residents. I also made some comments.</p> <p>There were no printed responses to these comments as far as I am aware.</p> <p>So, although we have done everything we could to participate and inform our community, it doesn't seem to have made any difference.</p> <p>New sites have been allocated: two of which in part had been refused on appeal, one as recently as April 2022. The Neighbourhood Plan has no influence in this. We are now limited to Design Codes.</p> <p>So, the power promised in the 2011 Localism Act to 'facilitate the devolution of decision making power from central government control to individuals and communities' has been weakened. This does not surprise me, as it was foreseeable that eventually the government would require more control.</p> <p>We had more properties being built in Nettleham than was expected of the village in the 2017 Central Lincolnshire Local Plan and yet we are allocated 175 more. The Plan is until 2040, but these properties could be built before 2030.</p> <p>There will be increased pressure on the Medical Centre. The shortage of GPs will not be solved in the short-term. There will be pressure on secondary school places. 1.1.3.. infrastructure provided at the same time as new homes, repeated again in Vision on page 11 and 1.5.2. I see no evidence how that will happen.</p> <p>The future reliance on bus services is over-optimistic. At a recent meeting of the Lincoln Transport Strategy Board a councillor complained about the unreliability of the buses, causing people to be late to work and resorting to taxis.</p> <p>Buses do not go directly to where many of the rural poor work at the times of their shifts.</p>			
--	--	--	--	--	--	--	--	--	--	--	--

									<p>There is no provision for pedestrians and cyclists to cross the A46 at the Wragby Road, Nettleham Road and Riseholme Road roundabouts.</p> <p>Whilst the fringe villages have more houses, there is very little development in small villages. At a time when more people are working from home, the most important factor to prevent car travel is internet connection. When I asked why that is not being addressed in this review, I was informed that this is being considered by a separate organisation.</p> <p>The position of development in the smallest settlements is dependent on the definition of hamlets. Policy S1: The Spatial Strategy and Settlement Hierarchy: 7: Hamlets.</p> <p>..dwellings clustered together to form a single developed footprint. Such a hamlet must have a dwelling base of at least 15 units (as at April 2018)</p> <p>Lincolnshire villages were typically formed by a collection of small farms. In and around Nettleham, there were originally 12 small farms. The present definition does not recognise that a community exists outside the base of 15 units, In Stainfield, for example, there may not be a base of 15 units, but, when I checked, there were over 40 council tax payers registered for Stainfield.</p> <p>Personally, I think some of the premises behind the Settlement Hierarchy policy are incorrect and others will soon be out of date with our way of life.</p> <p>If we are asking people to be self-sustainable why are many of these decisions being based on no-one being self- sustainable? Rudies Roots at Nettleham does not need any outside energy provider.</p> <p>The cost of fuel may reduce car usage. A sure way to remove traffic from the roads would be free bus transport for all school children. You can see the difference in holiday times. But that would mean extra funding.</p> <p>So, in a way to sum it up I think there is a feeling of disenfranchisement and not being heard. The fringe villages are providing more than their fair share of development and it will impact on the choices and quality of life of all residents.</p> <p>I also refer you to my comments for the Regulation 18 Consultation.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

Margaret Wilson

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100527	S80								<p>I would like to see the designation WL/WELT/008A permanently removed from future development sites, on the draft plan for West Lindsey, City of Lincoln and North Kesteven. Building on this site would destroy more wildlife habitat, increase carbon emission and overload, already stretched, health care and educational services in the village of Welton. However, most worrying to me, is the road aspect on Eastfield Lane. I have lived beside this road for 44 years and have seen the number of cars and speed of the vehicles increase, particularly over the last few years. The development on Eastfield Lane would further increase the size, number and speed of vehicles. There have been no significant improvements either to the road or to the pavements (where there are any). As the name suggests this is a LANE, which is not suitable for more traffic!</p>			No

T and Dr H Wordley

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103686	S1	Yes	Yes	Yes	No	No	No	Yes	[Representation summarised due to length. See attachment for full representation]	[Representation summarised due to	Yes	Yes

									<p>The land that this Representation is subject to is south of Fen Road, Heighington which the client has represented throughout the Local Plan Review process. Please find enclosed to this letter copies of the previous submission and a plan of the land.</p> <p>Site Details</p> <ul style="list-style-type: none">· Site Address Land to the south of Fen Road, Heighington· Parish Heighington· Ward Heighington & Washingborough· District North Kesteven· Hierarchy Large Village· Land Type Greenfield· Site Area (ha) 2.23· Potential Capacity Approximately 60 dwellings <p>The landowner considers that the Local Plan is positively prepared and compliant with the Duty to Co-Operate However, the landowner considers that the Local Plan is not justified, effective or consistent with national policy.</p> <p>The reasonings as to why the landowner considers The Plan not to be Justified, Effective or consistent with National Policy are explained in the paragraphs below -</p> <p>Justified</p> <p>Paragraph 35 of the NPPF (2021) provides guidance on the ‘soundness’ of examining Local Plans. To be ‘Justified’, plans are sound it they are an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>The landowner considers that the lack of allocation is not justified for the following reasons:-</p> <ul style="list-style-type: none">· Policy S1 of the Proposed Submission Draft identifies 20 Large Villages within the plan. Heighington is the only Large Village not to have any allocation.· The Reg 19 Sequential Test HOU006 document states ‘Other Sites Preferable’ in the comment section for reasons why the site isn’t allocated. However, no other sites within Heighington have been allocated. <p>Paragraph 35 of the NPPF (2021) provides guidance on the ‘soundness’ of examining Local Plans. To be ‘Effective’, plans are sound if they are deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>The landowner considers that the plan fails to be effective over the plan period due to lack of consistent allocation and controlled growth.</p> <p>On a localised scale, Heighington does not have any growth via allocations and when considering the supporting Sequential Test Assessment, it is considered difficult for Heighington to provide sufficient growth via only non-allocated sites. Data shows that in the other 19 Large Villages, the median average number of dwellings allocated within each village is 371 (median selected due to anomalies of Heckington and Witham Saint Hughes). If Heighington was to reach 371 dwellings over the plan period to match the same average growth-rate as the other villages,</p>	<p>length. See attachment for full representation]</p> <p>Considering the points made in Question 4, the landowner considers that changes are required to the Local Plan in the form of identifying and promoting further additional allocations for residential development in Heighington. Specifically, the landowner considers that the following parcel of land in figure 2 below, to the south of Fen Road, Heighington should be included as an allocation:</p> <p>The changes that the landowner would like to see are:</p> <ul style="list-style-type: none">· Inclusion of residential allocation at Heighington;· Inclusion of the land at Fen Road, Heighington allocated (NK/HEI/006) <p>The allocation of this land is considered to have the following benefits:</p> <ul style="list-style-type: none">· Provides Heighington with at least one allocation, which is needed to help sustain the village· This site is available and deliverable for residential development and has the capability and capacity to accommodate affordable housing.· There is new build to the west and north of the site and therefore further new build development will be in-keeping with the recent development· Sequentially, as proven by the accompanying Sequential Test		
--	--	--	--	--	--	--	--	--	--	---	--	--

								<p>it would require approx. 37 speculative piecemeal applications to have any possibility of reaching this figure. The effectiveness of the deliverability without allocation is considered to be remiss of The Plan, especially given that Policy S1 specifically states in regard to Large Villages ‘To maintain and enhance their role as large villages which provide housing, employment, retail and key services and facilities for the local area, the following settlements will be a focus for accommodating an appropriate level of growth via sites allocated in this plan’.</p> <p>At the forefront of National Policy and the National Planning Policy Framework (2021) is Achieving Sustainable Development and Delivering a sufficient supply of homes. The landowner does consider that The Plan is broadly consistent with National Policy, however the landowner considers that the execution of policies within is not consistent.</p> <p>As detailed within the ‘Justification’ section, the CLLP Policy Team have already recognised Heighington as a sustainable large village. The NPPF requires plans to be prepared with the objective of contribution to the achievement of sustainable development and be prepared positively, in a way that is aspirational but deliverable. It is considered that not allocating any growth to one of the higher tiered settlements in the spatial hierarchy does not promote sustainable growth or development, particularly when there are only 20 Large Villages identified across the CLLP area and especially given that the proposed site is available and has the ability to be delivered.</p> <p>As the village does not have any current allocations, it would require windfall sites to maintain supply and has a distinct lack of available and spatially preferable development land, it is considered that it is only through new allocations that development can be delivered to help provide suitable controlled sustainable growth for the village.</p> <p>There is some sympathy for the CLLP Policy Team in that there are limited locations within which to allocate growth within Heighington. The attached Sequential Test reviews this difficult situation and identifies the proposal site as an appropriate, sustainable and allocatable location for development.</p>	Assessment, this site is the most preferred location within Heighington · Is considered to be an appropriate location under the present local plan Policy LP2.			
1103687	S80	Yes	Yes	Yes	No	No	No	Yes	[Representation summarised due to length. See attachment for full representation] The land that this Representation is subject to is south of Fen Road, Heighington which the client has represented throughout the Local Plan Review process. Please find enclosed to this letter copies of the previous submission and a plan of the land. Site Details · Site Address Land to the south of Fen Road, Heighington · Parish Heighington · Ward Heighington & Washingborough · District North Kesteven · Hierarchy Large Village · Land Type Greenfield · Site Area (ha) 2.23 · Potential Capacity Approximately 60 dwellings The landowner considers that the Local Plan is positively prepared and compliant with the Duty to Co-Operate However, the landowner considers that the Local Plan is not justified, effective or consistent with national policy. The reasonings as to why the landowner considers The Plan not to be Justified, Effective or consistent with National Policy are explained in the paragraphs below - Justified Paragraph 35 of the NPPF (2021) provides guidance on the ‘soundness’ of examining Local Plans. To be ‘Justified’, plans are sound if they are an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. The landowner considers that the lack of allocation is not justified for the following reasons:- · Policy S1 of the Proposed Submission Draft identifies 20 Large Villages within the plan. Heighington is the only Large Village not to have any allocation. ·	[Representation summarised due to length. See attachment for full representation] Considering the points made in Question 4, the landowner considers that changes are required to the Local Plan in the form of identifying and promoting further additional allocations for residential development in Heighington. Specifically, the landowner considers that the following parcel of land in figure 2 below, to the south of Fen Road,	Yes	Yes

									<p>The Reg 19 Sequential Test HOU006 document states ‘Other Sites Preferable’ in the comment section for reasons why the site isn’t allocated. However, no other sites within Heighington have been allocated. Paragraph 35 of the NPPF (2021) provides guidance on the ‘soundness’ of examining Local Plans. To be ‘Effective’, plans are sound if they are deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. The landowner considers that the plan fails to be effective over the plan period due to lack of consistent allocation and controlled growth. On a localised scale, Heighington does not have any growth via allocations and when considering the supporting Sequential Test Assessment, it is considered difficult for Heighington to provide sufficient growth via only non-allocated sites. Data shows that in the other 19 Large Villages, the median average number of dwellings allocated within each village is 371 (median selected due to anomalies of Heckington and Witham Saint Hughes). If Heighington was to reach 371 dwellings over the plan period to match the same average growth-rate as the other villages, it would require approx. 37 speculative piecemeal applications to have any possibility of reaching this figure. The effectiveness of the deliverability without allocation is considered to be remiss of The Plan, especially given that Policy S1 specifically states in regard to Large Villages ‘To maintain and enhance their role as large villages which provide housing, employment, retail and key services and facilities for the local area, the following settlements will be a focus for accommodating an appropriate level of growth via sites allocated in this plan’. At the forefront of National Policy and the National Planning Policy Framework (2021) is Achieving Sustainable Development and Delivering a sufficient supply of homes. The landowner does consider that The Plan is broadly consistent with National Policy, however the landowner considers that the execution of policies within is not consistent. As detailed within the ‘Justification’ section, the CLLP Policy Team have already recognised Heighington as a sustainable large village. The NPPF requires plans to be prepared with the objective of contribution to the achievement of sustainable development and be prepared positively, in a way that is aspirational but deliverable. It is considered that not allocating any growth to one of the higher tiered settlements in the spatial hierarchy does not promote sustainable growth or development, particularly when there are only 20 Large Villages identified across the CLLP area and especially given that the proposed site is available and has the ability to be delivered. As the village does not have any current allocations, it would require windfall sites to maintain supply and has a distinct lack of available and spatially preferable development land, it is considered that it is only through new allocations that development can be delivered to help provide suitable controlled sustainable growth for the village. There is some sympathy for the CLLP Policy Team in that there are limited locations within which to allocate growth within Heighington. The attached Sequential Test reviews this difficult situation and identifies the proposal site as an appropriate, sustainable and allocatable location for development.</p>	<p>Heighington should be included as an allocation: The changes that the landowner would like to see are: · Inclusion of residential allocation at Heighington; · Inclusion of the land at Fen Road, Heighington allocated (NK/HEI/006) The allocation of this land is considered to have the following benefits: · Provides Heighington with at least one allocation, which is needed to help sustain the village · This site is available and deliverable for residential development and has the capability and capacity to accommodate affordable housing. · There is new build to the west and north of the site and therefore further new build development will be in-keeping with the recent development · Sequentially, as proven by the accompanying Sequential Test Assessment, this site is the most preferred location within Heighington · Is considered to be an appropriate location under the present local plan Policy LP2.</p>		
1103688	S80	Yes	Yes	Yes	No	No	No	Yes	<p>[Representation summarised due to length. See attachment for full representation] The land that this Representation is subject to is south of Fen Road, Heighington which the client has represented throughout the Local Plan Review process. Please find enclosed to this letter copies of the previous submission and a plan of the land. Site Details · Site Address Land to the south of Fen Road, Heighington · Parish Heighington · Ward Heighington & Washingborough · District North Kesteven · Hierarchy Large Village · Land Type Greenfield · Site Area (ha) 2.23 · Potential Capacity Approximately 60 dwellings The landowner considers that the Local Plan is positively prepared and compliant with the Duty to Co-Operate However, the landowner considers that the Local Plan is</p>	<p>[Representation summarised due to length. See attachment for full representation] Considering the points made in Question 4, the landowner considers that changes are required to the Local Plan in the form of identifying and</p>	Yes	Yes

								<p>not justified, effective or consistent with national policy. The reasonings as to why the landowner considers The Plan not to be Justified, Effective or consistent with National Policy are explained in the paragraphs below - Justified Paragraph 35 of the NPPF (2021) provides guidance on the ‘soundness’ of examining Local Plans. To be ‘Justified’, plans are sound if they are an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. The landowner considers that the lack of allocation is not justified for the following reasons:-</p> <ul style="list-style-type: none"> · Policy S1 of the Proposed Submission Draft identifies 20 Large Villages within the plan. Heighington is the only Large Village not to have any allocation. · The Reg 19 Sequential Test HOU006 document states ‘Other Sites Preferable’ in the comment section for reasons why the site isn’t allocated. However, no other sites within Heighington have been allocated. Paragraph 35 of the NPPF (2021) provides guidance on the ‘soundness’ of examining Local Plans. To be ‘Effective’, plans are sound if they are deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. The landowner considers that the plan fails to be effective over the plan period due to lack of consistent allocation and controlled growth. On a localised scale, Heighington does not have any growth via allocations and when considering the supporting Sequential Test Assessment, it is considered difficult for Heighington to provide sufficient growth via only non-allocated sites. Data shows that in the other 19 Large Villages, the median average number of dwellings allocated within each village is 371 (median selected due to anomalies of Heckington and Witham Saint Hughes). If Heighington was to reach 371 dwellings over the plan period to match the same average growth-rate as the other villages, it would require approx. 37 speculative piecemeal applications to have any possibility of reaching this figure. The effectiveness of the deliverability without allocation is considered to be remiss of The Plan, especially given that Policy S1 specifically states in regard to Large Villages ‘To maintain and enhance their role as large villages which provide housing, employment, retail and key services and facilities for the local area, the following settlements will be a focus for accommodating an appropriate level of growth via sites allocated in this plan’. At the forefront of National Policy and the National Planning Policy Framework (2021) is Achieving Sustainable Development and Delivering a sufficient supply of homes. The landowner does consider that The Plan is broadly consistent with National Policy, however the landowner considers that the execution of policies within is not consistent. As detailed within the ‘Justification’ section, the CLLP Policy Team have already recognised Heighington as a sustainable large village. The NPPF requires plans to be prepared with the objective of contribution to the achievement of sustainable development and be prepared positively, in a way that is aspirational but deliverable. It is considered that not allocating any growth to one of the higher tiered settlements in the spatial hierarchy does not promote sustainable growth or development, particularly when there are only 20 Large Villages identified across the CLLP area and especially given that the proposed site is available and has the ability to be delivered. As the village does not have any current allocations, it would require windfall sites to maintain supply and has a distinct lack of available and spatially preferable development land, it is considered that it is only through new allocations that development can be delivered to help provide suitable controlled sustainable growth for the village. There is some sympathy for the CLLP Policy Team in that there are limited locations within which to allocate growth within Heighington. The attached Sequential Test reviews this difficult situation and identifies the proposal site as an appropriate, sustainable and allocatable location for development. 	<p>promoting further additional allocations for residential development in Heighington. Specifically, the landowner considers that the following parcel of land in figure 2 below, to the south of Fen Road, Heighington should be included as an allocation: The changes that the landowner would like to see are:</p> <ul style="list-style-type: none"> · Inclusion of residential allocation at Heighington; · Inclusion of the land at Fen Road, Heighington allocated (NK/HEI/006) The allocation of this land is considered to have the following benefits: · Provides Heighington with at least one allocation, which is needed to help sustain the village · This site is available and deliverable for residential development and has the capability and capacity to accommodate affordable housing. · There is new build to the west and north of the site and therefore further new build development will be in-keeping with the recent development · Sequentially, as proven by the accompanying Sequential Test Assessment, this site is the most preferred location within Heighington · Is considered to be an appropriate location under the present local plan Policy LP2. 		
--	--	--	--	--	--	--	--	---	---	--	--

Grace Wright

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100102	S80								<p>Please note my objections to this proposal:</p> <p>Development at this site would destroy the countryside and the wildlife habitat. Would swamp Eastfield Lane with excessive traffic. Would boost carbon emissions. Would severely increase air pollution and noise. Would increase road accidents. Would completely engulf our already oversubscribed local healthcare and education services - these are already floundering with the number new homes already built and approved.</p> <p>We have lived in this village since 1984 and in this time Welton has grown out of all proportion. The Doctors' Surgery can't cope with an influx of any more new Patients, the Schools are bulging at the seams so much so that Villagers struggle to get places for their children, its impossible to get an appointment at the Dentist - and the increase in traffic is horrendous and downright dangerous. Coming into the Village down Cliff Road - it's like a racetrack!! The 30mph sign is totally disregarded, nothing is done to enforce the speed limit, and it's going to take a nasty accident before someone sits up and takes notice. Add to this an increased egress on Eastfield Lane if these houses go ahead - someone, somewhere in authority needs to put greed aside and consider the lives of the Villagers. The last thing Welton needs is another 450 houses - somewhere in the region of another 1800 residents!! Enough is enough - we live in the country and should be surrounded by green fields - not building sites with Companies cramming as many dwellings onto a parcel of land as they can manage.</p>			No

Jennifer Wright

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100523	S80								<p>I have recently been made aware that an area north of Eastfield lane is to be considered for further housing development.</p> <p>Firstly I cannot believe that this has not been communicated widely to the people of Welton as this really is a totally unsuitable site for development.</p> <p>Not only is it one of the few remaining areas of the village where the wildlife can live along side us but the roads leading to the site are narrow and I can only describe this as "an accident waiting to happen" should this development go ahead.</p> <p>I would not like to be the person responsible for adding this to the village plan.</p>			No

Richard Wright

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				

1100061	S77								<p>Thank you for the opportunity to review this plan. I am a part-landowner of an area identified in this plan: Reference NK/WAD/004A , Land South of Station Road, Waddington, Lowfields. Land Registry Title LL283731</p> <p>We had not previously been approached by the planning team nor did we submit this area for consideration but we are content for our land to be included in these local plans. Further to discussions with my co-owners of this land I confirm that we support your proposals for a new residential housing site allocation which includes our land.</p>			No
---------	-----	--	--	--	--	--	--	--	--	--	--	----

Organisations

Anglian Water Services Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101974	General								<p>Recent levels of housing growth (1642 homes a year) mean that Central Lincolnshire (Lincoln, North Kesteven and West Lindsey) has the fourth highest level of growth across the 58 Councils and four joint planning areas Anglian Water serves.</p> <p>Anglian Water notes that in drawing up the Plan, utilities including water supply and water recycling were considered at stage 2 – Broad Location – as part of the council’s Suitability assessment. Anglian Water provides both water and water recycling services to all Central Lincolnshire apart from the Gainsborough area which has its sewerage provided by Severn Trent.</p> <p>Anglian Water has reviewed the principal draft Local Plan documents and has the following detailed comments. We consider that the Plan requires no major amendments. Overall, our observation is that the plan whilst considering embedded carbon in houses and buildings does not take a quantitative approach to assessing whether the spatial distribution and quantum of growth minimises the need for new infrastructure. The NPPF requires consideration of climate change and infrastructure i.e., paragraphs 8 and 11, for example, although currently there is not stipulation that this should be a quantitative assessment. If such an assessment were to be undertaken following the sustainability hierarchy for the spatial options and infrastructure, then the Plan would have more justification and be evidence based. This assessment would also make the Plan more effective in guiding and monitoring growth over the Plan period.</p>			No
1104175	Intro; Context, Vision; Objectives								<p>1. Introduction</p> <p>Page 7. Anglian Water welcomes the Plan’s long-term approach in planning for sustainable growth in the three Council areas to 2040. Anglian Water is currently drafting plans for water resources and for drainage & water recycling for 2025 to 2030 which will also set out long term plans up to 2050. The further it has progressed through Examination and then adoption the greater weight that we and Ofwat as our regulator can place on the quantum and location of growth in agreeing water investment between 2025 and 2030. The likely final date when the certainty of growth in the Plan may be factored into water sector investment Plans is September 2023.</p> <p>Page 8. 1.2.6. Anglian Water recognises that it costs more per household to serve the rural locations of Central Lincolnshire including the provision and operation of water infrastructure. The decision to locate growth in more rural locations therefore has a cost implication for</p>			No

								<p>services including utility providers. Those costs will increasingly include the carbon costs of building and operating new infrastructure when headroom or environmental capacity in those rural locations require upgraded network capacity and/ or new distribution and treatment capacity.</p> <p>Page 9. 1.2.13. Anglian Water welcomes the increased focus on water in the Plan. A new issue which will impact on the pressure of water resources is the reduction in groundwater abstraction as we seek to respond to changes in the Environment Agency's approach to abstraction licences. This may for example reduce the capacity for growth in Central Lincolnshire Water Resource Zone (CL WRZ). Anglian Water is working with the Environment Agency to consider the future position on time limited licences at Kirkby La Thorpe and Welton/ Spridlington. The CL WRZ covers the majority of three Council's area except for the northeast of West Lindsey and south of North Kesteven.</p> <p>Page 11.1.4.1. Anglian Water notes that some 29,150 new homes are planned between 2018 and 2040. This indicates that growth will provide 1,325 new homes year. This is above the average housing delivery test figure for the past three years of 937 homes a year and below the build out delivery rate of 1,642 homes a year over the past three years. We welcome the statement in the Vision that this growth will not be at a cost to the environment. It is not evident however that growth is being directed to locations which have existing water infrastructure or environmental capacity. Growth which requires new infrastructure rather than existing capacity will make it more difficult for the Central Lincolnshire to move towards being a net-zero region. Growth at rates above the planned levels or in locations which were not due to come forward to later in the Plan period make it more difficult for Anglian Water to secure agreement from Ofwat and then roll out investment to meet the needs of new communities and businesses.</p> <p>Page 13. 1.5.2. We welcome the inclusion of objectives including:</p> <p>1. ...infrastructure to support sustainable communities</p> <p>4. ...measurable net gains in biodiversity and establishing nature recovery networks and ... green and blue spaces that are multifunctional</p> <p>7. Natural Resources- Water: To protect and enhance water resources and their quality</p> <p>10. Waste: To minimise the amount of waste generated across all sectors and increase the re-use, recycling, and recovery rates of waste materials</p> <p>11. Climate Change Effects and Energy</p> <p>12. Climate Change Adaptation and Flood Risk</p>			
1104176	S1							<p>Policy S1.</p> <p>Anglian Water considers the focus of growth on settlements at the top of the settlement hierarchy enables the potential delivery of supporting infrastructure which follows the sustainability hierarchy and could minimise capital (embedded) and operational carbon. We welcome the inclusion of utility infrastructure and renewable energy as an acceptable use in principle in the countryside. This could helpfully be referenced in policy S5 to ensure consistency.</p>			No
1104208	S1; S2; S76; S77; S78; S79; S80; S81; S82							<p>Further to our comments above on the carbon and environmental capacity assessment of growth options, Anglian Water has considered the water recycling capacity for allocations providing for 100 or more homes during the Plan period. The table below assigns a RAG assessment for those locations based on treatment capacity headroom at the WRC which would be likely to serve allocations/ level of development in the Plan in those growth locations. Planned growth has been averaged out over the 22 years of the Plan. Settlements with a RAG assessment of red will require additional treatment capacity in the short term (2022-2030, AMP7 and AMP8). Settlements at Amber require additional capacity in the remainder of the Plan period (2030-2040, AMP9 and AMP10). Settlements assessed as green have adequate permitted flow capacity to accommodate planned growth. Green settlements may be able to</p>			Yes

									support provide higher growth levels at subsequent Plan reviews or provide alternative lower carbon treatment capacity for nearby growth locations. See attachment for RAG table.			
1104177	S2								Policy S2. The focus on three towns and their hinterland villages with the remainder of homes (some 12% elsewhere) enables Anglian Water to plan for growth and investment in fewer locations.			No
1104178	S4								Policy S4. With reference to the list of large, medium, and small villages growth in those locations would necessarily be planned for by Anglian Water when those sites come forward.			No
1104179	S5								Policy S5. Part E of the policy should include utilities as an example of non- residential development which satisfies the criteria in section a).			No
1104181	Climate change								Page 27. 3.1.5. We wholeheartedly support local authorities which focus on energy and climate change. It is good to see the Councils applying numbers to the challenge and setting a budget for emissions. The location of development has a significant part to play in how much carbon is generated to enable its construction including supporting utility infrastructure. Anglian Water has pledged to be net zero by 2030. To do this we have been a sector leader in reducing operational carbon. The water sector as whole in the UK contributes 1.1% towards UK emissions. We now need to consider how we reduce the 0.4% parts of UK emissions from water sector embodied (capital) carbon. Our target to reduce Anglian Water's project's carbon by 70% is ambitious although not part of our net zero pledge. We are now looking at the final part of the carbon equation and helping Councils to steer growth towards locations which have existing water infrastructure and environmental capacity. We recognise that Local Plans allocate sites which provide for a 1% increase in housing stock each year. Planned growth in Central Lincolnshire exceeds that increase in housing stock so it is imperative that embedded carbon is minimised through reducing the need to build new infrastructure to support that growth. We recommend therefore that the precursor to the five themes in paragraph 3.1.9 should be: • The need to maximise the use of existing infrastructure capacity and efficiently manage demand to minimise the resource use and generate carbon in building new infrastructure			No
1104184	S6; S8								Anglian Water supports the principles for efficient buildings. We would welcome clarification that applications for minor buildings/structures such as kiosks will be treated proportionately in terms of validation and consideration of those proposals in the context of Policy S6 Design Principles for Efficient Buildings and S8 Reducing Energy Consumption for Non-residential buildings. Whilst the policy wording does not prevent us agreeing that an exception under the 'Exceptional Basis Clause' is appropriate a clarification would make this clearer and reduce costs and time in the determination of applications. We would welcome further discussion on how the policy works and further guidance as utility infrastructure does not use BREEAM etc. For example, to work effectively thresholds are needed for Energy Statements so that minor developments can set out their minimised impacts (including as part of net zero pledges and on-site renewables generation). These can then be more easily reported as part of the Councils' overall net zero objectives and monitoring focus on higher carbon development.			No
1104186	S11								Embodied Carbon. The Plan is one of the first we have seen which considers embodied carbon. Anglian Water has been following this approach for about a decade in minimising embodied (capital) carbon through design and materials from day one. We now have a level of project maturity on embodied (capital) carbon and so will be well placed to provide the required information in support of Anglian Water's applications.			No
1104190	S12; S20								3.2.28. Water Efficiency. We welcome the support for reducing potable water use to reduce carbon emissions associated with water treatment, supply, and water recycling. Policy S12. Water Efficiency and Sustainable Water Management. Research by Artesia indicates			No

									that increased awareness of water use through smart meters, more efficient white goods and community rainwater harvesting for use in toilet flushing would enable consumption to be reduced to 85l/p/d. Anglian Water supports the aspirations of policy S12 to seek to encourage developers to help new residents reduce the carbon impacts of water use. Rainwater harvesting and use can also have additional benefits through surface water management and blue/ green infrastructure provision. We support the principle that green roofs should be designed into flat roofs when they are not use for renewable energy. The policy will through its implementation need to allow for instances when it is impractical for small areas of flat roofs to be green roofs. There may also be instances when the technical requirements to support a green roof would mean the roof through its whole life cycle generates less carbon if it had a lower specification and was not a green roof. This flexibility point may be one for Policy S20 Resilient and Adaptable design.			
1104192	S14								Renewable Energy Generation. Anglian Water is rolling out a programme of renewable energy projects at our facilities as part of the delivery of our net zero by 2030 commitment. We support the move to support onshore wind generation and consider that existing developed land or sites provide a low carbon location for turbines which use existing hard and electricity network infrastructure which can reduce the land take required for renewables. Anglian Water agrees (3.3.4) that targets for generation should not be seen as a cap for the Plan period. We consider that Map 2 provides an evidence-based approach to identifying potential areas for medium to large scale wind turbines.			No
1104193	S16								Policy S16: Wider Energy Infrastructure. Anglian Water supports the policy and considers that energy storage and other smaller scale energy generation facilities such as anaerobic digestion can play an important part in providing local energy resilience including providing power for essential infrastructure. This climate change adaptation and resilience point may be one for Policy S20 Resilient and Adaptable design.			No
1104195	S21								Page 52. Flood risk. Anglian Water works with other organisations including Lincolnshire County Council which as the lead local flood authority is responsible for managing flood situations. We work to stop flooding from our sewers and our focus is on reducing and removing surface water from entering the public sewer network. The use of SuDS on all new developments reduces the risk of sewer flooding. We also have a programme of investment to reduce the instances of sewer flooding in existing developed areas. Anglian Water supports the use of SuDS (Policy S21) to make all surface water and thereby remove the need for its management via the public sewer network. Anglian Water agrees with the Environment Agency and national Planning Policy Guidance (Paragraph: 020 Reference ID: 34-020-201403060) that development should be planned so that it is able to connect to the public sewer network. Page 53. Anglian Water proposes above that development should first be located to utilise existing infrastructure capacity to reduce the embodied (capital) carbon in constructing new infrastructure. We agree that development should not lead to a deterioration in water quality in the wider environment and we support the objective in the Environment Act that society should improve water quality through reducing all sources of pollution including urban run-off and point sources of pollution from agriculture. Page 54. 3.7.9. As we improve the environmental performance of customer's water recycling network there are locations where the technical limits of Water Recycling Centres WRC) are reached. Development in these locations would require investment in new capacity – including nature-based solutions – before that housing and industry could be occupied and connected to the sewer network. Anglian Water's five-year investment plans are currently being developed and would be approved by the Ofwat in or about September 2023. Developers pay for their connection to the sewer network and customers through their bills following Ofwat agreement fund new WRC capacity.			No

									<p>We plan investment based on population. The forecast population is derived from a review of the adopted local plan cross referenced against accepted planning applications. Where we are confident in the local plan (adopted/examination stage) we take the full growth forecast for the end of the planning period and adjust the shorter term based on knowledge from planning applications. Beyond the planning period Anglian Water use the trend. Where the local plan is not adopted, we take known planning applications and follow a trend line for growth.</p> <p>To unpack this Anglian Water wanted as part of the previous regulatory period to plan for and secure agreement to invest to provide capacity to meet (and manage) demand at the levels of growth set out in all published plans. This was not agreed by Ofwat and so we have taken the above approach that sites will be factored in when the Local Plan is adopted. When major sites seek planning approval then these will be considered and given more weight/ certainty in Anglian Water's updated models. Sites with full planning permission will be given full weight in our modelling and considered as part of an annual review of the phasing of investment plans. The total amount of funding available for investment does not change in the five-year (AMP (Asset Management Plan)) period and so a decision to bring forward funding at WRC is likely to push back works at another WRC.</p>			
1104196	S28								<p>Employment. The diverse levels of water use and water recycling from distinct types of business mean that Anglian Water forecast the need for investment based on econometric growth in GVA and population. This uses regression modelling of current consumption per sector. The water supply and water recycling networks and treatment capacity can though only be planned in detail when employment and retail uses are known and come forward for either planning permission or increased levels of service. Since 2017 businesses have in the main been able to choose their water and water recycling supplier. When new development requires network or treatment capacity improvements the business will be charged for that.</p>			No
1104197	S45								<p>Page 98. Transport and Infrastructure. The funding for water infrastructure is split between investment to support growth which is agreed by Ofwat and comes from customer bills and developer funding to enable new homes and business to connect to the network. Anglian Water notes that the infrastructure required to support the Plan growth is considered in the 2020 Infrastructure Delivery Plan and Whole Plan Viability Study. Water and water recycling are discussed under that Study's Utilities section.</p> <p>Infrastructure Delivery Plan and Whole Plan Viability Study comments Page 18. 3.2 Utilities. Anglian Water notes the observation regarding the timescales of utility company investment plans. Rather than this being an engagement issue though it is more a question of alignment. As set out above we plan for growth through five-year plans known as AMPs (Asset Management Plans). Anglian Water is in AMP7 which runs from 2020 to 2025. We are now developing plans for AMP8 (2025-2030) which all Councils are consulted on. The first round of consultation will be between June and October this year (2022) for the two plans – one on water recycling and one covering water resources and supply.</p> <p>Page 21. 3.2.3 Water. The plans referred to from 2018 and 2019 will be superseded by the two new plans. The final plans are expected to be agreed by Ofwat in late 2023 and the new investment that they cover commenced from 2025. For water resources the key issue for Central Lincolnshire remains the water supply- demand balance gap in 2050. The deficit has increased since the last plan due to climate change, reductions in supply from groundwater and continued housing and population growth. The gap in supply will be addressed through demand reductions, continued reductions in leakage and increased capacity to move water between Water Resource Zones.</p> <p>Increased supply is planned by providing two new strategic reservoirs – one in south Lincolnshire and one in the Fens. The approach is to transfer water from rivers in times of heavy rain – which are forecast to increase due to climate change – and store this in the two</p>			No

									<p>reservoirs for use in drier periods. The reservoirs also offer the ability to improve flood resilience and support nature conservation. The Water Resources East regional plan consulted on in January 2022 set out the strategic options for supply. Ofwat will decide on the next stage in the investment plans for the two reservoirs in October 2022.</p> <p>Page 36. Anglian Water will be consulting on its two new plans in 2022 and would welcome comments from the Council's on whether the planned investment supports the growth set out in the draft Central Lincolnshire Plan. As identified above current growth levels and locations are factored into the two Anglian Water plans. The scale and duration of growth planned for the Sustainable Urban Extensions means that these are more easily planned for, and investment agreed by Ofwat. Disparate growth which has a less clear timescale for development will require developers to engage with Anglian Water at an early stage to ensure that in AMP changes to investment can be put in place (if required) alongside the connections to networks that developers fund.</p> <p>Appendix A. Page 6. As set out above the two existing Anglian Water plans from 2018 and 2019 will be superseded by a new Water Resources Management Plan (WRMP) and a Drainage and Waste Water Management Plan (DWMP). We would ask that the investment plans set out in Appendix A are updated with information in the new WRMP and DWMP.</p>			
1104198	S59								<p>Natural environment. Anglian Water welcomes the inclusion of SuDs and flood storage areas in the range of green and blue infrastructure given their ability to reduce the environmental costs of managing surface water and wellbeing/ place making benefits. We support Policy S59 Green and Blue Infrastructure and recognise that unlike water supply and waste water, developers may be required to pay developer contributions to the Councils to enable the effective and sustainable provision and management of surface water. Those developer contributions reduce the cost to the environment and customers of managing surface water if it were instead channelled to the public sewer network.</p>			No
1104199	S60								<p>Designated sites. We note the absence of Natura 2000 sites in Central Lincolnshire and would therefore observe that development is unlikely to be constrained by nutrient neutrality or water neutrality directions by Natural England. Anglian Water supports Policy S60 Protecting Biodiversity.</p>			No
1104200	S61								<p>Policy S61. Biodiversity Opportunity and Delivering Measurable Net Gains. Anglian Water committed in 2019 to deliver Biodiversity Net Gain as part of its construction and land management activities will contribute to nature's recovery across the region. Anglian Water has a net gain policy to offset at least 110% of the biodiversity value lost. Anglian Water supports Policy S61 Biodiversity and considers that it is imperative that emerging national guidance provides for the continued biodiversity gain to be managed to enable a landscape scale recovery of nature through enhancements supported by new development.</p>			No
1104201	S62								<p>Policy S62. Areas of Outstanding Natural Beauty and Areas of Great Landscape Value looks to be in line with the NPPF and is supported by Anglian Water.</p>			No
1104202	S63								<p>Policy S63 Green Wedges is important for Anglian Water given the location of the Canwick WRC and renewable energy and sustainability plans for the site. Part b) allows for utility development in a Green Wedge. We welcome this as renewable energy supports the 'green lung' objectives of the policy and part b) will support associated renewable energy generation when an application is put forward to the County Council.</p>			No
1104203	S66								<p>Policy S66 Trees and Woodlands. Anglian Water supports tree planting although we would observe that this is an issue on some of our operational sites where we may need to remove trees to facilitate operational development to support growth or enable environmental improvements. As some of our sites are constrained space for replanting can be an issue. We may need to provide off site replacement tree planting. This may also be required to ensure constrained sites have sufficient area to support future housing growth rather than having to build new capacity elsewhere or pump water or waste water further which has embedded or operational carbon impacts.</p>			No

1104204	S67								Policy S67 Best and Most Versatile Agricultural Land. We consider the policy has sufficient flexibility for Anglian Water to be able to demonstrate the locational need for a water infrastructure development outweighs the loss of farmland.			No
1104205	S68								<p>Sustainable Urban Extensions (SUE). Anglian Water will plan to support the SUE locations through seeking approval for investment in the WRMP and DWMP. We understand that planned growth between 2018 and 2040 is 32,672 homes is as follows:</p> <p>Lincoln (21,113) Homes Timescale (By 2040 unless otherwise stated)</p> <p>Western Growth Corridor 3,200 2040</p> <p>South East Quadrant 3,500 By 2040 (then a further 2,500)</p> <p>North East Quadrant 1,400 2040</p> <p>South West Quadrant 1,300 2040 (then a further 700)</p> <p>Other Lincoln sites 11,713 2018-2040</p> <p>Gainsborough (3,103) (Severn Trent – water recycling)</p> <p>Southern 1,500 2040 (then a further 1,000)</p> <p>Northern 750 2040 (then a further 1,750)</p> <p>Eastern - After 2040</p> <p>Other Gainsborough sites 853</p> <p>Sleaford (3,467)</p> <p>South Quadrant 1,450 2040</p> <p>West Quadrant 900 2040 (then a further 550)</p> <p>Other Sleaford 1,117</p> <p>Elsewhere 4,989</p> <p>Page 170. Table 2 Housing Trajectory. The table indicates that annual growth will increase from 1,637 homes in 21/22 to 2,107 in 2023/24 and then vary as allocate sites including SUE currently without permission come on stream. Over delivery early in the Plan period could reduce annual growth to 867 homes in 2039/40.</p>			No
1104171	S68, S80, S81, SA								<p>Page 20. Natural Resources – Water.</p> <p>Anglian Water welcomes the continued water efficiency standard of 110l/p/d in the plan for new homes and the support for sustainable design measures in Policy S12. It is noted that water quality issues will be a matter for development management so that water bodies are protected under the Water Framework Directive from development. The provision of water infrastructure will in most cases be possible including the provision of additional capacity for manage and recycling waste water. However, some locations and facilities are reaching their technical limits, for example, the Reepham WRC (Water Recycling Centre). At the Reg 18 consultation Anglian Water advised:</p> <p>‘Anglian Water remains committed through our Strategic Direction Statement to ensuring that our activities enhance and do not degrade the natural environment. Anglian Water as a sewerage undertaker has a statutory obligation under the Water Industry Act 1991 to provide wastewater services to our customers. We recognise that the Councils understand that the policy framework including the CLdLP supports these continued services, enables further operational development and associated infrastructure to be carried out whilst also seeking to protect the natural environment.’</p> <p>The Environment Agency’s (EA) Reg 18 submission in summary states regarding Policy S44:</p> <p>‘New development should connect to the main sewerage network except in exceptional cases. Connection should not be made until capacity in the network and at water recycling centres is available to prevent risks to amenity and the water environment. We therefore support the first section of policy S44.</p> <p>Based on experience, we have the following comments on how this works in practice:</p> <p>There are cases where the relevant WRC does not have capacity when a planning application is submitted and there is no clear evidence of utility company plans to provide it. It is unclear what evidence is expected in order to demonstrate that there ‘will be’ sufficient infrastructure capacity, at what stage.</p>			No

									<p>The Infrastructure Delivery Plan illustrates the work you have done on the issue of wastewater recycling centre capacity. Page 53 lists the required improvements you are aware of, with further detail in INF001b IDP (Infrastructure Delivery Plan) Schedule. From annual flow data received from Anglian Water Services, we have identified the following WRCs (Water Recycling Centre) of concern, most of which feature in your IDP – Corringham and Reepham being exceptions.'</p> <p>Anglian Water and the EA are considering WRCs which are at their technical limits. For Reepham we recommend a Statement of Common Ground between AW (Anglian Water), EA and WLDC that further homes which connect to the Reepham WRC could be allocated and then permitted when:</p> <p>a) Joint work between Anglian Water and the Environment Agency concludes what solutions are required to resolve the WRC flow compliance performance and b) if that resolution in part or whole depends on Reepham WRC investment, that investment is supported by Ofwat through Price Review and the DWMP (Drainage and Wastewater Management Plan) (2025-2030) process and c) the actions to resolve the flow compliance performance are implemented and show that there is suitable headroom to accommodate the planned growth.</p> <p>For the avoidance of doubt there may be options for some development locations – albeit possibly higher carbon intensive options – which utilise capacity at other WRCs. We recommend that the sites which would otherwise be served by Reepham WRC are programmed for the later stages of the Plan. The Reepham WRC also potentially would serve new homes in Cherry Willingham. Anglian Water, the Environment Agency and the Council consider that any homes in Cherry Willingham which would connect to the Reepham WRC rather than the Fiskerton WRC in the Local Plan should not be brought forward or then be permitted until criteria a), b) and c) are satisfied.</p> <p>Page 36. Table 4.4. Growth Options</p> <p>Anglian Water notes that the SA does not indicate any differential effect for the five Growth Options for the Natural Resources – Water objective. Whilst this may be a case of scale of impacts the higher performance of growth options 1 and 5 versus 2, 3 and 4 for Climate Change effects and energy suggests the more focused growth options in larger settlements could also better utilise existing utility infrastructure and focus investment. This is opposed to the distributed growth options which require multiple and spread investments in supporting infrastructure with its attendant capital and operational carbon impacts. Without a quantification of the impacts, in CO2e for example, it is difficult to advise whether the spatial option(s) selected are sound or fail to sufficiently future proof growth so that Central Lincolnshire development is baking in carbon rather than setting a direction of travel towards net zero. This includes the required water network and treatment infrastructure which is minimised through using existing capacity would also serve to reduce customer bills.</p> <p>Page 45. Table 5.1. Sustainability effects</p> <p>The SA advises that for Water:</p> <p>The vision sets out that new home should be efficient (it is assumed this includes water efficient) which should have positive effect on reducing the demand for water. Overall, minor positive uncertain effects are likely.</p> <p>The level of growth proposed means that this will increase the demand for water (see page 70). The benefit of water efficiency is to reduce that increased demand. Overall growth during the Plan period will mean that even with reductions in use from existing homes and business through valuing water more, for example by as smart meters raising resource efficiency and cost awareness, the growth will more than offset that existing user reduction. This will require an increase in supplies. That increase is also needed to provide resilience to climate change.</p> <p>Page 82. Mitigation. Table 5.5.</p> <p>Anglian Water supports the SUE (Policy S67) as they enable efficient, focused and potentially</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

									lower carbon investment following the sustainability hierarchy. The scale of the sites also supports a higher level of sustainable design incorporating integrated water management which reduces water demand, cuts the amount of waste water requiring offsite management and uses water on site to enhance green infrastructure and reduce flood risks on site and downstream.			
1101979	Map								<p>Policies Map We welcome the clarity provided by Policy 14 showing locations suitable for large scale wind turbines.</p> <ul style="list-style-type: none"> • Lincoln Urban expansion at Lincoln including Strategic Urban Expansion (SUE) at East Lincoln, South Canwick, North Hykeham and North Birchwood is supported by Anglian Water as a location which enables cost effective investment in supporting infrastructure and services. The sustainability of multiple sites at smaller town and villages around Lincoln depends on availability of existing infrastructure. • Gainsborough Growth at Gainsborough including SUE at North East Gainsborough and South Gainsborough – near to the station – is supported by Anglian Water including employment designations. Other growth locations in the town are well placed for sustainable access to the train station. • Sleaford The Sleaford SUE to the south and north west and smaller urban sites are supported by and support infrastructure and services. It is unclear how sustainable the sites at more rural locations including Billingham are or will be given existing and proposed employment and service locations. • Other Growth at Market Rasen at sites on the edge of existing settlement have the potential to utilise existing infrastructure including utility networks and capacity. 			No
1104168	SA								<p>Natural Resources. The SA correctly identifies that Central Lincs is within an area of serious water stress and that growth could exacerbate this. That water supply-demand gap will without interventions increase during the Plan period due to climate change, increased need for adaptation to drought and sustainability reductions in abstraction. Water resources will need to be more efficiently used in new homes and businesses and the services which support them.</p> <p>Part of the timely and sustainable provision of new water services – water supply and water recycling – is to locate growth which reduces the need to build new networks and treatment capacity.</p> <p>Climate and Flood. The SA support for SuDS (Sustainable Drainage System) and integrated water management follows national guidance.</p> <p>The assessment at Table 4 of the effects of preferred policies on Natural Resources – Water suggests that the Spatial Strategy has unclear (unassessed impacts) for water resources and infrastructure. Policy S4 and S5 on more rural locations for development are assessed as having neutral or negligible effects when some locations are likely to require significant investment in networks and/ or capacity which will be carbon intensive relative to the number of houses being provided.</p> <p>Policy S12 on Water Efficiency is rightly assessed as having a major positive effect for natural resources. However, we would question why that reduction in water use has a possible mixed impact on biodiversity and green infrastructure. Policies S59 to S66 on the natural environment</p>			No

									<p>are by contrast said to have a positive effect on Natural Resources – Water sustainability objectives.</p> <p>Policy S21 on Flood Risk has significant major positive benefits for natural resources although is assessed as having no effect on Climate Change when it is specifically designed to support adaptation in response to climate change.</p> <p>Policies S69 to S71 on the SUE allocations at Lincoln, Gainsborough and Sleaford are assessed as having a positive impact on natural resources – water. However, under Policy S76 the eight individual allocations have either a mixed/ unknown or neutral impact on the water objective.</p> <p>Of the 33 sites in the Lincoln Urban area (Policy S77) eight are assessed as having mixed/ unknown impacts and the remainder a neutral effect. Of the 16 sites in Gainsborough (Policy S78), one has a mixed/ unknown impact. For Sleaford all the 10 sites have a mixed/ unknown impact on the water objective.</p> <p>Under Policy S79 (Market Towns) the 8 sites in Caister and 10 sites in Market Rasen all have a mixed/ unknown impact on the water objective. All 188 sites in Larger Villages (S80) and 116 sites in Medium Villages (S81) and 61 sites in Smaller Villages (S82) are assessed as having a mixed/ unknown impact on the water objective.</p> <p>Given the balance of growth and allocations, the assessed cumulative impact (Table 6) somewhat surprisingly, suggests the impact on the Plan on Natural Resources – Water is positive or unknown.</p> <p>Anglian Water supports the four Monitoring indicators proposed to assess the significant effects of the Plan on Natural Resources – Water. The measures though need to then set out the target for that measure, responsibility for monitoring and corrective action. For example, the ‘Percentage of new development incorporating water efficiency measures will range between zero and 100% depending on the specification for those designs and systems. The actual effect in reducing use though needs to be monitored or the cumulative impact alongside static or increased use/ demand from existing buildings may have a highly negative cumulative impact. That may require expensive and intrusive retrofitting to assist customers to reduce use and/ or a high capital (embedded) and operational carbon supply projects in order to meet higher levels of increased demand.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

Beal Developments Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102415	Vision								<p>Whilst we believe that the vision presented in the Local Plan is generally acceptable, we believe that the wording needs to be amended to state ‘Central Lincolnshire will grow by a minimum of 29,150 homes’. We consider that this change is required for soundness, to ensure that sufficient housing is delivered to effectively meet identified needs and support economic growth across Central Lincolnshire.</p>	<p>Amend wording of vision to state ‘Central Lincolnshire will grow by a minimum of 29,150 homes’.</p> <p>Setting the 29,150 as a minimum figure is consistent with Planning Practice Guidance (PPG) which emphasises that the standard method provides:</p> <p>‘a minimum starting point in determining the number of</p>	Yes	No

										<p>homes needed in an area. It does not predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.</p> <p>...</p> <p>There may, occasionally, be situations where previous levels of housing delivery in an area, or previous assessments of need are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.’ (PPG; paragraph reference 2a-010-20190220)</p> <p>Furthermore, the Government White Paper on Levelling Up is likely to drive economic growth across Lincolnshire over the plan period. It is, therefore, prudent to plan for a minimum if the economic growth drives further demand for housing need across Central Lincolnshire.</p>		
1102416	S1								<p>We broadly support the spatial strategy and settlement hierarchy as articulated in Policy S1. In our view, having regard to this strategy, development should continue to be focused within the Lincoln Urban Area, Main Towns, Market Towns and Large Villages where accessibility to services and facilities is greater compared to smaller settlements within the plan area. Welton is identified as a ‘Large Village’. As such, the Local Plan through the allocation of suitable and deliverable sites, should continue to support housing growth.</p>		Yes	No
1102417	S2								<p>We support the clarity provided in the updates to this policy which make it clearer that the 23,320 dwellings is a baseline figure and that the plan does allow for up to 29,150 dwellings over the plan period. As highlighted above we consider this approach is consistent with the PPG.</p>	<p>Given the changes expected through the levelling up agenda it would be prudent to make clear that the 1,325 dwellings per annum (the higher end of the range) would be a starting point. Particularly as it also supports greater choice and affordability.</p>	Yes	No

										Setting 1,325 dwellings per annum as the minimum is consistent with the need for homes to support economic growth across the plan area as shown in the Economic Needs Assessment (2020).		
1102419	S4								We support the amendments to this policy when compared to the regulation 18 version.		Yes	No
1102421	S80								<p>Beal has land interests in Dunholme as shown in Appendix 1 and other land as shown in separate representations. The site is referenced as WL/DUNH/001 in the Residential Allocations Evidence Report (HOU002e, Appendix 3). The site was rejected as it is constrained by access and within a designated green wedge.</p> <p>Whilst we note that part of the site is within the designated green wedge as shown on the policies map, this area could be used for areas of open space and biodiversity net gain rather than for built form. This would have a wider benefit to the local community and would be accessible either through the development or via the adjacent bridleway.</p> <p>Whilst we note the concerns around access, it would be possible to create an access by purchasing an adjacent dwelling fronting Market Rasen Road, or through wider allocation of sites to the east of Dunholme through comprehensive masterplanning.</p> <p>The Site does not have any shared boundary with the A46 and therefore direct access to it would not be possible, which overcomes the concern raised in this regard. The conclusion states the A46 runs along the eastern boundary of the Site but this is much further afield and we do not believe this is an accurate description of the Site and its context.</p> <p>In reviewing the Sustainability Appraisal (SA) (STA004g) we have the following comments to make which do not appear to have been addressed in the new document STA004.1k:</p> <ul style="list-style-type: none"> • The site is an actively farmed field and is unlikely to contain any valuable biodiversity. It is considered that biodiversity net gain could be achieved on the site and therefore it follows it site could be scored with a '+' for 4.1. • Whilst we note the --/? Score for Landscape and Townscape due to the Green Wedge, the masterplanning of the site can ensure that this is avoided and open space, landscaping or for biodiversity net gain. • 14.1: Employment - we feel fails to consider the short to medium term impact of construction employment. • 14.2: Education, Training and Learning – Should also consider the opportunities for local skills and training for construction work through the development which Beal would be willing to consider. There is an identified skills shortage in the construction sector, which this development could help to address through S106 obligations. <p>Beal note the community issues raised in the Dunholme Neighbourhood Plan including the following:</p>	WL/DUNH/001 in Dunholme has previously been rejected for allocation by the Council, however it is highlighted as a 'reasonable alternative' by the SA. It is our view that the site can accommodate growth to the east of the village whilst sensitively designing around the green wedge designation for green and open space.	Yes	Yes

								<ul style="list-style-type: none"> • Need for small homes for elderly and young people; • Maintain the rural 'feel' of the village; • Improve infrastructure; • Enhancing green space, sports provision and footpaths; and • Local design and character of new development. <p>Beal believe development of this site, could address all of the above by facilitating bridleway upgrades, looking at greater pedestrian and cycle connectivity into the village. Further the green wedge area of the site can be utilised for open/green space to serve the wider village.</p> <p>Beal also have a history of building high-quality developments including more bespoke dwellings which reflect the local vernacular and context. This is something which Beal would like to liaise with local stakeholders on, alongside looking at appropriate housing mix to meet local demands. Furthermore, Beal would look to work with the local community through the Neighbourhood Plan process at how the Site may be able to come forward in a phased approach.</p>			
1102448	S80							<p>The Local Plan review proposed submission (March 2022) designates Scotter as a 'Large Village' under Policy S1: The Spatial Strategy and Settlement Hierarchy states:</p> <p>"Large villages are defined as those with 750 or more dwellings at 1 April 2018. To maintain and enhance their role as large villages which provide housing, employment, retail, and key services and facilities for the local area, the following settlements will be a focus for accommodating an appropriate level of growth via sites allocated in this plan. Beyond site allocations made in this plan or any applicable neighbourhood plan, development will be limited to that which accords with Policy S4: Housing Development in or Adjacent to Villages or other policies relating to non-residential development in this plan as relevant"</p> <p>Scotter provides a good range of services and facilities, and an appropriate level of growth is therefore considered acceptable.</p> <p>Emerging Policy S80, Housing Sites in Large Villages, identifies sites within the 'Large Villages' for residential development including Scotter. The adopted Scotter Neighbourhood Plan (2018) also allocates sites for residential development within Scotter, which are:</p> <ul style="list-style-type: none"> • Land East of North Moor Road (emerging Local Plan ref: WL/SCO/012 neighbourhood plan reference CL1456) 1.68 ha allocated for 42 dwellings and • North Moor Road (emerging Local Plan ref: WL/SCO/011, neighbourhood plan reference CL4674) 2.05 ha for 51 dwellings. <p>Both allocated sites are located to the north of the village disconnected from the main services and outside the settlement boundary. Site CL4674 is constrained by the adjacent flood zone 2. Site CL1456 is constrained by residential development along its boundary to the east, south and west.</p> <p>The proposed site west of Scotton Road is relatively unconstrained and provides an opportunity to accommodate a proportionate increase in the</p>	The site therefore presents an opportunity to address the scale of growth required at Scotter, in an appropriate location, and places it in a strong position to be considered for allocation.	Yes	Yes

									<p>required housing numbers. The site is approximately 6.5ha in size and therefore has the opportunity to provide up to 160 dwellings while also providing significant benefits including significant landscape improvement and biodiversity net gain.</p> <p>Furthermore, the proposed site is in a more favourable location in relation to Scotter facilities.</p> <p>[See attachment for table of facilities located in close proximity to the site].</p> <p>Footpaths can be extended to the Site and crossings provided to existing footpaths to ensure the above services are easily accessible by foot. All of the above services are considered to be within a comfortable walking distance which would reduce the need for car usage.</p> <p>There are also several stagecoach bus services running at various stops in the village including along the high street approximately 140m from the site. Services include the 100 Interconnect (Scunthorpe), 101, 367 (Gainsborough) and 601 (Scunthorpe).</p> <p>Planning history An outline application (ref: 134682) on the site for the erection of seventy-nine dwellings, ancillary public open space, landscaping, drainage and access was refused 12 October 2016. The reasons for refusal include:</p> <ul style="list-style-type: none"> • Significant growth detracting from the character of the area and raising concerns over highway safety and infrastructure access and • Insufficient drainage information. <p>Beal has considered how a carefully designed scheme could respond to these points and a concept plan has been provided in Appendix 2. A Flood Risk Assessment with drainage detail has been provided with these representations Appendix 3. The latter demonstrates how one of the original reasons for refusal can be overcome.</p> <p>The site lies immediately adjacent to residential development to the north and east and lies in close proximity to the surgery and village community hub. There is limited vegetation screening existing development when approaching from the south.</p> <p>The site represents a potential opportunity to provide needed housing while also providing a landscape buffer to the village, improving the village setting and views from the south.</p> <p>This indicative plan in Appendix 2 shows how an appropriate scheme with high levels of landscaping could mitigate significant negative impact will providing significant community benefit including:</p> <ul style="list-style-type: none"> • Public open space; • Improved pedestrian access through to the village; • Increases to available housing; • Mixed tenure and affordable housing; 			
--	--	--	--	--	--	--	--	--	--	--	--	--

								<ul style="list-style-type: none"> • Improved landscaping and biodiversity and • A strong contribution to the local economy. <p>An FRA and DIA report has been produced by Topping Engineers, to address any drainage concerns. The report summarises that the site poses no significant flood risk and drainage can be accommodated within a future scheme to accommodate the requirement of foul and surface water.</p> <p>In addition, on-site attenuation and drainage is to be developed in line with proposed development and the use of SuDS will be considered where possible to further reduce the impact. This is likely to be in the form of swales and attenuation ponds which will also serve biodiversity net gain functions.</p> <p>Although not directly on the site the downstream condition of the water course which has also been raised as an issue previously could also be considered further as part of any policy wording for the site.</p>			
1102452	S80							<p>[See attachment for the site's pertinent planning history]</p> <p>The above applications have been subject to non-material amendments and S73 applications to alter the permissions. However, these do not fundamentally impact on the development approved and relate primarily to minor condition alterations and layout changes.</p> <p>The Site is allocated in the adopted Central Lincolnshire Local Plan under reference CL1491 for 350 dwellings. The adopted Welton Neighbourhood Plan acknowledges the above planning history.</p> <p>The land east of Prebend Lane, Welton is split into two different allocations. These are:</p> <ul style="list-style-type: none"> • WL/WELT/007, and • WL/WELT/011. <p>WL/WELT/007: is proposed for the allocation of 104 new homes. Beal fully support this position and believe it represents a sensible extension of the village and of the development currently under construction by them.</p> <p>WL/WELT/011: is noted as currently being under construction. However, it is unclear how the Council has arrived at 288 dwellings overall. The original outline planning permission (ref: 131681) allowed the principle of 350 dwellings including specialist retirement units. The red line for this application is included within Appendix 1.</p> <p>Subsequently, Beal submitted a reserved matters application for 278 dwellings, whilst also applying for scale of the 72 specialist retirement units (ref: 135006).</p> <p>Beal is currently building out the 278 dwellings at the moment and a full application will be coming forward shortly for the specialist retirement units on the site.</p> <p>Our concern with the allocation as presented now is that it is unclear how</p>	<p>[See attachment, para 3.18, page 7, for proposed wording set out in a table]</p> <p>We believe the proposed changes would ensure a sound policy that is clear to decision makers how it is applied should new housing be proposed.</p> <p>Whilst the continued allocation of WL/WELT/011, the area identified also covers safeguarded land for housing previously identified by Beal and the area which previously benefited from planning permission for the specialist retirement units. We believe that the policy should be updated to reflect the overall capacity of the Site which is covered in the draft allocation to allow for approximately 450 homes rather than the now identified 288.</p>	Yes	Yes

								<p>a decision maker should apply the policy should the following come forward:</p> <ul style="list-style-type: none"> • Applications for specialist retirement units on land previously identified for such uses, and • Open market and affordable dwellings come forward for land identified through application 135006 as being safeguarded for housing. <p>Appendix 2 contains an approved site layout drawing from application 135006 which articulates the relationship between the safeguarded land, specialist retirement units, dwellings currently under construction and the recreation land to the north.</p> <p>It is our view that it would be illogical to not allocate and develop this safeguarded land as it forms a clear extension of land already under construction, it can be comprehensively designed into the development and would provide much better access to the recreation land to the north. Furthermore, leaving the land previously identified for the specialist retirement units undeveloped for such uses would also be illogical and a poor use of land which is available and deliverable for development.</p> <p>Both of the scenarios above would result in housing delivery above the 288 quoted within the policy, yet both parts of the wider site are covered by the policy designation as shown on the proposed policies map.</p> <p>It is therefore unclear how a decision maker would apply the policy in the future to housing over and above the 288 quoted. It is our view that it would be more prudent for the Council to allocate amend the dwellings over the plan period to c.450 to cover the safeguarded land and the specialist retirement units.</p>			
1102422	S80; SA							<p>Beal has land interests in Dunholme as shown in Appendix 1 under reference WL/DUNH/002 in the Local Plan evidence base which is 4.55 hectares and has an indicative capacity of c.100 dwellings. A concept plan has been provided in Appendix 2 for the Site.</p> <p>There is an inconsistency between the Residential Allocations Evidence Report 2022 (HOU002e) and the Housing Sites Sustainability Appraisal (SA) Appendix 3.3 (STA004g) with the former stating the site capacity is 85 dwellings and the SA stating it is 102.</p> <p>HOU002e states that the site is not allocated as it extends away from the settlement and is in areas of flood risk. However, it should be noted as shown in figure 2.1 below, that only a very limited portion of the site, limited to the southern boundary, is located in areas of risk of flooding. Further, the site could easily design around this constraint by placing open space and landscaped areas within this area.</p> <p>We are therefore content that flood risk does not pose a constraint to the development of the site more widely subject to appropriate design.</p> <p>The village is currently being expanded westward through the existing allocations in Dunholme, whilst development to the north and south would</p>		Yes	Yes

								<p>be inappropriate due to coalescence and breaking across the A46 respectively. As such, we believe that expansion eastward represents the next logical expansion of the village. The expansion would allow for upgrades to the adjacent bridleway to the west and north, and could improve connectivity into the village looking at pedestrian cycle movements. Furthermore, the SA does not identify the site as having a landscape or visual impact. Appropriate landscaping can be implemented as part of any application and written into a site-specific policy.</p> <p>In reviewing the SA (STA004g) we have the following comments to make:</p> <p>The site is an actively farmed field and is unlikely to contain any valuable biodiversity. It is considered that biodiversity net gain could be achieved on the site and therefore it follows it site could be scored with a '+' for 4.1.</p> <p>14.1: Employment - we feel fails to consider the short to medium term impact of construction employment.</p> <p>14.2: Education, Training and Learning – Should also consider the opportunities for local skills and training for construction work through the development which Beal would be willing to consider. There is an identified skills shortage in the construction sector, which this development could help to address through S106 obligations.</p> <p>These comments do not appear to have been picked up in STA004.1k (SA Consultation Responses) and are points all previously raised in our Regulation 18 representations.</p> <p>To boost the delivery of homes, we believe that this site is capable of allocation and there are no overriding technical reasons which would prevent development for residential uses.</p> <p>Whilst the Site is being promoted for c.100 dwellings through the Local Plan, Beal would also be willing to work with the local community through the Neighbourhood Plan to bring forward a smaller development.</p> <p>Beal note the community issues raised in the Dunholme Neighbourhood Plan including the following:</p> <ul style="list-style-type: none"> • Need for small homes for elderly and young people; • Maintain the rural 'feel' of the village; • Improve infrastructure; • Enhancing green space, sports provision and footpaths; and • Local design and character of new development. <p>Beal believe development of this site, could address all of the above by facilitating bridleway upgrades, looking at greater pedestrian and cycle connectivity into the village, to which it is well located close to existing facilities.</p> <p>Beal also has a history of building high-quality developments including more bespoke dwellings which reflect the local vernacular and context. This is something which Beal would like to liaise with local stakeholders.</p>			
--	--	--	--	--	--	--	--	---	--	--	--

									A concept plan has been provided in Appendix 2 which shows how the site could be design in accordance with the principle set out in 2.21 above.			
--	--	--	--	--	--	--	--	--	---	--	--	--

Boston Borough Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101301	S14	Yes		Yes	No	Yes	Yes	Yes	<p>We do not object to this version of the local plan.</p> <p>We only wish to comment on this paragraph.</p> <p>Following our response to the previous consultation we received an email on 2nd of December 2021 advising:</p> <p>In response to a suggestion made to our consultation, we have decided to add in a 2km buffer to settlements outside of Central Lincolnshire, where these are broadly consistent with the 2km buffer applied within Central Lincolnshire (i.e. named settlements in local plans that might experience development as a result of policies, that have more than 50 dwellings within it, and are within 2km of the Central Lincolnshire boundary).</p> <p>The first bullet point of para 3.3.12 says:</p> <p>All settlements identified in the Settlement Hierarchy (plus 2km buffer)</p>	<p>We query whether this bullet point should in fact say:</p> <p>‘All settlements over 50 dwellings identified in the Settlement Hierarchy and settlements over 50 dwellings outside Central Lincolnshire (plus 2km buffer)’.</p>	No	No

Boyer

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1094646	S1	Yes	Yes	Yes	Yes	Yes	Yes	Yes			Yes	No

Bracebridge Heath Parish Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102102	S6; S7; S8; S9; S10; S11; S12; S13; S14; S15; S16; S17; NS18; S19; S20	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Bracebridge Heath Parish Council supports the focus on environmental matters and in particular the policies which detail mitigations for energy consumption. The Council supports the inclusion of policy NS18 to provide electric vehicle charging.		No	No
1102104	NS27	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Bracebridge Heath Parish Council supports the intention behind this policy to support genuine annexes and not development which may be later disaggregated and treated as a separate residence.		No	No

1102113	S48	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The inclusion of a separate policy covering walking and cycling infrastructure and defining the measures in place to ensure that walking and cycling are prioritised within development schemes. In particular, a focus on closing the gaps in existing networks is supported. This will help to ensure that communities benefit from a network of cycling and walking provision and not disjointed schemes.		No	No
1102116	S49	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Bracebridge Heath Parish Council welcomes the inclusion of standards for parking within residential developments. The emphasis on 'on plot' parking will be beneficial for communities.			No
1102120	S50	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Bracebridge Heath Parish Council recognises and supports that there are no significant changes proposed for this policy.		No	No
1102123	S51	Yes	Yes	Yes	Yes	Yes	Yes	Yes	It is pleasing to see that for on-site provision there is an emphasis on 'maximising the green infrastructure network' and delivering 'biodiversity net gain'. Provision of linked open spaces will contribute to the overall function and benefits of the green space.		No	No
1102128	S53	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The separation and elaboration of aspects of good design is welcome. The inclusion of a section detailing support for nature is a positive change. The points made under 'Lifespan' are also a positive change and Bracebridge Heath Parish Council welcomes the approach to ensuring a clear strategy for ongoing management and stewardship.		No	No
1102131	S60	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The improved emphasis on 'delivering' net gains in biodiversity rather than merely 'seeking' to deliver these net gains is a positive change.		No	No
1102134	S61	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The inclusion of minimum standards for net gains in biodiversity is welcomed.		No	No
1102138	S66	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Bracebridge Heath Parish Council welcomes the introduction of the policy on trees, woodland and hedgerows. Protecting trees in this way is important in tackling climate change, providing habitats and also for public and community amenity value. The council supports the requirement where appropriate, for developer contributions towards the future management and maintenance of new trees and woodland.		No	No

British Sugar Plc

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EIP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102479	S28				No		No		<p>Representations on behalf of British Sugar Plc – Former Bardney Syrup Factory</p> <p>Within the adopted CLLP, redevelopment of the Site to assist in the delivery of economic prosperity and job growth is supported by Policy LP5, as a non-allocated Local Employment Site ('LES'). Policy LP5 supports appropriate proposals for new B1 (now E)/B2/B8 employment development and/or redevelopment of sites for B1 (now E)/B2/B8 on non-allocated but existing LESs, subject to satisfying that they do not conflict with neighbouring land uses, their scale does not harm the character and amenities and they do not impact unacceptably on the highway network.</p> <p>We object to employment land policies of the CLLP Review Proposed Submission document is unsound, as they are not justified and are not consistent with the National Planning Policy Framework ('NPPF') 2021.</p> <p>Draft Policy S28 setting out the spatial strategy for employment identifies that there will be significant growth in a number of sectors, most notably agri-food, manufacturing, business services and the visitor economy. It allocates land to meet the strategic needs and directs employment development within Strategic Employment Sites, existing Important Established Employment Areas ('IEEA'), and at Sustainable Urban Extensions as part of mixed use communities. Non-designated Local Employment Areas ('LEA'), as defined by Policy S32, are protected to ensure</p>	The former Sugar Factory site ('the Site') is currently occupied/operational in part, and part of the redundant factory buildings have been demolished in order to facilitate future re-use/redevelopment. The Site as a whole represents a longstanding and established industrial and economic development site, forming part of Bardney. As such, the CLLP Review should ensure that there is a positive policy		No

									<p>that there are jobs and services available to meet the local needs and to allow enterprises to flourish at suitable sites. Outside these employment land allocations and non-designated LEAs, economic development is limited to small-scale proposals which satisfy the requirements of Policy S33 or Policy S34.</p> <p>Under the proposed employment policy framework as described above, the Site has no site specific allocation as employment land. Policy S32 defines LEAs as sites:</p> <ul style="list-style-type: none"> • Sized 0.5ha or more; • At least 2,500sqm of existing floorspace; • With 3 or more units occupied by separate businesses, and • Within Tiers 1-5 of the Settlement Hierarchy defined in Policy S1. <p>At present, it is considered that the Site satisfies all of the above criteria to be defined as a LEA, as the total site area is circa 58ha, the recently constructed Jordans and Ryvita factory building extends to circa 13,000sqm of floor area with further employment area withing the other buildings, at least 3 subsidiary businesses of ABF are still operating, and the Site is within Bardney identified as Tier 4 (Large Villages) in Policy S1. However, the above criteria are not fit for purpose for the Site, as there are no defined “units” (with the exception of the Jordans and Ryvita building), so it could be interpreted as not satisfying the third criteria.</p> <p>In addition, the Site may be occupied by less than 3 businesses in future which would declassify the Site from the LEA. Furthermore, there is ambiguity as to whether the southern parcel of the Site, which has been an integral part of the industrial operation, will fall within the settlement of Bardney.</p> <p>As demonstrated above, the Site has been subject to longstanding industrial uses and operations, and is therefore suitable for employment redevelopment. Indeed, The Jordans and Ryvita Class B2 bakery has replaced part of the former Barney Syrup factory in 2018, which represents significant investment and contributions to the local economy and jobs. Part of the redundant factory buildings have been demolished in order to facilitate potential re-use/redevelopment of the area in future. The Site therefore warrants a definitive allocation as employment land to safeguard the existing operations and to support future economic development, than a LEA under Policy S32, as there is no certainty that the Site will continue to fall under the definition of the LEA during the plan period.</p> <p>The Site should be allocated as an IEEA where proposals for Classes B2, B8 and E(g) uses are supported. IEEAs are defined by Policy S31 as sites located in Tiers 1-4 in Policy S1 (Large Villages and above), on sites 2ha or more and have at least 7,500sqm of ground floor space. The Site is in Tier 4 and substantially exceeds the other criteria. Given the longstanding use of the Site for employment purposes and the Site’s suitability for continued employment use and previously developed land status, the Site’s non-allocation is unjustified. To the contrary, the Site’s allocation as employment land as an IEEA will ensure that the Site is brought forward for employment development in future and continues to make a substantial contribution to the Central Lincolnshire economy.</p> <p>Non-designation of the Site is not consistent with the NPPF (2021) which requires planning policies to:</p> <ul style="list-style-type: none"> • Set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for (inter alia) employment and other commercial development (paragraph 20); 	<p>framework for the Site’s future re-use or redevelopment for economic development. Indeed, the Site was previously identified as appropriate for redevelopment.</p> <p>The CLLP Review Proposed Submission document is unsound on the basis that the Site is not allocated as defined employment land, which is not justified or consistent with the NPPF, on the basis of the longstanding use of the Site as industrial operations and its significant contribution to Central Lincolnshire economy now and in the future.</p>		
--	--	--	--	--	--	--	--	--	---	--	--	--

								<ul style="list-style-type: none"> • Help create the conditions in which businesses can invest, expand and adapt, placing significant weight on the need to support economic growth and productivity (paragraph 81); • Set criteria or identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the plan period (paragraph 82); • Enable the sustainable growth and expansion of all types of business in rural areas (paragraph 84); • Encourage the use of previously developed land and sites that are physically well-related to existing settlements where suitable opportunities exist (paragraph 85), and • Give substantial weight to the value of using suitable brownfield land within settlements for homes or other identified needs and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land (paragraph 120). 			
1102485	S31				No		No	<p>Draft Policy S28 setting out the spatial strategy for employment identifies that there will be significant growth in a number of sectors, most notably agri-food, manufacturing, business services and the visitor economy. It allocates land to meet the strategic needs and directs employment development within Strategic Employment Sites, existing Important Established Employment Areas ('IEEA'), and at Sustainable Urban Extensions as part of mixed use communities. Non-designated Local Employment Areas ('LEA'), as defined by Policy S32, are protected to ensure that there are jobs and services available to meet the local needs and to allow enterprises to flourish at suitable sites. Outside these employment land allocations and non-designated LEAs, economic development is limited to small-scale proposals which satisfy the requirements of Policy S33 or Policy S34. Under the proposed employment policy framework as described above, the Site has no site specific allocation as employment land. Policy S32 defines LEAs as sites:</p> <ul style="list-style-type: none"> • Sized 0.5ha or more; • At least 2,500sqm of existing floorspace; • With 3 or more units occupied by separate businesses, and • Within Tiers 1-5 of the Settlement Hierarchy defined in Policy S1. <p>At present, it is considered that the Site satisfies all of the above criteria to be defined as a LEA, as the total site area is circa 58ha, the recently constructed Jordans and Ryvita factory building extends to circa 13,000sqm of floor area with further employment area withing the other buildings, at least 3 subsidiary businesses of ABF are still operating, and the Site is within Bardney identified as Tier 4 (Large Villages) in Policy S1. However, the above criteria are not fit for purpose for the Site, as there are no defined "units" (with the exception of the Jordans and Ryvita building), so it could be interpreted as not satisfying the third criteria. In addition, the Site may be occupied by less than 3 businesses in future which would declassify the Site from the LEA. Furthermore, there is ambiguity as to whether the southern parcel of the Site, which has been an integral part of the industrial operation, will fall within the settlement of Bardney. As demonstrated above, the Site has been subject to longstanding industrial uses and operations, and is therefore suitable for employment redevelopment. Indeed, The Jordans and Ryvita Class B2 bakery has replaced part of the former Barney Syrup factory in 2018, which represents significant investment and contributions to the local economy and jobs. Part of the redundant factory buildings have been demolished in order to facilitate potential re-use/redevelopment of the area in future. The Site therefore warrants a definitive allocation as employment land to safeguard the existing operations and to support future economic development, than a LEA under Policy S32, as there is no certainty that the Site will continue to fall under the definition of the LEA during the plan period. The Site should be allocated as an IEEA where proposals for Classes B2, B8 and E(g) uses are supported. IEEAs are defined by Policy S31 as sites located in Tiers 1-4 in Policy S1 (Large Villages and above), on sites 2ha or more and have at</p>	<p>The former Sugar Factory site ('the Site') is currently occupied/operational in part, and part of the redundant factory buildings have been demolished in order to facilitate future re-use/redevelopment. The Site as a whole represents a longstanding and established industrial and economic development site, forming part of Bardney. As such, the CLLP Review should ensure that there is a positive policy framework for the Site's future re-use or redevelopment for economic development. Indeed, the Site was previously identified as appropriate for redevelopment. The CLLP Review Proposed Submission document is unsound on the basis that the Site is not allocated as defined employment land, which is not justified or consistent with the NPPF, on the basis of the longstanding use of</p>		No

								<p>least 7,500sqm of ground floor space. The Site is in Tier 4 and substantially exceeds the other criteria. Given the longstanding use of the Site for employment purposes and the Site's suitability for continued employment use and previously developed land status, the Site's non-allocation is unjustified. To the contrary, the Site's allocation as employment land as an IEEA will ensure that the Site is brought forward for employment development in future and continues to make a substantial contribution to the Central Lincolnshire economy. Non-designation of the Site is not consistent with the NPPF (2021) which requires planning policies to:</p> <ul style="list-style-type: none"> • Set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for (inter alia) employment and other commercial development (paragraph 20); • Help create the conditions in which businesses can invest, expand and adapt, placing significant weight on the need to support economic growth and productivity (paragraph 81); • Set criteria or identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the plan period (paragraph 82); • Enable the sustainable growth and expansion of all types of business in rural areas (paragraph 84); • Encourage the use of previously developed land and sites that are physically well-related to existing settlements where suitable opportunities exist (paragraph 85), and • Give substantial weight to the value of using suitable brownfield land within settlements for homes or other identified needs and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land (paragraph 120). 	the Site as industrial operations and its significant contribution to Central Lincolnshire economy now and in the future.		
1102484	S32				No		No	<p>Draft Policy S28 setting out the spatial strategy for employment identifies that there will be significant growth in a number of sectors, most notably agri-food, manufacturing, business services and the visitor economy. It allocates land to meet the strategic needs and directs employment development within Strategic Employment Sites, existing Important Established Employment Areas ('IEEA'), and at Sustainable Urban Extensions as part of mixed use communities. Non-designated Local Employment Areas ('LEA'), as defined by Policy S32, are protected to ensure that there are jobs and services available to meet the local needs and to allow enterprises to flourish at suitable sites. Outside these employment land allocations and non-designated LEAs, economic development is limited to small-scale proposals which satisfy the requirements of Policy S33 or Policy S34.</p> <p>Under the proposed employment policy framework as described above, the Site has no site specific allocation as employment land. Policy S32 defines LEAs as sites:</p> <ul style="list-style-type: none"> • Sized 0.5ha or more; • At least 2,500sqm of existing floorspace; • With 3 or more units occupied by separate businesses, and • Within Tiers 1-5 of the Settlement Hierarchy defined in Policy S1. <p>At present, it is considered that the Site satisfies all of the above criteria to be defined as a LEA, as the total site area is circa 58ha, the recently constructed Jordans and Ryvita factory building extends to circa 13,000sqm of floor area with further employment area withing the other buildings, at least 3 subsidiary businesses of ABF are still operating, and the Site is within Bardney identified as Tier 4 (Large Villages) in Policy S1. However, the above criteria are not fit for purpose for the Site, as there are no defined "units" (with the exception of the Jordans and Ryvita building), so it could be interpreted as not satisfying the third criteria.</p> <p>In addition, the Site may be occupied by less than 3 businesses in future which would declassify the Site from the LEA. Furthermore, there is ambiguity as to whether the southern parcel of the Site, which has been an integral part of the industrial operation, will fall within the settlement of Bardney.</p>	<p>The former Sugar Factory site ('the Site') is currently occupied/operational in part, and part of the redundant factory buildings have been demolished in order to facilitate future re-use/redevelopment. The Site as a whole represents a longstanding and established industrial and economic development site, forming part of Bardney. As such, the CLLP Review should ensure that there is a positive policy framework for the Site's future re-use or redevelopment for economic development. Indeed, the Site was previously identified as appropriate for redevelopment.</p> <p>The CLLP Review Proposed Submission</p>		No

									<p>As demonstrated above, the Site has been subject to longstanding industrial uses and operations, and is therefore suitable for employment redevelopment. Indeed, The Jordans and Ryvita Class B2 bakery has replaced part of the former Barney Syrup factory in 2018, which represents significant investment and contributions to the local economy and jobs. Part of the redundant factory buildings have been demolished in order to facilitate potential re-use/redevelopment of the area in future. The Site therefore warrants a definitive allocation as employment land to safeguard the existing operations and to support future economic development, than a LEA under Policy S32, as there is no certainty that the Site will continue to fall under the definition of the LEA during the plan period.</p> <p>The Site should be allocated as an IEEA where proposals for Classes B2, B8 and E(g) uses are supported. IEEAs are defined by Policy S31 as sites located in Tiers 1-4 in Policy S1 (Large Villages and above), on sites 2ha or more and have at least 7,500sqm of ground floor space. The Site is in Tier 4 and substantially exceeds the other criteria. Given the longstanding use of the Site for employment purposes and the Site's suitability for continued employment use and previously developed land status, the Site's non-allocation is unjustified. To the contrary, the Site's allocation as employment land as an IEEA will ensure that the Site is brought forward for employment development in future and continues to make a substantial contribution to the Central Lincolnshire economy.</p> <p>Non-designation of the Site is not consistent with the NPPF (2021) which requires planning policies to:</p> <ul style="list-style-type: none"> • Set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for (inter alia) employment and other commercial development (paragraph 20); • Help create the conditions in which businesses can invest, expand and adapt, placing significant weight on the need to support economic growth and productivity (paragraph 81); • Set criteria or identify strategic sites for local and inward investment to match the strategy and to meet anticipated needs over the plan period (paragraph 82); • Enable the sustainable growth and expansion of all types of business in rural areas (paragraph 84); • Encourage the use of previously developed land and sites that are physically well-related to existing settlements where suitable opportunities exist (paragraph 85), and • Give substantial weight to the value of using suitable brownfield land within settlements for homes or other identified needs and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land (paragraph 120). 	document is unsound on the basis that the Site is not allocated as defined employment land, which is not justified or consistent with the NPPF, on the basis of the longstanding use of the Site as industrial operations and its significant contribution to Central Lincolnshire economy now and in the future.		
--	--	--	--	--	--	--	--	--	---	---	--	--

Brown & Co

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103090	S1; S4	Don't know		No	No	No			We refer to the submission we made in August 2021 (copy attached). We see there has been very little, if any, change in the policies to facilitate a greater flexibility in housing growth and where people reasonably wish to live. The current settlement hierarchy is somewhat restrictive and as is the growth targets to be met in that hierarchy. Interestingly, a small definition in	The threshold for small villages should be decreased to 20 dwellings which is a reasonable number to start at a qualification as a hamlet.	Yes	Yes

								<p>this Local Plan is defined as a village of between 50 to 249 dwellings. Of more significance is the fact that there are a number of villages where there are a reasonable number of houses whilst not necessarily 50 and which clearly are not hamlets which is generally regarded as being a small cluster of houses in open countryside. There are clearly villages where there are community facilities be it schools, churches or village halls which should reasonably be classed as a small village which would provide for some level of growth in accordance with the Policy S4. That would help achieve some additional growth, but as it alluded to in our comments in August 2021, we feel that there should be greater flexibility in the Plan process. As has been recently demonstrated, as a consequence of the pandemic and other general demographic changes, more people are tending to move away from the cities and are looking for desirable places to live in the countryside where they can work from home and this will also help supplement some of the community facilities which are wanting of additional financial support.</p> <p>Generally we refer to and rely on the comments made in the form which we submitted in August 2021 and a copy of that is attached.</p>	<p>That is in Policy S1. In Policy S4 we would suggest that the levels which are indicated as typically attunable are increased to 20 dwellings in large villages and medium villages and up to 10 dwellings in small villages.</p> <p>Other existing policy criteria would make sure that they are reasonable and this change will facilitate flexibility and the opportunity for additional levels of growth to be achieved and to provide choice which is important in the current market place.</p>		
1103092	S4	Don't know		No	No	No		<p>We refer to the submission we made in August 2021 (copy attached). We see there has been very little, if any, change in the policies to facilitate a greater flexibility in housing growth and where people reasonably wish to live. The current settlement hierarchy is somewhat restrictive and as is the growth targets to be met in that hierarchy. Interestingly, a small definition in this Local Plan is defined as a village of between 50 to 249 dwellings. Of more significance is the fact that there are a number of villages where there are a reasonable number of houses whilst not necessarily 50 and which clearly are not hamlets which is generally regarded as being a small cluster of houses in open countryside. There are clearly villages where there are community facilities be it schools, churches or village halls which should reasonably be classed as a small village which would provide for some level of growth in accordance with the Policy S4. That would help achieve some additional growth, but as it alluded to in our comments in August 2021, we feel that there should be greater flexibility in the Plan process. As has been recently demonstrated, as a consequence of the pandemic and other general demographic changes, more people are tending to move away from the cities and are looking for desirable places to live in the countryside where they can work from home and this will also help supplement some of the community facilities which are wanting of additional financial support. Generally we refer to and rely on the comments made in the form which we submitted in August 2021 and a copy of that is attached.</p>	<p>The threshold for small villages should be decreased to 20 dwellings which is a reasonable number to start at a qualification as a hamlet. That is in Policy S1. In Policy S4 we would suggest that the levels which are indicated as typically attunable are increased to 20 dwellings in large villages and medium villages and up to 10 dwellings in small villages. Other existing policy criteria would make sure that they are reasonable and this change will facilitate flexibility and the opportunity for additional levels of growth to be achieved and to provide choice which is important in the current market place.</p>	Yes	No

Brown & Co JHWalter

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103088	NS24	Yes	Yes	No	No	No	Yes	Yes	<p>Support inclusion of a custom and self-build policy</p> <p>As stated above, in principle, we are supportive of and welcome a specific policy on custom and self-build housing being included in the Central Lincolnshire Local Plan Proposed Submission Draft March 2022. As stated in paragraph 4.3.6 on page 63 of the Proposed Submission Draft March 2022, the Central Lincolnshire Housing Needs Assessment (2020)</p>	<p>In light of the response to question 4, we consider changes are required to the wording and content of Policy NS24. The changes and reasons for why these changes are considered necessary are discussed below.</p>	Yes	No

									<p>highlighted that in 2019 there were 136 people on the self-build registers of the Central Lincolnshire Districts, which clearly indicates that there is significant interest and demand for this form of housing. Central Lincolnshire Authorities supporting the principle of custom and self-build homes as part of the housing supply and including a specific policy to provide a framework within for self-builders can deliver their dream homes is very positive.</p> <p>Policy not positively prepared, justified nor effective Although we support the inclusion of a specific custom and self-build policy, we consider the policy (draft Policy NS24) has not been positively prepared, justified nor effective for the reasons set out below.</p> <p>Parts 1 (individual plots) and 2 (multiple plots on a site) together with paragraph 4.3.8 suggests proposals for custom and self-build dwellings will only be supported if they are consistent with other relevant policies in the Local Plan. One can only assume that this includes the spatial strategy throughout the document, including the number of dwellings allowed in “appropriate locations” within Policies S3 (Housing in the Lincoln Urban Area, Main Towns and Market Towns) and S4 (Housing Development in or Adjacent to Villages). In the case of potential custom and self-build dwellings in large, medium and small villages, the wording of draft Policy S4 suggests such dwellings will be restricted to those in “appropriate locations” within the “developed footprint” of the village that are typically up to 10 dwellings in large and medium villages and up to 5 dwellings in small villages. Draft Policy S4 goes on to state that proposals for residential development on unallocated land immediately adjacent to the developed footprint will only be supported where this is a First Homes exception site in accordance with the NPPF and exclusively for a rural affordable housing exception site.</p> <p>If the above interpretation of the policy is correct, draft Policy NS24 is very restrictive on where custom and self-build housing could be located and the numbers allowed in a single development, depending on the classification of a settlement. This would be particularly restrictive in large, medium and small villages, as draft Policy S4 specifically restricts edge of settlement locations to First Homes exception sites and rural affordable housing exception sites and makes no allowance for custom and self-build housing. Therefore, it is considered that the policy is worded and prepared in a negative way that does not actively and positively promote nor encourages individuals or developers to undertake a custom or self-build project in the Central Lincolnshire Districts. Furthermore, if custom and self-build housing is not actively encouraged and planning applications for such housing are not coming forward and granted, draft Policy NS24 will not be effective at meeting the demand on the self-build registers of the Central Lincolnshire</p>	<p>The first change we consider necessary to make Policy NS24 positively prepared, justified and effective is to amend and provide clarity on the spatial locations where custom and self-build homes could be possible and be less restricted than that currently suggested in the Proposed Submission Draft CLLP.</p> <p>As stated above, draft Policy S4 and paragraph 4.3.8 suggests custom and self-build proposals will be spatially restricted to those sites in “appropriate locations” within the “developed footprint” of large, medium and small villages and up to 10 dwellings in large and medium villages and up to 5 dwellings in small villages. The policy also states that only First Homes exception sites and rural affordable housing exception sites will be supported on unallocated sites outside but immediately adjacent to the developed footprint of a village. We consider that the draft Policy NS24 should be more specific on suitable locations for custom and self-build housing schemes or draft Policy S4 specifically includes custom and self-build housing will be supported on unallocated land immediately adjacent to the developed footprint of a settlement where, evidence from the self-build register, suggests that there is an identified need in that area. It is considered that this would have the potential to open-up more custom and self-build sites and, therefore, positively promote custom and self-build housing whilst being effective at meeting the demand on self-build registers of the Central Lincolnshire Districts.</p> <p>The second change we consider necessary relates to Part 2 (Multiple plots on a site). We consider that the requirement for multiple plot sites to have a plot passport when outline permission or permission in principle is sought should be removed and only have this requirement for full and reserved matters applications. As stated earlier this document, outline and permission in principle applications for conventional market housing does not require the level of detail required for a plot passport for custom and self-build</p>		
--	--	--	--	--	--	--	--	--	---	---	--	--

									<p>Districts.</p> <p>This is very disappointing as it is understood that West Lindsey District Council (WLDC), as one of the CLLP authorities, was promoted as one of the original 11 Vanguard Authorities in 2014. The Vanguard Authorities (VA) were tasked with identifying and meeting the needs of people seeking to self-build under the Localism Act 2012. The VA came with funding (all be it limited) and the VA were given responsibilities to promote and develop the delivery of self-build plots. Today WLDC charge an “Admin fee of £52 and note that this is only to enter the register in order for WLDC to gauge demand and does not commit WLDC to offering any other service. In fact, the website states “...it is advised that you use traditional means of searching to find land suitable for your project”.</p> <p>Brown & Co JHWalter are Chartered Surveyors, Town Planners and sell residential, agricultural and residential land and property, so have significant interest in self build and have clients interested in developing such. We can offer a working partnership with CLLP in order to develop this service further.</p> <p>It is noted that Part 2 (Multiple plots on a site) of draft Policy NS24 requires a plot passport for when outline permission or permission in principle is sought for plots of custom and self-build homes. The policy also states that additional specifications including materials, landscaping details and access arrangements may also be necessary in certain circumstances. We feel such detailed information is not necessary nor justified given outline and permission in principle applications for conventional market housing do not require such information and are only required for full and reserved matters applications. Although the policy allows for variations on the plot passport parameters, it requires a detailed planning application to fully justify any changes to demonstrate that they are suitable for the plot if they are to be supported. Similar to the majority of outline and permission in principle applications for residential developments, the information the policy requests as part of the plot passport is often not known at that early stage of a scheme. Custom and self-build homes are supposed to be an individual’s choice on the design of their own home and requesting such detailed information at an early stage together with requiring an individual to fully justify any changes via a detailed application, could significantly discourage individuals from undertaking a custom or self-build project. Therefore, it is considered that the draft policy, in its current form, is not positively prepared by encouraging custom and self-build housing across the Central Lincolnshire Districts nor justified given the information required for an outline or permission in principle applications for custom and self-build homes seems significantly more than that required for conventional market housing with no justification why.</p>	<p>housing and such detail is often not known at the initial outline application stage. By removing the requirement for such information, the Local Plan will positively encourage and promote custom and self-build homes, by allowing potential applicants for such homes, greater flexibility in order to meet their requirements.</p> <p>The final change we consider necessary relates to part 3 (provision of plots on large sites) and the requirement for proposals for 100 or more dwellings needing to provide serviced plots to deliver at least 5% of the total number of dwellings on the site as self-build or custom build homes. As stated above, the policy implies that the Central Lincolnshire Districts will meet the self-build demand by providing such housing in large housing developments. If this were to occur, it could theoretically allow the Central Lincolnshire Districts to resist single or small-scale speculative custom and self-build housing schemes. Therefore, we suggest removing part 3 of the draft policy altogether. This would allow greater opportunities and positively encourage individuals to undertake single or multiple custom and self-build plots whilst allowing the Central Lincolnshire District’s to meet the self-build demand. If the CLLP Policy Team are insistent that this should be retained, we consider the 36-month period should at least be reduced, to say 12 months and after this period if the custom and self-build plots are unsold, they should automatically become conventional dwellings rather than needing to submit a detailed planning application to potentially allow the change to occur.</p> <p>It should be noted that all of the residential policies allowing and supporting development could accommodate self-build and thus positively prepared policy is only required for additional locations and exceptions to standard residential permissions. The approach taken within the Submission draft appears to be designed to restrict and control self-build and deliver it within existing allocations, rather than any real thought about how to</p>		
--	--	--	--	--	--	--	--	--	---	---	--	--

									<p>We also feel that part 3 (Provision of plots on large sites) is not positively prepared, justified nor effective. This part of the policy requires proposals consisting of 100 or more dwellings to provide serviced plots to deliver at least 5% of the total number of dwellings on the site as custom or self-build homes. It is considered that this is very restrictive for developers who would also have to provide between 10 to 25% of affordable housing on such sites, as per draft Policy S22 (Affordable Housing), depending on a schemes location in Central Lincolnshire. Providing such a high amount of affordable housing together with custom and self-build plots, which are likely to have a smaller market than conventional market housing, could have a significant impact on the viability of larger sites, especially with current build costs which are unlikely to ease in the near future. Furthermore, although the policy allows for the custom and self-build plots to be built out as conventional market housing, the plots have to be marketed as custom and self-build plots for a minimum of 36 months and then be subject to a detailed planning application to change to conventional market housing. This approach is not only costly for the developer but could leave undeveloped plots within otherwise completed developments that remain for some time, becoming an eye sore and unattractive to those people living near a plot. It could also mean that if a plot is sold and an individual comes back and builds their home, it will be a source of potential noise and disruption to neighbours whilst the building work is being undertaken. In addition, if the individual runs out of money to finish their project, it could leave a half-completed plot in an otherwise completed development, which again could be an eye sore and be unattractive to those people living near the plot.</p> <p>Furthermore, if all schemes over 100 dwellings must include a minimum of 5% custom and self-build housing, the demand identified on the custom and self-build register could be easily met through such housing in larger housing sites. For example, taking the figure (136 people) quoted in paragraph 4.3.6 on page 83 of the Proposed Submission Draft March 2022, if part 3 of the policy were to remain unchanged, theoretically the demand for 136 custom and self-build dwellings could be met in 27 allocated sites of 100 dwellings or more across Central Lincolnshire or just one of the four Lincoln Sustainable Urban Extensions (SUEs). If this were to occur, it would allow the Central Lincolnshire Districts to meet the custom and self-build demand, but also could theoretically allow the Central Lincolnshire Districts to resist single or small-scale speculative custom and self-build housing schemes. We consider that this is not the idea of custom and self-build schemes, given individuals who undertake such projects are likely to want to have unique plots which are not just another plot in a larger housing development. Therefore, it is considered that this is not positively promoting nor encouraging individuals to undertake a custom or self-build project. It is considered that this, in turn,</p>	<p>encourage and deliver self-build and custom housing. This is very disappointing for a Local Plan Area which includes a Vanguard Authority.</p> <p>Summary In principle, we are supportive and welcome a specific policy on custom and self-build housing being included in the Central Lincolnshire Local Plan Proposed Submission Draft March 2022. However, we consider many aspects of the policy are not positively prepared, justified nor effective for the reasons set out in this document and suggest the following changes:-</p> <ul style="list-style-type: none"> • Amend the policy so it is more spatially specific on suitable locations for custom and self-build housing schemes or draft Policy S4 to specifically include the support of custom and self-build housing on unallocated land immediately adjacent to the developed footprint of a large, medium or small village, where evidence from the self-build registers, identifies a demand/need for such housing in that area. • Remove the requirement for a plot passport when outline permission or permission in principle is sought for custom and self-build homes in Part 2 (Multiple plots on a site) and only have the passport requirement for full and reserved matters applications. • Remove part 3 (Provision of plots on large sites) altogether. If the CLLP Policy Team are insistent this should be retained, we consider the 36-month period should at least be reduced, to say 12 months and after this period if the plots are unsold, they should automatically become conventional dwellings without the need for submitting a detailed planning application to potentially allow the change to occur. <p>In the context of this policy, we consider that the amendments suggested above would make the Local Plan positively prepared, justified and effective for draft Policy NS24 which covers custom and self-</p>		
--	--	--	--	--	--	--	--	--	---	--	--	--

									would not be effective at meeting the individual's requirements on the self-build register across the Central Lincolnshire Districts.	build housing across the Central Lincolnshire Districts.		
--	--	--	--	--	--	--	--	--	---	--	--	--

C Ottewell and Sons

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1104445	S28	Yes	Yes	Yes	No	Yes	No	Yes	<p>S 28 , S 29 , S 31, S 32 .</p> <p>Important Established Employment Areas (IEEA) Newtoft with its Thriving Business Park Should be with all the others mentioned ' Hemswell ex RAF is on , as is other City , towns and villages .</p> <p>Been forgotten when it's offering already so much to the Local rural Economy .</p> <p>Also supports Agri - food , and the massive Farming Industry Sector, it has Heritage Qualities as a Famous Wartime base Policy S43 .</p> <p>Further Regenerating of New Toft should be highlighted and Encouraged as a Rural Business Park just as important as Urban Lincoln NS 72 , Gainsborough NS 73 Sleaford NS 74</p> <p>With its War time Heritage interest as Farmers anyway plans have already started on policy S51 , S60 , S66 . as a last Legacy for this Famous Old RAF Base .</p>		Yes	No
1104446	S29	Yes	Yes	Yes	No	Yes	No	Yes	<p>S 28 , S 29 , S 31, S 32 . Important Established Employment Areas (IEEA) Newtoft with its Thriving Business Park Should be with all the others mentioned ' Hemswell ex RAF is on , as is other City , towns and villages . Been forgotten when it's offering already so much to the Local rural Economy . Also supports Agri - food , and the massive Farming Industry Sector, it has Heritage Qualities as a Famous Wartime base Policy S43 . Further Regenerating of New Toft should be highlighted and Encouraged as a Rural Business Park just as important as Urban Lincoln NS 72 , Gainsborough NS 73 Sleaford NS 74 With its War time Heritage interest as Farmers anyway plans have already started on policy S51 , S60 , S66 . as a last Legacy for this Famous Old RAF Base .</p>		Yes	No
1104447	S31	Yes	Yes	Yes	No	Yes	No	Yes	<p>S 28 , S 29 , S 31, S 32 . Important Established Employment Areas (IEEA) Newtoft with its Thriving Business Park Should be with all the others mentioned ' Hemswell ex RAF is on , as is other City , towns and villages . Been forgotten when it's offering already so much to the Local rural Economy . Also supports Agri - food , and the massive Farming Industry Sector, it has Heritage Qualities as a Famous Wartime base Policy S43 . Further Regenerating of New Toft should be highlighted and Encouraged as a Rural Business Park just as important as Urban Lincoln NS 72 , Gainsborough NS 73 Sleaford NS 74 With its War time Heritage interest as Farmers anyway plans have already started on policy S51 , S60 , S66 . as a last Legacy for this Famous Old RAF Base .</p>		Yes	No
1104450	S32	Yes	Yes	Yes	No	Yes	No	Yes	<p>S 28 , S 29 , S 31, S 32 . Important Established Employment Areas (IEEA) Newtoft with its Thriving Business Park Should be with all the others mentioned ' Hemswell ex RAF is on , as is other City , towns and villages . Been forgotten when it's offering already so much to the Local rural Economy . Also supports Agri - food , and the massive Farming Industry Sector, it has Heritage Qualities as a Famous Wartime base Policy S43 . Further Regenerating of New Toft should be highlighted and Encouraged as a Rural Business Park just as important as Urban Lincoln NS 72 , Gainsborough NS 73 Sleaford NS 74 With its War time Heritage interest as Farmers anyway plans have already started on policy S51 , S60 , S66 . as a last Legacy for this Famous Old RAF Base .</p>		Yes	No
1104444	S82	Yes	Yes	Yes	No	Yes	No	Yes	<p>Just wanted to highlight the Village of Newtoft again, more Famously called during the War and into the the late 1970s was RAF Faldingworth, which was a all Polish Squadron that flew our Lancaster Bombers in world war 2 which is quite Poignant as to what's happening in</p>		Yes	Yes

									<p>Ukraine now. It Deserves a modern Facelift as it's our History to be Preserved , Especially those young brave Polish Airman that came over to help win the war , many didn't come back to Faldingworth on the Raids on Germany .</p> <p>Unlike former rundown towns in our District like Gainsborough and market Rasen much Good Regeneration has taken place Marshall's yard for one ! and hundreds of new homes , similar new homes in Market Rasen who now have a fantastic new Leisure centre , but what's for the same run down Village of Newtoft ,!! they did with help from West Lindsey a few years ago now have a new Village hall and social club , but for many families that have grown up in Newtoft a lot of the next generation are looking to stay but there's nowhere for them to live , unfortunately over the years not there wishes that they have had to go live in places like Market Rasen, but given the chance they would come back to there rural roots .</p> <p>At the other end of the scale older Residences who would like the opportunity to move into a Bungalow to rent & buy as we all know been a ex RAF base all 170 homes there is only 2 bungalows , so again people who struggle to get up the stairs either have to live downstairs that is not Ideal , or leave there rural community and move .</p> <p>The Big positive New Toft has against many other Large villages in the District it has a Thriving business Park , from Agricultural engineers, Tractor and machinery sales , Fruit and veg wholesale suppliers , Shot blasting , Land Rover repairs and export , Pipe Manufacturers , Builder's all of which serves a vast rural Agricultural Farming area of West Lindsey who don't want to drag there large tractors into towns for repairs if necessary so if more new mixed homes could be built in Newtoft theres a good chance they could walk or cycle to local Farms and with the Business park still growing all the time there will be more opportunities for young people to start off there Careers in the Rural Countryside .</p> <p>Of the 3 sites that was Originally put forward on the central Lincolnshire plan review , I have no preference whatsoever I understand it would not be all of them , but there is Definitely a need for between 15/ and 25 with quite a few of them been Bungalows. There is a 4 acres Woodland of ours on the Approach to new Toft , I think the Community would like to own it if possible, so they could Apply for funding regarding seating & Walkways , ponds etc , happy to work with them in a Overall masterplan.</p> <p>Land WL/Toft 001 , WL/Toft 002 . WL/ Toft 003 woodland area .</p> <p>This proposed submission for New Toft , Covers policy's for Housing Growth in Newtoft for Rural peoples Needs covering S 22 mixed Affordable housing S 23 Meeting Accommodation Needs , Hopefully some Self Build homes with pony paddocks in Countryside . Needs that are not Easily available .</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

Castle Square Developments

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103163	S5	Yes	Yes	No	No	No	No	Don't know	<p>As currently drafted, while the policy states that proposals for non-residential development will be supported, the criteria are too restrictive and effectively impose a ban on many types of potentially suitable commercial/economic development that could make a significant contribution to the rural economy.</p> <p>This approach is not in accordance with the NPPF, which seeks to support a prosperous</p>	In order to make the policy sound and consistent with national policy, a further criterion should be added to	Yes	No

									<p>rural economy.</p> <p>Para. 85 of the NPPF confirms that “planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”</p> <p>A further criterion should therefore be added to the policy which could allow the development of sites that are close to strategic road networks/proposed new relief roads and other acceptable locations for development where a site specific need can be demonstrated. In the context of para 85 of the NPPF, these sites may be well related to existing settlements/other development and the opportunity to develop in such locations should be encouraged where a suitable opportunity exists.</p> <p>The ‘Reasons for Selecting Preferred Policies’ document (June 2021) suggested that the alternative to not including a policy restricting development in the countryside risks development taking place in the open countryside beyond existing settlements, increasing the need to travel by car, length of journeys and associated greenhouse gas emissions. A less restrictive approach could also result in the countryside becoming urbanised, either on an individual development basis or cumulatively.</p> <p>However, the policy should include more flexibility, to accord with the requirements of the NPPF. The proposed additional criterion would still only allow development in the countryside where it can be justified, and where a potential site presents an opportunity for commercial/economic development and would not lead to the urbanisation of the rural areas.</p> <p>In conclusion, the policy, as currently drafted, is not positively prepared or effective in line with the requirements.</p>	Policy S5 which could allow the development of sites that are close to strategic road networks/proposed new relief roads and other acceptable locations for development where a site specific need can be demonstrated.		
--	--	--	--	--	--	--	--	--	---	---	--	--

Cereform Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1104148	S28; S29; S30; S31; S32; S33; S34				No		No		The Maltings operated by Cereform is an established industry, and operates within the agri-food sector which is identified as one of the priority sectors in the GLLEP. It is also part of the historic identity of Gainsborough and our client is committed to the ongoing operation and growth of the business. The draft Local Plan does not protect the Maltings as an active industrial business in the agri-food sector, well established in Gainsborough, or support its ongoing operation and growth, contrary to the NPPF. The Local Plan contains onerous requirements and significant barriers for the existing business to adapt to changing needs and grow, rather than encouraging	<p>We therefore strongly object to the Employment Policies. Should the Maltings remain as a non-designated employment proposals within identified settlements, we consider that the following amendments are necessary:</p> <p>“Part 1: Other Employment proposals not within SES, IEEA, SUE and not defined as a LEA, but that are within a settlement named in the Settlement Hierarchy in Policy S1, will be supported, where</p>		No

								<p>sustainable economic growth. We therefore consider that the Local Plan is unsound and strongly object to Policy NS73 and Employment Policies.</p> <p>The Maltings operates in the agri-food sector, which is identified as one of priority employment and business sectors by the Greater Lincolnshire Local Enterprise Partnership ('GLLEP'). This is recognised in Policy S28, which states: "Aligned to the Greater Lincolnshire Local Industrial Strategy, and as a key component of the Midlands Engine, there will be significant growth in a number of sectors, most notably agri-food, manufacturing, business services, and the visitor economy".</p> <p>As clarification provided in the Evidence Report on Employment Policies S28-S34 (March 2022), the Maltings site is not a Strategic Employment Site, an Employment Allocation on Sustainable Urban Extensions, an Important Established Employment Area, or a Local Employment Area. This means that there is no policy which protects the existing industrial operations at the Maltings, let alone supporting its continued operation and growth.</p> <p>The Evidence Report refers to Policy S33 being an applicable policy for the Maltings site. The policy requires that, in the case of the expansion of an existing employment use, proposals will be acceptable where they satisfy criteria b-f, which includes the proposal to satisfy that there is no significant adverse impact on the viability of delivering any allocated employment site, which should not be a relevant consideration for any development relating to the existing businesses. Part 2 of Policy 33 seeks to resist the loss of non-designated employment, but it is only effective in dealing with proposal which directly replaces the existing employment us.</p> <p>The series of employment policies do not protect or support growth of the Maltings, which is inconsistent with the GLLEP identifying the agri-food sector being one of the priority business and employment sectors in the region and Policy S1 recognising it as one of the sectors expected to grow. We therefore consider that Employment Policies are unsound, as they do not provide an appropriate framework to protect the existing business in the agri-food sector to continue its operation and to support future growth, contrary to the NPPF Chapter 6 which requires planning policies to positively and proactively encourage sustainable economic growth.</p>	<p>the proposal relates to the ongoing maintenance and operation of an existing employment use. In the case of the expansion of an existing employment use, proposals will be supported where they satisfy criteria b, c, d and f below, where appropriate.</p> <p>In the case of new employment proposals, proposals will be supported provided:</p> <p>a) There is a clear demonstration that there are no other suitable appropriate sites or buildings within designated employment areas or LEA within the same settlement or within 5km of the site; and</p> <p>b) the scale of the proposal is commensurate with the scale and character of the existing settlement; and</p> <p>c) there is no significant adverse impact on the character and appearance of the area, and/or the amenity of neighbouring occupiers; and</p> <p>d) there are no significant adverse impacts on the local highway network; and</p> <p>e) there is no significant adverse impact on the viability of delivering any allocated employment site; and</p> <p>f) the proposals maximise opportunities for modal shift away from the private car.</p> <p>In the case of the expansion of an existing employment use, proposals will be acceptable where they satisfy criteria b-f above.</p> <p>Proposals that will result in the loss of non-designated employment will be supported providing that:</p> <p>a) the loss of land or buildings will not adversely and significantly affect the employment opportunities or services available in the area that the site or building would likely serve; and</p> <p>b) the proposal will not harm the character of the locality and/or the amenities of neighbouring occupiers; and</p> <p>c) the proposal will not impact unacceptably on the local and/or strategic highway network.</p> <p>Proposals that will result in the loss of existing non-designated employment indirectly or prejudice its future growth will be resisted.</p>		
1104140	NS73				No		No	<p>The Maltings operated by Cereform is an established industry, and operates within the agri-food sector which is identified as one of the priority sectors in the GLLEP. It is also part of the historic identity of Gainsborough and our</p>	<p>It is considered that Policy NS73 is unsound on the basis that it is not justified and not consistent with the NPPF We therefore strongly object to the wording of the policy and request</p>		No

								<p>client is committed to the ongoing operation and growth of the business. The draft Local Plan does not protect the Maltings as an active industrial business in the agri-food sector, well established in Gainsborough, or support its ongoing operation and growth, contrary to the NPPF. The Local Plan contains onerous requirements and significant barriers for the existing business to adapt to changing needs and grow, rather than encouraging sustainable economic growth. We therefore consider that the Local Plan is unsound and strongly object to Policy NS73 and Employment Policies.</p> <p>The Maltings is designated in the Gainsborough Riverside Regeneration Area ('GRRRA') under Policy NS73 under Site Reference ROA6. The draft Policies Map published for consultation designates an extensive area to the south of the town centre. Policy NS73 supports development proposals within the GRRRA. The Evidence Report for Policy NS73 (March 2022) explains that this policy sets out a framework outlining what proposals would be considered favourably and opportunities for regeneration that will maximise the natural feature of the riverside and promote greater connectivity to the town centre through walking and cycling routes. However, it is considered that the policy does not provide an appropriate framework, as it effectively adopts a blanket approach to supporting any types developments, particularly those that meet the criteria mainly relating to the quality of development and the improvement of the connectivity/public realm. This means that while industrial developments are permissible in principle, residential developments are also permissible in principle even if it adjoins the existing industrial operations at the Maltings or prejudices the ongoing industrial operations and potential growth. As previously stated in our representations, this is a significant concern for our client, as it does not recognise the needs of the existing industrial operations in Class B2 use. The supporting paragraph for the policy explains that a mix of uses which support the town centre offer would be appropriate and makes specific reference to office, leisure and residential uses. Residential use in particular, if proposed adjacent to, or close proximity to, the existing Maltings operation, would prejudice the ongoing operation and future growth of the business.</p> <p>The Evidence Report for Policy NS73 responds to our previous objection by stating that our concerns about the existing business would be covered within the suite of employment policies to what is acceptable against the relevant tier of employment hierarchy. However, for the reasons that we explain later in this submission, the suite of employment policies do not address our concern and we therefore maintain our objection on grounds of the lack of policies to protect and encourage the existing businesses to</p>	<p>that the following amendments are made so that existing industrial operations and its expansions are supported within the GRRRA.</p> <p>"Development proposals within the Gainsborough Riverside Regeneration Area, shown on the Policies Map as ROA6, will be supported in principle, where they facilitate the regeneration of the area, provided that they support and/or do not prejudice the existing businesses, including industrial operations, and their economic growth. Development proposals which prejudice the existing industrial operations or their growth will be refused.</p> <p>Development Proposals will be viewed particularly favourably where they: New criterion: Support the existing businesses and contribute positively to the economic growth; a) Protect, enhance or restore the historic identity of the town; b) Strengthen the connection between the river and the town; c) Make the most of the riverside location enhancing; d) Deliver innovative design or design excellence which provides visual interest; e) Contribute positively to the Conservation Area; f) Expand leisure opportunities related to the riverside; and/or g) Enhance public spaces and green infrastructure."</p>		
--	--	--	--	--	--	--	--	---	---	--	--

									<p>maintain and improve their operation.</p> <p>The Local Plan should ensure that it supports economic growth of the existing businesses in line with Paragraphs 81 and 82 of the NPPF which require:</p> <ul style="list-style-type: none"> • Planning policies and decision to help create the conditions in which businesses can invest and adapt; • Placing significant weight on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development; • Planning policies to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies, and • Planning policies to set criteria or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period. 		
--	--	--	--	--	--	--	--	--	--	--	--

Chestnut Homes

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101708	S3	Yes	Don't know	Yes	Don't know	No	Yes	Yes	<p>In broad terms we are supportive of this policy which provides a flexible policy allowing for future opportunities to be brought forward in the most sustainable locations.</p> <p>We are particularly pleased to see the inclusion of the exceptions policy for First Homes which we feel could make a significant contribution to the housing market in the Local Plan period.</p> <p>To be most effective we believe that this policy should allow for cross subsidy from an appropriate amount of Market Housing in line with the Rural Affordable Housing policy within S22.</p>		Yes	No
1101712	S4	Yes	Yes	Yes	Don't know	No	Yes	Yes	<p>The flexibility provided by this policy is welcomed with additional unallocated sites within Villages being considered as well as sites adjacent to the developed footprint. We are concerned that the effectiveness of this policy will be reduced by the thresholds imposed of 10 dwellings for the large and medium Villages. These locations are capable in our experience of accommodating developments of a larger scale and we believe it would be more appropriate to relate the size of development to the size of the Village in which it is located as per the approach for the First Homes exceptions policy.</p>	Omit the specific threshold of 10 dwellings for villages and adopt a more flexible approach to enable all applications to be treated on their own merits in relation to the village they are located in.	Yes	No
1101722	S7	Yes	Yes	Don't know	No	No	No	Yes	<p>We note the CLLP desire to act faster and go further with respect to the Future Homes Standard (FHS) and fully understand the political and moral desire to act in this way.</p> <p>We recognise we have a corporate responsibility with respect to the Climate Change agenda and are keen to paly our part in addressing these issues.</p> <p>We are concerned however at the potential knock on effect that such an approach could have in the Central Lincolnshire area which could severely impact on housing delivery over the Local Plan period.</p> <p>The introduction of the FHS will provide a significant challenge to the housebuilding industry over the next few years. It is a challenge that will no</p>	<p>We believe that the timescales for implementing the changes to the Building regulations should be done via the transitional arrangements proposed rather than accelerating them via Local Plan policies</p> <p>We also believe that the Clause 3 Viability exclusion</p>	Yes	No

									<p>doubt be fully embraced as we seek to play our part in addressing the key issues that exist for todays society. However it will involve considerable advances in technology, improvements in materials/product evolution as well as considerable upskilling in some trades.</p> <p>This will all take time to evolve and is the main rationale for the transitional arrangements for the introduction of the new Building regulation standards.</p> <p>We are therefore concerned that by seeking to go further and faster than the Building regs this could prejudice the delivery of housing over the Local Plan period particularly in the early years. The profile of the housebuilders in the Central Lincs area is a significant proportion of SMEs who will arguably be least capable of quickly implementing the enhanced measures that are being suggested.</p> <p>This is not an attempt to avoid implementing such changes but merely a matter of timing and making sure that the implementation is done in a timescale that will not have a detrimental effect on housing delivery.</p>	should be applicable for all Zones in the Local Plan area not just zones C and D.		
1101726	S22	Yes	Yes	No	No	No	No	Yes	<p>We note that the Local Plan seeks to impose a reduced cap of £140,000 for First Homes which would result in homes up to a market value of £200,000 being applicable for this product.</p> <p>We do not believe that his would be effective in achieving the government's policy objectives for First Homes as it would severely restrict the type of dwellings that could be developed under this product.</p> <p>Current market values in large parts of the Central Lincs area are such that only 1 or 2 bed dwellings would fit into the £200,000 cap. Indeed in some areas this £200,000 limit may result in only one bedroom houses being eligible.</p> <p>We do not believe that the government policy was aimed at being this restrictive and strongly object to this cap being imposed via this proposed policy.</p> <p>Chestnut Homes has been involved in the governments Early Delivery Programme for First Homes on 3 sites in Lincolnshire which has proved very successful to date with all dwellings reserved very quickly following release.</p> <p>There has been no evidence of lack of affordability with the product being universally embraced by purchasers unable to buy in the current housing market.</p> <p>This we believe is the intention of this policy and we do not believe that the reduced cap should be imposed.</p> <p>We also question why market housing being used to cross subsidise on exceptions sites should be limited to helping the provision of Affordable rent properties rathe than to assist the delivery of First Homes.</p>	<p>Omit the reduce cap of £140,000 for First Homes</p> <p>Allow cross subsidy from market housing to enable First Homes exception sites to be developed</p>	Yes	No
1101729	S49	Yes	Yes	Don't know	No	No	Don't know	Yes	<p>We note the inclusion of a restriction on Parking Court provision not associated with flatted development which will only be acceptable in exceptional circumstances. We do not believe this is a justified approach as the design of some sites will often necessitate the provision of such parking courts.</p> <p>Each site needs to be considered on its own merits with the provision of parking courts considered to be a perfectly acceptable design approach for many sites.</p> <p>Chestnut Homes has developed numerous high quality designed sites with such parking courts throughout Lincolnshire and we do not accept that they should in principle be considered unacceptable.</p>	Remove para stating that Parking provision is only acceptable in exceptional circumstances.	Yes	No
1101730	S78	Yes	Yes	Don't know	No	Don't know	No	Yes	The site specific requirements for ongoing developments with outline panning permission include the provision of additional requirements for reserved matters	Remove the requirement of site specific additional requirements for reserved	Yes	No

									applications which we do not believe is justified following receipt of an outline permission.	matters applications where planning permission is in place for the whole site		
--	--	--	--	--	--	--	--	--	---	---	--	--

Church Commissioners

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102208	S1	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>We consider that draft Policy S1 is compliant with paragraph 61 of the NPPF and is considered sound in the context of paragraph 35 of the NPPF.</p> <p>The Central Lincolnshire Local Plan Review Growth Options Paper (June 2021) outlines that one area of change for the growth strategy compared to the adopted Local Plan, is that villages near to the Main Towns are considered to have an important role in supporting these centres, recognising the ability of residents within these locations to access facilities and services in the Main Towns. In taking this approach, we support for example the identification of Fiskerton as a Medium Village in the settlement hierarchy.</p>		Yes	No
1102200	S2	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>We consider draft Policy S2 is compliant in the context of paragraph 35 of the NPPF.</p> <p>The Proposed Submission Plan sets out a housing requirement range of 1,060 – 1,325 dwellings per year during the Plan Period (or between 23,320 and 29,150 dwellings between 2018 and 2040). Whilst 23,320 is the baseline housing requirement, the Proposed Submission Plan states that its strategic aim is to facilitate the delivery of 29,150 new dwellings, and 24,000 new jobs over the Plan Period in order to support the economic growth ambitions for Central Lincolnshire (paragraph 2.2.8 of the Proposed Submission Plan). We consider that this approach is evidenced in the Central Lincolnshire Economic Needs Assessment Update (March 2020) (“ENAU”). It forms part of the evidence base which identifies that job growth over the Plan Period to date far exceeds the growth anticipated in the 2015 Economic Needs Assessment. We agree with paragraph 8.5 of the ENAU that the available evidence therefore justifies a reassessment of the potential scale and profile of future housing growth in Central Lincolnshire over the period to be covered by the new Plan.</p> <p>Paragraph 12.0.1 of the Draft Plan states that Sustainable Urban Extensions (“SUEs”) will, “form an</p>		Yes	No

									integral part of the Local Plan strategy, delivering more than half of the housing requirements in the Plan Period”. The Commissioners have previously provided evidence that the SUE allocations at the South East Quadrant (site reference: NK/CAN/003), South West Quadrant (site reference: NK/NHYK/001) and North East Quadrant (site reference: COL/ABB/001) are deliverable and developable.			
1102164	S3; S4; S22	Yes	Yes	No	Yes	Yes	No	Yes	<p>The Central Lincolnshire Housing Needs Assessment (HNA) (2020) updated the evidence in the Strategic Housing Market Assessment (SHMA) (2015) to provide the evidence for affordable housing need in Central Lincolnshire. The HNA findings suggest that across Central Lincolnshire, there is a newly arising need for 592 affordable homes per year to 2040 taking into account the existing backlog. To help meet this need it is therefore important that a proportion of all new housing developments are affordable, subject to viability. We agree with this assertion.</p> <p>However, in respect of Policy S22 ‘Part Three: Rural affordable housing’, and proposals for First Home exception sites which will be supported in line with Policies S3 and S4, we do have concerns relating to restrictive policy text associated with Policy S4. Please see our comments above in terms of changes to policy we consider necessary to enable to the policies to be considered positively prepared and in line with national guidance.</p>		Yes	No
1102176	S4; Glossary	Yes	Yes	Yes	Yes	No	No	Yes	<p>As acknowledged in paragraph 2.4.1, the significant rural population of Central Lincolnshire means that it is important to maintain and enhance the services and features of the rural area in order to sustain the vibrancy of rural settlements and the quality of life experienced by those living in such areas. We fully support and endorse this assertion.</p> <p>Whilst the Local Plan makes provision for housing growth at a variety of locations across Central Lincolnshire, it is considered that further allocations can be made to help meet local needs and demand in or adjacent to the variety of villages throughout the district. Whilst we acknowledge some flexibility for some growth in villages through draft Policy S4, we do have some significant concerns regarding some of the policy text that proposes quite onerous restrictions to development, both in terms of yield and tenure.</p> <p>Firstly, we note that outside of allocations (either in the Local Plan or Neighbourhood Plans) development would be restricted to either up to 5 or</p>	<p>It is therefore proposed the policy text should be amended as follows [Square brackets denot text suggested for removal]:</p> <p>“1. Large, Medium and Small Villages, as defined in the Settlement Hierarchy in Policy S1, will experience limited growth to support their role and function through allocated sites of 10 or more dwellings in the Local Plan, sites allocated in neighbourhood plans, or on unallocated sites in appropriate locations* within the developed footprint** of the village [that are typically:</p> <ul style="list-style-type: none"> • up to 10 dwellings in Large Villages and Medium Villages; and • up to 5 dwellings in Small Villages. <p>Proposals on unallocated sites not meeting these criteria will not generally be supported unless there are clear material planning considerations that indicate otherwise.]</p> <p>2. Residential development proposals for unallocated sites [within the size thresholds set out in part 1 of this policy and] within the developed footprint of the village will only be supported where it would...”</p>	Yes	No

									<p>10 dwellings depending on location. It is considered that restricting development via proposing a cap to development yield in settlements where sustainable development is encouraged via other policies (such as draft Policy S1), would lead to sustainable smaller scale sites not being used effectively or efficiently. As identified at paragraph 69 of the NPPF (2021), small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. Therefore, restricting sites to up to 5 or 10 units is not considered to be an effective or positive approach to policy.</p> <p>It is therefore considered that a cap on the scale of development (e.g. up to 10 dwellings in Large Villages and Medium Villages; and up to 5 dwellings in Small Villages) should be deleted from policy text. For example, Paragraph 72 of the NPPF states that local planning authorities should support the development of entry-level exception sites, suitable for first time buyers (or those looking to rent their first home), unless the need for such homes is already being met within the authority's area. The only restriction referred to by the Framework is that set out at footnote 35 what states entry-level exception sites should not be larger than one hectare in size or exceed 5% of the size of the existing settlement. It does not actually restrict housing numbers other than the two criteria set out above (e.g. no larger than 1 ha or not exceeding 5% of the size of the existing settlement).</p>	<p>The restrictions currently proposed by draft policy S4 are consider onerous and not in line with the Framework. The NPPF provides policy comfort in respect of scale of such development going forward. If anything, reference could be made to the Framework and in particular footnote 35 if deemed necessary by the Council.</p> <p>It is vital that each development site is assessed on its own individual merits and the recommended deletion of the above text would allow that; ensuring policy is effective and positively prepared in line with national guidance.</p> <p>Finally, when reviewing what the definition is of the “developed footprint of the village”, there is concern that the definition itself creates a barrier to suitable development in line with the NPPF. When reviewing the glossary, developed footprint of a settlement is defined as “the continuous built form of the settlement and excludes:</p> <ul style="list-style-type: none"> • individual buildings or groups of dispersed buildings which are clearly detached from the continuous built up area of the settlement; • gardens, paddocks and other undeveloped land within the curtilage of buildings on the edge of the settlement where land relates more to the surrounding countryside than to the built-up area of the settlement; • agricultural buildings and associated land on the edge of the settlement; and • outdoor sports and recreation facilities and other formal open spaces on the edge of the settlement.”. <p>It is considered that these four criteria are overly restrictive, especially the third bullet point which relates to agricultural buildings. It is considered that excluding agricultural buildings and associated land on the edge of the settlement from the developed footprint of an area is potentially excluding prime re-development sites, particularly where the farm steading is no longer required for agricultural use. Farming practices have changed overtime leading to many farm steadings becoming redundant or underutilised and the traditional buildings becoming surplus to requirements, following the change in modern day activities and the machinery now used. This is recognised in national planning policy whereby the NPPF even refers to utilising such buildings at paragraph 80 as an exception to development in the countryside. This is even more pertinent for buildings on the immediate edge of a</p>		
--	--	--	--	--	--	--	--	--	---	--	--	--

										<p>settlement.</p> <p>Such sites, whilst technically greenfield land, have the same attributes as brownfield land due to containing large amounts of hardstanding and buildings (sometime unsuitable for conversion - either structurally and/or economically from a viability perspective). It is therefore considered additional flexibility should be built into the policy in respect of agricultural buildings / steadings and land on the edge of settlements as these can often lead to providing sustainable development opportunities in locations which are close to existing services and facilities.</p> <p>We therefore propose the following text should be deleted from the Glossary “agricultural buildings and associated land on the edge of the settlement”.</p>		
1102167	S5	Yes	Yes	No	Yes	Yes	No	Yes	<p>We do not support draft Policy S5, especially Part A: Re-use and conversion of non-residential buildings for residential use in the countryside, as it is not considered to be in line with the NPPF and the national policy support for conversion of buildings in the countryside.</p> <p>As stated in paragraph 80(c) of the NPPF (, planning policies and decisions should avoid the development of isolated homes in the countryside unless the development would re-use redundant or disused buildings and enhance its immediate setting.</p>	<p>It is therefore considered that, for draft Policy S5 to be positively prepared and in accordance with national policy, it should be re-worded to provide additional flexibility that supports the reuse of existing buildings without the need for extensive marketing procedures or significantly limiting new openings and / or additional features that could actually enhance the building and its future use.</p> <p>It is therefore proposed that Policy S5 Part A is amended so that it provides the flexibility intended by the NPPF in terms of enabling existing buildings in the countryside to find a viable future use.</p>	Yes	No
1102154	S69	Yes	Yes	Yes	Yes	No	Yes	Yes	<p>In relation to South West Quadrant SUE (SWQ) – Land at Grange Farm, Hykeham We continue to support the use of Sustainable Urban Extensions (“SUEs”) within the Local Plan as a strategy for delivering more than half of the housing requirement in the Plan Period, as this approach is in accordance with national policy, notably paragraph 73 of the NPPF which states that the supply of large numbers of new homes “can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns”.</p> <p>South East Quadrant SUE (SEQ) Canwick Heath.</p> <p>We consider that the identification of the SUE meets the basic conditions of the NPPF in the context that there is robust and credible evidence that it is suitable for residential development, available and that the proposed level of delivery can take place in the Plan Period.</p> <p>Since December 2021 two applications within the South East Quadrant SUE have progressed</p>	<p>We believe that the policy wording should be amended to allow early delivery of homes on the allocation, utilizing the existing road infrastructure.</p> <p>South West Quadrant SUE (SWQ) – Land at Grange Farm, Hykeham We therefore consider it appropriate to amend the draft policy wording criterion (a), which would be consistent with paragraph 12.1.10, second bullet point, as follows:</p> <ul style="list-style-type: none"> • Approximately 2,000 dwellings. Subject to appropriate technical justification a first phase of residential development can be delivered in advance of the North Hykeham Relief Road via Boundary Lane. The remainder of the allocation to be linked to the delivery of the North Hykeham Relief Road. 	Yes	No

								<p>significantly:</p> <ul style="list-style-type: none"> • Jesus College Oxford’s application for up to 450 dwellings, provision of primary school land and formation of roundabout on land north of Canwick Avenue (planning application ref: 16/1564/OUT) – approved at Planning Committee in December 2021. • Church Commissioners’ application for up to 1,087 dwellings, up to 0.44 ha of Use Class C2 (residential institution), up to 2.6 ha employment use development (including Use Classes E and a Mobility Hub) on Land Off Sleaford Road Bracebridge Heath (planning application ref: 20/0057/OUT) – received resolution to approve from Planning Committee in February 2022. We anticipate the Section 106 agreement will be signed and the decision notice released in Summer 2022. <p>South West Quadrant SUE (SWQ) – Land at Grange Farm, Hykeham</p> <p>We consider that the identification of the SUE meets the basic conditions of the NPPF in the context that there is robust and credible evidence that it is suitable for residential development and available.</p> <p>As noted within our previous representations, the Commissioners’ technical consultant team have identified an opportunity to deliver a first phase of the SWQ to create a critical mass of development before the North Hykeham Relief Road is required. Amending the policy wording would allow early delivery of homes on the allocation, utilising the existing road infrastructure.</p> <p>North East Quadrant SUE (NEQ) – Greetwell Area</p> <p>We consider that the identification of the SUE meets the basic conditions of the NPPF in the context that there is robust and credible evidence that it is suitable for residential development and available.</p> <p>As noted within Paragraph 12.1.6 of the Draft Plan, part of the NEQ was granted outline planning permission for up to 500 homes in 2016 (Planning Application reference: 132932) with detailed permission being approved for the first phase of 150 dwellings in 2019 (Planning Application reference: 138460). The first phase is currently being developed by Persimmon with the Commissioners overseeing the delivery. A development partner has now been selected to deliver the balance of dwellings, and a further Reserved Matters application for the remaining 350 dwellings is pending determination (Planning Application reference: 144285).</p>			
--	--	--	--	--	--	--	--	---	--	--	--

1102162	S80	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>NK/BBH/003: Land South of Bracebridge Heath We consider that the identification of the site for developments meets the basic conditions of the NPPF in that there is robust and credible evidence that the site is suitable for residential development and that it is available, and that delivery can take place with the Plan Period.</p> <p>As noted within the Housing and Economic Land Availability Assessment (March 2020) ("HELAA"), the site is in single ownership, there are no deliverability or viability issues.</p> <p>Site NK/BBH/003 is subject to a planning application (planning application ref: 20/0057/OUT) which received resolution to approve from Planning Committee in February 2022. We anticipate the Section 106 agreement will be signed and the decision notice released in Summer 2022</p>		Yes	No
1102159	S81	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>WL/FISK/001A: Land North of Corn Close, Fiskerton We consider that the identification of the site for residential development meets the basic conditions of the NPPF in that there is robust and credible evidence that is suitable for residential development and that it is available, and that delivery can take place within the Plan Period.</p> <p>The technical documents and masterplan concept framework which were previously provided with our Draft Plan representations in August 2021 demonstrate how the site can be developed in a way that addresses the site-specific requirements and delivered within the first five years of the Plan (as is identified in draft Policy S81).</p>		Yes	No

City of Lincoln Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
11850549	S1	Y									Yes	No
11850517	S2	Y							The City of Lincoln Council fully supports Policy S2 in that it provides a positive approach to supporting growth and regeneration for Central Lincolnshire through boosting housing growth above the Local Housing Need figure. The Council also supports the continued focus for the majority of Central Lincolnshire's growth within the Lincoln Strategy Area which builds on the successful approach delivered in the current Local Plan. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11850677	S3	Y							The City of Lincoln Council fully supports Policy S3 in terms of providing a positive framework for considering any proposals not being allocated and also ensuring that only sustainable development is permitted. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No

11850837	S6	Y							<p>The City of Lincoln Council fully supports the proactive stance the Local Plan is taking towards addressing and mitigating the impacts of Climate Change. The role of planning, and Local Plan's in particular play, in setting and driving ambitious carbon reduction targets is vital if we are to reduce overall global temperature rise. Having declared its own Climate Change Emergency in July 2019, The City Council therefore fully endorses the approach taken to Climate Change in the Local Plan.</p> <p>The City Council also supports the robustness of the evidence based underpinning the Climate Change policies.</p>		Yes	No
11930581	S6	Y							<p>The City of Lincoln Council fully supports Policy S6 as a means of reducing the energy demand of new development through careful design principles and the hierarchy within the Policy in term of prioritising steps 1-3 to reduce the demand for energy and therefore the reduce carbon footprint and help support the Local Plan's ambitions to be a net-zero. The City of Lincoln Council considers the policy to be sound and deliverable.</p>		Yes	No
11930613	S7	Y							<p>The City of Lincoln Council fully supports Policy S7 as the Policy details how new residential development will meet stringent energy requirements including reducing energy consumption which is crucial in helping combat carbon emissions. The Policy takes a realistic approach in acknowledging that in certain areas of Central Lincolnshire a flexible approach is needed to ensure that a balance is struck between development adhering to high energy standards without jeopardising scheme viability. The City of Lincoln Council considers the policy to be sound and deliverable.</p>		No	No
11930645	S8	Y							<p>The City of Lincoln Council fully supports Policy S8 as the Policy details how new non-residential buildings will meet stringent energy requirements including reducing energy consumption which is crucial in helping combat carbon emissions. The City of Lincoln Council considers the policy to be sound and deliverable.</p>		Yes	No
11930677	S9	Y							<p>The City of Lincoln Council fully supports Policy S9 as a means of encouraging new developments to connect to decentralised energy and non-fossil fuel based CHP networks which helps reduce carbon emissions. The City of Lincoln Council considers the policy to be sound and deliverable.</p>		Yes	No
11930709	S10	Y							<p>The City of Lincoln Council fully supports Policy S10 as means of supporting the maximum use of resources and reduction in waste connected with development proposals. The City of Lincoln Council considers the policy to be sound and deliverable.</p>		Yes	No
11930741	S11	Y							<p>The City of Lincoln Council fully supports Policy S11 as it is becoming increasingly important to consider embodied carbon and the carbon savings which can be made through avoiding demolition where possible and the re-use of existing buildings. The City of Lincoln Council considers the policy to be sound and deliverable.</p>		Yes	No
11930773	S12	Y							<p>The City of Lincoln Council fully supports Policy S12 as the Policy will support water efficiency measures in new developments which is particularly important as Central Lincolnshire is identified as being within an area of serious water stress. The City of Lincoln Council considers the policy to be sound and deliverable.</p>		Yes	No
11930805	S13	Y							<p>The City of Lincoln Council fully supports Policy S13 as a means of encouraging the reduction of energy consumption in development proposals involving change of use, redevelopment or extension to existing buildings. The City of Lincoln Council considers the policy to be sound and deliverable.</p>		Yes	No
11930837	S14	Y							<p>The City of Lincoln Council fully supports Policy S14 as this policy is a particularly important area in supporting Central Lincolnshire's aim towards a net-zero. Having Local Plan policies which proactively support and encourage an increase in renewable energy generation is a key component of this aim and S14 sets a positive and supportive policy framework for renewable energy proposals including solar and wind energy generation. The City of Lincoln Council considers the policy to be sound and deliverable.</p>		Yes	No
11930869	S15	Y							<p>The City of Lincoln Council fully supports Policy S15 as it is important to maintain and protect existing renewable energy infrastructure in order to continue to contribute towards the</p>		Yes	No

									reduction in carbon emissions. The City of Lincoln Council considers the policy to be sound and deliverable.			
11930901	S16	Y							The City of Lincoln Council fully supports Policy S16 as it is important that the Local Plan supports energy infrastructure schemes to be developed that will support the requirements for low carbon energy including electricity demand e.g. battery storage. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11930933	S17	Y							The City of Lincoln Council fully supports Policy S17 as a means of protecting and conserving existing carbon sinks across Central Lincolnshire as they are a major carbon storage resource. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11930965	NS18	Y							The City of Lincoln Council fully supports Policy NS18 as it is important that the Local Plan proactively encourages the deployment of electric vehicle charging points in development in order to contribute towards the reductions in carbon emissions associated with transport. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11930997	S19	Y							The City of Lincoln Council fully supports Policy S19 as it demonstrates Central Lincolnshire's position on moving away from fossil fuel extraction. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11931029	S20	Y							The City of Lincoln Council fully supports Policy S20 as designing buildings to be resilient and adaptable to mitigate the impacts of climate change will become increasingly important. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11931061	S22	Y							The City of Lincoln Council fully supports Policy S22 as the policy seeks to support the delivery of the required number and type of affordable housing required in Central Lincolnshire (as evidenced in the Central Lincolnshire Housing Needs Assessment) whilst at same time acknowledging the need to balance infrastructure needs across Central Lincolnshire through the identification of value zones. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11931093	S25	Y							The City of Lincoln Council fully supports Policy S25 as the policy supports the provision of a wide range of housing which is required in Central Lincolnshire and Lincoln in particular where shared accommodation, including student accommodation is in high demand. The policy recognises the impact that over-concentration can have on existing communities. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11931125	S28	Y							The City of Lincoln Council fully supports Policy S28 as the policy will help ensure that the identified employment needs (as supported in the evidence including the Economic Needs Assessment) of Central Lincolnshire are met and that the identified employment sites in Policy S28 provide a range of strategic and local employment opportunities. The Policy compliments the City of Lincoln Council's support for growing Lincoln's economy as set out in documents such as the Lincoln Growth Strategy. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11931157	S29	Y							The City of Lincoln Council fully supports Policy S29 as the policy helps to meet the identified strategic employment requirements across Central Lincolnshire. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11931189	S30	Y							The City of Lincoln Council fully supports Policy S30 as the policy supports the provision of employment on the SUEs across Central Lincolnshire. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11931221	S31	Y							The City of Lincoln Council fully supports Policy S31 as the policy supports the provision of existing established employment areas which are of particular importance in supporting the economy and employment within Lincoln as the major employment area within Central Lincolnshire. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11931253	S35	Y							The City of Lincoln Council fully supports Policy S35 as the policy supports the retail hierarchy in particular with Lincoln being the most significant retail area in Central Lincolnshire. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11931285	S36	Y							The City of Lincoln Council fully supports Policy S36 as the policy supports the importance of the role that Lincoln City centre plays in Central Lincolnshire as the main destination in providing a range of facilities and services including retail, leisure, tourism, arts and education		Yes	No

									provision. Policy S36 supports the City of Lincoln Council's aims and ambitions in promoting Lincoln as a key destination for both residents and visitors to the City. The City of Lincoln Council considers the policy to be sound and deliverable.			
11931317	S40	Y							The City of Lincoln Council fully supports Policy S40 which supports the role of District Centres in providing residents with access to more local retail, leisure and office provision. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11931349	NS41	Y							The City of Lincoln Council fully supports Policy NS41 as the policy helps to support the importance that shop frontages play in retaining and improving the character and visual appearance of areas. This is of particular importance in Lincoln where the City Council has been successful in helping to fund a number of shop frontage renovation schemes through the Heritage High Street Action Zone. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11931381	S42	Y							The City of Lincoln Council fully supports Policy S42 as the policy helps promote and support the importance of the visitor economy to Central Lincolnshire and Lincoln particularly which is an established international, national and regional tourist destination. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11931413	S47	Y							The City of Lincoln Council fully supports Policy S47 as the policy will assist in the overall delivery of sustainable modes of transport and improve accessibility for residents which is in accordance with the themes set out in the emerging 5th Lincolnshire Transport Plan and the Lincoln Transport Strategy. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11931445	S48	Y							The City of Lincoln Council fully supports Policy S48 as the Policy will help to promote and encourage walking and cycling within the City which from a City of Lincoln Council will have multiple benefits including supporting mental health and well-being, improving the local environment and reducing transport accessibility inequality in the City. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11931477	S49	Y							The City of Lincoln Council fully supports Policy S49 as the policy provides a justified approach to parking provision across Central Lincolnshire including the different approaches that are required in urban areas such as Lincoln. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11931509	S52	Y							The City of Lincoln Council fully supports Policy S52 as given the important role that Lincoln's Universities play in the economy of Lincoln, a Policy is needed to support their growth and development. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11932597	S57	Y							The City of Lincoln Council fully supports Policy S57 as given the nationally significant historic nature of the City, particularly the historic core of Lincoln, the policy provides a balanced approach to ensuring developments protect, conserve and seek opportunities to enhance the historic environment of the City. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11932629	S58	Y							The City of Lincoln Council fully supports Policy S58 as the policy will help to ensure development proposals will take into account the unique visual setting of the Cathedral, Castle and general skyline. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11932661	S61	Y							The City of Lincoln Council fully supports Policy S61 as the policy provides a positive policy framework that will help to ensure BNG is applied across Central Lincolnshire in a consistent manner. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11932693	S68	Y							The City of Lincoln Council fully supports Policy S68 as the policy reflects the expected supply and delivery of the SUE's across Central Lincolnshire. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11932725	S69	Y							The City of Lincoln Council fully supports Policy S69 as the policy reflects the expected supply and delivery of the SUE's in Lincoln. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11932757	NS72	Y							The City of Lincoln Council fully supports Policy NS72 as the policy provides a supportive framework which enables and promotes development that will enhance and re-develop		Yes	No

									Lincoln's regeneration and opportunities areas. The City of Lincoln Council considers the policy to be sound and deliverable.			
11932789	S76	Y							The City of Lincoln Council fully supports Policy S76 as the policy reflects the expected supply and delivery of the SUE's in Lincoln. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11932821	S77	Y							The City of Lincoln Council fully supports Policy S77 as the policy reflects the expected supply and delivery of housing sites in the Lincoln Urban Area. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No
11932853	S83	Y							The City of Lincoln Council fully supports Policy S83 as the policy reflects the expected supply and delivery of Gypsy and Traveller and Travelling Showpeople sites in the Central Lincolnshire. The City of Lincoln Council considers the policy to be sound and deliverable.		Yes	No

Cliff Cluster Villages

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103297	S1	Don't know		Don't know	No	No	Don't know	Don't know	<p>Sustainability and the Rate of Growth S1 "The Spatial strategy and settlement hierarchy"</p> <p>We aim to reach the target of net zero emissions by 2030, but consultants to the Central Lincolnshire Local Plan Panel state, "Under current practices after seven years, Central Lincolnshire would have a carbon debt..." highlighting that this plan is ineffective, and even these targets are now deemed inadequate by the Intergovernmental Panel on Climate Change (IPCC). An increase of over a thousand new dwellings every year will inevitably increase carbon emissions, both in their construction and in their occupation. We therefore need a much slower rate of construction to give time for technology to overcome what the IPCC state is already a dangerous expected outcome. Although technology is moving fast and new low carbon opportunities will no doubt arrive, until they do, we do not have the ability to build at this proposed rate without substantially increasing carbon emissions.</p> <p>The policies calling for higher building standards, charging points etc. are all subject to the viability assessments. These are already compromised in the largest developments as evidenced by lower Community Infrastructure Levy (CIL) requirements in the Sustainable Development Extensions of Sleaford, Gainsborough and Lincoln. In reality, the level of CIL delivered to Parish Councils who have been subjected to significant amounts of new housing is totally inadequate to provide any meaningful infrastructure improvements to mitigate the impact of increased population on road usage, parking near shops, etc.</p> <p>The plan does not go far enough in its environmental ambitions to off-set the increased environmental impact of increased development. For this reason, the plan is not sound and not effective.</p>	We believe that the building should be 'back end' rather than 'front end' loaded to try to tackle this failing, and therefore a phasing or 'capping' mechanism is required. The total number of dwellings is too high to accommodate without significant adverse impact on the character of our local villages and should be at the lower end of Government requirements.	Yes	No

1103299	S2	Don't know		Don't know	No	No	Don't know	Don't know	<p>Number of new dwellings required S2 “Growth levels and distribution”</p> <p>We welcome the reduction in the number of new dwellings required, noted at between 1,060 and 1,325 every year, but it is still too high to be genuinely sustainable. However, the vision target and Policy S2 state 29,150 new dwellings in total, which equates to 1,325 every year for 22 years. For clarity, the lower figure of 23,320 new dwellings based on the figure of 1,060 new homes per year, needs to be included. The higher figure is used to fulfil ‘economic ambition’, but in the interests of sustainability, we must strike the right balance in achieving economic, environmental and social wellbeing, and meet the carbon emission targets. For these reasons the plan is not sound and not justified.</p>	<p>We support the addition in 2.2.8 that the lower figure will be used in the calculation of the five-year land supply. A phasing or capping mechanism is also required to enable development without damage to the character of our villages.</p>	Yes	No
1103300	S4	Don't know		Don't know	No	No	Don't know	Don't know	<p>Pressure on village development S4 “Housing development in or adjacent to villages”</p> <p>We object to the pressure placed on villages that have few facilities and little capacity to generate the community services and facilities needed to support an increasing population. This pressure is created by two policies: removing the maximum growth cap on villages; and by allowing First Time and affordable homes to be built outside the current village footprint. When permission is granted to build fewer than 10 dwellings per application in small or medium villages, this does not attract 106 monies or trigger the requirement for affordable housing. While these small developments do attract CIL monies, there are constraints on how CIL can be spent and the figures are too small to achieve anything useful or proportionate to the development that generated them.</p> <p>However, the cumulative effect of these small developments on the character of the area and the pressure on infrastructure such as roads and services, becomes significant and is not sustainable. The capping defined in the current policy has been lifted where there was clear local support for the need, highlighting that this is an effective tool to help manage growth.</p> <p>Whilst a gradual increase in new electric vehicles is taking place, there is no likelihood that existing use of fossil fuels in vehicles or household heating will decrease significantly before 2030, according to Government assessment.</p> <p>For these reasons the plan is not sound and not effective.</p>	<p>The cap of 10% maximum growth over the life of the plan needs to be reapplied as this is the key mechanism for maintaining the rate of growth at a sustainable level, which is much needed in all our village and town communities. To support this, a clearer definition of local support needs to be provided.</p> <p>In both urban and rural areas, the continued requirement for more dwellings, without any guarantee of matching services and facilities, is highly controversial. The rate of development needs to be slower to combat the adverse impact of increased traffic levels on air pollution, carbon emissions and quality of life. Coupled with this, we need to see greater evidence that not only is the cumulative effect of increased housing development on the host village’s services and infrastructure considered, but also that the cumulative effect of neighbouring villages’ development is considered. As an example, the Cliff Villages are served by a single GP surgery, and whilst one can argue that the impact created by any individual recent new development in the villages is insignificant, the reality is that the combined effect of the significant increase in housing in Navenby and Waddington over the last 5 years means that the 2 GPs in the Navenby surgery are now dealing with nearly 3 times the Government’s recommended number of patients.</p> <p>Therefore, Planners should restrict permission for housing developments with</p>	Yes	No

										a capping or phasing mechanism in order to enable development at a pace that does not impact adversely on the character of our villages, and to ensure facilities can be provided at the right pace.		
1103303	S14	Don't know		Don't know	No	No	Don't know	Don't know	<p>Wind Turbines S14</p> <p>The U-turn on wind turbines from being a general presumption against approving their build, to a general presumption in favour, is not appropriate. We note the distinction between small-scale and large-scale developments, but even turbines of up to 40m have a significant impact on industrialising the open countryside of an area as flat as Lincolnshire. Although 'local' support is required for much larger turbines, this is hard to define in the rural areas where they would need to be built and the Authorities' requirements might be deemed satisfied by achieving support from just one small village, despite the adverse impact on people in or moving through a large radius around it, who might be objecting or even have no voice in the discussion because of where Authority boundaries fall. For example, the Nocton wind farm proposal was in Nocton Parish, but geographically much closer to Bardney, which is in a different district council area. It is also worth noting that many objections to the Nocton wind farm proposal came from Lincoln, some 10 miles away, because of the potential loss of views towards and away from Lincoln Cathedral. If one takes that distance as the radius of the area affected, it means that everybody in an area of more than 300 square miles around the proposed site would be impacted by an alien feature in an otherwise rural landscape.</p> <p>There is potential for sufficient green energy production in Central Lincolnshire without the use of large wind turbines, which for a variety of reasons are better located offshore. They should therefore be taken out of the plan as they are not an appropriate element of Central Lincolnshire's strategy to reduce our dependence on fossil fuels.</p>	We recognise the need for an assured increase in renewable energy generation within the District in a relatively short timescale. However, Appendix A of Task C: Emissions Reductions Targets highlights that there is sufficient potential to meet Central Lincolnshire's green energy needs using solar and anaerobic digestion means, which provide greater certainty of a defined level of production than wind turbines do. Therefore, the use of wind turbines to solve Central Lincolnshire's future energy needs should be removed from the plan and greater emphasis placed on more certain strategies.	Yes	No

CN Overton Ltd and Wellingore Farms Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102992	S1	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Land Adjoining Medical Centre Grantham Road Navenby</p> <p>It is our view that the above Policies (S1,S4 & S80) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages.</p> <p>Policy S1 states that growth will be allowed in large villages (such as Navenby) to an "appropriate" level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an "appropriate" level may be.</p>	n/a	No	No

									<p>Policy S4 does not allow for unallocated sites adjacent to large villages to be brought forward for open market or retirement housing where there is a demonstrable demand. It is our view that it should. The draft Local Plan supports First Home and Rural Affordable Exception sites and we consider that this is a restrictive and short sighted policy.</p> <p>The site is situated adjacent to the village of Navenby which is identified as a Large Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated April 2022.</p> <p>The site currently has an extant consent for a 70 Self-contained Bedroom Care Home plus 9 Independent Living Bungalows (16/0040/OUT) and is subject to a new application for 48 No “Over 55” Bungalows which will include for 12 policy compliant Affordable Bungalows to replace the current implemented consent due to the changing circumstances of demand for such accommodation within the immediate area.</p> <p>The proposed Policy S80 does not include the above-mentioned consented site and it is our view that it should.</p> <p>In the Residential Allocations Evidence Report 2022 it is acknowledged that there is an extant consent for the Care Home Facility, but it discounts the possibility of a variation of use for the site as detailed above and the proposed draft Local Plan as submitted will not allow for such sites to be considered for an alternative/variation of existing consented use.it is our view that the Draft Local Plan should allow for such variations to be considered.</p>			
1102993	S4; S80	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Land Adjoining Medical Centre Grantham Road Navenby It is our view that the above Policies (S1,S4 & S80) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. Policy S1 states that growth will be allowed in large villages (such as Navenby) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be. Policy S4 does not allow for unallocated sites adjacent to large villages to be brought forward for open market or retirement housing where there is a demonstrable demand. It is our view that it should. The draft Local Plan supports First Home and Rural Affordable Exception sites and we consider that this is a restrictive and short sighted policy. The site is situated adjacent to the village of Navenby which is identified as a Large Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated April 2022. The site currently has an extant consent for a 70 Self-contained Bedroom Care Home plus 9 Independent Living Bungalows (16/0040/OUT) and is subject to a new application for 48 No “Over 55” Bungalows which will include for 12 policy compliant Affordable Bungalows to replace the current implemented consent due to the changing circumstances of demand for such accommodation within the immediate area. The proposed Policy S80 does not include the above-mentioned consented site and it is our view that it should. In the Residential Allocations Evidence Report 2022 it is acknowledged that there is an extant consent for the Care Home Facility, but it discounts the possibility of a variation of use for the site as detailed above and the proposed draft Local Plan as submitted will not allow for such sites to be considered for an alternative/variation of existing consented use.it is our view that the Draft Local Plan should allow for such variations to be considered.</p>	n/a	No	No
1102994	S80	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Land Adjoining Medical Centre Grantham Road Navenby It is our view that the above Policies (S1,S4 & S80) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. Policy S1 states that growth will be allowed in large villages (such as Navenby) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be. Policy S4 does not allow for unallocated sites adjacent to large villages to be brought forward for open market or retirement housing where there is a demonstrable demand. It is our view that it should. The draft Local Plan supports First Home and Rural</p>	n/a	No	No

									Affordable Exception sites and we consider that this is a restrictive and short sighted policy. The site is situated adjacent to the village of Navenby which is identified as a Large Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated April 2022. The site currently has an extant consent for a 70 Self-contained Bedroom Care Home plus 9 Independent Living Bungalows (16/0040/OUT) and is subject to a new application for 48 No “Over 55” Bungalows which will include for 12 policy compliant Affordable Bungalows to replace the current implemented consent due to the changing circumstances of demand for such accommodation within the immediate area. The proposed Policy S80 does not include the above-mentioned consented site and it is our view that it should. In the Residential Allocations Evidence Report 2022 it is acknowledged that there is an extant consent for the Care Home Facility, but it discounts the possibility of a variation of use for the site as detailed above and the proposed draft Local Plan as submitted will not allow for such sites to be considered for an alternative/variation of existing consented use.it is our view that the Draft Local Plan should allow for such variations to be considered.			
--	--	--	--	--	--	--	--	--	--	--	--	--

Coleby Parish Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102100	S1								Coleby Parish Council welcomes the retention of Coleby Village in Level 6 as a ‘small village’ We welcome that, beyond site allocations made in the Local Plan or any applicable neighbourhood plan (but see comments re Appendix 1 allocations in comments on Policy S4), development will be limited to that which accords with Policy S4: Housing Development in or Adjacent to Villages or other policies relating to non-residential development as relevant.			No
1102101	S2								Coleby Parish Council is pleased to see that revised growth levels are based around updated Housing Needs and Economic Assessments and, as a consequence, have reduced.			No
1102103	S4								Coleby Parish Council welcomes the fact that Policy S4 appears to take a more restrictive view on which development will be supported i.e. Within the developed footprint where it would: a) preserve or enhance the settlement’s character and appearance; b) not significantly harm the character and appearance of the surrounding countryside or the rural setting of the village; and c) be consistent with other policies in the development plan On unallocated land immediately adjacent to the developed footprint where this is: a) a First Homes exception site in accordance with the NPPF and provided it is outside of the Lincolnshire Wolds Area of Outstanding Natural Beauty and not within a location that is subject of a Designated Rural Area as defined in Annex 2 of the NPPF; or b) exclusively for a rural affordable housing exception site. BUT we object to the uplift of maximum dwellings per site in small villages from 4 to 5 which seems to have no rationale as the overall housing requirement for the County is reduced. We are also VERY concerned that there is no longer a brake available to our community on			No

								<p>development that would exceed the “housing requirement” or maximum dwellings per site such as that provided by the current “demonstrable community support” requirements. This is seen by residents as a way of ‘leaving the door open’ and removing the ability of local residents to make decisions about their own locality.</p> <p>The “housing requirement” in Appendix 1 states that it covers the Parish whereas it was clarified previously that the current LP requirement covers only the village of Coleby. This was an issue when the current plan was developed and should be clarified. If it is decided to stick with a requirement for Parishes (a change from the current LP) we submit that credit should be given to development outside the village but within the Parish during the life of the current Local Plan.</p> <p>Finally, the “allocation” in Appendix 1 appears to be at odds with the formal NKDC quarterly monitoring statement and this should be corrected.</p>			
1102105	S5							<p>Coleby Parish Council supports the collation of various strands to Development in the Countryside into a single Policy S5.</p> <p>We are, however, unclear as to how elements of Policy S5 fits with Permitted Development Rights e.g. for Agricultural Buildings converted to dwellings.</p>			No
1102106	S6; S7; S8; S9; S10; S11; S12; S13; S14; S15; S16; S17; NS18; S19; S20; S21							<p>Policies S6 to S21 focusing on Energy, Climate Change and Flooding</p> <p>Coleby Parish Council supports the increased focus on environmental concerns and achieving ambitious net carbon zero targets. We would, however, emphasise that visual and other sensory impacts, especially in and adjacent to conservation areas, should be an important factor in deciding green energy etc. developments.</p>			No
1102107	S22							<p>Coleby Parish Council welcomes the aggregation of policy re Affordable Housing into Policy S22. Affordable Housing should benefit from reduced price and not be reduced quality and steps should be taken to ensure that they remain “affordable” on resale and do not just provide a step onto the housing ladder for the first purchasers.</p>			No
1102108	S23							<p>Coleby Parish Council welcome consideration of specific housing needs so that new residential development should maintain, provide or contribute to a mix of housing tenures, types and sizes to help support the creation of mixed, balanced and inclusive communities.</p>			No
1102109	NS24							<p>Coleby Parish Council supports a single overarching policy for custom and self-build housing as set out in Policy NS24.</p>			No
1102110	NS27							<p>Coleby Parish Council welcomes the overall policy within Policy NS27 re Residential Annexes and the underlying intent to support genuine annexes and seek to prevent pseudo annexes that can later be separated.</p>			No
1102112	S40							<p>Coleby Parish Council welcomes the proposals to maintain the viability and vitality of Village Centres in Policy S39, but it is unclear to us how this relates to recent changes in permitted development rights allowing Class E premises to change use to Class C3 dwellings. This should be clarified.</p>			No
1102114	S45							<p>Coleby Parish Council is concerned that ambitions to secure appropriate infrastructure improvements through planning consent / conditions may not, based on historical experience, materialise. It appears to be easy for developers to renege on, or appeal, agreements to provide supporting infrastructure.</p> <p>There are serious reservations about the impact on social, economic, and environment infrastructure resulting from increased housing development along the ridge villages including but not exclusively – Education and Health – numbers of school places and primary health care</p>			No

									– GP’s and Community Clinicians; Communications – Transport, Road Usage, and Broadband; Business and Skills Development & Jobs.			
1102115	S47								Coleby Parish Council welcomes support for proposals which contribute towards an efficient and safe transport network that offers a range of transport choices for the movement of people and goods.			No
1102118	S49								Coleby Parish Council welcomes the clear requirements for car parking provision in ‘Other Locations’ in Policy S48 and Appendix 2. Whilst there is a conflict between car ownership / parking provision and environmental targets, travel by car remains essential in villages such as ours especially as public transport is very limited. We particularly welcome the fact that Neighbourhood Plans may specify standards other than set out in this Policy.			No
1102119	S50								Retention of Community Facilities, particularly those identified in our Neighbourhood Plan, are crucially important to the continued sustainability of our community. Coleby Parish Council notes that no significant changes are proposed regarding potential development affecting Community Facilities. However, we are aware that recent Permitted Development Rights for Class E premises could potentially deprive communities of their community facilities and hope that this can be addressed in the criteria to further protect CFs.			No
1102121	S53								Coleby Parish Council supports the broad approach to design and amenity standards in Policy S52.			No
1102122	S54								Coleby Parish Council welcomes the focus on Health and Wellbeing in Policy S53. However, as well as an overarching duty to promote Health and Wellbeing, Local Authorities have a similar duty with regard to reducing crime and disorder which does not seem to receive much coverage in the draft proposed Plan.			No
1102124	S57								Coleby Parish Council welcomes that development proposals should protect, conserve and seek opportunities to enhance the historic environment of Central Lincolnshire.			No
1102126	S59								Coleby Parish Council welcomes proposals to safeguard green and blue infrastructure in Central Lincolnshire from inappropriate development			No
1102129	S60								Policy S60: Protecting Biodiversity and Geodiversity and Policy S61: Biodiversity Opportunity and Delivering Measurable Net Gains Coleby Parish Council welcomes these.			No
1102132	S61								Policy S60: Protecting Biodiversity and Geodiversity and Policy S61: Biodiversity Opportunity and Delivering Measurable Net Gains Coleby Parish Council welcomes these.			No
1102135	S64								Coleby Parish Council welcomes that an area identified as a Local Green Space on the Policies Map or within an adopted Neighbourhood Plan will be protected from development in line with the NPPF, which rules out development on these sites other than in very special circumstances.			No
1102137	S66								Coleby Parish Council welcomes the protection of Trees, Woodland and Hedgerows in Policy S65 and hopes that planners will ensure that destruction of mature trees etc. is an absolutely last resort as the offset measures proposed will take many years, perhaps generations, to restore the ecosystems of large mature trees			No

Collingham Parish Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100094	General								Thank you for consulting the Parish Council on the Central Lincolnshire Local Plan We have no comments to make with regard the proposed document, other			No

									than it would appear to be a very good plan and potentially a model for others to follow			
--	--	--	--	--	--	--	--	--	--	--	--	--

Corringham Parish Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101247	S82; General	Don't know	Don't know	Yes	No	Don't know	Yes	No	Corringham Parish has not been directly invited to take part in any consultation on the CLLP review. This is despite Corringham PC having consulted with the JPU at all stages of our site allocations and made them aware of our work when the JPU put out their call for sites. We feel this goes against any duty to Co-operate. In view of this we also feel the inclusion of the site allocated for Corringham is unjustified.	A revision of the required development numbers for Corringham in line with numbers agreed for our NHP. Removal of the site allocation for Corringham and adoption of the sites already allocated in the adopted Corringham Neighbourhood Plan	No	Yes

Cyden Homes Limited

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102632	Vision	Yes	Yes	No	No	No	No	Yes	We consider that the draft Local Plan's Vision is broadly appropriate, however, we recommend that it is amended to state that 'Central Lincolnshire will grow by a minimum of 29,150 new homes'. We consider that this change is needed for soundness, to ensure that sufficient housing is delivered to effectively meet identified needs and support economic growth.		Yes	No
1102633	S1	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>We support the proposed spatial strategy which seeks to focus on delivering sustainable growth, creating cohesive and inclusive communities and provide the scale and mix of housing types that will meet the identified needs of Central Lincolnshire.</p> <p>In our view, having regard to this strategy, development should continue to be focused within the Lincoln Urban Area, Main Towns, Market Towns and Large Villages where accessibility to services and facilities is greater compared to smaller settlements within the Plan area.</p> <p>As a Large Village within the Lincoln Strategy Area, Cherry Willingham offers a range of facilities and services. Growth at Cherry Willingham should therefore be supported by the Local Plan through the allocation of suitable and deliverable sites, as we discuss further below.</p>	In the context of Policy S2 which identifies how growth should be distributed, we consider that Policy S1 should specify that the Lincoln Urban Area, Main Towns, Market Towns and Large Villages located within the Lincoln Strategy Area (the identified focus for the majority of growth) will be prioritised for growth. Referring to the intended distribution of growth alongside the settlement hierarchy would provide clarity for readers and ensure that the Plan is effective.	Yes	No
1102635	S1; S2	Yes	Yes	No	No	No	No	Yes	Paragraph 61 of the National Planning Policy Framework (NPPF) (2021) states that:	The Local Plan Review should identify a single	Yes	No

								<p>‘To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance’.</p> <p>Planning Practice Guidance (PPG) emphasises that the standard method provides:</p> <p>‘a minimum starting point in determining the number of homes needed in an area. It does not predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.</p> <p>...</p> <p>There may, occasionally, be situations where previous levels of housing delivery in an area, or previous assessments of need are significantly greater than the outcome from the standard method. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests.’ (PPG; paragraph reference 2a-010-20190220)</p> <p>Therefore, the Local Plan should, as a minimum, make provision for the local housing need figure. Importantly, however, providing the minimum number of homes needed would not be consistent with the Government’s objective of significantly boosting the supply of homes or Central Lincolnshire’s stated vision to ‘be a location of positive growth’ with the Plan area’s city, market towns and many of its villages to ‘see new homes built, new jobs created and improved infrastructure developed’.</p> <p>On the basis of the above, we recommend that the housing requirement to be included in the Local Plan should be higher than the minimum housing need figure identified by the standard method. It should include an appropriate uplift which is informed by economic growth aspirations across the Plan area. We consider that this uplift is justified in order to ensure that the sufficient homes are available to support projected job growth, as projected in the Economic Needs Assessment (2020).</p> <p>The Housing Needs Assessment (2020) concludes that 1,325 dwellings per annum is required to support the expected growth in jobs.</p> <p>In this regard, we recommend that a housing requirement of at least 1,325 dwellings per annum is identified in the Local Plan, i.e. the higher end of the range currently referred to. Taking this account, Policy S2 should state that a minimum of 29,150 homes will be delivered during the Plan period.</p> <p>As set out in our representations at earlier stages of the Local Plan’s preparation, we consider that the Local Plan Review should identify a single housing need and requirement figure which includes an appropriate uplift reflecting economic growth aspirations. Site allocations and land supply position calculations should both be informed by this single figure. This would be consistent with the Inspectors’ report on the adopted Local Plan which states that:</p> <p>‘In order to be clear and effective the plan should set out the single OAN figure.’ (IR; paragraph 52)</p> <p>In respect of the distribution of growth, we support the retention of the Lincoln Strategy Area as the focus for growth in the Plan in recognition of its prominence</p>	<p>housing need and requirement figure which includes an appropriate uplift reflecting economic growth aspirations. Site allocations and land supply position calculations should both be informed by this single figure.</p> <p>The Local Plan allocates a broad range of sites within the Lincoln Strategy Area.</p> <p>The Plan incorporates a mechanism to allow for alternative development sites to come forward to provide for any housing not delivered at the anticipated rate.</p>		
--	--	--	--	--	--	--	--	--	--	--	--

									<p>within the Plan area in terms of employment and amenity provision. In recognition of this area as the focus for growth, we recommend that the Lincoln Strategy Area is referred to within Policy S1, further to our comments above.</p> <p>However, we maintain that there is a need for a broader range of site allocations within this area. The adopted Local Plan is reliant on Sustainable Urban Extensions (SUEs) for the delivery of a significant proportion of new housing across the Plan period; this reliance risks the delivery of sufficient new homes in Central Lincolnshire to meet identified needs. Indeed, paragraph 2.2 of the Central Lincolnshire Sustainable Urban Extensions Topic Paper (March 2022) states that the SUEs are expected to deliver between 48% and 60% of the overall housing requirement between 2018 and 2040 (which is identified as being a range of 23,320 to 29,150 dwellings). In relation to the Lincoln Strategy Area, as across the wider plan area, there is a reliance on the SUEs with a significant proportion of housing anticipated to be delivered at the SUEs.</p> <p>Therefore, we recommend that the Local Plan allocates a broad range of sites within the Strategy Area. In our view, this should include sites of differing scales and in different locations, reflecting the demand for different housing types in different locations across the Plan area. To this end, the Local Plan should make provision for housing in both urban and rural locations where there is a local need and where new development in sustainable locations can enhance and maintain the vitality of existing communities.</p> <p>Crucially, the allocation of a range of sites, both within the Lincoln Strategy Area and across the Plan area, should have regard to deliverability and market capacity. Applying such an approach will help to ensure that the development needs of the area are addressed effectively. As we return to below, having regard to deliverability, where there is insufficient evidence to demonstrate that sites are deliverable, they should be de-allocated and alternative site allocations identified in the Local Plan.</p> <p>Alternatively, additional sites should be allocated to ensure that there remains a sufficient supply of housing being delivered in the event that some sites are delayed. In the context of the Lincoln Strategy Area being the focus for growth, these additional sites should be focused within the Strategy Area. This would ensure that the identified housing needs within the Plan area are met in full in a timely manner, consistent with the Plan's vision</p> <p>To ensure that a robust supply is delivered in the event of unforeseen delays on the SUEs or allocations, we recommend that the Plan also incorporates a mechanism to allow for alternative development sites to come forward to provide for any housing not delivered at the anticipated rate. Again in the context of the Lincoln Strategy Area being the focus for growth, alternative sites located within this area should be prioritised for development in the event such circumstances arise. Policy S2 should therefore be amended to reflect this.</p>			
1102639	S4	Yes	Yes	No	No	No	No	Yes	<p>Having regard to our comments above relating to the potential for delivery on some sites to be delayed, we recommend that Policy S4 is revised to specify an additional circumstance in which residential development on unallocated greenfield sites immediately adjacent to the developed footprint of villages will be supported.</p>	<p>Recommend part 3 of Policy S4 is amended to add new text as follows:</p> <p>c) in order to make alternative provision for an allocated site at</p>	Yes	No

										the same village which has not been delivered in accordance with the anticipated trajectory and is demonstrated to be undeliverable within the next five years.		
1102680	S80	Yes	Yes	No	No	No	No	Yes	<p>The supply of new housing in the Plan area is currently heavily reliant on the delivery of the SUEs. Furthermore, there has been limited progress on some sites allocated in the adopted Local Plan with no evidence demonstrating that they will be deliverable within the Plan period. As such, there is a risk that a sufficient supply of deliverable sites will not be maintained in Central Lincolnshire, in accordance with paragraphs 68 and 74 of the NPPF.</p> <p>Importantly, sites allocated at Cherry Willingham in the adopted Local Plan, and proposed to be carried forward as allocations under Policy S80 in the emerging Local Plan, (site references WL/CW/001, WL/CW/002 and WL/CW/003) have not come forward for development.</p> <p>Indeed, no planning applications have been approved for any of the sites and only one planning application (relating to WL/CW/001) has been submitted to date (reference 142874). This application is yet to be determined, despite being submitted more than 12 months ago. The Central Lincolnshire Five Year Land Supply Report (October 2021) outlines that there is not sufficient evidence for its inclusion in the five-year supply. Equally, the report identifies that there is no evidence available that the latter phases will deliver in the five-year period.</p> <p>This is substantially slower than the delivery rates anticipated when the Local Plan was being prepared (the September 2016 Five Year Land Supply Report identified that first completions on all three sites were anticipated during 2020/21 and a total of 110 dwellings completed on the three sites by 2021/22). Evidently, the delivery expectations which informed the Local Plan have not been met with completions now not anticipated until 2026/27 at the earliest.</p> <p>Policy S80 states that the development will be delivered in phases, with WL/CW/002 dependent on the delivery of WL/CW/001 and WL/CW/003 dependent on the delivery of both other sites. In this context, and noting the considerable delays with just the initial phase, the delivery of the total quantum of housing is likely to take considerable time.</p> <p>In our view, the lack of evidence demonstrating any progress in bringing forward development at sites at Cherry Willingham or demonstrating that any dwellings will be delivered within the five-year period also calls into question their deliverability in the period to 2040. This is particularly the case given the phased approach to delivery which could see extensive delays before the third parcel delivers any new housing.</p> <p>To this end, it is vital that the Local Plan properly reconsiders all site allocation as well as potential alternative and/or additional site allocations, such as our clients land south of Hawthorn Road, Cherry Willingham. As demonstrated in the enclosed Vision Document, land south of Hawthorn Road, Cherry Willingham offers an opportunity to deliver a high-quality new development in a sustainable location adjacent to the existing settlement of Cherry Willingham. The proposed development has the</p>	<p>The Local Plan properly reconsiders all site allocation as well as potential alternative and/or additional site allocations, such as our clients land south of Hawthorn Road, Cherry Willingham. Overall, our client's site is at least comparable in sustainability terms with the allocated sites.</p> <p>Sites which can no longer be demonstrated to be suitable, available and deliverable should be de-allocated and alternative sites allocated. Alternatively, additional sites should be identified to ensure that there will be a sufficient supply of housing to meet identified needs.</p>	Yes	Yes

								<p>potential to provide significant benefits including the provision of new market and affordable dwellings as well as new publicly accessible open space. There are no known legal, technical or market viability constraints which would prevent or unduly delay the site being brought forward for housing development.</p> <p>We note that the Sustainability Assessment published as part of the current consultation assesses our client's site as a reasonable alternative site. [See table in attachment page 5].</p> <p>The table above demonstrates that, overall, our client's site is at least comparable in sustainability terms with the allocated sites. When mitigation is taken into account, the site is demonstrably sustainable, and we feel strongly that it should be scored equal to or better than the existing allocated sites.</p> <p>This, alongside the availability and deliverability of sites, should be taken into account in the consideration of site allocations in the new Local Plan. Sites which can no longer be demonstrated to be suitable, available and deliverable should be de-allocated and alternative sites allocated. Alternatively, additional sites should be identified to ensure that there will be a sufficient supply of housing to meet identified needs.</p> <p>Ultimately, failure to adopt such an approach could result in insufficient housing being delivered within the Plan period if undeliverable sites remain allocated and development is not supported on sites which could deliver new homes within the Plan period.</p> <p>A further risk to the delivery of sufficient dwellings to meet needs is the proposed approach to windfall. We note that a reduction in the threshold for considering sites for allocation has been made, from 25 dwellings to 10 dwellings. We consider that, if the Local Plan, is to be effective and deliverable across the Plan period, this increase in small site allocations must be reflected in a reduction in any windfall allowance included in the Plan's housing trajectory.</p> <p>Paragraph 71 of the NPPF states that:</p> <p>'Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery and expected future trends.'</p> <p>In our view, lowering the threshold for site allocations will impact upon the quantum of housing delivered through windfall as a result of an increased number of sites being specifically identified in the Local Plan. Therefore, to avoid double-counting, a reduction in the level of supply assumed from windfall is needed, informed by robust evidence identifying likely windfall delivery rates. At present this does not appear to have been undertaken, with a windfall allowance broadly the same as that currently assumed in land supply calculations applied.</p> <p>We welcome the removal of the windfall allowance prior to 2026/27 and the amendment in years 2026/27 and 2027/28, which in total remove approximately 400 units from the supply. In our view this is a more realistic assumption; however, the windfall rates assumed throughout the remainder of the plan period should also be reviewed to ensure they are robust and supported by evidence.</p>			
--	--	--	--	--	--	--	--	--	--	--	--

1102688	S80	Yes	Yes	Yes	Yes	Don't know	Don't know	Yes	<p>I wish to support the allocation of land West of Station Road and North of Nettleham Close, Branston.</p> <p>Cyden Homes are the developer of the current Housing Allocation on Station Road consisting of 109 Residential Dwellings (that site is well underway and delivering Homes).</p> <p>We have an interest in the proposed Housing Allocation – NK/BRAN/007 and presently have a pre-planning application lodged with NKDC for the proposed allocation.</p> <p>The allocated land could easily be developed from the infrastructure already in place on the current site and would form a continuation of that development leading to early delivery of Homes.</p> <p>With regard to some of the additional observations about the site I can comment as follows:-</p> <p>4.1 – Conserve and enhance biodiversity – The development will contain a number of ecological enhancements along with extending the current wildlife corridor on the western edge of the land that connects to The Jungle LWS.</p> <p>6. Built and Historic Environment – On the present development no Archaeological investigations or surveys were requested and there has been no indication of any previous use of the land other than modern farming, however we would be happy to carry out desk-based studies to establish any previous uses if required along with any further investigations.</p> <p>7. Natural Resources – Water – We are not aware of any specific issues relating to foul water drainage capacity and Anglian Water have not raised the matter with us regarding the development. It is unlikely that the foul flows generated from this size of development would have an effect on the capacity of the Water Recycling Centre.</p> <p>9.1 – Agricultural Land – The proposed allocation is located on a hill, due to the location of near surface fracture limestone and the associated modern methods of farming has resulted in poor surface ground quality which has a high concentration of limestone in the topsoil. Whilst Grade 2 in classification in reality the ground is poor quality.</p> <p>9.2 – Mineral Resources – The proposed allocation extends no further into the safeguarded area than the current housing development.</p> <p>13.1 – Access to services and facilities – New pedestrian and cycling infrastructure shall be provided through to existing footpath networks on the west and east of the development. The footpath network has already been extended as part of our current development along Station Road and the Public Footpath (Number 10) to the west of the development has been improved through the payment of a commuted sum as part of the current development. There have also been two new bus stops erected on Station Road again through the payment of a commuted sum as part of the current development. Those bus stops shall be directly accessible through the footpath network within the development, presently under construction.</p> <p>14.2 – Education, training, and learning – Access easily available as above.</p>			No
---------	-----	-----	-----	-----	-----	------------	------------	-----	---	--	--	----

Day Farms

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101300	S81	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>LAND OFF DUNHOLME ROAD, SCOTHERN - HOUSING ALLOCATION WL/SC/003</p> <p>- The continued proposed allocation of the above site is welcomed and the owners are pleased to note that following earlier representations the potential immediate availability of this land for development has been recognised by the simplification of some of the conditions proposed in the earlier Consultation Draft.</p> <p>- The frontage land to Dunholme Road was sold in September 2017 with the benefit of Outline Planning Permission for 33 dwellings and with a development access with all mains services protected through to the subject land. Since then all dwellings have been completed and sold or let, demonstrating the appeal of the location and confirming the deliverability of the allocation currently proposed.</p> <p>- The Proposed Submission Draft acknowledges that any flood risk from the Beck on the southern boundary can be met satisfactorily and suggests that a small amount of public open space can be provided on site.</p> <p>- A balancing pond will be required in the south eastern corner and we feel that this should provide the opportunity for an extended area of public open space along the side of the Beck where a suitable landscaping scheme can form part of flood prevention measures, while ensuring improved habitat linkages and biodiversity.</p> <p>We would be pleased to provide any further clarification if required</p>	n/a	Yes	No

Deers Leap Properties Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1107481	S1	Yes	Yes	Yes			Yes	Yes	It is considered that the Spatial Strategy generally works well in terms of ranking settlements by size and amenities. We support the continued categorisation of Saxilby and Nettleham as large villages and agree that these two settlements should continue to have land allocated for further sustainable growth.		Yes	No
1100368	S1; S80; S81	Yes	Yes	Yes	Don't know	Don't know	Yes	Yes	We welcome the continued allocation of WL/NHAM/034 in the Submission Draft Local Plan. This site is currently under construction with a number of properties already completed and occupied. Interest in this site has been high, sales rates are buoyant and further applications to increase site density have been submitted.		Yes	Yes
1107479	S81	Yes	Yes	Yes			Yes	Yes	<p>We support and welcome the continued proposed allocation of site ref. WL/SC/003 in Scothern. Further to our earlier consultation responses, we consider this site offers a good opportunity to deliver additional growth in the village without compromising its rural charm or affecting the village's existing built footprint.</p> <p>Phase 1 of the site (allocated under the current Central Lincolnshire Local Plan and in the 'made' Scothern Neighbourhood Plan under site ref. H1.1) is now complete and all dwellings are occupied. Sales rates were extremely strong and delivery rates high – a momentum that is fully expected to continue throughout the development of phase 2.</p> <p>To confirm, site ref. WL/SC/003 remains available and unconstrained for development. In the period since the publication of the Consultation Draft version of the plan, an options agreement has now been signed with the landowner and this provides long- term certainty over the deliverability of new dwellings on the land.</p>		Yes	Yes

									<p>Whilst the agreement covers a protracted period of time, it is the intention of all parties involved to prepare and submit a planning application for this site as soon as practicable following adoption of the new Central Lincolnshire Local Plan. To expedite this, work on a new planning application for the site is scheduled to commence later in 2022.</p> <p>Assuming the Local Plan Review maintains the expected pace through its final stages, the following delivery scenario is expected to be achieved for this site:</p> <ul style="list-style-type: none"> - Planning application submitted late 2022/early 2023. Approved by end of 2023. - Development on site to commence in 2024 – site completed within 5 years. - Likely site completion by 2027/28. <p>Whilst this is ambitious, this build rate is demonstrably realistic and broadly mirrors the delivery of new dwellings for phase 1 of this site (which included the period that the construction industry was worst affected by the effects of the Covid-19 pandemic), whereby a delivery rate equivalent of 20 units per annum was achieved.</p> <p>The speed of delivery at this site will be further supported by the presence of existing/recently installed utility connections and the newly established access, constructed for phase 1.</p> <p>These factors considerably boost the ability to commence works faster and complete the build-out sooner. Accordingly, the removal of the additional constraints that were associated with this site in earlier draft versions of the revised plans (relating to phasing and the impact of smoke from the now decommissioned garden centre boiler) will rightly allow this site to make a significant contribution to the five-year housing supply for the area once the new plan is adopted.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

Defence Infrastructure Organisation (DIO)

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103923	S1								<p>The settlement hierarchy set out in Policy S1 designates Scampton (RAF) as a Medium Village, where ‘some limited growth’ is supported through allocations in the plan, subject to the village being well connected or well served.</p> <p>This is at odds with draft Policy S75 which defines the RAF Scampton site as a significant large-scale ‘opportunity area’ which clearly offers potential for more than just the ‘limited growth’ supported by Policy S1.</p>	<p>In order to avoid this policy conflict, we consider that Policy S1 should be re-worded to include an exception/greater flexibility concerning the RAF Scampton site to allow more than ‘limited growth’ in the eventuality that this is supported by Policy S75 and the associated Masterplan.</p> <p>For the purposes of effectiveness, Policy S1 should also allow for the ‘Scampton’ settlement to move up the settlement hierarchy (again if supported by Policy S75 and/or the Masterplan approved by the Council).</p>	Yes	No

1103925	S2								<p>Policy S2 seeks to direct the majority of new housing delivery to the Lincoln Strategy Area (which includes the RAF Scampton site). We consider this approach to be sound, given that it seeks to direct new development to the most sustainable locations and in closest proximity to the largest settlement within the Central Lincolnshire area. As such, new development will be sustainably located to make best use of existing and emerging public transport infrastructure and will benefit from strong access to existing and emerging social and community infrastructure, amenities and Lincoln's main urban area. It also accounts for the locational characteristics of the district's supply of suitable, available, achievable previously developed land, including at RAF Scampton.</p> <p>With regards to the housing targets quoted within Policy S2, we note that an overall housing target of 29,150 is identified (equating to 1,325 new homes being delivered per annum over the new Local Plan period). We support the principle that this is at the upper end of the range identified via the standard method. The Draft Local Plan also acknowledges that these figures are the latest Local Housing Need figure derived from the standard method and are also supplemented by a greater top-end housing figure to allow for the wider economic growth ambitions identified in the ENA and HNA. We support this approach for a top and bottom range for the provision of housing during the plan period as it will encourage the delivery of suitable and appropriate development to match the anticipated growth for the area.</p>	We would recommend these figures continue to be reviewed as preparation of the Draft Local Plan progresses and during the examination period, as well as future reviews, in order to capture any changes in housing need figures.	Yes	No
1103926	S4								<p>In alignment with our earlier comments on Draft Policy S1, we consider that Draft Policy S4 should be worded to better align with Policy S75. As currently worded, Policy S4 supports only 'limited growth' within 'Medium Villages' such as Scampton (RAF).</p> <p>This is at odds with draft Policy S75 which defines the RAF Scampton site as a significant and large-scale 'opportunity area' which clearly offers potential for more than just the 'limited growth' supported by Policy S4.</p>	In order to avoid a policy conflict, we consider that Policy S4 should be re-worded to include an exception/greater flexibility concerning the RAF Scampton site to allow more than 'limited growth' in the eventuality that this is supported by Policy S75 and the associated Masterplan.	Yes	No
1103927	S7								<p>We strongly support the aspiration to deliver high standards of sustainability and energy performance within new development within the Borough. Currently, Policy S7 includes a tiered approach to such requirements, notably allowing Sites within identified Value Zones C and D to negotiate relaxed energy and sustainability requirements, if justified on a viability grounds.</p> <p>Currently, the RAF Scampton Site is not located within Value Zones C or D, with the majority of the site falling within Value Zone B and part of the eastern corner falling within Value Zone A. We would recommend that this be revised, given that the viability position concerning this Site is currently unknown (and given that redevelopment of the Site will likely be subject to several substantial heritage-related costs associated with ensuring the longer-term maintenance and use of the Grade II listed Hangers on-site).</p>	<p>Given the above, we would recommend either that:</p> <ul style="list-style-type: none"> - The RAF Scampton Site be included within either Value Zones C or D (to allow for site-specific energy and sustainability requirements to be agreed in due course, on the basis of overall scheme viability reflected in the master planning process for the site); or - That the policy be worded more flexibility to allow for the extent of sustainability and energy requirements to be negotiated concerning all new development within the 	Yes	No

										District, should overall scheme viability indicate that meeting the initial requirements of Policy S6 would be unachievable.		
1103928	S8								<p>Similarly to our comments concerning Draft Policy S75, we consider that Policy S8 should be re-worded to allow for sustainability requirements to be negotiated on a site-by-site basis, in the event that scheme viability justifies a departure from the initial requirements set out in Policy S8.</p> <p>In our view, this approach (and added degree of flexibility) would help to ensure that redevelopment at RAF Scampton could come forward more easily in accordance with Policy S75, and would ultimately enhance the overall soundness of the emerging Local Plan.</p>	Policy S8 should be re-worded to allow for sustainability requirements to be negotiated on a site-by-site basis, in the event that scheme viability justifies a departure from the initial requirements set out in Policy S8.	Yes	No
1103930	S11								<p>We support the Council's desire to reduce embodied carbon content within major development proposals. However, it is considered that the introduction of the 'presumption against demolition' in the Regulation 19 version of the Draft Local Plan is overly restrictive and is likely to cause an unnecessary barrier to future masterplanning exercises in large scale opportunity areas. This is particularly relevant in the case of RAF Scampton which was designed as an inward facing, site to serve a military purpose and which, therefore, contains a number of buildings and building layouts that may not lend themselves to alternative uses.</p> <p>In our view, a presumption against demolition of any of the buildings on site will prevent any future RAF Scampton Masterplan from taking a design led approach to make the best use of the Site and creating a high-quality new place based on the design principles set out in the site specific Policy S75.</p>	We therefore consider that the policy should be amended to allow additional flexibility by encouraging the retention of buildings to be considered and reflecting this in the masterplanning of the site rather than establishing a presumption against demolition.	Yes	No
1103931	S22								<p>We broadly support the Council's aims to ensure that affordable housing is delivered within new development to meet the needs of the Central Lincolnshire area.</p> <p>Policy S22 currently identifies a range of affordable housing requirements, applicable in relation to sites within various 'zones' within the Local Plan area.</p> <p>As currently worded, Policy S22 identifies the RAF Scampton Site to be within 'Value Zone B', whereby 20% affordable housing will be sought, with the north-eastern corner falling within 'Value Zone A' where 25% is sought, We support the explicit reference within Policy S22 that the requirement for affordable housing will be subject to viability, and that a lower provision of affordable housing may be acceptable if justified on the basis of the scheme's viability.</p> <p>As previously set out, the redevelopment of the RAF Scampton Site will also be subject to several unique costs, principally those associated with bringing the Grade II listed hangars back into use and those associated with the potential need for remediation of the Site given its historic use. The DIO's team is currently reviewing these costs and would like to discuss these further with WLDC in early course.</p> <p>Following this review and these discussions, it may be appropriate for the RAF Scampton site to be moved to Value Area C or D within the Draft Local Plan (whereby lower affordable housing provision would be targeted) or otherwise the level of affordable housing to be set through the masterplanning process.</p>		Yes	No

1103932	S28								<p>We have previously set out that Draft Policy S1 (which sets out the settlement hierarchy for Central Lincolnshire) should be revised to include an exception for RAF Scampton which would allow greater growth there beyond its current 'Medium Village' classification. This approach would help to ensure consistency with Policy S75 concerning the Site, which would allow for the quantum of new development at the Site to be agreed/determined through a comprehensive masterplanning process in due course.</p> <p>We consider that Policy S28 should also be worded to include an exception/greater flexibility concerning the RAF Scampton Site. Doing so will ensure that this policy is as consistent with (and would not restrict) Policy S75, which theoretically would allow for employment floorspace to come forward at the Site provided this is justified and agreed through a comprehensive masterplanning process.</p>	Policy S28 should also be worded to include an exception/greater flexibility concerning the RAF Scampton Site.	Yes	No
1103933	S33								<p>Similarly to our comments concerning Policy S22, we consider that Policy S33 should be re-worded to include an exception/greater flexibility concerning the principle of employment uses coming forward on the RAF Scampton site, providing these are justified and agreed via a robust and comprehensive masterplanning process.</p> <p>This approach would help to ensure greater consistency with Policy S75, therefore enhancing the soundness of this policy when reviewed against the relevant NPPF tests of soundness (NPPF Paragraph 35).</p>	Policy S33 should be re-worded to include an exception/greater flexibility concerning the principle of employment uses coming forward on the RAF Scampton site	Yes	No
1103934	S35								<p>As previously set out, Policy S75 seeks to ensure that the mix and quantum of new development at the RAF Scampton site comes forward (and be agreed) through a comprehensive masterplanning process concerning the Site.</p> <p>In our view, and to ensure consistency with Policy S75, Policy S35 should be reworded to include an exception/greater flexibility for the RAF Scampton site to allow for small scale retail (such as a local centre) to come forward there if agreed with WLDC through a comprehensive masterplanning process in due course. This approach would enhance the soundness of this policy.</p>	Policy S35 should be reworded to include an exception/greater flexibility for the RAF Scampton site to allow for small scale retail (such as a local centre) to come forward there if agreed with WLDC through a comprehensive masterplanning process	Yes	No
1103935	S40								<p>Similarly to our position concerning Policy S35, we consider that Policy S40 should be reworded to include an exception/greater flexibility for the RAF Scampton site to allow for town centre uses floorspace to come forward there if agreed with WLDC through a comprehensive masterplanning process in due course.</p> <p>This approach would enhance the soundness of Policy S40.</p>	Policy S40 should be reworded to include an exception/greater flexibility for the RAF Scampton site to allow for town centre uses floorspace to come forward there if agreed with WLDC through a comprehensive masterplanning process.	Yes	No
1103937	S42								<p>We broadly support the above policy approach, which seeks to ensure that new tourism-related within the identified villages (as per the settlement hierarchy in Policy S1) be supported. In our view, there is potential for an element of tourism-related development to be delivered at RAF Scampton, and Policy S42 would support this (providing that this comes forward as part of a comprehensive masterplanned approach in alignment with Policy S75).</p>		Yes	No
1103938	S47								<p>We broadly support the above policy approach, which seeks to ensure that new development be accessible by public transport modes. We consider that the proposed accessibility requirements set out in Policy S47 would be consistent with the aspirations of Policy S75.</p>		Yes	No

1103941	S57								<p>Draft Policy S57 is considered to align with Paragraph 194 of the NPPF, which notably states that:</p> <p>“Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation”.</p> <p>Overall, we consider Draft Policy S57 to be a sound policy approach concerning the protection and conservation of heritage assets within the Central Lincolnshire area.</p>		Yes	No
1103917	S75								<p>[Representation summarised see attached]</p> <p>The RAF have confirmed their intent is to leave the RAF Scampton site in all respects, making it available for disposal with no encumbrances. MOD is committed to working with West Lindsey District Council to bring the site to market in a manner which will contribute positively to Central Lincolnshire whilst generating best value for Defence.</p> <p>Subject to the satisfactory completion of the necessary site closure work, it is anticipated the site being disposed of free of any encumbrances by the end of March 2023.</p> <p>Whilst a new owner is sought, and for as long as safety and the conditions of sale allow, it is RAF’s intention to continue to use the protected airspace above RAF Scampton to train the Red Arrows. If this activity is unsuitable, or unsafe, the Red Arrows would train in temporary alternative locations across Lincolnshire. The RAF very much consider Lincolnshire to be the Team’s home and RAF’s firm intent is to seek alternative training areas within the County within easy reach of their new base at RAF Waddington.</p> <p>As it stands the protection of the airspace is set out within The Air Navigation (Restriction of Flying) (Royal Airforce Scampton) (Restricted Zone EG R313) Regulations 2016 (R313). These Regulations essentially restrict all aircraft from flying below 9,500ft above mean sea level within the protected airspace at any time which may be notified unless aircraft are proceeding under the direction of air traffic control at RAF Waddington.</p> <p>The preamble to proposed policy S75 refers to R313 and additional wording has been inserted at the beginning of policy S75 stating;</p> <p>“Before any masterplan is developed the value of the airspace above RAF Scampton and within 5 nautical miles of its centre must be fully understood including for any ongoing need for airspace for use by The Red Arrows, for other defence needs, and for potential opportunities for commercial use of this airspace that will offer significant opportunities to boost the local or wider economy relating to the aviation industry. Any value identified for these uses of the airspace and the site itself should be incorporated in a masterplan and prioritised taking into account the identified value it presents.”</p> <p>MOD is concerned that the above paragraph lacks sufficient definition or terms of reference to allow it to be clearly interpreted. It is not clear how the masterplanning process will consider the ‘value’ of R313, how this will be weighed in the planning balance or how factors of acknowledged importance such as heritage will be ‘prioritised’ against each other.</p> <p>The control or R313 exists outside of any planning legislation and it is not clear why this needs to be included in the local plan. Therefore as currently drafted the wording of the first paragraph of policy S75 is not considered ‘clear and unambiguous’ as required by para 16 of the NPPF (July 2021).</p> <p>Point k) of proposed policy S75 also states that development proposals and the masterplan should;</p> <p>“Demonstrate any ongoing Ministry of Defence use or operation at the site or</p>		Yes	Yes

									<p>in the airspace and provide a full assessment of how this use will be compatible with the proposals and will not hinder its deliverability or sustainability or result in any safety concerns.”</p> <p>MOD have previously argued that this element of the policy is not necessary as it has been confirmed that the RAF will vacate the site free of any encumbrances.</p> <p>Subject to the above and further comments made within the documentation prepared by Avison Young MOD are otherwise supportive of the positive wording of Policy S75 which creates a context in which aspirational redevelopment of the site could be achieved whilst maintaining an emphasis on the need for any such development to be sustainably and wholistically planned following withdrawal of the military.</p> <p>MOD has engaged Avison Young and Capita to assist with further technical work in order to demonstrate that development of the site can be brought forward under policy S75 which is submitted in parallel with this letter.</p> <p>We have previously set out why we consider the Site to be a suitable, available and achievable for significant mixed-use development. As such, we strongly support the aspiration to include Policy S75 within the Draft Local Plan, which relates specifically to the RAF Scampton site and provides broad parameters and requirements for its future mixed-use development.</p> <p>The approach set out in Policy S75 will help to ensure that this key and significant brownfield landholding is suitability and sustainably planned for in the future. Notwithstanding this, we would like to make the following comments on the current draft policy, all of which are geared towards ensuring that it is ultimately prepared as soundly as possible (in accordance with the NPPF test of soundness identified previously):</p> <ul style="list-style-type: none"> - Policy S75 has currently been prepared as a means of ensuring that there is a site-specific policy basis to manage the redevelopment of the Site ‘in the event that the Ministry of Defence withdraw’ from the Site in the future. As set out within earlier sections of this Representation, however, it has been confirmed that the Site is due to become vacant from 2023 onwards. Given the degree of certainty associated with the future vacancy of the Site, we recommend that Policy S75 be re-worded to reflect this context. - Policy S75 currently requires that a ‘masterplan’ be prepared in conjunction with, and for approval by, the District Council’ prior to submission of any planning application concerning the Site. We support this approach. The DIO has been working with WLDC to discuss the opportunities that the Site offers and explore its technical constraints. At this early stage, an Opportunities and Constraints Document has been prepared (see Appendix VIII) which explores these elements and provides a high-level overview of the development potential of the Site. We also provide a summary of this document within below sections of this Representation. - Policy S75 currently includes a requirement for the value of the airspace above the Site, including ongoing need for use by the Red Arrows, other defence needs and commercial opportunities, to be fully understood prior to any masterplan being developed. The policy also currently includes a requirement for any airspace value to be prioritised in any masterplan. We consider that this matter should be removed from the policy wording, given the following context. <ul style="list-style-type: none"> o The protected airspace above the Site (spanning 5 nautical miles from the centre of the Site) is currently protected for use by military-related aircraft. The airspace is technically referred to as R313. o The protection of the airspace is set out within The Air Navigation (Restriction 			
--	--	--	--	--	--	--	--	--	--	--	--	--

								<p>of Flying) (Royal Airforce Scampton) (Restricted Zone EG R313) Regulations 2016. These Regulations essentially restrict all non-military aircraft from flying below 9,500ft above mean sea level within the protected airspace at any time which be notified.</p> <p>o The MoD has no requirement to preserve the restricted airspace above and around Scampton for the use of the RAF Aerobic Team and the Site will be sold without any encumbrance.</p> <p>o Policy S75 repeats control which is already established by separate legislation as explained above. The inclusion of this matter within the policy is therefore contrary to Paragraph 16 of the NPPF which requires policies to serve a clear purpose.</p> <p>Policy S75 does not currently prescribe the mix of land uses supported on the site. The policy is also silent on the acceptable amount of development. Instead, it seeks to defer these details to be defined in the Masterplan. We also note that the implied support for an element of residential floorspace to come forward at the Site in the Regulation 18 draft of the Plan has now been removed (since the policy was previously consulted on at Regulation 18 Draft Local Plan stage). In our view, in order for the policy to be more effective (including in its ability to provide an adequate policy basis to underpin the Masterplan), it should preferably provide further, more specific, details on the acceptable mix of uses and the amount of development. On the basis of existing evidence, in principle, the Site demonstrably comprises a suitable, available and achievable site for a mix of uses, including residential, employment and cultural uses and other complimentary and/or public facing uses in the future. On this basis, we consider that Policy S75 should be refined to more clearly identify the potential for a mixture of uses including residential and employment uses where appropriate) to be delivered at the Site in the future.</p> <p>Policy S75 requires that any masterplan delivers a net zero carbon development, including the offsetting of existing homes on the Site. Whilst the DIO are committed to delivering development incorporating the highest sustainability standards, we consider that in principle offsetting requirements should not be retrospectively applied as this will create an offsetting burden for new development. This is particularly the case considering that a number of the existing buildings on-site are dated and do not incorporate modern building fabric standards or heating systems therefore requiring higher levels of carbon offset.</p> <p>Noting that the term 'Masterplan' is not defined in the NPPF or the draft local plan, for the purposes of procedural effectiveness and clarity, we recommend that the policy should clarify the intended status of the Masterplan (perhaps including options), which could either be a Supplementary Planning Document or other non-statutory guidance endorsed by the Council.</p> <p>Policy S75 is prescriptive in setting out the matters which any forthcoming masterplan should address. We broadly support this approach, subject to the above refinements being made to the wording of these criteria.</p> <p>We have provided an Opportunity and Constraints Report for review (see Appendix VIII)</p>			
1103906	S84							<p>Turning to the Reg 19 Consultation, MOD is pleased to note that Policy S84 – Ministry of Defence Establishments, which reflects an update to current local plan policy LP57, has been included in the plan review.</p> <p>The 'in principle' support for defence related development, within and adjacent</p>		Yes	Yes

								<p>to operational MOD sites afforded by Part 1 of draft policy S84, is welcomed. In accordance with comments previously made, policy S84 also specifically takes into account potential future requirements for residential development to support a continued military presence in Central Lincolnshire and clarifies that this will be acceptable subject to satisfying the relevant policies within the Local Plan.</p> <p>MOD cautiously welcomes the addition of Part 1 to policy S84 in relation to military housing, although it is important in any reading of the plan as a whole, to recognise that policies within the broader plan applicable to open market residential development, may not be appropriate or necessarily carry the same weight on MOD land.</p> <p>Part 2 of Policy S84 is welcomed by MOD as it will assist in safeguarding against inappropriate development close to key Defence sites which would adversely affect matters of National Defence.</p> <p>This matter was also highlighted in the 'issues and options' and MOD are glad this had been acknowledged in the LP as it accords with guidance contained within Para 97 b) of the NPPF July 2021 which states... 'Planning policies and decisions should promote public safety and take into account wider security and defence requirements by b) recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.</p> <p>Part 3 of Policy S84 refers to the redevelopment of land surplus to MOD requirements and whilst there is currently no intention to dispose of any land other than RAF Scampton within the Central Lincolnshire Local Plan area the flexibility afforded by this policy is welcomed.</p>			
1103946	SA							<p>The FSAR notably includes an appraisal of potential site allocations and all reasonable alternatives against relevant sustainability objectives. As it stands, this section of the FSAR (Appendix 5.3 - Housing Site Allocations SA West Lindsey) does not include an assessment of RAF Scampton either as a potential housing allocation nor as a reasonable alternative.</p> <p>We acknowledge that it may currently be difficult to include the Site as a potential housing allocation within the FSAR at this stage, given that the nature and quantum of development capable of being delivered there will be determined through a comprehensive masterplanning process in due course. However, in moving forward, and as discussions with WLDC officers (and preparation of a site-specific Masterplan/Planning Brief/SPD) are progressed, we would recommend that the RAF Scampton Site be scoped into the Sustainability Appraisal's assessment of potential housing sites.</p> <p>In our view, this approach would ensure that the inclusion of the RAF Scampton site as a potential housing allocation within the emerging Local Plan is as robust as possible.</p> <p>FSAR Assessment of Relevant Policies The FSAR also includes an assessment concerning how each Draft Local Plan policy has performed against various Sustainability Appraisal criteria.</p>		Yes	No

									<p>Within Sections 3 and 4 of this Report, we have provided detailed recommendations concerning how to improve the effectiveness and soundness of relevant policies within the Draft Local Plan. We consider that these policies should be updated on this basis, and that these then be re-appraised if there are future iterations of the Sustainability Appraisal.</p> <p>We reserve the right to comment on future iterations of the Sustainability Appraisal in the future. As it stands, and for the reasons set out previously, we do not consider various policies within the Local Plan to be as effective or sound as they could be at this stage.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

Dennis Estates

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101292	S4; S81	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Re: Land East of Station Road, Digby – NK/DIG/002</p> <p>S1 states that growth will be allowed in medium villages (such as Digby) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be. We consider that the Local Plan should define this. Similarly Policies S5 and S81 should be reviewed to reflect this and the comments below.</p> <p>This site has been rejected because of alleged impacts on the character of the settlement, it being on the edge of Digby. This description is misleading. Twentieth Century residential development lies to the west (around Harrowby Close), and a site with planning permission for residential development (permission 19/1607/FUL) is to the north, over Station Road. The development to the west looks over the site, and as such the land promoted for development is viewed in the context of front elevations of residential properties when viewed from the east.</p> <p>The permitted site to the north, together with the rest of that field, are also proposed for allocation (NK/DIG/01 and NK/DIG/006). The delivery of the neighbouring allocations will change the character of the site frontage on Station Road.</p> <p>Instead of extending out into the countryside, this site, which is bound by Digby Beck, which has trees along its length, to the south and an established hedge line and substantial tree belt to the east, is enclosed by existing and future development in the settlement and would round off the settlement if developed in whole or part. Views of the development, other than from the street frontage, would be limited by existing and proposed development, the tree belt to the east and the tree line along the beck to the south. The is contained and could be developed without setting a precedent for further development stretching south or east.</p> <p>The Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022 does not identify any technical constraints to the allocation of the promoted land other than it being Grade 3 agricultural land. The comment referencing potential flooding is not relevant as the site does not sit within any Environment Agency Flood Zones and we are advised that this has not historically flooded.</p> <p>The relatively small, contained field, however, is less than 20 Ha and isolated from other agricultural land by roads, development, the stream line and tree belt. Its loss would not be significant in terms of the quantum of agricultural land.</p> <p>The Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April</p>	See above	No	No

									2022 should be reviewed in light of the permitted development to the north. Digby as a medium village would be supported by the allocation of residential land to support the existing local facilities in the settlement.			
1101293	S5	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Land East of Station Road, Digby – NK/DIG/002 S1 states that growth will be allowed in medium villages (such as Digby) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be. We consider that the Local Plan should define this. Similarly Policies S5 and S81 should be reviewed to reflect this and the comments below. This site has been rejected because of alleged impacts on the character of the settlement, it being on the edge of Digby. This description is misleading. Twentieth Century residential development lies to the west (around Harrowby Close), and a site with planning permission for residential development (permission 19/1607/FUL) is to the north, over Station Road. The development to the west looks over the site, and as such the land promoted for development is viewed in the context of front elevations of residential properties when viewed from the east. The permitted site to the north, together with the rest of that field, are also proposed for allocation (NK/DIG/01 and NK/DIG/006). The delivery of the neighbouring allocations will change the character of the site frontage on Station Road. Instead of extending out into the countryside, this site, which is bound by Digby Beck, which has trees along its length, to the south and an established hedge line and substantial tree belt to the east, is enclosed by existing and future development in the settlement and would round off the settlement if developed in whole or part. Views of the development, other than from the street frontage, would be limited by existing and proposed development, the tree belt to the east and the tree line along the beck to the south. The is contained and could be developed without setting a precedent for further development stretching south or east. The Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022 does not identify any technical constraints to the allocation of the promoted land other than it being Grade 3 agricultural land. The comment referencing potential flooding is not relevant as the site does not sit within any Environment Agency Flood Zones and we are advised that this has not historically flooded. The relatively small, contained field, however, is less than 20 Ha and isolated from other agricultural land by roads, development, the stream line and tree belt. Its loss would not be significant in terms of the quantum of agricultural land. The Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022 should be reviewed in light of the permitted development to the north. Digby as a medium village would be supported by the allocation of residential land to support the existing local facilities in the settlement.	See above	No	No
1101294	S81	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Land East of Station Road, Digby – NK/DIG/002 S1 states that growth will be allowed in medium villages (such as Digby) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be. We consider that the Local Plan should define this. Similarly Policies S5 and S81 should be reviewed to reflect this and the comments below. This site has been rejected because of alleged impacts on the character of the settlement, it being on the edge of Digby. This description is misleading. Twentieth Century residential development lies to the west (around Harrowby Close), and a site with planning permission for residential development (permission 19/1607/FUL) is to the north, over Station Road. The development to the west looks over the site, and as such the land promoted for development is viewed in the context of front elevations of residential properties when viewed from the east. The permitted site to the north, together with the rest of that field, are also proposed for allocation (NK/DIG/01 and NK/DIG/006). The delivery of the neighbouring allocations will change the character of the site frontage on Station Road. Instead of extending out into the countryside, this site, which is bound by Digby Beck, which has trees along its length, to the south and an established hedge line and substantial tree belt to the east, is enclosed by existing and future development in the settlement and would round off the settlement if developed in whole or part. Views of the development, other than from the street frontage, would be limited by existing and proposed development, the tree belt to the east and the tree line along the beck to the south. The is	See above	No	No

									contained and could be developed without setting a precedent for further development stretching south or east. The Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022 does not identify any technical constraints to the allocation of the promoted land other than it being Grade 3 agricultural land. The comment referencing potential flooding is not relevant as the site does not sit within any Environment Agency Flood Zones and we are advised that this has not historically flooded. The relatively small, contained field, however, is less than 20 Ha and isolated from other agricultural land by roads, development, the stream line and tree belt. Its loss would not be significant in terms of the quantum of agricultural land. The Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022 should be reviewed in light of the permitted development to the north. Digby as a medium village would be supported by the allocation of residential land to support the existing local facilities in the settlement.			
--	--	--	--	--	--	--	--	--	--	--	--	--

Eagle Hall Farm Estates Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101371	S4	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Re: Eagle Hall Farmyard, Swinderby</p> <p>It is our view that the above Policies (S4, S5 and S81) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages and in particular the above site.</p> <p>The site is situated adjacent to the village of Eagle which is identified as a Medium Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. The site has been rejected as a suitable site for development and it is our view that the site should be allocated for development on the basis that it is immediately available and suitable for development as set out in the initial proposals put forward and as specified in the documents (NK/EAG/001) within the Interim Sustainability Appraisal Report for the Draft Central Lincolnshire Local Plan (April 2022) – Appendix 3.2: Sustainability Appraisal of Preferred Housing Site Allocations and Reasonable Alternatives Considered. Page 230.</p>	See above comments	No	No
1101377	S4	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Re: Eagle Road, North Scarle</p> <p>It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages.</p> <p>The site is situated adjacent to the village of North Scarle which is identified as a Small Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. The site has been rejected as a suitable site for development and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/NSCA/003) within the Residential Allocations Evidence Report 2022 for the Draft Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022 – Appendix 1 – North Kesteven District. Page 50.</p> <p>We would also point out that the land to the south of this site has now been developed out.</p>	n/a	No	No
1101383	S4	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Re: Land East of High Street, Swinderby – NK/SWI/001</p> <p>It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the</p>	n/a	No	No

									<p>inclusion of significant residential development in and around designated Large, Medium and Small Villages.</p> <p>The site is situated adjacent to the village of Swinderby which is identified as a Small Village within the Central Lincolnshire Local Plan Review – Proposed Submission of Local Plan dated 16 April 2022. The site was previously identified as a “reasonable alternative” in earlier Consultation documents and has now been rejected and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/SWI/001) within the Residential Allocations Evidence Report 2022 – Appendix 1 – North Kesteven District. Page 242.</p> <p>The reason for rejection is stated as being unable to deliver 10 or more dwellings due to the presence of Tree Preservation Orders. It is our view that a suitably designed scheme could be prepared to provide for an appropriate form of development and would also point out that there is consented development adjacent to the south of this site.</p>			
1101399	S4	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Large Farm, North Scarle - NK/EAG/007</p> <p>It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the inclusion of significant residential development in open countryside in and around designated Large, Medium and Small Villages. There are numerous opportunities to provide small residential development sites from existing farmsteads and the policy within S5 should reflect and encourage this.</p> <p>The site is situated some 1.5 k from the village which is identified as a Small Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022.</p> <p>The site has been rejected as a suitable site for development and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/EAG/007) within the Interim Sustainability Appraisal Report for the Draft Central Lincolnshire Local Plan (June 2021) – Appendix 3.2: Sustainability Appraisal of Preferred Housing Site Allocations and Reasonable Alternatives Considered. Page 240.</p> <p>It is noted that reference to this site has not been included within the Appendix 1 – Residential Allocations Evidence Report 2022 – North Kesteven which forms part of the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan.</p>	n/a	No	No
1101403	S4	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Re: Land West of Lincoln Road, Eagle Moore – NK/EAG/002</p> <p>It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages.</p> <p>The site is situated adjacent to the village of Eagle which is identified as a Medium Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022.</p> <p>The site was previously identified as a “reasonable alternative” but has now been excluded from the final proposed Draft document and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/EAG/002) within the Central Lincolnshire Local Plan – Proposed</p>	n/a	No	No

									Submission Local Plan (April 2022) – Appendix 3.2: Sustainability Appraisal of Preferred Housing Site Allocations and Reasonable Alternatives Considered. Page 232. The reason for rejection is stated as being that the site is at risk of surface water flooding. However, our clients confirm that flooding has never been an issue on this site and we can confirm that the site does not sit within any recognised Environment Agency Flood Zones.			
1101410	S4	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: South Scarle Lane, North Scarle – NK/NSCA/002 It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. The site is situated adjacent to the village of North Scarle which is identified as a Small Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. The site has been rejected as a suitable site for development and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/NSCA/002) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022) – Page 48. Whilst the site is located on the edge of the settlement it is our view that it would be appropriate for development and would not adversely affect the setting of any adjacent properties and would point out that the previously consented roadside development has now been completed.	n/a	No	No
1101440	S4	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Southern Lane, Morton – NK/SWI/003 It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. The site was originally submitted through the Housing & Economic Land – Site Suggestion Form dated 28 February 2019 and it has not been included in the current Central Lincolnshire Local Plan – Proposed Submission Local Plan dated 16 April 2022. It is our view that the Housing Allocations Evidence Report 2021 did not sufficiently allow for full consideration of this site and as a consequence of this it should have been considered and subsequently allocated for development. It is noted that the site is excluded from the Residential Allocations Evidence Report 2022 – North Kesteven District despite the earlier submissions. As stated in the original submission, the site is immediately available for development and it is our view that it should be reconsidered. The site is located adjacent to Bracken Road which has existing development based around local employment at Morton Hall.	n/a	No	No
1101373	S5	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Eagle Hall Farmyard, Swinderby It is our view that the above Policies (S4, S5 and S81) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages and in particular the above site. The site is situated adjacent to the village of Eagle which is identified as a Medium Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. The site has been rejected as a suitable site for development and it is our	See above comments	No	No

									view that the site should be allocated for development on the basis that it is immediately available and suitable for development as set out in the initial proposals put forward and as specified in the documents (NK/EAG/001) within the Interim Sustainability Appraisal Report for the Draft Central Lincolnshire Local Plan (April 2022) – Appendix 3.2: Sustainability Appraisal of Preferred Housing Site Allocations and Reasonable Alternatives Considered. Page 230.			
1101378	S5	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Eagle Road, North Scarle It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. The site is situated adjacent to the village of North Scarle which is identified as a Small Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. The site has been rejected as a suitable site for development and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/NSCA/003) within the Residential Allocations Evidence Report 2022 for the Draft Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022 – Appendix 1 – North Kesteven District. Page 50. We would also point out that the land to the south of this site has now been developed out.	n/a	No	No
1101384	S5	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Land East of High Street, Swinderby – NK/SWI/001 It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. The site is situated adjacent to the village of Swinderby which is identified as a Small Village within the Central Lincolnshire Local Plan Review – Proposed Submission of Local Plan dated 16 April 2022. The site was previously identified as a “reasonable alternative” in earlier Consultation documents and has now been rejected and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/SWI/001) within the Residential Allocations Evidence Report 2022 – Appendix 1 – North Kesteven District. Page 242. The reason for rejection is stated as being unable to deliver 10 or more dwellings due to the presence of Tree Preservation Orders. It is our view that a suitably designed scheme could be prepared to provide for an appropriate form of development and would also point out that there is consented development adjacent to the south of this site.	n/a	No	No
1101400	S5	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Large Farm, North Scarle - NK/EAG/007 It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the inclusion of significant residential development in open countryside in and around designated Large, Medium and Small Villages. There are numerous opportunities to provide small residential development sites from existing farmsteads and the policy within S5 should reflect and encourage this. The site is situated some 1.5 k from the village which is identified as a Small Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. The site has been rejected as a suitable site for development and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/EAG/007) within the Interim Sustainability Appraisal Report for the Draft Central Lincolnshire Local Plan (June 2021) – Appendix 3.2: Sustainability Appraisal of Preferred Housing Site Allocations and Reasonable Alternatives Considered. Page 240. It is noted that reference to this site has not been included within the Appendix 1 – Residential Allocations Evidence Report 2022 – North Kesteven which forms part of the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan.	n/a	No	No
1101405	S5	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Land West of Lincoln Road, Eagle Moore – NK/EAG/002 It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. The site is situated adjacent to the village of Eagle which is identified as a Medium Village	n/a	No	No

									within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. The site was previously identified as a “reasonable alternative” but has now been excluded from the final proposed Draft document and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/EAG/002) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022) – Appendix 3.2: Sustainability Appraisal of Preferred Housing Site Allocations and Reasonable Alternatives Considered. Page 232. The reason for rejection is stated as being that the site is at risk of surface water flooding. However, our clients confirm that flooding has never been an issue on this site and we can confirm that the site does not sit within any recognised Environment Agency Flood Zones.			
1101411	S5	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: South Scarle Lane, North Scarle – NK/NSCA/002 It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. The site is situated adjacent to the village of North Scarle which is identified as a Small Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. The site has been rejected as a suitable site for development and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/NSCA/002) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022) – Page 48. Whilst the site is located on the edge of the settlement it is our view that it would be appropriate for development and would not adversely affect the setting of any adjacent properties and would point out that the previously consented roadside development has now been completed.	n/a	No	No
1101441	S5	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Southern Lane, Morton – NK/SWI/003 It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. The site was originally submitted through the Housing & Economic Land – Site Suggestion Form dated 28 February 2019 and it has not been included in the current Central Lincolnshire Local Plan – Proposed Submission Local Plan dated 16 April 2022. It is our view that the Housing Allocations Evidence Report 2021 did not sufficiently allow for full consideration of this site and as a consequence of this it should have been considered and subsequently allocated for development. It is noted that the site is excluded from the Residential Allocations Evidence Report 2022 – North Kesteven District despite the earlier submissions. As stated in the original submission, the site is immediately available for development and it is our view that it should be reconsidered. The site is located adjacent to Bracken Road which has existing development based around local employment at Morton Hall.	n/a	No	No
1101366	S32	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Employment Site – Besthorpe Road, North Scarle It is our view that the above Policies (S32 and S33) do potentially sufficiently provide for the inclusion of Employment areas outside established settlements and this site has not in our opinion been adequately considered. The site located at Besthorpe Road, North Scarle was originally submitted through the Housing & Economic Land – Site Suggestion Form dated 28 February 2019 and it has not been included in the current Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. It is our view that the site should be specifically included as it is adjacent to existing commercial enterprises and represents an opportunity to further expand rural enterprise. Specific inclusion of this site would identify it to potential occupiers seeking a rural employment location as opposed to established employment sites within larger urban settlements.	We would recommend that specific established sites that represent Local Employment Areas should be stated/included in Policy S32 so as to identify them for the benefit of businesses seeking rural employment sites.	No	No
1101367	S33	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Employment Site – Besthorpe Road, North Scarle It is our view that the above Policies (S32 and S33) do potentially sufficiently provide for the inclusion of Employment areas	We would recommend that	No	No

									outside established settlements and this site has not in our opinion been adequately considered. The site located at Besthorpe Road, North Scarle was originally submitted through the Housing & Economic Land – Site Suggestion Form dated 28 February 2019 and it has not been included in the current Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. It is our view that the site should be specifically included as it is adjacent to existing commercial enterprises and represents an opportunity to further expand rural enterprise. Specific inclusion of this site would identify it to potential occupiers seeking a rural employment location as opposed to established employment sites within larger urban settlements.	specific established sites that represent Local Employment Areas should be stated/included in Policy S32 so as to identify them for the benefit of businesses seeking rural employment sites.		
1101374	S81	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Eagle Hall Farmyard, Swinderby It is our view that the above Policies (S4, S5 and S81) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages and in particular the above site. The site is situated adjacent to the village of Eagle which is identified as a Medium Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. The site has been rejected as a suitable site for development and it is our view that the site should be allocated for development on the basis that it is immediately available and suitable for development as set out in the initial proposals put forward and as specified in the documents (NK/EAG/001) within the Interim Sustainability Appraisal Report for the Draft Central Lincolnshire Local Plan (April 2022) – Appendix 3.2: Sustainability Appraisal of Preferred Housing Site Allocations and Reasonable Alternatives Considered. Page 230.	See above comments	No	No
1101379	S82	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Eagle Road, North Scarle It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. The site is situated adjacent to the village of North Scarle which is identified as a Small Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. The site has been rejected as a suitable site for development and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/NSCA/003) within the Residential Allocations Evidence Report 2022 for the Draft Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022 – Appendix 1 – North Kesteven District. Page 50. We would also point out that the land to the south of this site has now been developed out.	n/a	No	No
1101386	S82	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Re: Land East of High Street, Swinderby – NK/SWI/001 It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. The site is situated adjacent to the village of Swinderby which is identified as a Small Village within the Central Lincolnshire Local Plan Review – Proposed Submission of Local Plan dated 16 April 2022. The site was previously identified as a “reasonable alternative” in earlier Consultation documents and has now been rejected and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/SWI/001) within the Residential Allocations Evidence Report 2022 – Appendix 1 – North Kesteven District. Page 242. The reason for rejection is stated as being unable to deliver 10 or more dwellings due to the presence of Tree Preservation Orders. It is our view that a suitably designed scheme could be prepared to provide for an appropriate form of development and would also point out that there is consented development adjacent to the south of this site.	n/a	No	No
1101401	S82	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Large Farm, North Scarle - NK/EAG/007 It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the inclusion of significant residential development in open countryside in and around designated Large, Medium and Small Villages. There are	n/a	No	No

									<p>numerous opportunities to provide small residential development sites from existing farmsteads and the policy within S5 should reflect and encourage this. The site is situated some 1.5 k from the village which is identified as a Small Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. The site has been rejected as a suitable site for development and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/EAG/007) within the Interim Sustainability Appraisal Report for the Draft Central Lincolnshire Local Plan (June 2021) – Appendix 3.2: Sustainability Appraisal of Preferred Housing Site Allocations and Reasonable Alternatives Considered. Page 240. It is noted that reference to this site has not been included within the Appendix 1 – Residential Allocations Evidence Report 2022 – North Kesteven which forms part of the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan.</p>			
1101406	S82	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Re: Land West of Lincoln Road, Eagle Moore – NK/EAG/002 It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. The site is situated adjacent to the village of Eagle which is identified as a Medium Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. The site was previously identified as a “reasonable alternative” but has now been excluded from the final proposed Draft document and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/EAG/002) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022) – Appendix 3.2: Sustainability Appraisal of Preferred Housing Site Allocations and Reasonable Alternatives Considered. Page 232. The reason for rejection is stated as being that the site is at risk of surface water flooding. However, our clients confirm that flooding has never been an issue on this site and we can confirm that the site does not sit within any recognised Environment Agency Flood Zones.</p>	n/a	No	No
1101412	S82	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Re: South Scarle Lane, North Scarle – NK/NSCA/002 It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. The site is situated adjacent to the village of North Scarle which is identified as a Small Village within the Central Lincolnshire Local Plan Review – Proposed Submission Local Plan dated 16 April 2022. The site has been rejected as a suitable site for development and it is our view that the site should be allocated for development on the basis that it is immediately available for development as set out in the initial proposals put forward and as specified in the documents (NK/NSCA/002) within the Central Lincolnshire Local Plan – Proposed Submission Local Plan (April 2022) – Page 48. Whilst the site is located on the edge of the settlement it is our view that it would be appropriate for development and would not adversely affect the setting of any adjacent properties and would point out that the previously consented roadside development has now been completed.</p>	n/a	No	No
1101443	S82	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>Re: Southern Lane, Morton – NK/SWI/003 It is our view that the above Policies (S4, S5 & S82) do not sufficiently provide for the inclusion of significant residential development in and around designated Large, Medium and Small Villages. The site was originally submitted through the Housing & Economic Land – Site Suggestion Form dated 28 February 2019 and it has not been included in the current Central Lincolnshire Local Plan – Proposed Submission Local Plan dated 16 April 2022. It is our view that the Housing Allocations Evidence Report 2021 did not sufficiently allow for full consideration of this site and as a consequence of this it should have been considered and subsequently allocated for development. It is noted that the site is excluded from the Residential Allocations Evidence Report 2022 – North Kesteven District despite the earlier submissions. As stated in the original submission, the site is immediately available for development and it is our view that it should be reconsidered. The site is located</p>	n/a	No	No

									adjacent to Bracken Road which has existing development based around local employment at Morton Hall.			
--	--	--	--	--	--	--	--	--	---	--	--	--

East Lindsey District Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100485	General	Yes	Yes	Yes	Yes	Yes	Yes	Yes			No	No

Ecotricity

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101447	S14	Yes	Yes	Yes	No	No	No	Yes	<p>We welcome that Policy S14: Renewable Energy states that the Central Lincolnshire Joint Strategic Planning Committee is committed to supporting the transition to a net zero carbon future and will seek to maximise appropriately located renewable energy generated in Central Lincolnshire, and that proposals for renewable energy schemes, including ancillary development, will be supported.</p> <p>The intention set out in paragraph 3.3.1 is also welcomed; the role of the Local Plan in facilitating ‘an increase in renewable energy generated in Central Lincolnshire, as part of a transition towards a net-zero carbon future...by proactively encouraging investment in renewable energy infrastructure, encouraging and supporting the delivery of wider transformation infrastructure (such as energy storage).’</p> <p>We accept that this approach and Policy S14 itself is in accordance with the NPPF’s statement that in order to increase the use and supply of renewable energy, plans should ‘provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts.’ (Paragraph 155).</p> <p>However, we are concerned that paragraph 3.3.4 refers to an aim of the Joint Committee to ‘facilitate the delivery of approximately 230MW’ of solar energy (presumably within the plan period) runs the risk of being unsound. It is understood that this figure is not set as ‘either a cap or ceiling’ (although the sentence syntax could be improved), and indeed the figure does not appear within Policy S14: Renewable Energy.</p> <p>We note from the evidence base (Central Lincs Policy S14: Renewable Energy Evidence Report – March 2022) that this figure of 230 MW is at the lower end of that recommended by consultants (appointed in July 2020) as the most appropriate target for Central Lincolnshire to ‘help the UK meet its targets’ and to achieve a carbon neutral Central Lincolnshire by 2050 to accord with the Paris Agreement.</p> <p>The stated figure is also very low in comparison with the solar energy capacity and requirements of Central Lincolnshire as identified by the renewable energy sector, as evidenced by the number of detailed proposals currently under consideration or</p>	<p>To avoid ambiguity at paragraph 3.3.4, a revised wording would provide a clear summary of how the evidence base (the consultants’ report commissioned in 2020) set out a methodology and findings to inform the emerging Local Plan. The range of figures for required solar and wind (along with any relevant comparators such as acres and percentage of Plan area) could be included as background context for Policy S14. For this part of the Plan to be both effective and justified, the revised paragraph should clearly report the higher MW figures from the evidence base that the consultants concluded would be required to help the UK meet its targets and to achieve a carbon neutral Central Lincolnshire by 2050 to accord with the Paris Agreement.</p> <p>Alternatively, in the interest of clarity and to avoid any ambiguity,</p>	Yes	No

									<p>due to come forward in the next 12-24 months within both North Kesteven and West Lindsey. Moreover, the reference to the lowest and least ambitious figure from the evidence base does not accord with the clear direction of Government policy from the Energy White Paper (2020), through the Carbon Budget Order (2021), Net Zero Strategy: Build Back Greener (2021), and Draft Revised National Policy Statements in Energy and Renewable Energy Infrastructure (2021), to the policy paper on British Energy Security Strategy (April 2022). The latter demonstrates how the Government's ambitions for the quantum of solar generation in the UK has gradually increased in successive document documents to 70GW by 2035.</p> <p>Whilst the figure of 230 MW is therefore of significant concern as being neither justified or effective, the reference within paragraph 3.3.4 to neither a cap nor a ceiling, further renders this element of the Plan as potentially unsound.</p> <p>Policy S14 includes a reference to Best and Most Versatile (BMV) agricultural land as one of the factors weighing against the presumption in favour of ground based photovoltaic schemes. However, this position is not supported by the NPPF and planning application refusals on BMV considerations have been successfully challenged at appeal. Moreover, the draft National Policy Statement for Renewable Energy Infrastructure (EN-3), whilst also stating that nationally significant projects (such as the proposed Heckington Fen solar farm) should avoid BMV land where possible, advises that land type 'should not be a predominating factor in determining the suitability of the site location' (paragraph 2.48.13). The reference within Policy S14 also omits to acknowledge that solar schemes are temporary in nature and are usually compatible with continued agricultural use during the years of operation, before full restoration at the end of the permitted period, and can lead to an improvement in soil quality.</p>	<p>paragraph 3.3.4 (and the related 3.3.5) could be removed in its entirety.</p> <p>The reference within Policy S14 to Best and Most Versatile agricultural land should be revised to remove the blanket reference to BMV land as an exception against the presumption in favour and refer instead to how the issue should be considered in any assessment of clear and demonstrable significant harm.</p>		
--	--	--	--	--	--	--	--	--	--	--	--	--

Egdon Resources UK Limited

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101510	Intro	Yes	Yes	Yes	No	Yes	Yes	Yes	The section entitled "Central Lincolnshire in Context" fails to refer to the important role that Central Lincolnshire has played and will continue to play in generating both renewable and non-renewable energy. This includes solar farms such as Fiskerton Airfield, potential new wind turbine development and long-established production wellsites such as Welton and Fiskerton Airfield. It is important that the Local Plan acknowledges the importance of having a mix of energy sources within Central Lincolnshire.	Add the following text to the paragraph: "Central Lincolnshire has played and will continue to play a key role in generating both renewable and non-renewable energy. This includes solar farms such as Fiskerton Airfield, potential new wind turbine development and long-established production wellsites such as Welton and Fiskerton Airfield. The Local Plan acknowledges the importance of having a mix of energy sources within Central Lincolnshire."	No	No
1101512	S1	Yes	Yes	Yes	No	Yes	No	Yes	We welcome the inclusion within part 8 of the policy that development in the countryside will be restricted to four criteria which includes minerals or waste development. However, we question the need to include the words "in accordance with separate Minerals and Waste Local Development Documents".	It is recommended that the fourth criteria of Policy S1 (8) be amended to "Minerals and waste development."	No	No

									<p>There is no explanation in the supporting text as to what this means. In any event, it is unclear why minerals and waste development must be in accordance with M&W LDD; planning permission can be granted for development contrary to policy if material considerations override policy objections. There is also a typo – two “to’s”.</p> <p>No evidence is provided by the Local Plan as to why minerals and waste development must be in accordance with M&W LDD. The National Planning Policy Framework (NPPF) states that planning law requires applications for planning permissions must be determined in accordance with the development plan unless material considerations indicate otherwise.</p>			
1101515	S5	Yes	Yes	Yes	No	Yes	No	Yes	<p>Criteria a) of Part E of Policy S5 (Non-residential development in the Countryside) is not consistent with Part 8 of Policy S1 (Countryside). Part E states that the type of development that would be allowed in the countryside is restricted to either one that maintains or enhances the rural economy or in proximity to existing established businesses or natural features. Part 8 of policy S1 refers to mineral and waste development as being acceptable in the countryside. Applications for minerals and waste may not necessarily fit with these criteria in Part E of Policy S5.</p>	Criteria a) of Part E should be amended to include minerals and waste.	No	No
1101517	S5	Yes	Yes	Yes	No	Yes	No	Yes	<p>Part G of Policy S5 (Agricultural, forestry, horticultural or other rural land-based development) is not consistent with Part 8 of Policy S1 (Countryside). Part G of Policy S5 makes no reference to minerals and waste development which could be classed as “other rural land-based development.” Part 8 of policy S1 refers to mineral and waste development as being acceptable in the countryside. Applications for minerals and waste may not necessarily fit with these criteria in Part G of Policy S5.</p> <p>Criteria a) and e) should not apply to such forms of development as they will require specific dedicated buildings. Significant earthworks may also be required as part of the nature of the development.</p>	<p>Part G should be amended to include minerals and waste and make clear that parts a) and e) do not apply.</p> <p>The second paragraph of policy S5 Part G should read “Where permission is required, development proposals for buildings required for agriculture or other land-based development purposes, including mineral and waste development will be supported where: ...” A caveat should be included within Part G that “Criteria a) and e) do not apply to material and waste development”.</p>	No	No
1101521	S6	Yes	Yes	Yes	No	Yes	No	Yes	<p>Policy S6 is overly prescriptive, unreasonably onerous and inconsistent with the Government’s aim to promote low-emission alternatives to the use of fossil fuels for heating new homes by 2025. Paragraph 154 b) of the NPPF acknowledges that new development should be planned in ways that can help reduce greenhouse gas emissions, such as through its location, orientation and design. Likewise, paragraph 157 b) of the NPPF states that local planning authorities should expect new development to take account of landform, layout, building orientation and massing to minimise energy consumption. Criteria 1 and 2 of the policy therefore appear to be consistent with the NPPF.</p> <p>Paragraph 154 b) of the NPPF states that any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards. However, the “Technical Housing Standards - nationally described space standard (2015)” make no</p>	<p>For the policy to accord with national policy, the policy should be amended as follows:</p> <ol style="list-style-type: none"> 1. Substitute “considered” for “used and in the following order:” 2. Delete criteria 3-5. 3. Delete the final sentence with respect to Energy Statements. 	No	No

									reference to criteria 3, 4 or 5 in Policy S6. Criterion 3 (fabric of buildings) appears to fall within the Building Regulations regime. Criteria 4 and 5 are unrealistic and undeliverable requirements for all forms of development in all locations within Central Lincolnshire and go far beyond the Government's national technical standards. They are therefore contrary to national policy.			
1101522	S8	Yes	Yes	Yes	No	Yes	No	Yes	Policy S8 is overly prescriptive and unreasonably onerous in its requirement for an Energy Statement for all new non-residential development. It does not appear to exclude temporary buildings such as portacabins and includes no minimum floor area of a building. The policy does not accord with Government policy and appears to fall within the Building Regulations.	<p>Delete the policy as it falls outside planning policy and it is impractical for all non-residential buildings to meet the criteria set out in Policy S8. Alternatively, the policy could be amended to exclude temporary buildings and those buildings below 1,000 sqm in floor area.</p> <p>If the decision was made to amend the policy it is suggested the first section of Policy S8 is amended to "All new non-residential development proposals, excluding temporary buildings and those buildings below 1,000 sqm in floor area must include an Energy Statement which confirms that all such non-residential units:".</p>	No	No
1101527	S9	Yes	Yes	Yes	No	Yes	No	Yes	Policy S9 excludes combined heat and power (CHP) generation which relies upon fossil fuels. This is contrary to national planning policy. The National Planning Policy Framework (NPPF) defines "decentralised energy" as local renewable and local low carbon energy sources. Paragraph 155 c) of the NPPF states that plans should "identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems. Low carbon fuels include cleaner fossil fuels such as natural gas.	Policy S9 should be amended to comply with the NPPF, specifically Paragraph 155 c). Policy S9 should state that "Any proposal for a new or extended combined heat and power network will be supported if the power source of such a network is renewable or low carbon energy, including fossil fuel sources such as coal bed methane and gas".	No	No
1101500	S10	Yes	Yes	Yes	No	No	Yes	Yes	The policy as currently worded is insufficiently clear and thereby not effective. It is presumed that the reference to Policy S9 at para 3.2.22 is a typo. It is unclear why there is a reference to 'any policies in the Minerals and Waste Development Plan'. Policy S10 is not justified in that there is a lack of evidence as to why this is the most appropriate strategy, or what relevance policies within the Minerals and Waste Development Plan have to Policy S10.	The reference to Minerals and Waste Development policies should be removed from Policy S10. The examples included as bullet points in para 3.2.22 need to be reworded as criteria against which proposals will be determined.	No	No
1101502	S11	Yes	Yes	Yes	No	Yes	No	Yes	Policy S11 is too broad a policy and goes beyond national planning policy. There is no presumption against demolition in either the NPPF or planning practice guidance. Demolition of buildings is also permitted development under Parts 10 and 17 of the General Permitted Development Order 2015. The requirements under 'Major development proposals' of Policy S11 appear to fall within building regulations rather than the planning regime.	Policy S11 should be deleted as it is contrary to national planning guidance and falls outside the planning regime.	No	No
1101494	S19	Yes	Yes	Yes	No		No	Yes	Paragraph 3.5.7. is contrary to national planning and energy policy. Para 209 of the NPPF states that it is essential there is a sufficient supply of minerals to provide the energy the country needs. Para 210 of the NPPF states that planning policies should provide for the extraction of mineral resources of local and national importance.	Paragraph 3.5.7. should be deleted.	Yes	No

									<p>Annex 2 of the NPPF confirms that oil and gas fall within this definition and that they are necessary to meet society's needs. This has been confirmed in two planning appeal decisions allowing fossil fuel extraction in North Lincolnshire and the South Downs National park respectively – APP/Y2003/W/19/3221694 (January 2020) and in APP/Y9507/W/20/3265729 (December 2021). There is a national need for onshore oil and gas, as part of a diverse and secure energy supply. Government energy policy recognises that the UK is not currently in a position to rely solely on renewable energy sources. Fossil fuels will continue to have a role in the UK's energy system for some time to come.</p> <p>The representation of Paragraph 3.5.7 should be considered in relationship with our representation of Policy S19 which is contrary to national policy and the National Planning Policy Framework.</p>			
1101497	S19	Yes	Yes	Yes	No		No	Yes	<p>Paragraph 3.5.8. is contrary to national planning and energy policy. Para 209 of the NPPF states that it is essential there is a sufficient supply of minerals to provide the energy the country needs. Para 210 of the NPPF states that planning policies should provide for the extraction of mineral resources of local and national importance. Annex 2 of the NPPF confirms that oil and gas fall within this definition and that they are necessary to meet society's needs. This has been confirmed in two planning appeal decisions allowing fossil fuel extraction in North Lincolnshire and the South Downs National Park respectively – APP/Y2003/W/19/3221694 (January 2020) and in APP/Y9507/W/20/3265729 (December 2021). There is a national need for onshore oil and gas, as part of a diverse and secure energy supply. Government energy policy recognises that the UK is not currently in a position to rely solely on renewable energy sources. Fossil fuels will continue to have a role in the UK's energy system for some time to come.</p> <p>The representation of Paragraph 3.5.8 should be considered in relationship with our representation of Policy S19 which is contrary to national policy and the National Planning Policy Framework.</p>	Paragraph 3.5.8. should be deleted.	Yes	No
1101498	S19	Yes	Yes	Yes	No		No	Yes	<p>Paragraph 3.5.9. is contrary to national planning and energy policy. Para 209 of the NPPF states that it is essential there is a sufficient supply of minerals to provide the energy the country needs. Para 210 of the NPPF states that planning policies should provide for the extraction of mineral resources of local and national importance. Annex 2 of the NPPF confirms that oil and gas fall within this definition and that they are necessary to meet society's needs. This has been confirmed in two planning appeal decisions – APP/Y2003/W/19/3221694 (January 2020) and in APP/Y9507/W/20/3265729 (December 2021). There is a national need for onshore oil and gas, as part of a diverse and secure energy supply. Government energy policy recognises that the UK is not currently in a position to rely solely on renewable energy sources. Fossil fuels will continue to have a role in the UK's energy system for some time to come.</p> <p>The representation of Paragraph 3.5.9 should be considered in</p>	Paragraph 3.5.9. should be deleted.	Yes	No

									relationship with our representation of Policy S19 which is contrary to national policy and the National Planning Policy Framework.			
1101506	S19	Yes	Yes	Yes	No	No	No	Yes	<p>Policy S19 is contrary to national energy policy (the Overarching National Policy Statement for Energy (EN-1) and the National Planning Policy Framework (NPPF). The NPPF states that the planning system should support the transition to renewable and low carbon energy and infrastructure. It does not state that fossil fuel extraction should be refused. National energy policy is aimed at reducing demand by consumers. It is no part of national policy to seek to reduce emissions by restricting hydrocarbon extraction in the UK. There will be a continuing role for fossil fuels in providing for UK energy needs during the transition to a low carbon economy.</p> <p>The British Energy Security Statement, published in April 2022, puts the focus upon reducing imports of oil and gas and boosting our domestic reserves to increase our security of supply.</p>	Policy S19 should be deleted.	Yes	No
1101491	S34	Yes	Yes	Yes	No	Yes	No	Yes	Policy S34 is unduly restrictive and overly complicated. It would have a detrimental impact upon mineral and waste development. These operations often take place in the countryside as minerals can only be extracted where they are found. There is no exclusion of the temporary employment generation that mineral development will provide. There is no acknowledgement in the Policy that there will be a need for non-designated employment in the countryside generated by mineral development.	Policy S34 should be amended specifically to exclude temporary development associated with minerals. Policy S34 should be adapted to include the caveat “With the exceptions of those developments associated with minerals.”	No	No
1101489	S54	Yes	Yes	Yes	No	Yes	No	Yes	Policy S54, entitled ‘Health and Wellbeing’ extends beyond the parameters of national planning policy. There is no justification for the thresholds set out in sub paragraph b. It is unduly restrictive and in practice it may not be feasible to comply with Policy S54. Project location has not been taken into consideration, the promotion and support of physical and mental health and wellbeing will not be viable in cases where a project is located in a remote location.	For Policy S54 to be the most appropriate strategy, it should include where appropriate that there are exceptions to the case, thus enabling the Policy to be realistically deliverable. The inclusion of the words, “Where appropriate” should precede the policy so that it is clear to users of the Plan that mental and physical health outcomes may not always be relevant when considering all development proposals.	No	No

Environment Agency

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101452	S12	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>As expected, the requirement for the higher water efficiency standard of 110 per person per day in residential development has been carried over from the existing plan. We support this and also the encouragement to go further, for example to 85 litres per day person.</p> <p>As recognised in the Sustainability Appraisal, Central Lincolnshire is within an area of serious water stress, which could be made worse by growth and climate change effects. To mitigate this, water</p>		No	No

									resources need to be more efficiently used in new homes and businesses.			
1101454	S14	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>We support the policy and positive approach to increasing renewable energy production.</p> <p>The list in paragraph 3.3.2 of renewable energy technology types is useful.</p> <p>The supporting paragraphs evidence the work done to support the policy and identify areas suitable for large scale wind energy generation.</p> <p>Policy S14 includes reference to ‘ancillary development’. This recognises the potential for renewable energy generation at existing sites or as part of a new development where this is not the sole or primary purpose.</p>		No	No
1101457	S21	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>S21 a) to f) Flood Risk</p> <p>We support the policy. It reflects the requirements of national planning policy although adding no local detail or objectives. We note that much of text is unchanged from the equivalent policy in the adopted Local Plan.</p> <p>Reference to the sequential approach to development layout within a site would make the policy more effective, by highlighting this requirement to developers.</p> <p>Furthermore, we would welcome an additional criterion to ensure proposals demonstrate they will deliver nature-based solutions to mitigation flood risk, including enhancements to the green and blue infrastructure network, where possible.</p>	Although we consider S21 a) and f) to be sound, we consider the suggestions above to strengthen the policy approach in accordance with the national ambitions set out in the Government’s 25 Year Environment Plan and to address the future risk posed by climate change.	No	No
1101459	S21	Yes	Yes	Yes	Yes	Yes	No	Yes	<p>Paragraph 3.7.2 in the Draft Plan states that SFRA levels 1 and 2 have been undertaken. As we previously advised Central Lincolnshire, we do not consider this is an accurate description of the work that has taken place, which we consider to be inconsistent with the relevant guidance. The documents in the Local Plan Library with these titles, particularly the ‘Level 2 SFRA’ cannot be accurately described as such when compared to the Environment Agency guidance on GOV.UK (How to prepare a strategic flood risk assessment - GOV.UK (www.gov.uk)).</p> <p>Paragraph 160 of the Framework states ‘Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.’</p> <p>We do not think this makes the plan fundamentally unsound in relation to flood risk, as is clear that in allocating additional sites the Councils have directed development towards areas of low flood risk, only allocating a small number of housing sites that are partly within Flood Zones 2 and 3. We also do not think it necessary to produce a detailed Level 2 SFRA or carry out</p>	<p>It is difficult to suggest alternative text for this sentence without changing the titles of the documents referred to.</p> <p>It would also be better as a separate point from the rest of the paragraph.</p> <p>Please consider the following:</p> <p>‘In allocating sites within this Local Plan, the Councils have considered all sites put forward against the Flood Map for Planning and any available surface water flood risk information. (See document (SFRA Level 1).) Following application of the sequential approach within the Plan area, the small number of sites newly allocated in this plan with areas in Flood Zones 2 or 3 were considered further, to establish how they could be safely developed. (See document (SFRA Level 2).)</p> <p>Or</p>	No	No

									<p>additional work at this stage (See separate comment on Policy S21 regarding the SFRA documents). The documents themselves are useful for the purpose intended by the Councils.</p> <p>However, paragraph 3.7.2 may be misleading for developers and potentially development management officers applying Policy S21.</p>	<p>‘In allocating sites within this Local Plan, the Councils have produced Addenda to the existing SFRA, focusing on sites put forward for allocation (‘SFRA level 1’) and sites to be allocated with areas in Flood Zones 2 or 3 (‘SFRA Level 2’).’</p>		
1101463	S21	Yes	Yes	Yes	Yes	Yes	No	Yes	<p>SFRA Level 1 This includes introductory text on methodology, followed by maps of the Plan area and of existing or proposed site allocations with more than 10% areas in FZ2 or 3. The document helpfully includes any ‘old references’. There is also a summary table of whether a site is proposed for housing or other use, with % area in FZ2/3.</p> <p>Paragraph 3.1 states “The previous Level 1 SFRA was issued on 30th March 2015. It contains information which is still relevant and can be found on the Central Lincolnshire Planning Policy Library website.’ In fact, the 2015 SFRA is only in the library for the previous plan (Planning Policy Library Central Lincolnshire (n-kesteven.gov.uk).) It draws and builds on earlier SFRA’s for the individual councils. Many of the links no longer work.</p> <p>Paragraph 3.4 states ‘The EA Flood Zones do not currently include an allowance for climate change. However, recent discussions with the EA has concluded that the impact of climate change on the extent of the Flood Zones in this area is likely to be negligible and should not significantly impact on the strategic allocation of land.’</p> <p>It is correct that the flood zones on the Flood Map for Planning, in accordance with national planning guidance, do not take account of climate change. However, the remaining text is misleading. While we advised there may be a negligible strategic effect on flood zones from climate change, we have not confirmed that the impact of climate change on flood zones in Central Lincolnshire as a whole is likely to be negligible. Any planning application will have to consider climate change as part of the site-specific flood risk assessment to identify areas potentially at risk in the future.</p> <p>SFRA Level 2 This document primarily addresses flood risk to specific sites proposed for allocation. Some more detail has been added following our advice at the Regulation 18 stage, including advice to developers in 3.10-3.15 and Appendix 2 and a table of data sources in Appendix 3.</p> <p>Paragraph 1.8 is a repeat of paragraph 3.4 in the Level 1 SFRA and the same comments apply.</p> <p>3.1 explains the level 2 SFRA now includes only intended allocations, without planning permission. It clarifies which are existing and which are new.</p> <p>3.6 explains that the document ‘identifies the potential mitigation</p>	<p>3.1 The 2015 SFRA should be added to the current Library to validate paragraph 3.1. The document would benefit from updating.</p> <p>SFRA Level 1 Paragraph 3.4 Suggested amended text: ‘The flood zones on the Flood Map for Planning, in accordance with national planning guidance, do not take account of climate change. Discussions with the Environment Agency concluded that adding climate change allowances to the models used to define the flood zones in this area would not affect the flood zones strategically. This SFRA has not therefore attempted to estimate future flood zone extents. However, any planning application will have to consider climate change as part of the site-specific flood risk assessment to identify areas potentially at risk in the future, using best available flood risk data.’</p> <p>SFRA Level 2 Ideally the document should be re-titled. Its role is perhaps to apply part 2 of the Exception Test.</p> <p>Paragraph 1.8 suggested amended text as above.</p> <p>Potential mitigation options suggested text for all examples: ‘Development to avoid areas of flood risk, including consideration of the climate change impacts.’ ‘Raised floor levels’ could be added as an exceptional alternative, or additional measure where data is less robust.</p>	No	No

									<p>measures that might be required should the site be formally allocated’.</p> <p>‘Potential mitigation options’ for each site are variously ‘development to avoid areas of flood risk’ and ‘floor level raised’.</p> <p>The reason for the choice is not obvious – avoidance (following the sequential approach) should be possible with all these sites. Again, climate change is not mentioned.</p>			
1101467	S21	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>S21: g) to t) Protecting the Water Environment: We strongly support these criteria of the policy, taken as a whole.</p> <p>h) We welcome the requirement that ‘Development proposals should demonstrate...that adequate mains foul water treatment and disposal already exists or can be provided in time to serve the development’ and (3.7.14) the advice that development proposals should be discussed with relevant bodies. We also welcome the reminder of the ‘foul drainage hierarchy’ (Planning Practice Guidance Paragraph: 020 Reference ID 34-020-20140306).</p> <p>However, this would benefit from more detail (perhaps in the supporting text) to indicate the level of information required with the development proposal, particularly where capacity is not available at the time of the planning application and it is necessary to demonstrate that treatment capacity ‘can be provided in time’. We have experienced a lack of clarity in applying similar policies at the planning application stage.</p> <p>Also based on experience, we have specific concerns regarding non-mains sewerage proliferation linked to employment sites, which tend to be developed piecemeal, with each successive applicant arguing that they cannot afford the costs of connection to the (relatively close) mains network.</p> <p>We would expect policy S21 h) to be monitored for effectiveness in informing decision makers and protecting water resources.</p>	<p>We advise provision of additional supporting information to improve transparency on what would be expected at the planning application stage. We consider the following suggestions to make the policy more effective.</p> <p>Paragraph 3.7.14 highlights the importance of those proposing development liaising with relevant organisations, including the relevant Water Company, which we welcome. This could be strengthened to state that, as a result of effective collaboration with key stakeholders, proposals should evidence outcomes, including phasing plans where appropriate, to ensure compliance with the policy requirements.</p> <p>Criterion h) could also be amended as follows:</p> <p>'h) that adequate mains foul water treatment and disposal already exists or can be provided in time to serve the development, as evidenced by a foul drainage strategy, including liaison with the Water / Sewerage Company, the outcome of this and implications for the development and a phasing plan where appropriate. Non mains foul sewage disposal solutions should only be considered where it can be shown to the satisfaction of the local planning authority that connection to a public sewer is not feasible.'</p>	No	No
1101468	S21	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>These paragraphs recognise the pressure on wastewater infrastructure caused by growth and the importance of working with the Environment Agency and relevant bodies (the water companies) to prevent harm to the water environment and amenity. This is essential to ensure water recycling centres do not receive wastewater beyond their treatment capacity, leading to flooding and/or pollution of watercourses – as well as to ensure necessary development can be accommodated and is not held back.</p>		No	No

									<p>We have shared information with the Councils and signed a statement of common ground committing to further liaison. We are aware that Anglian Water have also shared information, advised on future ways of working and committed to signing the statement of common ground subject to amendments.</p> <p>The Environment Agency and other risk management authorities are also working with water companies to support the development of their Water Resources Management Plans and Drainage and Wastewater Management Plans.</p>			
1101465	S21; S77; S78; S79; S80; S81; S82	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>Sequential test document HOU006:</p> <p>The tables from page 7 onwards include a column to say whether the sequential test is passed. All sites in Flood Zone 2 or 3 are listed as not passing. It is usual practice to say that the sequential test has been passed for sites in Flood Zones 2 and 3 if it has been demonstrated that there are no 'reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding'.</p> <p>Placing 'no' in the sequential test column for COL/BOU/001 and others could lead to confusion. While the test is not automatically passed (as could be said for sites not at risk of flooding), it needs to have been passed, following consideration of availability of alternative sites, in order for a site to be allocated or granted planning permission.</p> <p>The document lists the reasons for rejecting sites but does not give specific reasons for choosing the sites including Flood Zones 2 and 3. This information may be elsewhere.</p>		No	No
1101470	S25	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>When the Article 4 direction was adopted, City of Lincoln Council agreed with the Environment Agency an approach of not allowing ground floor HMO bedrooms in Flood Zone 3 unless a site-specific flood risk assessment had demonstrated these were above relevant flood levels. It was agreed that while a change of use from a traditional dwelling to an HMO is within the same vulnerability classification, there is an increase in risk if ground floor bedrooms are included, because of the potential for rooms to be locked and first floor areas unavailable as shared space.</p> <p>However, this approach is not referred to in the local plan policy or the supplementary planning document for the Article 4 direction. Following our representations during the Regulation 18 consultation, paragraph 4.4.5 has been amended to highlight that 'not putting occupants at risk' includes development of residential accommodation or bedrooms at ground floor level in an area at risk of flooding. While we welcome this, we consider that the advice and position could be stronger and clearer.</p>	<p>We consider this to be important to be consistent with the National Planning Policy Framework (NPPF) position that policies should support appropriate measures to ensure future resilience of communities and infrastructure to climate change impacts. Paragraph 154 a) of the NPPF sets out that new development should be planned in ways that 'avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures'.</p> <p>To make the policy stronger and more explicit, we suggest an additional criterion f) that no ground floor bedrooms in new HMOs in Flood Zones 2 or 3 are acceptable unless a site-specific flood risk assessment has demonstrated</p>	No	No

										that finished floor levels are above the relevant flood level.		
1101472	S44	Yes	Yes	Yes	Yes	Yes	Yes	Yes	At the Regulation 18 stage we raised the matter of the Showground site still not being connected to the mains sewerage network, which is unfortunate given plans for its continued expansion. The Environment Agency has in the past encouraged applicants to fully investigate the practicality of connecting; however, in individual cases applicants have been able to demonstrate that it is impracticable for them to do so. Although this is not mentioned in the Local Plan, the impact of proposals for the Showground on infrastructure is now included in the latest Statement of Common Ground Appendix 1 under item 7.		No	No
1101473	S59	Yes	Yes	Yes	Yes	Yes	Yes	Yes	We support the policy and are pleased that it clearly acknowledges the value of 'blue' (water related) infrastructure.		No	No
1101474	S60	Yes	Yes	Yes	Yes	Yes	Yes	Yes	We support the policy; it has been improved in response to comments from the Environment Agency and other relevant organisations at the Regulation 18 stage, and afterwards collaboratively via the Greater Lincolnshire Nature Partnership.		No	No
1101475	S61	Yes	Yes	Yes	Yes	Yes	Yes	Yes	We support the policy; it has been improved in response to comments from the Environment Agency and other relevant organisations at the Regulation 18 stage, and afterwards collaboratively via the Greater Lincolnshire Nature Partnership.		No	No

Evans McDowall Architects Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
11861077	S5	N					No		<p>Paragraph 80 of the NPPF requires Planning policies and decisions to avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:</p> <p>(a) there is an essential need for a rural worker, including those taking majority control of a farm business, to live permanently at or near their place of work in the countryside;</p> <p>(b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;</p> <p>(c) the development would re-use redundant or disused buildings and enhance its immediate setting;</p> <p>(d) the development would involve the subdivision of an existing residential building; or</p> <p>(e) the design is of exceptional quality, in that it:</p> <ul style="list-style-type: none"> - is truly outstanding, reflecting the highest standards in architecture, and would help to raise standards of design more generally in rural areas; and - would significantly enhance its immediate setting, and be sensitive to the defining characteristics of the local area. <p>bullet point (e) allows for the the design of exceptional quality to be considered. No such provision is allowed for with the current or draft CLLP.</p>	a similarly worded paragraph to bullet point (e) is added to policy S5 to allow such developments to be considered	No	No

Fiskerton Developments Ltd

Rep ID		Q2: Legal Compliance	Q3: Tests of Soundness	Q4: Please give details.			
--------	--	----------------------	------------------------	--------------------------	--	--	--

	Comment on	Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate		Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
1100326	S81	Yes	Yes	Yes	No	No	No	Yes	<p>The eastern edge of proposed greenfield housing allocation WL/FISK/001A is set circa 150m from my client's site – The Former Tanya Knitwear Site, Ferry Rd, LN3 4HU. My client's site is a previously developed site characterized by existing redundant / unoccupied former commercial premises, demolished buildings which resulting brick /materials on site and covered by hard standing. (Photos attached) It also accommodates a single dwelling which is currently rented and occupied (See Photos attached). It is considered an unsound, non-effective and ultimately a non-consistent proposition with National Planning Policy to allocate a greenfield site on the edge of Fiskerton when a brownfield site is available, suitable, and deliverable some 150m away from the proposed allocation. Furthermore, and for the sake of being concise at this stage, we make the following observations in the context of SA site appraisal of WL/FISK/001A: • Housing – my client's site would also deliver open market and affordable housing. • My client's site is not materially further away to the nearest GP Surgery in Cherry Willingham (2.5km away) than that proposed for allocation. • My client's site is also within walking distance to existing open space – footpaths (flood lit) are already in situ from the site to the centre of the Village. • My client's site could deliver open space on a site which would reduce the extent of hard standing on site and IMPROVE site biodiversity which a green field site allocation cannot do. • My client's site is also not within 500m of a designated wildlife site, nor within a BOM area or designated as a local green space. It is however a brownfield site unlike the proposed greenfield site. • We have no heritage assets on site at Tanya Knitwear and little archeological potential due to the previous development of the site. A greenfield site would have a much higher risk of significance. • Site would also not affect railways, strategic highway network, etc. • The proposed site is entirely Grade 3 Agricultural land – productive agricultural land. My client's site is brownfield and previously developed. • There is no designated centre in Fiskerton and while the proposed site is within 100m of a bus stop my client's site is located adjacent to an existing bus stop. • Both sites not within a Minerals safeguarding area and within FZ1. My clients' sites redevelopment with new open space would have the potential to show much greater betterment than the redevelopment of a greenfield site. • My client's site has the potential to deliver new housing AND deliver employment space – this would result in a far more sustainable pattern of development - i.e., home and jobs – not purely 100% commuter housing. The SA identifies the nearest designated employment site is some 5.2km away in Lincoln. • Both sites provide good access to the Primary School. My clients have only been made aware of the need to promote their site within the Local Plan process in the past 14 days and were unaware of the 'new' housing allocation in Fiskerton. Considering that Policy LP4 on the 25 March 2022 (the latest available data at the time of this submission being lodged) identified a Remaining Growth Level of 65 new homes, the proposed allocation of a greenfield site in a medium village, and of a scale in the region of twice the remaining growth level is considered an unsound proposition which is inconsistent with National Planning Policy. In a matrix scoring system we do not consider that my client's site should be scored lower than the proposed allocation site - WL/FISK/001A. Accordingly, we respectfully wish the Inspector to consider the logic and planning policy basis of allocating a greenfield site of circa 122 units in this village. We consider it not to be a sound proposition and would not be good 'plan making'. On the basis that the Former Tanya Knitwear Site is available for housing development (a site of 1.1HA) it respectfully submitted that this site either in full or in part could meet the remaining growth levels for the village in a far</p>	<p>We consider that the greenfield housing allocation for circa 122 dwellings in Fiskerton as currently proposed is unjustified. See comments made in Section 4. • We seek either full de-allocation of housing site WL/FISK/001A - Land North of Corn Close or a very significant reduction in the housing number allocation of 122 and overall site area. • It is not justified. • We seek the allocation of land at the very near previously developed Former Tanya Knitwear Site on Ferry Rd, Fiskerton for housing to meet the current un-met housing needs of this Medium Village.</p>	Yes	Yes

									more sustainable way than simply allocating a vast expanse of new housing on a greenfield site. The proposed allocation is only set some 150 m away from my clients previously developed site which could accommodate either solely housing or a mix of housing and employment to create a more sustainable pattern of development than is currently proposed in Fiskerton.			
--	--	--	--	--	--	--	--	--	---	--	--	--

Fiskerton Parish Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100322	S81	Yes	Yes	Yes	Yes	Yes	No	Yes	I support this Local Plan subject to the requirement to engage with the local community. The Fiskerton Neighbourhood Plan Group (2014-19) negotiated a development plan for this site with the assistance of the landowner, which included planning gain for the local community that was highly valued. The Neighbourhood Plan completed in 2019 comprised approximately 200 houses, low density housing, broad green buffer strips between the new and existing housing and the transfer of ownership of the Paddock, a protected green space in the middle of the village, to the Parish Council to be managed as an open space for the benefit of the community. The residents of Fiskerton supported the Neighbourhood Plan presented to West Lindsey Council in 2019 but there was no wish for a 200-house development in the village without the considerable planning gain that had been negotiated with the Neighbourhood Plan Group (2014-19) and the landowners, the Church Commission. I would fully support this Local Plan for this site if the planning gain for the community mentioned above was included.		No	No

Fiskerton Residents Group

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101572	S1	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Policy S1 is fully supported by the members of Fiskerton Residents Group. The group fully support the proposed policy S1 Spatial Strategy and Settlement Hierarchy. The changes made can be seen to have been fully informed by evidence based arguments and documentation. We note and support the changes made and the inclusion of the proposed site in Fiskerton North of Ferry Road. We are also pleased to note that this policy and site allocation for Fiskerton is supported by the landowners of the site The Church Commissioners.		No	No
1101574	S2	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Policy S2 is fully supported by the members of Fiskerton Residents Group. The group fully support the proposed policy S2 Growth Levels and Distribution. This policy is the most suitable and fair way to distribute growth over the CLLP area and specifically with reference to Fiskerton village which needs to grow in population size sufficiently to keep and improve current facilities and infrastructure and attract younger families into the village.		No	No
1101575	S4	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Policy S4 is fully supported by the members of Fiskerton residents Group. The group fully support the proposed policy S4 Housing Development in or Adjacent to Villages. This policy and content is supported in full. Specifically with refence to Fiskerton village. Fiskerton needs to develop to remain relevance in the future. The group support that development should be inclusive and therefore central to the village and the school and services. Development should also reflect the need for affordable as well as market value housing.		No	No
1101588	S48	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Policy S48 is fully supported by the members of Fiskerton Residents Group. The group fully support the proposed policy S48 Walking and Cycling Infrastructure. This policy		No	No

									is most important to Fiskerton village along with the adjacent villages of Reephram and Cherry Willingham. All three villages need safe interconnections via cycleways and footpaths to allow safe travel between communities without the need for motor vehicles. These will allow children to go to and from schools safely and will encourage all residents to improve their health and wellbeing.			
1101592	S57	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Policy S57 is fully supported by the members of Fiskerton Residents Group. The group fully support the proposed policy S57 The Historic Environment. This policy is of great importance and is fully supported. All our rural history and archaeology must be protected for future generations. Planning conditions are a very easy and effective way to achieve this.		No	No
1101595	S64	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Policy S64 is fully supported by the members of Fiskerton Residents Group. The group fully support the proposed policy S64 Local Green Space. The policy of rolling on 2017 CLLP protected green spaces is fully supported and enforcing the protection of any new suitable areas is to be supported with particular reference to Fiskerton village.		No	No
1101599	S65	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Policy S65 is fully supported by the members of Fiskerton Residents Group. The group fully support the proposed policy S65 Important Open Space. This policy is of great importance and supported fully. Fiskerton has few open spaces within the village and all should be preserved for future generations to continue to enjoy the rural feel of the village. New developments should consider the design and ensure the rural environment of the village is preserved.		No	No
1101620	S81	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>Policy S81 is fully supported by the members of Fiskerton Residents Group. The group fully support the proposed policy S81 Housing Sites in Medium Villages.</p> <p>The group fully support the site as allocated for Fiskerton WL/FISK/001A.</p> <p>Work has been carried out by a group of residents during the period 2014 to 2019 to produce a NDP in which Fiskerton would necessarily develop to remain sustainable and relevant for the next generation and provide the needed infrastructure to support this.</p> <p>This site when assessed proved to be the most sustainable in planning terms for development over the next 20 years. The group carried out many consultations with local residents over that period and gained majority support on a number of consultation events and agreed with the landowners, who made the site available for inclusion in the finished NDP 2019. The landowners also agreed, along with the LPA, to offsite planning gain in the form of the existing Paddock area, as a community use open space (Village Green).</p> <p>The new incoming PC raised objection to the inclusion of the site, as it bounded on a number of their personal dwellings. The PC which included two District Councillors withdrew the already deposited plan from the Reg 16 consultation with WLDC in 2019. Since that time the NDP has not progressed with the current PC, other than to hold a consultation in mod 2020.</p> <p>In that consultation the current site was included for consultation along with other sites in the village which has all previously failed the site assessment as not suitable for the numbers needed or failed the tests for inclusion in a NDP or the CLLP in force at that time.</p> <p>The site North of Ferry Road which covered an area of approx 10ha including open spaces, in its original proposal for the Fiskerton NDP, was for the purpose of the Parish Councils 2020 consultation, split into two sites.</p> <p>This action was obviously intended to split the total vote for the Site North of Ferry Road in favour of their preferred site. However, taking the result of the PC's 2020 consultation, the total votes cast for the two halves of the North of Ferry Road site (WL/FISK/001A) still gained the most votes and therefore, again came out as the most acceptable to the residents.</p> <p>This group full support the allocation (WL/FISK/001A) for the future development in Fiskerton as the most sustainable, inclusive and suitable site in planning terms, and in accordance with</p>		No	No

									the latest Parish Council 2020 consultation results, also with local residents. We note that the landowners are still also in agreement with the selection of this site and they confirm that it would be made available within the first five years of the CLLP and Fiskerton NDP.			
--	--	--	--	--	--	--	--	--	---	--	--	--

Fort Farming Limited

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103153	S63	Don't know		No	No	No			<p>We refer to previous submission in respect of our client's property and the need to retain flexibility on this for development purposes. It is an important strategic site on the edge of Lincoln and with the area of land within the bypass current and proposed there are very few areas around Lincoln that could be developed without impacting on other designations and in particular areas of high landscape value or those which are within more susceptible flood areas. Our client's land which sits between the A15 and the Burton Road is strategically well located and there has been Developer interest. There is plenty of other land which achieves the Burton to Nettleham Green Wedge without this land being designated as such. Burton village is on the edge of and falls down through an escarpment running to the west and other areas of land and, therefore, is not visible and to an extent from the land to the east and because of that the need for a Green Wedge in this location is not essential. Nettleham is some distance away to the east.</p> <p>We refer to submissions previously submitted.</p>	<p>The removal of our client's property (Ellis Farm) from the Policy Designation S63.</p> <p>Please note at Q6 we wish to reserve our position at this stage as to whether we will participate in the oral examination or not. We have, therefore, ticked both boxes. A lot depends on other representations received and we would wish to reserve the right to attend the oral examination if felt appropriate at the time and when full particulars of representations have been disclosed.</p> <p>For ease of reference we attach a copy of our earlier representations and those submitted on 24th August 2021.</p>	Yes	Yes

Furrowland Holdings

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1104084	General	No						No	<p>General - Duty to Cooperate.</p> <p>Section 33A of the Planning and Compulsory Purchase Act 2004 (as amended) imposes a duty on the Local Planning Authority (LPA) to co-operate with other local planning authorities, county councils and prescribed bodies/persons in maximising the effectiveness of the preparation of the Local Plan so far as relating to a strategic matter. A strategic matter is defined as "sustainable development or use of land that has or would have a significant impact on at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas." The LPA is required to engage constructively, actively and on an ongoing basis in any process by means of which the Local Plan is prepared.</p> <p>It has been established that, in assessing whether a LPA has performed its duty, it is necessary for the inspector to come to a planning judgement involving "not a mechanistic acceptance of all documents submitted by the plan-making authority but a rigorous examination of those documents and the evidence received so as to enable an Inspector to reach a planning judgement on whether there has been an active and ongoing process of co-operation." Patterson J goes on to conclude: "The</p>	<p>The CLLP authorities are under a statutory duty to engage with authorities affected. It is considered they have failed to do so completely, let alone on an active and ongoing basis as identified by the Courts as the key level of engagement. Thorough re-engagement is considered to be required to address the matters raised in the main objection.</p>	Yes	No

								<p>key phase in my judgement is ‘active and ongoing’” and, in the circumstance of that case, the Inspector was entitled to conclude that there were gaps and that the process had not been either active or ongoing.</p> <p>Planning Practice Guidance to the National Planning Policy Framework July 2021 (NPPF, “The Framework”) provides (Para. 24) that strategic policy making authorities are under a duty to : “....cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.”</p> <p>The Framework sets out that these authorities should (Para. 27) “...prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.”</p> <p>It is submitted that in preparing the Reg 19/pre submission consultation draft Central Lincolnshire Local Plan (“CLLP”) that Central Lincolnshire Joint Strategic Planning Committee (“The LPA”) as the strategic policy making authority have not met that statutory duty.</p> <p>The Council have issued a Duty to Cooperate Statement (“DtC”) as part of the suite of consultation documents pursuant to the Reg 19 consultation. This does not in our opinion address the most apparent or important cross boundary impacts and issues affecting the CLLP area resulting from the influence of surrounding districts, primarily North Lincolnshire to the north, and the surrounding districts to the west in Nottinghamshire County, particularly Bassetlaw District Council. Primarily these influences are between the Housing Market Areas.</p> <p>It is clearly the case that there is a strategic relationship between North Lincolnshire Council and the northern, West Lindsey District parts of the CLLP area, and that sustainable development or use of land within the northern CLLP area would have (or at least be very likely to have) significant impact on North Lincolnshire and vice versa. The same conclusion could be reached in relation to Bassetlaw District to the west.</p> <p>Housing Market Areas. In addressing Matter 1 - “Meeting Housing Need”, the DtC states “Central Lincolnshire operates as a self-contained housing market area. The Central Lincolnshire Housing Needs Assessment sets out the housing requirement for the area for the Local Plan period (2018 to 2040). Central Lincolnshire intends to meet the full housing requirement through allocations within its own area and does not need neighbouring authorities to assist in meeting this need.”. Evidence to inform this judgement is arguably out of date, Housing Market Areas having not been reviewed since the 2009 Lincolnshire Sub-regional Housing strategy was prepared. This however identified overlap with housing markets of North Lincolnshire, North East Lincolnshire/Grimsby and Bassetlaw.</p> <p>Similarly, North Lincolnshire Council’s own Local Housing Needs Assessment of 2019 shows two way commuter flows between North Lincolnshire and West Lindsey District. It should be noted that neither evidence report is up to date in terms of</p>			
--	--	--	--	--	--	--	--	---	--	--	--

								<p>recognising the levels of under delivery and lack of housing supply in the North Lincolnshire area, (NLC having failed to meet the Housing Delivery Test and has an extremely marginal 5 year housing supply), with potential to impact on housing demand in the northern/West Lindsey parts of the CLLP area. This is a pressing current issue that needs addressing, and assumptions regarding the self containment of North Lincolnshire Housing Market Area are considered unreliable at best.</p> <p>Similarly, the North Derbyshire and Bassetlaw Strategic Housing Market Assessment Final Report, (GL Hearn November 2013) identifies that some very eastern wards in Bassetlaw are identified as part of a Lincoln-focused market. The degree of self containment in the eastern part of Bassetlaw District is not therefore considered to be fully understood. It should be noted that in the DtC to Bassetlaw DCs emerging Local Plan there is no evidence that cross boundary discussion occurred on Housing Market issues.</p> <p>Strategic Growth.</p> <p>As well as allocating a new “Bassetlaw Garden Village” at the A1/A57 Apleyhead Junction site, to the east of the Bassetlaw Plan area the former Cottam Power Station site is allocated in the emerging Bassetlaw Local Plan as a “broad location for priority regeneration”. This inherently acknowledges:</p> <ul style="list-style-type: none"> - The A57 between the A1 and Lincoln as an appropriate corridor for strategic growth. - Opportunities for cross boundary working on flood mitigation along the Trent. - Opportunities to improve modal shift away from car based travel and opportunities for improvements to service and community infrastructure provision, improvements to rural public transport, pedestrian and cycle connectivity between the Cottam Power Station site and settlements in the CLLP area to the immediate east side of the river Trent. <p>It is considered that some level of cross boundary working to maximise these opportunities should have been considered as part of inter authority working between Bassetlaw DC and the CLLP authorities. The recent news in March 2022 that one of the two landowners of the Apleyhead Junction/“Bassetlaw Garden Village” site has pulled out of the project, which will delay submission of the Bassetlaw Local Plan until at least June 2022, also raises the issue that some of the 590 dwellings proposed on that site to 2038, 4000 in total, will not be delivered, also in my opinion justifies further cross boundary working to ascertain how much of the shortfall is likely to “leak” into the CLLP area.</p> <p>Conclusion.</p> <p>It is clear that the Central Lincolnshire Local Plan (CLLP) will have a significant impact on strategic housing matters in North Lincolnshire and the delivery of strategic growth and regeneration in Bassetlaw District. It is therefore under a statutory duty to engage with both authorities affected. It has failed to do so completely, let alone on an active and ongoing basis as identified by the Courts as the key level of engagement.</p> <p>The CLLP must therefore be considered to have failed this legal requirement.</p>			
1104093	General				No			<p>Para 35 of the National Planning Policy Framework (NPPF, !The Framework”) July 2021 provides that for a plan to be justified, it must provide !an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.” (Our emphasis).</p>	The A57 Trent to Lincoln part of the plan area should be investigated as an appropriate location	Yes	No

								<p>This representation must be considered in conjunction with representations on Appropriate Strategy, Accessibility and Transport, and Growth Levels and Distribution.</p> <p>In summary the above find:</p> <p>I) That the draft plan fails to meet the housing requirement and results in a grossly skewed distribution of growth towards the southern/North Kesteven part of the plan area.</p> <p>II) That the draft plan fails to address issues of poor multi modal transport provision and resulting peripherality in the northern part of the plan area.</p> <p>III) That the plan unreasonably restricts growth in smaller settlements in order to justify maintained over reliance on sustainable urban extension where the reliability of assumptions on their delivery must be seriously questioned.</p> <p>If the above is accepted, it is considered that further significant work is required to identify alternative allocations in the City of Lincoln and West Lindsey District parts of the plan area. Given the fact (see representations on Duty to Cooperate) the emerging Bassetlaw Local Plan accepts that the A57 corridor between Sheffield and Lincoln, via the A1, is a strategic growth corridor, (a new garden village settlement being proposed at Apleyhead Junction and a major mixed use regeneration scheme is proposed at the former Cottam Power stations sites,), opportunities for cross boundary working to establish the Central Lincolnshire Local Plan area parts of the A57 corridor from the Trent into Lincoln as a suitable location for further growth must surely present a rational alternative option for consideration.</p> <ul style="list-style-type: none"> - Opportunities for joint working to secure multi modal transport gains and overall connectivity. - Site opportunities no more than 18 minutes travel time from the City of Lincoln. - Opportunities for mitigation of flood risk. - Opportunities to maintain and improve the viability and resilience of existing settlements through appropriate levels of growth, with demonstrable local community support. - Opportunities to meet and exceed the requirements of emerging CLLP policies on Energy, Climate Change and Flooding. - Housing market stimulus through showcase exemplar developments on one of the key gateway routes into the northern part of the plan area. <p>The A57 Trent to Lincoln part of the plan area should therefore be investigated as an appropriate location for reasonable alternative allocations, and joint working be established with Bassetlaw District to this end.</p>	for reasonable alternative allocations, and joint working be established with Bassetlaw District to this end.		
1104080	Vision; Objectives; S1	No			No			<p>Para 35 of the National Planning Policy Framework (NPPF, “The Framework”) July 2021 provides that for a plan to be justified, it must provide “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.” (Our emphasis).</p> <p>There is also a legal requirement pursuant to s19 of the Planning and Compulsory Purchase Act 2004 for the Central Lincolnshire Joint Strategic Planning Committee (CLJSPC) to identify the strategic priorities for the development and use of land in the Council’s area (ss1A) and policies to address those priorities (ss1B).</p> <p>As a general comment the Vision and Objectives (p.11) are somewhat generic and “any place”, (and have obviously been carried forward from the adopted 2017 CLLP without review). They do not relate back to issues earlier identified in the Central Lincolnshire in Context section, page 7. One would expect to see specific statements such as “The Main Town of xxxx has challenges in terms of xxxx and to address this</p>	It is considered the Plan does not meet this test of soundness for the reasons set out above on matters of legal compliance, and it is considered a fundamental review of the overall plan strategy is required to address all the above, including a forward looking settlement assessment	Yes	Yes

								<p>the plan will seek to xxxxx”.</p> <p>It is considered that Policy S1 “The Spatial Strategy and Settlement Hierarchy” is not wholly consistent with achieving the “Vision for Central Lincolnshire”, and does not achieve and /or conflict with some elements of the Vision. In these circumstances, it is questionable whether the legal requirement to identify the strategic priorities and to include policies to address those priorities could be concluded to be rationally satisfied by the CLLP:</p> <p>“The spatial strategy will focus on delivering sustainable growth for Central Lincolnshire that meets the needs for homes and jobs, regenerates places and communities, and supports necessary improvements to facilities, services and infrastructure.</p> <p>Development should create strong, sustainable, cohesive and inclusive communities, making the most effective use of previously developed land and enabling a larger number of people to access jobs, services and facilities locally.</p> <p>Development should provide the scale and mix of housing types and a range of new job opportunities that will meet the identified needs of Central Lincolnshire in order to secure balanced communities.</p> <p>Decisions on investment in services and facilities, and on the location and scale of development, will be assisted by the Central Lincolnshire Settlement Hierarchy.”</p> <p>- The draft Plan is opaque in terms of how a facilities audit of existing community infrastructure provision has been undertaken. In particular there is a paucity of analysis of existing multi modal transport connections between existing settlements both within and adjoining the Plan Area, including analysis of strategic routes and gaps in routes and service provision, and analysis of historic roles of settlements within the plan area and connections with surrounding smaller settlements. This is considered de minimus to ensure hinterlands and sub areas are identified, and if necessary planned for with specific policies. It is also notable that the draft plan completely fails to address decline in rural public transport provision, a significant barrier to maintaining and achieving thriving and resilient rural settlements.</p> <p>- There is no apparent evidence of consultation (as required in para 25 of the Framework) with infrastructure providers (including utilities, NHS Trust, Education and others) to identify strategic issues for community infrastructure provision over the plan period that might effect both the future role and function of existing settlements to 2040. Underlying Sustainability Appraisal assesses the impact of the proposed strategy on the basis of crude auditing of existing facilities as presented in the Central Lincolnshire Local Plan Review Services and Facilities Methodology Report, May 2020, not in terms of baseline needs etc, which in our opinion should have been an important factor is deriving and developing growth options. In the absence of such an understanding, consultation with local communities is essentially meaningless. Without an understanding of the future long term viability of existing community infrastructure such as local schools, primary health care and pharmacies, local shops etc etc in settlements, particularly rural settlements, local communities are not empowered to make real judgements on the scale of growth that might be required to maintain existing levels of service provision, let alone potential future service needs, specialist housing needs etc etc. In that the understanding of rural issues in the WLDC part of the Plan Area is informed by a</p>	<p>methodology, review of transport evidence including cross boundary working, and a fundamental reconsideration of the approach given to rural settlements, via an up to date Rural Proofing study, so as to allow significantly more flexibility and choice for local communities to plan so as to maintain the vitality, viability and resilience of their communities and maintain vital and balanced communities.</p>		
--	--	--	--	--	--	--	--	---	--	--	--

								<p>Community Strategy that expired in 2016, there is clear need for a more up to date “Rural Proofing” exercise and study, commensurate with that undertaken by Durham Council to underpin the recently adopted Durham Local Plan (I attach the Durham example as an annex to this representation).</p> <p>- The ability to achieve the above needs to be considered in the context of the draft plan delivering a significantly reduced housing growth target (between 23,320 and 29,150 dwellings to 2040), as compared to the adopted 2017 CLLP which aimed to deliver 39,960 dwellings from 2012 to 2036. (As at March 2020, the CLLP had underdelivered 3,023 of the dwelling requirement to 2020, or 24.5% below the 2012-2020 requirement, as per Central Lincolnshire Five Year Land Supply Report 1 April 2021 to 31 March 2026). While the realism of meeting even this reduced target is considered in separate representations, it is very clear that this is to be achieved by severe restraint on smaller settlements.</p> <p>- Exceptions criteria and percentage growth targets have been completely removed. Policy S4 restricts settlement growth through both applications and neighbourhood plans to sites of 5 - 10 dwellings within “the developed footprint” of settlements and requires that they “retain the core shape and form of the settlement”, a bar that is arguably set so high as to make very few sites achievable. This is a plan that seeks to achieve what could most generously be described as managed decline of rural settlements. Given the seismic shift in commuting and shopping patterns that have resulted from the Covid 19 pandemic, which has actually seen a shift towards increased home working and increased local service use, the draft plan will inevitably result in a sharp reversal in this prevalent trend, leading to a return to car borne shopping and commuting, with a commensurate decline in local/rural service offer (which has nationally seen somewhat of a renaissance over the Covid pandemic).</p> <p>- No flexibility is allowed to plan for specific needs in local communities such as retirement living, and by being similarly constrained by the criteria in Policy S4, to provide first homes. The result will inevitably be declining and socially unbalanced communities across the plan period.</p> <p>In summary, It is considered the draft Plan does not meet this test of soundness for the reasons set out above on matters of legal compliance, and it is considered a fundamental review of the overall plan strategy is required to address all the above, including a forward looking settlement assessment methodology, review of transport evidence including cross boundary working, and a fundamental reconsideration of the approach given to rural settlements so as to allow significantly more flexibility and choice for local communities to plan so as to maintain the vitality, viability and resilience of their communities and maintain vital and balanced communities.</p>			
1104096	S2				No			<p>Growth Levels and Distribution.</p> <p>Para 35 of the National Planning Policy Framework (NPPF, “The Framework”) July 2021 provides that for a plan to be justified, it must provide “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.”.</p> <p>There is also a legal requirement pursuant to s19 of the Planning and Compulsory Purchase Act 2004 for the Central Lincolnshire Joint Strategic Planning Committee (CLJSPC) to identify the strategic priorities for the development and use of land in the Council’s area (ss1A) and policies to address those priorities (ss1B).</p> <p>The draft Plan at Policy S2 “Growth Levels and Distribution” presents a distribution as follows:</p>	<p>Proposed changes needed to make the CLLP sound on these matters:</p> <ul style="list-style-type: none"> • Critical appraisal of delivery assumptions behind the Sustainable Urban Extensions in line with Clark Weightman report. • A requirement that the individual districts return HDT and 5 year 	Yes	Yes

								<p>Lincoln Strategy Area -18,656 West Lindsey (Gainsborough) - 3,498 North Kesteven - (Sleaford) - 3,498 Elsewhere - 3,498</p> <p>This gives the impression of a rational pattern of distribution of growth focussed on the regeneration of the City of Lincoln and its travel to work area “the Lincoln Strategy Area” - See Diagram 1.</p> <p>The above figures are opaque and highly misleading. The draft plan avoids the distribution by individual district, although a split can be derived by extrapolating a figure for each district based on the Governments last published Standard Method calculation for the individual Districts of 2017/18. Applying the same percentage split of the proposed allocations to the individual districts derives a distribution as follows - (See Diagram 2):</p> <p>City of Lincoln - 5,566 West Lindsey. - 7,838 North Kesteven - 12,706</p> <p>If one applies the same percentage split to the lower overall target (and bearing in mind it is stated that the aspiration is to achieve the higher target):</p> <p>City of Lincoln - 6,086 - 7,608 West Lindsey. - 7,112 - 8,890 North Kesteven - 10,120 - 12,709</p> <p>The allocation as presented therefore achieves the middle of the range for West Lindsey, virtually meets the high range for North Kesteven, and fails to meet even the low range for the City of Lincoln.</p> <p>It is clear that the proposed allocation focuses the majority of growth in North Kesteven District and the North Kesteven parts of the Lincoln Strategy Area (Just under 50% of total allocation). If one examines the existing (2018 figures) population of the individual districts, within a total population of 308,395 for the CLLP area, population by individual districts splits as follows:</p> <p>City of Lincoln - 31.6% West Lindsey - 30.7% North Kesteven - 37.6%</p> <p>The draft CLLP allocation will in fact therefore result in a disproportionate level of growth in North Kesteven District/the south of the CLLP area, with a commensurate reduction in growth in the West Lindsey/City of Lincoln/Northern part of the CLLP area as compared to existing population distribution.</p> <p>For the CLLP area to have passed both its past Housing Delivery Test (HDT) and 5 year housing supply assessment shows that the “paper returns” do not match the reality of the situation. It is considered vital for the revised plan, that if a joint plan area is to continue, that individual housing requirements are established for the composite Districts and both HDT and 5 year supply monitoring are returned on this basis, rather than the CLLP area as a whole, and that West Lindsey and the City of Lincoln (both of who had demonstrable housing supply shortfalls on their former</p>	<p>housing supply figures rather than the CLLP area wide approach previously accepted.</p> <ul style="list-style-type: none"> • The need to reinstate or formulate new exceptions policies is considered. • An alternative site allocation exercise be undertaken to look at further allocations, contingency sites, and the cross boundary delivery of strategic site options. 		
--	--	--	--	--	--	--	--	---	---	--	--

								<p>local plans) can no longer “hide” behind continued strong performance in North Kesteven District.</p> <p>Moving beyond performance and distribution of growth, one must also consider the deliverability of the proposed allocation. I append to this report a paper by Andrew Clark of Clark Weightman valuers, which considers the deliverability of the major Strategic Urban Extensions proposed. (This report will be updated at an appropriate point prior to the Examination hearings). The findings are that assumed build out rates are extravagantly overestimated and totally unrealistic, without even considering the realism of delivering major strategic sites in parallel, and effectively in competition with each other, and the fact that some of these schemes, particularly the City of Lincoln extensions at the North East Quadrant and Eastern Growth Corridor, have been allocated since before 2000 and have failed to deliver even a single dwelling. At the previous Examination in Public into the adopted 2017 CLLP, the Inspectors were persuaded, in light of similar concerns, that exceptions criteria in strategic policies would act as a “safety valve” if the allocated sites failed to deliver (again). It must be noted that no such exceptions are now proposed.</p> <p>The bottom line to Mr Clark’s analysis is that the allocation proposed delivers (see Diagram 3):</p> <p>City of Lincoln. - 4,031 West Lindsey. - 7,458 North Kesteven - 9,666 21,155</p> <p>This is below even the “low” target for the CLLP area to 2040 (23,320), and it is the City of Lincoln that demonstrably shows the greatest proportionate under delivery. (There is also the factor, as outlined in representations under “Duty to Cooperate” that the overall housing target may need adjusting upwards to reflect under delivery in the North Lincolnshire Council area to the North. In context, delivery issues mean that every Council area north of North Kesteven District and south of the Humber has the potential to suffer considerable housing supply shortfalls if the Draft CLLP allocations are accepted without question.)</p> <p>In summary, proposed changes needed to make the CLLP sound on these matters:</p> <p>A) Critical appraisal of delivery assumptions behind the Sustainable Urban Extensions in line with Andrew Clark’s findings B) A requirement that the individual districts return HDT and 5 year housing supply figures rather than the CLLP area wide approach previously accepted. C) The need to reinstate or formulate new exceptions policies is considered. D) An alternative site allocation exercise be undertaken to look at further allocations, contingency sites, and the cross boundary delivery of strategic site options.</p>			
1104091	S2; SA	Yes						<p>Para 35 of the National Planning Policy Framework (NPPF, "The Framework") July 2021 provides that for a plan to be justified, it must provide "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence." (Our emphasis).</p> <p>The SEA Directive (2001/42/EC) deals with requirements in respect of environmental issues that have to be taken into account in relation to plans and programmes and are in turn applied within the UK via transposing regulations.</p>	The growth levels and options presented in policy S2 should be reconsidered in light of the fact that they do not align with the findings of Sustainability	Yes	No

									<p>Article 5 of the SEA Directive requires environmental reports to be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and geographical scope of the plan or programme are identified, described and evaluated. Article 6 requires a draft plan or programme of the environmental report to be made available and the public must be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme or its submission.</p> <p>The environmental evaluation of alternatives must be on a comparable basis to the evaluation of the preferred option.</p> <p>The SEA Directive is transposed into domestic law by the Environmental (Assessment of Plans and Programmes) Regulations 2004 (‘2004 Regulations’). Regulation 12 of the 2004 Regulations requires an environmental report to identify, describe and evaluate the likely significant effects on the environment of the following:</p> <ul style="list-style-type: none"> • implementing the plan or programme; • reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme; <p>It has been established that the duty is not simply to assess all reasonable alternatives but also to explain the reasons for selecting the alternatives dealt with as, unless this is done, the reader of the environmental report will be unable to understand the basis for selecting the alternatives and whether the selection was deficient (Heard v Broadland DC [2012] Env. L.R. 23. This should be dealt with explicitly in the environmental report to avoid a ‘paper chase’ through earlier documents to find the basis for selection/rejection and that even if the issues were discussed at an early stage in the policy formation it still must be set out in the report or sustainability appraisal (Save Historic Newmarket Ltd V Forest Heath DC [2011] J.P.L.</p> <p>How were options derived?</p> <p>As the SA states, The Issues and Options Consultation Report September 2019 provides a summary of the responses to the Issues and Options consultation. The majority of respondents agreed with using a range for identifying housing need and to retaining the Lincoln Strategy Area, Gainsborough and Sleaford as the focus for growth in Central Lincolnshire.</p> <p>Building on the work undertaken for the Issues and Options stage, and using the latest evidence, including the Housing Needs Assessment (April 2020) and the Economic Needs Assessment Update (March 2020), the Central Lincolnshire authorities established five high level spatial options for growth, presented in the Central Lincolnshire Growth Options Paper (June 2021), as follows:</p> <p>Option 1: Urban focus: This option focuses growth in the main urban areas (Lincoln, Gainsborough and Sleaford) and would see growth aligned to the settlement hierarchy – the larger the settlement, the more growth it would receive.</p> <p>Option 2: Small site focus: This option would spread development across a greater number of sites across a larger number and range of locations. It would focus growth to more, smaller sites in more settlements, including small villages.</p>	Appraisal at the Issues and Options stage that a balanced option for distributing growth was the most sustainable option, and there is no justification for why that option had not been progressed.		
--	--	--	--	--	--	--	--	--	---	--	--	--

									<p>Option 3: Transport/ infrastructure corridor focus: This option would focus development around transport corridors (the main aerial roads, railway network where there are stations within proximity, locations well-served by bus routes and locations with active travel opportunities) which link settlements to the main centres of Lincoln, Gainsborough and Sleaford.</p> <p>Option 4: Creation of new settlement/s: This option would see the creation of one or more new settlements within the countryside, or potentially at a specific currently small settlement/s where significant growth would be focused. This option does not assume all growth would be accommodated in this way. It is assumed a minimum of 500 dwellings would be needed for the creation of a new settlement.</p> <p>Option 5: Balanced combination of Options 1 to 3: This option would incorporate elements of Options 1 to 3 to find a balanced approach for distributing growth. Within the Lincoln Strategy Area there would be a focus on the Lincoln urban area and the retention of the Sustainable Urban Extensions. Beyond this there would also be growth focussed around the area in smaller settlements, particularly focused in settlements along the transport corridors and in settlements with a good range of facilities and services available either within the village or nearby. This would see all settlements in the hierarchy down to small villages being considered for some allocations.</p> <p>The detailed SA findings of these five options presented in Appendix 3 to the SA and a summary is presented in SA Table 4.4. The Growth Options Paper concluded the preferred option for distributing growth was Option 5: Balanced combination of options 1-3. From a sustainability point of view, this option performed the best against the sustainability objectives out of the five options. Although it should be noted that the majority of effects also carried uncertain effects due to the strategic nature of the options.</p> <p>As the SA points out, in preparing the Regulation 18 Draft Local Plan, the Central Lincolnshire Authorities considered further options in relation to the spatial strategy, level of housing growth and the distribution of this growth. It must be noted that the growth options did not include Option 5 as previously assessed, growth options presented at this stage being:</p> <p>Option 1: Based on existing population levels, with a focus on the Lincoln Strategy Area (prioritising urban regeneration, sustainable urban extensions to Lincoln and settlements which serve, and are serviced by Lincoln), and a slight boost to levels for the main towns of Gainsborough and Sleaford and nearby villages</p> <p>Option 2: A policy which delivers more growth to 'Elsewhere', i.e., not the Lincoln Strategy Area and not the main towns</p> <p>Option 3: A policy which does not actively distribute growth to locations and lets the market decide.</p> <p>Option 4: Creation of one or more new settlements.</p> <p>There is no justification at all for how Option 5, assessed as the most Sustainable growth option from the Issues and Options stage was excluded.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

								<p>This is extremely important, because Option 5 in my opinion should be reconsidered as the solution to critical issues identified in representations submitted on behalf of my client to this consultation on Appropriate Strategy, Accessibility and Transport, and Growth Levels and Distribution, which find:</p> <ul style="list-style-type: none"> • That the draft plan fails to meet the housing requirement and results in a grossly skewed distribution of growth towards the southern/North Kesteven part of the plan area. • That the draft plan fails to address issues of poor multi modal transport provision and resulting peripherality in the northern part of the plan area. • That the plan unreasonably restricts growth in smaller settlements in order to justify maintained over reliance on sustainable urban extension where the reliability of assumptions on their delivery must be seriously questioned. <p>It is also the case that it is Growth Option 5 from the Issues and Options stage which appears to be most aligned with the strategy being proposed in the neighbouring emerging Bassetlaw Local Plan.</p> <p>In summary there is demonstrably another reasonable alternative growth option, assessed as the most sustainable Growth option at the Issues and Options stage, which appears to have been dismissed with no reasoned justification.</p> <p>As such the failure of proper consideration of reasonable alternatives demonstrates a failure to comply with Regulation 12 of the Regulations and makes it impossible for the CLLP to be considered sound.</p>			
1104090	S4				No			<p>Housing Development in or Adjacent to Villages. Para 35 of the National Planning Policy Framework (NPPF, “The Framework”) July 2021 provides that for a plan to be justified, it must provide “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.” (Our emphasis).</p> <p>There is also a legal requirement pursuant to s19 of the Planning and Compulsory Purchase Act 2004 for the Central Lincolnshire Joint Strategic Planning Committee (CLJSPC) to identify the strategic priorities for the development and use of land in the Council’s area (ss1A) and policies to address those priorities (ss1B).</p> <p>Draft Policy S4 limits unallocated sites in large, medium and small villages to: “1. Large, Medium and Small Villages, as defined in the Settlement Hierarchy in Policy S1, will experience limited growth to support their role and function through allocated sites of 10 or more dwellings in the Local Plan, sites allocated in neighbourhood plans, or on sites in appropriate locations* within the developed footprint** of the village that are typically:</p> <ul style="list-style-type: none"> • up to 10 dwellings in Large Villages and Medium Villages; and • up to 5 dwellings in Small Villages. <p>Proposals on unallocated sites not meeting these criteria will not generally be supported unless there are clear material planning considerations that indicate otherwise.</p> <p>2. Residential development proposals for unallocated sites below the thresholds set out in part 1 of this policy and within the developed footprint of the village will only</p>	<p>- Restrictive criteria in policy S4 requiring that proposal sites be within “the developed footprint” of settlements and requires that they “retain the core shape and form of the settlement”, are so subjective as to be unimplementable without underlying adopted townscape assessments and design guidance to inform this judgement. - If it is the intention that local communities can allocate sites out-with the criteria of Policy S4, it should be stated explicitly that the constituent authorities will not object to Neighbourhood Plans</p>	Yes	No

								<p>be supported where it would:</p> <p>a) preserve or enhance the settlement’s character and appearance; c) not significantly harm the character and appearance of the surrounding countryside or the rural setting of the village; and d) be consistent with other policies in the development plan.</p> <p>3. Proposals for residential development on unallocated land immediately adjacent to the developed footprint will only be supported where this is:</p> <p>a) a First Homes exception site in accordance with the NPPF and provided it is outside of the Lincolnshire Wolds Area of Outstanding Natural Beauty and not within a location that is subject of a Designated Rural Area as defined in Annex 2 of the NPPF; or</p> <p>b) exclusively for a rural affordable housing exception site.</p> <p>Any proposals for First Homes exceptions sites or rural affordable housing exception sites will also be subject to the requirements of Policy S22. The consideration of proportionality of a proposal for a First Home exceptions site will be considered on a site basis informed by consideration of the impact on landscape, village character and the historic environment, topography, overall built footprint, visual impact, and intensity of use of the site. Evidence supporting the planning application will need to robustly examine and illustrate why the proposal is proportionate in size to the existing settlement. Whilst not a cap, it is unlikely that a proposal that would result in an increase in the overall area of the developed footprint of the village, or an increase in dwelling numbers, of more than 5% would be considered proportionate, and potentially considerably less (especially if any exception sites have already been provided or planned for at that settlement).</p> <p>* The definition of “appropriate locations” as used throughout this policy is provided in the Glossary. ** The definition of “developed footprint” as used throughout this policy is provided in the Glossary. ”</p> <p>- The Framework, as confirmed in Braintree District Council v Secretary of State for Communities and Local Government & Ors [2018] EWCA Civ 610, seeks to prevent isolated development in the countryside. Linblom Js comments are particularly relevant, confirming that the wording of (then para 55 of the Framework) “Simply differentiates between the development of housing within a settlement - or village - and new dwellings that would be ‘isolated’ in the sense of being separate or remote from a settlement”. Policy S4 in completely failing to take into account walkability to existing social and community infrastructure in a settlement, (which was held in the Braintree case to not offend against the Framework), emphasises how restrictive this policy actually is, seeking not to sustain and maintain the robustness and resilience of existing settlements, rather one would suspect to artificially restrict housing numbers to justify grandiose (and arguably undeliverable) strategic sites, mainly in the North Kesteven part of the plan area, and to protect very long term allocated sites in other settlements such as Gainsborough that had and will have little prospect of delivery.</p> <p>- The wording of criteria 2 is ambivalent, does “Below the threshold” mean larger</p>	on grounds of general conformity and basic conditions based on perceived non compliance with the criteria of policy S4.		
--	--	--	--	--	--	--	--	---	---	--	--

								<p>than or smaller than?</p> <p>- Framework section 12 “Achieving Well Designed Places” makes it clear (para.128) that “To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place, and should allow a suitable degree of variety.”. Restrictive criteria in policy S4 requiring that proposal sites be within “the developed footprint” of settlements and requires that they “retain the core shape and form of the settlement”, are so subjective as to be unimplementable without underlying adopted townscape assessments and design guidance to inform this judgement.</p> <p>- It is ambivalent as to whether the criterion in S4 limit Neighbourhood Plans to the same restrictions as applicants for unallocated sites. If this is the intention, then this would seem to be directly contrary to the Governments intentions for Neighbourhood Plans at Framework para.29 that “Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan.”. If it is the intention that local communities can allocate sites out-with the criteria of Policy S4, it should be stated explicitly that the constituent authorities will not object to Neighbourhood Plans on grounds of general conformity and basic conditions based on perceived non compliance with the criteria of policy S4.</p>			
1104086	S22				Yes			<p>While policies S21 address exceptions Affordable Housing , the plan could actually be innovative in terms of securing small autonomous eco housing clusters.</p>	<p>The Council might wish to consider an additional policy to this effect , perhaps based on the approach the Welsh Assembly have adopted in Welsh Tech Advice Note 6 “One Planet Developments”. This approach has been adopted by some English Councils. Including York City Council and is under consideration by Cornwall County Council.</p>	No	No
1104077	S47				No			<p>Accessibility and Transport.</p> <p>While it is recognised that the 4th Lincolnshire Local Transport Plan (LTP) is currently under review, the draft plan has been prepared on the basis of a LTP that is now 9 years out of date, and only covers the period up to 2023. This cannot be considered as a Robust Evidence Base to underpin preparation of local plan transport policies, particularly given the huge implications of the Covid 19 epidemic in terms of peoples travel behaviour, most markedly:</p> <p>- A shift towards home working with a commensurate increase in reliance of local services such as pharmacies, local shops etc and a reduction in office working in main centres</p>	<p>It is considered that the plan needs to take a holistic look at overall strategy and ensure that the overall distribution of growth takes into account the need to maintain and improve accessibility to local services,</p>	Yes	No

									<p>- A shift towards online shopping and home deliveries with a commensurate reduction in car based shopping trips.</p> <p>It is also the case that that the Uk Government has committed to the end of the sale of new petrol and diesel cars in the Uk by 2030, well within the CLLP period to 2040. Similar measures are likely to apply to public transport such as buses. As such the need to reduce car travel to mitigate the impact of CO2 emissions on climate change will be less of a priority over the plan period.</p> <p>All the above must be considered in the context of a plan that fundamentally relies of a very traditional settlement hierarchy, failing to recognise that a more dispersed pattern of growth is now possible to ensure a continued renaissance in local service provision in existing settlements, which in itself will result in greater self containment and reduced vehicle trips.</p> <p>The draft Plan also fails to address a perennial barrier to growth in the northern, primarily West Lindsey part of the plan area, that being poor rural public transport provision and the risk of increased isolation for members of rural communities that do not have access to a private car.</p> <p>Even the outdated 2013 4th LTP acknowledges this trend, for example in relation to access to health care provision:</p> <p>“2.32 As highlighted in the Social Exclusion Unit’s ‘Making the Connections’ report in 2003, the general centralisation of healthcare facilities due to economies of scale has led to the need to travel greater distances to healthcare facilities. This is a major problem in large rural counties such as Lincolnshire, particularly when added to the high proportion of elderly residents, many without access to a car, as highlighted earlier. Poor access can lead to missed appointments with the consequent impact not only on the patient’s health, but also significant cost to the NHS. ”</p> <p>It is considered that the plan needs to take a holistic look at overall strategy and ensure that the overall distribution of growth takes into account the need to maintain and improve accessibility to local services, (particularly in rural areas), seek to secure improved electric bus services in rural areas, and acknowledge and address rural peripherality and isolation in the widest sense, as a barrier to the continued vitality and resilience of rural communities in the plan area. In particular, the plan need to address:</p> <ul style="list-style-type: none">- opportunities to support and enhance existing levels of services in settlements through appropriate levels of growth where improved social and community infrastructure can be achieved.- Opportunities for cross boundary working with Bassetlaw District to ensure joint working to maximise the sustainable transport benefits of the major regeneration of the former Cottam Power Station site.- Opportunities to secure public transport improvements in rural areas through developer subsidy of new and improved routes and services.	<p>(particularly in rural areas), seek to secure improved electric bus services in rural areas, and acknowledge and address rural peripherality and isolation in the widest sense, as a barrier to the continued vitality and resilience of rural communities in the plan area. In particular, the plan need to address:</p> <ul style="list-style-type: none">• opportunities to support and enhance existing levels of services in settlements through appropriate levels of growth where improved social and community infrastructure can be achieved.• Opportunities for cross boundary working with Bassetlaw District to ensure joint working to maximise the sustainable transport benefits of the major regeneration of the former Cottam Power Station site.• Opportunities to secure public transport improvements in rural areas through developer subsidy of new and improved routes and services.		
--	--	--	--	--	--	--	--	--	---	--	--	--

Gladman

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with	Complies with Duty				

							national policy	to Co- Operate				
110383 9	General								<p>Duty to Cooperate</p> <p>The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation.</p> <p>Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, Central Lincolnshire must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet any unmet housing needs.</p>		Yes	No
110384 2	S1								<p>The spatial strategy seeks to focus on delivering sustainable growth opportunities across Central Lincolnshire to meet the need for homes and jobs for current and future generations.</p> <p>The spatial strategy includes eight tiers from the 'Lincoln Urban Area' at the top to 'Countryside' at the bottom. The majority of new growth opportunities are concentrated towards the main urban areas of Lincoln, Gainsborough and Sleaford, as well as settlements that support their roles with the remaining growth allocated across Central Lincolnshire.</p> <p>In principle, Gladman support the councils approach in seeking to focus development towards the most sustainable towns and villages capable of accommodating new growth opportunities. In particular, Gladman support the identification of Welton as a 'Large Village' where development will be allowed which will enhance its role as a Large Village through the provision of housing, employment, retail and other key services opportunities via allocations proposed through the emerging CLLP.</p> <p>Despite this, Gladman consider that the draft CLLP in its current form limits the ability of sustainable growth opportunities from coming forward in lower settlement tiers capable of accommodating more growth. Tiers 4-6 only allow for site allocations identified within the Local Plan otherwise they are limited to the policy requirements in accordance with Policy S4 (discussed below). These requirements only allow for development in a narrow set of circumstances and therefore further flexibility is required to ensure that sustainable settlements located in lower settlement tiers, which have a range of services and facilities, are able to grow sustainably. Indeed, by way of example the Inspector's Report to the adopted CLLP suggested that: "There is an argument that some Tier 5 and 6 villages have few planning constraints and benefit from comparatively higher levels of local employment and/or services and could therefore accommodate more development than the 10 or 15% growth level, such as Bassingham."</p> <p>Whilst it is accepted that Bassingham falls within the bracket as a Medium Village owing to the number of existing dwellings within the village, it is recommended that this settlement is included as a Large Village owing to the number of local services and facilities present within the settlement. Several other settlements with similar credentials, or less, are designated as Large Villages, only being distinguished from Bassingham it appears by the number of dwellings they currently contain.</p> <p>Gladman note that the approach proposed in the draft CLLP for determining which tier of the Settlement Hierarchy a settlement is classified in remains the same as that from the adopted CCLP in 2017. The Spatial Strategy and Settlement Hierarchy Evidence Report (June 2021) concludes the proposed approach will continue to use dwellings numbers to define the tier of each village. Medium Villages will remain at 250-749 dwellings and Large Villages will remain at 750 dwellings and over.</p> <p>Gladman feel that this is too crude an approach to measuring settlements such as Bassingham, as it does not consider a number of other services and facilities that Bassingham offers which make it more of a sustainable location than a number of the Large Villages. Appendix 1 in the Central Lincolnshire Local Plan Review Services and facilities Methodology Report (May 2020) shows the broad range of facilities and services available in Bassingham compared to other settlements. For instance, it demonstrates that Bassingham has a doctor's surgery whereas the Large Villages of Witham St Hughes, Heighington and Dunholme do not.</p> <p>The recognised lack of any significant technical constraints, national designations and its demonstrably sustainable status owing to the range of services and facilities it provides both point to the fact that, were it not for its number of existing dwellings, Bassingham would be designated in a higher tier of the settlement</p>		Yes	No

								hierarchy. It should therefore be classified as a Large Village, with a level of growth commensurate to its status.			
110384 4	S2							<p>Housing Requirement</p> <p>Policy S3 seeks to provide a housing requirement for Central Lincolnshire as a range of 1,060 – 1,325 dwellings per year over the plan period 2018 – 2040. For the purposes of housing land supply calculations the Council is seeking to use the baseline housing requirement of 23,320 dwellings (i.e. 1,060dpa) whilst the strategic aim is to facilitate delivery of the top end of the range of 29,150 new dwellings.</p> <p>However, the delivery of the top of the range should not be considered a ceiling and should instead be considered as the minimum figure to be achieved. Gladman support the conclusions reached in the Council's Economic Needs Assessment Update (2020). It demonstrates that on average around 1,850 jobs per annum have been created across Central Lincolnshire, far exceeding previous growth expectations outlined in the previous Economic Needs Assessment (2016) and projects forward a growth rate of approximately 992 jobs per year. Indeed, as highlighted at paragraph 2.2.5, the Housing Needs Assessment concludes that 1,325 dwellings per year (i.e. the upper end of the housing range) is needed to support the expected growth in jobs. Accordingly, it is inappropriate to rely on the standard method figure as the minimum housing requirement when the Councils' own evidence demonstrates that a figure towards the upper end of the housing range is required to support economic growth.</p> <p>Gladman support the fact that the Councils are allocating sites above the standard method figure in order to meet economic growth aspirations. One of the clear strategic purposes of the Local Plan is to deliver a sufficient housing requirement to support the economic growth of the area. However, by setting the five year supply position by reference to a much lower figure the Councils are circumventing a critical planning regime control. It would usually be the case that where a local plan fails to deliver sufficient housing (i.e. allocations are delayed etc.) then the tilted balance is triggered by the failure to maintain a five year supply and the shortfall is delivered by windfall development. If the Local Plan were to be adopted as proposed then that would not be the case. Instead in the future the Councils could fail to deliver the required housing to achieve the necessary economic growth in the Local Plan but still have a five year supply of housing and avoid triggering the tilted balance, thus making it harder for the shortfall to be addressed. This would allow the Councils to be failing to accord with their Local Plan with no express adverse consequences. By using the lower range figure as the five year supply figure, the Plan is undermining the delivery of its strategic policy aims for economic growth and thus arguably renders the Plan ineffective and thus unsound.</p> <p>Furthermore, the use of a range is unclear and ambiguous and is in direct conflict with the NPPF. The use of a range especially as the lower end will consistently change in line with the standard methodology is inherently unclear and ambiguous.</p> <p>This matter was considered at Fylde Local Plan Examination in Public by Inspector Wright in 2018. As part of their Local Plan Review the Council wanted to replace the housing requirement figure with a range (the lower figure being derived from the standard methodology). The Inspector clearly rejected this approach between paragraph 32 – 34 which stated:</p> <p>Policy H1 in the FLP32 sets the minimum annual housing requirement as 415 dwellings. Policy DLF1 sets the overall requirement as 8,715 new homes over the 21 year plan period. The Plan revises both policies to include the lower housing requirement figure of 275 dpa and 6,895 dwellings overall, as assessed through the standard method. However, it also keeps the existing figures and identifies the housing requirement as a range. As proposed, Policy H1 therefore identifies 275-415 dpa as the housing requirement for the period 2019-2032, with the earlier years 2011-2019 remaining at 415 dpa. Policy DLF1 provides for a minimum of 6,895-8,715 new homes over the whole plan period.</p> <p>Identifying the housing requirement as a range lacks clarity, is not effective and implies there is a maximum figure. Whilst I note that the Plan does not specifically state that the top of the range is a ceiling, it can be implied, and it is critical that the housing requirement is set out unambiguously. Accordingly, it is necessary for the housing requirement to be identified as a single minimum figure within the Plan for the period 2019/20 to 2031/32 and as a single figure for the total plan period requirement.</p> <p>Therefore, in order to meet the housing needs identified in paragraph 30 above, it is necessary to modify Policy DLF1 so that the minimum total housing requirement for the plan period is 7,275 dwellings. Similarly, Policy H1 requires modifying so that the minimum annual housing requirement is 305 dwellings for the period 2019-2032.... (emphasis added)</p>		Yes	No

								<p>Indeed, this matter was also considered in the Inspector’s Report to the North Warwickshire Local Plan Examination. In this instance, the Council submitted a plan on the basis of enabling a minimum requirement of 5,808 dwellings across the plan period with the aspiration to deliver a further 3,790 dwellings to assist in the delivery of unmet housing needs from neighbouring local authorities. Whilst this was a matter of strategic planning, the Inspector in this instance found at paragraph 1325 that the aspiration to deliver the upper end of the range may not legitimately be met without consequence and found that the phrasing of policy LP6 required modification in that the overarching housing figure of 9,598 dwellings should be expressed as a minimum (thereafter informing a housing trajectory, the basis upon which a five year housing land supply requirement is established).</p> <p>Whilst this related to cross boundary strategic issues, the principle remains the same that it would be inappropriate to plan for the lower end of the range, particularly due to its reliance for the purposes of calculating housing land supply, when the strategic aim of the plan is to deliver a figure which corresponds with economic growth.</p> <p>As such, the figure of 29,150 dwellings over the plan period should be seen as the minimum to plan for. https://www.northwarks.gov.uk/download/downloads/id/8766/nwbc_local_plan_inspectors_final_report.pdf</p> <p>Distribution of Growth</p> <p>The proposed development strategy follows a similar approach to the adopted CLLP setting out a hybrid approach incorporating a variety of development options in a range of locations for future growth across the district.</p> <p>The strategy seeks to concentrate the majority of new housing growth towards the Lincoln Strategy Area, where there is best access to services, facilities, jobs and infrastructure. In order to meet wider development needs and to support and improve existing services and facilities, growth is also directed towards Gainsborough, Sleaford and Elsewhere in the District to support a range of local communities across the district.</p> <p>Gladman are supportive of a strategy which adopts a hybrid approach to growth, in so much as it directs growth to a range of tiers of settlements across the settlement hierarchy. In relation to the distribution of growth, Gladman are supportive that the Councils have maximised housing supply across the widest possible range of sites, by size and market location so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary, a wider variety of sites in the widest possible range of locations will help ensure a responsive supply of housing land and thus increases housing delivery.</p> <p>Whilst Gladman recognise that Lincoln and the main towns will be a focus for growth as they offer the most sustainable locations and consequently it follows that they should be delivering a significant proportion of growth, this does not mean that the emerging Local Plan should place an overreliance on these locations at the expense of other sustainable settlements within the district. Indeed, paragraph 2.4.1 of the draft Local Plan clearly indicates that a total 142,000 residents representing 47% of the district’s population reside in the smaller settlements and that this significant rural population means that development is required to maintain and enhance services and features in the rural area. However, only 12% growth is directed towards smaller settlements across the settlement hierarchy and is therefore insufficient to support these settlements.</p> <p>Gladman consider that some smaller settlements, particularly those identified as Large to Medium settlements, have sufficient capacity to accommodate more housing than what is currently being allocated to them through plan allocations. In order to achieve sustainable patterns of development across the district, it is vital that some of these settlements, such as Basingham, Saxilby and Scothern, are allocated more growth due to the level of services and facilities they currently provide.</p>			
110384 5	S4							<p>The above policy relates to development in or adjacent to large, medium and small villages as defined in the settlement hierarchy in Policy S1. It states that these developments will experience limited growth to support their role and function through allocated sites of 10 or more dwellings in the Local Plan, in neighbourhood plans, or on sites in appropriate locations within the development footprint.</p> <p>In principle, Gladman support the acknowledgement for proposals on unallocated greenfield sites immediately adjacent to the development footprint will be supported where they provide a First Homes exception site in</p>		Yes	No

								<p>accordance with the NPPF or where they are exclusively for a rural affordable housing exception site. However, we would advise caution in relying on such an approach as development of solely 100% affordable housing or First Homes exception policy may render development proposals unviable when linked to other policies in the Local Plan. Accordingly, it is recommended that an element of market housing should also be allowed to ensure the overall development proposals can be delivered viably.</p> <p>Notwithstanding the above, the policy also states that “proposals on unallocated sites not meeting these criteria will not generally be supported unless there are clear material planning considerations that indicate otherwise.” Gladman consider the policy as currently worded is too inflexible and also inhibits developments across sustainable settlements which require greater growth directed towards them to support them in order to maintain and enhance the vibrancy of rural areas across the district. Gladman consider that a more flexible approach to development beyond development footprints is required in line with the requirements of the presumption in favour of sustainable development.</p>			
110384 6	S7							<p>In principle, whilst Gladman support the idea that development proposals should demonstrate how they will reduce energy consumption, we would be concerned that achieving the requirements listed in the policy wording may result in adverse impacts to development viability. In this regard, whilst three exceptions to the policy are listed, clause 3 which relates to development viability only relates to development in Sleaford and Gainsborough and the immediate surrounding land only and that the application of the policy standards may not be possible for some cases for viability reasons. However, whilst this may be the case in Value Zones C and D, regardless of a sites location this clause should be extended to all settlements to ensure individual applications can be considered appropriately through the development management process as there are a whole host of issues which effect development viability and the viability clause should not be focused on Sleaford and Gainsborough alone.</p>		Yes	No
110384 7	S22							<p>The Housing Need Assessment identifies a newly arising need for 592 affordable homes per year to 2040 considering the existing backlog. Policy S21 sets out the strategic aim will be to deliver circa 12,000 affordable dwellings during the plan period.</p> <p>Where a site qualifies for affordable housing, the percentage sought will be based on the value zones indicated on map 3 which shows a range from 10%-25%. Even if all qualifying affordable housing schemes were delivered at 25% against the housing requirement’s strategic aim of 29,150 dwellings, this would only deliver 7,250 dwellings which falls far short of the required affordable housing.</p> <p>Accordingly, Gladman recommend that the councils should consider increasing the overall housing requirement in accordance with the PPG which states: “An increase in the total housing figures included in the Plan may need to be considered where it could help deliver the required number of affordable homes”.</p>		Yes	No
110385 1	NS24							<p>In principle, Gladman support the intentions of the above policy as this is in line with Government thinking to provide opportunities for custom and self-build housing. However, we would suggest that in circumstances where plots remain unsold, that the period of at least 36 months may be too long. It is generally accepted that a period of 12 months is normally required in Local Plans where plots can revert back to the developer for alternative forms of housing.</p>		Yes	No
110384 9	S28							<p>Gladman support the strategy to strengthen the Central Lincolnshire economy by offering a wide range of employment opportunities principally focused in and around the Lincoln urban area and the towns of Gainsborough and Sleaford with further employment provision split across the settlement hierarchy. Such an approach is consistent with the Greater Lincolnshire Local Industrial Strategy, which is a key component of the Midlands Engine which seeks to ensure significant growth in a number of employment sectors.</p> <p>Given the Plan’s ambitions for economic growth, we reiterate that there is a need for housing and employment needs to be aligned and that the associated housing figure of 29,150 dwellings is considered as the minimum to be achieved.</p>		Yes	No
110385 3	S80; S81							<p>Gladman have a number of site interests across Central Lincolnshire. These include:</p> <ul style="list-style-type: none"> • Land north of Heath Lane, Welton; • Land north of Thurlby Road, Bassingham; • Land north of Church Lane, Saxilby; and • Land off Sudbrooke Road, Scothern. <p>Gladman support the identification of Land north of Heath Lane as a proposed allocation for development of 195 dwellings. However, Gladman consider that all the above development proposals represent sustainable</p>		Yes	Yes

									<p>development opportunities to assist Central Lincolnshire in meeting its housing needs. Gladman consider that each site represents a sustainable opportunity for future residential development. Further details regarding the sites listed above are provided in a dedicated Story Map6 which is attached at Appendix 1 of these representations.</p> <p>As a first point, Gladman can confirm that all sites are genuinely available for development and are deliverable. There are not expected to be any insurmountable constraints to the development of the sites. Gladman has a proven track record in ensuring the delivery of sites. We keep a detailed record of all sites which we gain a planning permission and monitor progress from sale to a housebuilder through the remainder of the planning process up to the first completions on the ground. Typically, the average timescale from permission to a spade in the ground in around 18 months. Gladman would be happy to provide the Council with further details regarding this should the Council consider it necessary to support the allocation at Land north of Heath Lane.</p> <p>Notwithstanding the above, Gladman consider that additional allocations are required to ensure an appropriate buffer is accounted for on top of the strategic aim to deliver a minimum of 29,150 dwellings over the plan period and believe that the development opportunities listed above provide opportunity to accommodate additional growth in the rural area.</p>			
1103840	SA								<p>In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, the SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.</p> <p>The CLISPC should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the draft CLLP's decision-making and scoring should be robust, justified and transparent.</p>		Yes	No

Gleeson Homes

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103171	S1	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Gleeson Homes support the spatial strategy focus on delivering sustainable growth for Central Lincolnshire and support Hemswell Cliff being identified as a 'Medium Village,' where well-connected or well-served medium villages may receive limited growth through allocations.		No	No
1103173	S22	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Gleeson Homes support the inclusion of the viability caveat within the policy and support the reference within the policy wording to include all types of affordable housing as defined at Annex 2 of the NPPF, which includes First Homes.		No	No
1103175	S23	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Gleeson Homes are generally supportive of providing a mix of housing to meet the needs of the housing market area, although this must be considered against the viability of schemes to ensure they can be deliverable.		No	No
1103169	S81	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>The purpose of this letter is to demonstrate that the site – which is allocated for housing in both the adopted Central Lincolnshire Local Plan (2017) ('the Local Plan') and the Local Plan Review - continues to be available, suitable and deliverable in the short-term for residential development.</p> <p>As discussed above, the site to the south of the A631 at Hemswell Cliff is allocated for housing development in the adopted Local Plan and it is proposed that this allocation is carried forward as part of the Local Plan Review under Policy S81.</p> <p>As such, the principle of residential development on the site is considered to be acceptable and suitable for development, which has been demonstrated through the Council's previous grant</p>		No	Yes

									<p>of outline planning permission for residential development at the site in 2017.</p> <p>Gleeson Homes confirm that the site is available now and is deliverable in the short-term, with no technical or ownership constraints which would prevent a planning application from coming forward in the near future.</p> <p>The indicative layout enclosed with this representation demonstrates that the site can be satisfactorily developed for 196 dwellings. A pre-application enquiry was submitted to the Council for 196 units, and the Council's response from 29th March 2022 considered that the proposals are acceptable in principle.</p> <p>In light of the above, Gleeson Homes are supportive of the continued allocation of the site for housing in the Local Plan Review and we suggest that the indicative capacity of the allocation should be increased to 196 dwellings in Policy S81 to reflect the deliverability of the site in the short-term on this basis.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

GPS Planning and Design Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103629	S78	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>In relation to Policy S78 (Housing sites in the Main Towns) and site WL-GAIN014 we fully support the proposed allocation of site ref. WL/GAIN/014- the Former Environment Agency Office, Corringham Road, Gainsborough which is a previously developed brownfield site situated in a highly sustainable town location.</p> <p>This residential allocation is for the delivery of around 34 dwellings, however in our considered opinion it is possible that a greater quantum of dwellings could be delivered given the site's excellent location and through a carefully considered and appropriate design and layout. The site is within easy walking distance to the diverse range of services and facilities that Gainsborough town centre has to offer. Several bus services and connections also operate in close proximity which offer future residents with a sustainable option other than the private motor car.</p> <p>In light of the above and other planning considerations, we formally write to register our full support your proposed allocation of site ref. WL/GAIN/014- the Former Environment Agency Office, Corringham Road, Gainsborough.</p>		Yes	No

Greater Lincolnshire Nature Partnership

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
11943733	Strategic priorities	Y					No		<p>The Greater Lincolnshire Nature Partnership is a partnership of 49 organisations working together to achieve more for nature. This response is based on the joint values and positions as agreed by our members. Each of these organisations may respond individually with additional comments.</p> <p>The GLNP feels that the Historic, Built and Natural environment section is not strong enough. Paragraph 8c of the NPPF states that the planning system has an objective "to protect and enhance our natural, built and historic environment". This identifies that the duty to enhance is</p>	<p>To bring the paragraph in line with the NPPF "where possible" should be removed, leaving the following suggested wording: "To conserve and enhance the natural, built and historic environment".</p> <p>This will improve the Plan's compliance with national policy and contribute to sound local policy.</p>	Yes	No

									equally as important as protection and as such the inclusion of “where possible” gives the paragraph insufficient strength.			
11943605	Vision	Y					No		<p>The Greater Lincolnshire Nature Partnership is a partnership of 49 organisations working together to achieve more for nature. This response is based on the joint values and positions as agreed by our members. Each of these organisations may respond individually with additional comments.</p> <p>Paragraph 179b of the NPPF calls for “Plans to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species”. Therefore, the GLNP supports the recognition of the range of natural habitats found within Central Lincolnshire and their role as part of an ecological network.</p> <p>However, Paragraph 31 of the NPPF states that “The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.” While the GLNP agrees that the scale and range of these habitats holds the potential to support “wildlife adaptation and environmental resilience to climate change”, the quality, extent and connectivity of this network needs to be improved to do so. This is evident from looking at Biodiversity Opportunity Mapping prepared on behalf of the Central Lincolnshire Planning Team by the GLNP, to underpin this Local Plan.</p> <p>The wording of this paragraph could suggest that no enhancement is required, which would identify a misunderstanding of the evidence which underpins the Plan.</p>	Clearer wording could be as follows: “Across Central Lincolnshire there are a range of natural habitats, including wetland, woodland, calcareous grassland and remnants of heathland and fen which together provide contribute to ecological networks and nodes potentially of sufficient scale which, with enhancement, have the potential to support wildlife adaptation and environmental resilience to climate change.” This wording would show that the Local Plan is underpinned by an understanding of the evidence it is based on, meeting requirements set by Paragraph 31 of the NPPF and further strengthen the Plan’s meeting of requirements to promote “the enhancement of priority habitats [and] ecological networks” as set out in Paragraph 179b.	No	No
11943637	Vision	Y				No	No		<p>The Greater Lincolnshire Nature Partnership is a partnership of 49 organisations working together to achieve more for nature. This response is based on the joint values and positions as agreed by our members. Each of these organisations may respond individually with additional comments.</p> <p>All planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity, therefore the GLNP supports the reference to ensuring that growth does not erode the area’s environmental assets.</p> <p>However, this does not go far enough, Paragraph 8c of the NPPF states that the planning system has an environmental objective which requires it “to protect and enhance our natural, built and historic environment”. This is further expanded on through Paragraphs 174, which requires planning policies to “contribute to and enhance the natural and local environment” and 179b, which requires Plans to “protect and enhance biodiversity” by promoting “the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species”. The GLNP feels that the addition of an intention to enhance the natural environment will contribute to meeting these requirements and improve the soundness of the Local Plan.</p> <p>Paragraph 1.2.15 is also not effective in regards to net zero and meeting</p>	Suggested wording to improve compliance with national policy and contribute to a more effective Plan can be found below. “Central Lincolnshire faces a range of challenges, notably the need to improve social and economic conditions, including health, housing, jobs and the range and quality of facilities whilst at the same time ensuring that the environment is improved, that commitments to make the region net zero carbon are met and to ensure that growth does not erode, but enhances the area’s environmental and heritage assets and does not exacerbate pressure on natural resources.”	Yes	No

								objectives of sustainable development, specifically relating to mitigating and adapting to climate change. In light of the 2021 IPCC report, which states that “limiting human-induced global warming to a specific level requires limiting cumulative CO2 emissions, reaching at least net zero CO2 emissions,” the GLNP feels that paragraph 1.2.15 should commit to more than making “efforts.” Instead decisive action must be taken to make the region net zero carbon.			
11943701	Vision	Y					No	<p>This is a revision of response PSLP/75.</p> <p>The Greater Lincolnshire Nature Partnership is a partnership of 49 organisations working together to achieve more for nature. This response is based on the joint values and positions as agreed by our members. Each of these organisations may respond individually with additional comments.</p> <p>Paragraph 179b of the NPPF calls for “Plans to promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species”. Therefore, the GLNP supports the recognition of the range of natural habitats found within Central Lincolnshire and their role as part of an ecological network.</p> <p>However, Paragraph 31 of the NPPF states that “The preparation and review of all policies should be underpinned by relevant and up-to-date evidence.” While the GLNP agrees that the scale and range of these habitats holds the potential to support “wildlife adaptation and environmental resilience to climate change”, the quality, extent and connectivity of this network needs to be improved to do so. This is evident from looking at Biodiversity Opportunity Mapping prepared on behalf of the Central Lincolnshire Planning Team by the GLNP, to underpin this Local Plan.</p> <p>The wording of this paragraph could suggest that no enhancement is required, which would identify a misunderstanding of the evidence which underpins the Plan.</p>	Clearer wording could be as follows:	Yes	No
11943765	S17	Y				No	No	<p>The Greater Lincolnshire Nature Partnership is a partnership of 49 organisations working together to achieve more for nature. This response is based on the joint values and positions as agreed by our members. Each of these organisations may respond individually with additional comments.</p> <p>The GLNP supports the commitment to protect and preserve existing peat, but feels it is important to include the commitment to restore and improve the condition of peat as suggested in 3.4.1., this would also be in line with Policy S17 of the draft Plan, Carbon Sinks, which states “Existing carbon sinks, such as peat soils, must be protected, and where opportunities arise they should be enhanced in order to continue to act as a carbon sink.” According to Natural England’s Carbon Storage and Sequestration by Habitat report (2021), not only are peat habitats an existing store of carbon, they also have the potential to sequester CO2e indefinitely, unlike other habitats which reach states of equilibrium. It is also clear that without restoration they have the potential to become net sources of greenhouse gas.</p>	<p>The following suggested wording would improve the Plan’s compliance with national policy and contribute its overall positive preparation.</p> <p>“Although they make up a relatively small area of Central Lincolnshire they should be protected, preserved and restored wherever possible to ensure they continue to store and sequester carbon.”</p>	Yes	No

									<p>Paragraph 174a of the NPPF requires planning policies to enhance the natural and local environment by “protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils.” This needs to be reflected in local policy and supporting paragraphs.</p> <p>Equally, every opportunity must be taken to meet the environmental objective of sustainable development outlined in Paragraph 8c, relating to climate change mitigation and adaptation to ensure the Local Plan is positively prepared.</p>			
11943797	S17	Y				No	No		<p>The Greater Lincolnshire Nature Partnership is a partnership of 49 organisations working together to achieve more for nature. This response is based on the joint values and positions as agreed by our members. Each of these organisations may respond individually with additional comments.</p> <p>All planning authorities should recognise and implement their legal and policy duties to protect and enhance biodiversity as required by the NPPF in Paragraphs 8c, 174 and 179. Equally, Paragraph 8c of the NPPF states that the environmental objective for sustainable development includes “mitigating and adapting to climate change, including moving to a low carbon economy”, while Paragraph 20d calls for strategic policies to make sufficient provision for and planning measures to “address climate change mitigation and adaptation”. As such the GLNP supports the inclusion of Policy S17.</p> <p>However, distinction should be made between peat soils, which were previously subject to agricultural usage and functioning peat-based habitats. For example, lowland fen is an irreplaceable habitat and as such should not be developed upon in line with Paragraph 180c of the NPPF which states “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons”. It should be made clear in the wording of the policy that irreplaceable habitats receive further protections, so as not to suggest these habitats can be developed on if criteria a and/or b are met. Not doing so has the potential to undermine the sustainability of development and therefore impact the effectiveness of the Local Plan.</p>	<p>Additional criteria could be added to address this, stating that it must be demonstrated that carbon sinks are not part of an irreplaceable habitat. Suggested wording could be as follows:</p> <p>“c) the carbon sinks are not a component of an irreplaceable habitat as identified by the NPPF.”</p> <p>Alternatively, the policy could make reference to Policy S60 and the requirements regarding irreplaceable habitats that it contains.</p>	Yes	No
11943829	S20	Y		No			No		<p>The Greater Lincolnshire Nature Partnership is a partnership of 49 organisations working together to achieve more for nature. This response is based on the joint values and positions as agreed by our members. Each of these organisations may respond individually with additional comments.</p> <p>Paragraphs 3.6.1. – 3.6.3. The protection, enhancement and management of the natural environment is a crucial part of climate change adaptation. Paragraph 154a of the NPPF states that where areas are vulnerable to the impacts of climate change new development should “...ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.” As such these paragraphs should make it clear that quality design includes the implementation of green infrastructure. This would make the supporting paragraph compliant</p>	<p>Wording could be as follows “3.6.3 Furthermore, the built environment should be built to last and set within networks of quality green infrastructure: buildings should be designed in a way that they are adaptable and can be fit for purpose in the long term, even if their use changes.”</p>	Yes	No

									with national policy and contribute towards positive preparation of the plan relating to sustainable development objectives. The multifunctional nature of green infrastructure would also improve the overall effectiveness of the plan.			
--	--	--	--	--	--	--	--	--	---	--	--	--

Historic England

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102211	Intro								Paragraph 1.2.14 is welcomed.			No
1102213	Strategic priorities								'The Historic, built and Natural Environment' strategic priority for LPA's is welcomed. Reference to 'settings' should be included.	Include reference to 'settings'		No
1102216	Vision								The tenth paragraph is welcomed. Again, it would be helpful to include reference to 'settings' such as 'heritage assets and their settings'.	Include reference to 'settings'		No
1102218	Objectives								Objective 6 is strongly welcomed.			No
1102220	S5								Part A: criteria b) and c) are strongly welcomed.			No
1102221	S11								Clarification that the policy refers to non-listed buildings is welcomed within 'Presumption against development'.			No
1102222	S13								The *Note at the end of the policy is strongly welcomed.			No
1102238	S14								<p>Policy S14: Renewable Energy. Although within the second paragraph, the amended criteria (i) is welcomed together with much of the supporting text, in particular paragraph 3.3.15, there are significant concerns regarding the approach, the Central Lincolnshire Energy Study 2011 and the corresponding wind map in particular where heritage is not sufficiently addressed due to insufficient evidence.</p> <p>Paragraph 3.3.12 references the mapping of principle constraints. Whilst the inclusion of 'Protected Battlefields; Scheduled Monuments; Historic Parks and Gardens; Conservation Areas' is welcomed, there is no reference to listed buildings and settings for any heritage asset. Settings are of particular importance in the assessment of wind turbine proposals.</p> <p>Whilst it is acknowledged that the Central Lincolnshire Energy Study 2011 study does include reference to heritage (such as on page 90 together with other references), this study is relatively dated and does not provide a sufficiently comprehensive locally specific assessment.</p> <p>The approach taken towards identifying potential areas for wind energy developments is not based upon sufficiently robust evidence. Indeed the areas which have been identified as being suitable for such developments may result in harm to a number of Central Lincolnshire's most important designated heritage assets and hence render the policy incompatible with the NPPF's overarching objectives of sustainable development and specifically paragraph 190. Further detail is set out in the Wind Map box below. [entered as separate comment]</p> <p>Paragraph 007 of the Planning Practice Guidance for Renewable and low carbon energy, states that "great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting;" The approach proposed does not reflect this.</p>	<p>The change to criteria i) of policy S13 in accordance with our previous response is welcomed. However, Historic England's other concerns remain. Please see comments in relation to the wind map below.</p> <p>Paragraph 3.3.12 should include reference to listed buildings and the settings of heritage assets.</p> <p>Historic England would be very happy to assist with additional wording in the supporting text to provide greater clarity and strength.</p> <p>Amendments / additional notation are required to the wind map if taken forward, as set out below.</p>		No

								<p>Consequently, it is considered that the approach of Policy S14, the Central Lincolnshire Energy Study 2011 and the corresponding Wind Map does not comply with the NPPF:-</p> <p>(1) The identification of specific areas as being suitable for wind energy development is not based upon a sufficiently robust evidence base.</p> <p>(2) The areas which have been identified for wind energy development could lead to pressure for such developments in locations which would be likely to result in harm to a number of Central Lincolnshire's most important designated heritage assets. Consequently, the approach to the identification of specific areas as being suitable for wind turbine developments does not demonstrate that the plan is setting out a "positive strategy for the conservation of the historic environment" as is required in the NPPF.</p> <p>The plans showing wind areas cannot support a sound Local Plan policy in relation to renewable energy, as they are not based on a robust evidence base or methodology nor do they adequately address the historic environment as set out above. As such, the wind map with the areas shown should not be included in its present form.</p>			
1102241	S14							<p>There are strong concerns regarding the wind map and the purple areas as proposed without more detailed assessment. The Wolds AONB, Nocton Fen, area around Legsby, and historic landscape along the Witham should not be included. Long range views to Lincoln cathedral are of particular concern.</p> <p>The wind modelling methods based on radius from assets tend to leave the prominent moors and fens between the settlements more likely to be purple – in this landscape these areas can be particularly important to the setting of heritage assets, in particular on Nocton Fen.</p> <p>Historic England have previously given a very clear position on large turbines on Nocton Fen due to their position between numerous monastic establishments set around the fen. Although this scheme was withdrawn, there is concern that the proposed policy may encourage similar proposals when previously raised concerns still remain.</p> <p>Nocton Fen and the environs of the River Witham are of particular importance as around the Fen numerous religious establishments were founded gaining both a place of spiritual isolation (the Fens were a northern European proxy for the deserts of early monasticism - in the manner of St Guthlac at Crowland) and a rich resource for grazing, wild fowling etc.</p> <p>The zone between the Roman Car Dyke and River Witham with Lincoln and its Cathedral and Castle to the north and a startlingly rich group of monastic sites strung out along its length down to Tattershall Castle at the south, is especially sensitive to the introductions of large moving objects into that space.</p> <p>This is a landscape of the highest sensitivity to turbine installation with very strong horizontal lines across the fen around which rise an array of nationally important assets.</p> <p>The addition of a succinct legend box to the map to explain the requirement for full assessment and that sites may not be suitable in anycase (particularly given the</p>	<p>If the map is to be retained, the purple areas require further amendment and notation.</p> <p>Historic England would be very happy to discuss amendments through the SOCG process, utilising a similar method of an explanatory legend box on the wind map as used elsewhere within the region.</p>		No

									very strong concerns outlined above), as done elsewhere in the region would help to address this. Historic England would be happy to provide examples and assist with wording.			
1102243	NS41								Criteria b is strongly welcomed.			No
1102244	S53								The Design and Amenity policy is welcomed, in particular criteria a)			No
1102246	NS55								Criteria a) is welcomed.			No
1102247	S57								Provision of an Historic Environment section and policy and the detail provided within is strongly welcomed. Reference to heritage assets and their settings within 10.0.3 is particularly welcomed, together with reference to non-designated heritage assets and the provision of a Local List. Policy S57 is welcomed.			No
1102249	S58								The supporting text and Policy S58 are strongly welcomed.			No
1102250	S62								Policy S62 is supported, in particular criteria h).			No
1102251	S68								The references to heritage and views throughout are welcomed within policies S69-73, it would be helpful to have an overarching reference to heritage within policy S68, similar to criteria h).	Historic England would be very happy to assist with wording.		No
1102253	S69								South East Quadrant SUE (SEQ) Canwick Heath Reference to the adopted SPD is welcomed together with heritage assets.			No
1102254	S69								An overarching criteria is required for Lincoln referencing conservation areas within the regeneration areas and key heritage assets, including views to and from the cathedral and historic hillside on the north escarpment; alternatively perhaps this could be incorporated within policy S68. Western Growth Corridor SUE (WGC) Criteria c) is welcomed, reference to the Swanpool Roman Kiln Site should also be included within this criteria. The areas left open in the approved scheme should remain open in any future applications coming forward. South East Quadrant SUE (SEQ) – criteria c) is welcomed. North East Quadrant (NEQ) – criteria d) is welcomed, further strengthening of the wording in relation to archaeology is recommended.	Historic England would be very happy to assist with wording.		No
1102255	NS74								ROA9 is welcomed. Please also see comments in Appendix B. There are strong concerns regarding the continued development of the Grade II Registered Park, which is on the HAR register, beyond the two sites identified as allocations, eroding the integrity of the RPG and a consequent loss of significance. A heritage-led management plan for the remaining intact areas of the registered park should be put in place.	A heritage led management plan should be put in place for the remainder of the RPG.		No
1102259	S75								The amendments to criteria f) are welcomed, together with the supporting text. Reference to the following document would be helpful:- https://historicengland.org.uk/images-books/publications/raf-scampton-historic-characterisation/			No
1103028	S76								COL/ABB/001 - North East Quadrant, Land at Greetwell Area, Lincoln (S75) Is the area shown larger than previously proposed? Views to and from the cathedral should be fully considered. There is known archaeology at the site due to previous works. As such, site specific policy bullet point requirement should be included. COL/BOU/001- Western Growth Corridor (S75) Please see our previous comments on the Western Growth Corridor. NK/CAN/003 - South East Quadrant, Canwick Heath	Historic England would be happy to advise regarding wording		No

									Please see our previous comments regarding the SEQ. Some of the regeneration zones in Lincoln City centre need strong heritage policies, including views to and from the historic hillside/cathedral for example and Conservation Areas where affected;			
1103019	S78								WL/GAIN/019 - Gateway Riverside Housing Zone, Gainsborough Please see our previous comments regarding the Conservation Area and Grade II school.			No
1103037	S79; S80								WL/MARK/003 (S79 Station) - Land to the east of Gordon Field & south of Chapel Street, adjoining Market Rasen Railway. The bullet point added in respect of the Grade II Listed station and its setting as previously requested is welcomed. WL/SAXI/014 - Land off Sturton Road Saxilby (S79) Please see our previous comments on applications on this site. A policy criteria is required to protect the setting of the church of St Botolph, particularly views to and from the church from the north and views between the village to the north and the church tower. NK/SKEL/007 - Land east of Lincoln Road, Skellingthorpe A policy criteria is required to protect the setting of the GII listed Manor House.	WL/SAXI/014 - Is the entirety of the site under construction? A site specific requirement bullet point should be added if the site is not fully developed to ensure protection of the setting of the Church of St Botolph, in particular views to and from the church from the north and views between the village to the north and the church tower. NK/SKEL/007 - A site specific requirement bullet point should be added to ensure protection of the setting of the Grade II Listed Manor House.		No
1103021	S80								NK/GREY/001 (S80) - Orchard House Rauceby Hospital Grantham Road South, Greylees The retention of the orchards is welcomed.			No
1103044	S80								The site [WL/CW/009] appears to break into Willingham Fen – between the village and North Delph / River Witham, there is the potential for setting impacts on the Scheduled Monument – Greetwell and wider historic landscape character in this zone between Greetwell / Fiskerton / Washingborough – there is very high archaeological sensitivity and potential in this zone. The site specific requirement bullet point for an archaeology assessment is welcomed.			No
1102260	S81								The below site specific requirement bullet points are welcomed:- NK/EAG/005 Development to be sensitive to the setting of Grade II Listed Village Farmhouse and Grade II Listed Ford Cottage to the west of the site and to the wider setting of other Listed Buildings. NK/WELL/002A Development to be sensitive to the setting of Grade II Listed Village Cross, Grade II Listed Greystones, Grade II Listed Rovistan House, Grade II Listed Home Farm Cottages and wider setting of other Listed Buildings, Conservation Area and Area of Great Landscape Value.			No
1102264	S82								The below site specific requirement bullet points are welcomed:- NL/LEAD/001 Development to be sensitive to the setting of the Grade II Listed Station House to the south-west of the site.			No

									NK/MART/001 Development to be sensitive to the setting of the conservation area			
1103041	S82								NK/SWI/006 Produce World Ltd, Moor Lane, Swinderby (S81) Views of Swinderby church tower (GII*) from Green Lane should be protected.	Does the design code include protection to the views of the Grade II* listed Swinderby Church tower from Green Lane?		No
1102274	SA								Section 6 of the table on page 106/107 is welcomed, in particular the removal of the proximity buffer from the 'Assumptions and Approach'.			No
1102269	Evidence								Whilst EVR057 is noted, a detailed evidence base is required to reflect heritage assets across the borough, such as including Conservation Area appraisals and Local Lists within the evidence base pages. As proposed, the evidence base is contrary to the NPPF, in particular paragraphs 31 and 35. Paragraph 31 states that "the preparation and review of all policies should be underpinned by relevant and up-to-date evidence." Reference to an evidence base is unclear and it would be helpful to make its' location clearer (much of the evidence may be available, but is not listed on the evidence page). Particularly relevant to site allocations and designations could include the following:- <ul style="list-style-type: none"> • Updating conservation area appraisals • Site and area specific Heritage Impact Assessments • Undertaking characterisation studies • Producing setting studies – of specific settlements, or specific heritage assets Local lists – reference to which was welcomed the heritage section. Assessments of landscape sensitivity	Provide a comprehensive heritage evidence base to support the plan, within a separate section in the Consultation Library. It is likely that much of the evidence is already available. Historic England would be happy to advise.		No

Holdingham Farm LLP

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102517	S1	No	Don't know	No	No	No	No	Don't know	Policy S1 states that growth will be allowed focused in the main settlements of Lincoln Gainsborough and Sleaford. 12% of the growth over the plan period is expected to be delivered in Sleaford. This continues the strategy of previous structure plans, regional strategies and Local Plans and is still a reasonable approach. Sleaford has experienced significant growth in recent decades which had put a strain on services and utilities. The adopted Local Plan had been informed by a separate "Masterplan Process" considering alternative development sites and various opportunities to facilitate delivery of Growth. The adopted Local Plan was based on the main outcomes arising from the Masterplan process. Important conclusions were a reliance on two key Sustainable Urban Extensions to deliver a high proportion of the growth. Delivery of one of these sites (Sleaford Southern Quadrant (Handley Chase)) is now coming forward, with development accelerating as more developers take on phases of development. The second site (Sleaford Western Quadrant) is subject to a planning application, for which a resolution to approve was made in 2017, but little progress has been made to finalise the decision since that time. Delays in delivering these two key sites will potentially undermine delivery of the required level of growth. The previous strategy for Sleaford was dependent upon delivery of some key infrastructure for the town, including a new bridge and link road to join the south of the town across the railway line to the town centre, via Boston Road, increase in foul sewerage treatment capacity and delivery of a new secondary school. The development approved under decision 18/0745/OUT removes the opportunity to deliver the new link road. The link road is of particular importance because there is only one main road connection over the railway line which is subject to delays caused by a level crossing. Although the consent is not implemented and will lapse in December 2022, it casts doubt on the ability to deliver improvements to the		No	No

									highways network to support growth. The delays in progressing the Sleaford West SUE, however, cast doubt on the ability to deliver growth in accordance with the Masterplan, as formalised in the adopted Central Lincolnshire Local Plan. The draft Local Plan continues allocations and has not reviewed the highways safety issue or explored any alternative ways to link the south of the town other than relying on the existing level crossing. A review is underway of the Masterplan for the town, but this is expected to be completed after the adoption of the Local Plan. The Local Plan is unsound, therefore, because the choice of allocations in and around Sleaford has not taken into account the inability to deliver key infrastructure that underpinned the adopted Local Plan. Policy S3 focuses Growth within the developed footprint of Sleaford, with development outside of, but immediately adjacent to the developed footprint being treated on their merits. Whereas a focus on the town is considered appropriate, the current wording of the policy discourages growth adjacent to the settlement. In reality many forms of development may be appropriate adjacent to the developed footprint. Discouraging growth on the edge of the settlement may prejudice the ability to deliver the overall growth agenda. The distribution of growth identified in Policy S1 and S2 is supported in principle, but the choice of sites allocated in the plan needs to be reviewed in light of delays delivering the Urban Extensions, specifically the Sleaford West Urban Extension casts doubt on the ability to deliver the growth Agenda. Other allocations may be required to deliver growth in the lifetime of the plan. The delivery of key infrastructure, that underpinned the growth strategy set in the adopted local plan, has been cast into doubt because the new link road cannot be delivered if development approved under 18/0745/OUT is delivered. Delays in delivering the Sleaford West SUE may cause issues regarding the capacity of secondary education serving the town. The choice of allocations and the distribution around Sleaford should be reviewed in light of these changes in circumstance. Policy S3 should be reworded to more positively welcome development adjacent to the developed footprint of Sleaford, rather than the current approach which will only allow development in exceptional circumstances.			
1102518	S1; S2; S3	No	Don't know	No	No	No	No	Don't know	Policy S1 states that growth will be allowed focused in the main settlements of Lincoln Gainsborough and Sleaford. 12% of the growth over the plan period is expected to be delivered in Sleaford. This continues the strategy of previous structure plans, regional strategies and Local Plans and is still a reasonable approach. Sleaford has experienced significant growth in recent decades which had put a strain on services and utilities. The adopted Local Plan had been informed by a separate "Masterplan Process" considering alternative development sites and various opportunities to facilitate delivery of Growth. The adopted Local Plan was based on the main outcomes arising from the Masterplan process. Important conclusions were a reliance on two key Sustainable Urban Extensions to deliver a high proportion of the growth. Delivery of one of these sites (Sleaford Southern Quadrant (Handley Chase)) is now coming forward, with development accelerating as more developers take on phases of development. The second site (Sleaford Western Quadrant) is subject to a planning application, for which a resolution to approve was made in 2017, but little progress has been made to finalise the decision since that time. Delays in delivering these two key sites will potentially undermine delivery of the required level of growth. The previous strategy for Sleaford was dependent upon delivery of some key infrastructure for the town, including a new bridge and link road to join the south of the town across the railway line to the town centre, via Boston Road, increase in foul sewerage treatment capacity and delivery of a new secondary school. The development approved under decision 18/0745/OUT removes the opportunity to deliver the new link road. The link road is of particular importance because there is only one main road connection over the railway line which is subject to delays caused by a level crossing. Although the consent is not implemented and will lapse in December 2022, it casts doubt on the ability to deliver improvements to the highways network to support growth. The delays in progressing the Sleaford West SUE, however, cast doubt on the ability to deliver growth in accordance with the Masterplan, as formalised in the adopted Central Lincolnshire Local Plan. The draft Local Plan continues allocations and has not reviewed the highways safety issue or explored any alternative ways to link the south of the town other than relying on the existing level crossing. A review is		No	No

									<p>underway of the Masterplan for the town, but this is expected to be completed after the adoption of the Local Plan. The Local Plan is unsound, therefore, because the choice of allocations in and around Sleaford has not taken into account the inability to deliver key infrastructure that underpinned the adopted Local Plan. Policy S3 focuses Growth within the developed footprint of Sleaford, with development outside of, but immediately adjacent to the developed footprint being treated on their merits. Whereas a focus on the town is considered appropriate, the current wording of the policy discourages growth adjacent to the settlement. In reality many forms of development may be appropriate adjacent to the developed footprint. Discouraging growth on the edge of the settlement may prejudice the ability to deliver the overall growth agenda. The distribution of growth identified in Policy S1 and S2 is supported in principle, but the choice of sites allocated in the plan needs to be reviewed in light of delays delivering the Urban Extensions, specifically the Sleaford West Urban Extension casts doubt on the ability to deliver the growth Agenda. Other allocations may be required to deliver growth in the lifetime of the plan. The delivery of key infrastructure, that underpinned the growth strategy set in the adopted local plan, has been cast into doubt because the new link road cannot be delivered if development approved under 18/0745/OUT is delivered. Delays in delivering the Sleaford West SUE may cause issues regarding the capacity of secondary education serving the town. The choice of allocations and the distribution around Sleaford should be reviewed in light of these changes in circumstance. Policy S3 should be reworded to more positively welcome development adjacent to the developed footprint of Sleaford, rather than the current approach which will only allow development in exceptional circumstances.</p>			
1102516	S3	No	Don't know	No	No	No	No	Don't know	<p>Policy S1 states that growth will be allowed focused in the main settlements of Lincoln Gainsborough and Sleaford. 12% of the growth over the plan period is expected to be delivered in Sleaford. This continues the strategy of previous structure plans, regional strategies and Local Plans and is still a reasonable approach.</p> <p>Sleaford has experienced significant growth in recent decades which had put a strain on services and utilities. The adopted Local Plan had been informed by a separate “Masterplan Process” considering alternative development sites and various opportunities to facilitate delivery of Growth.</p> <p>The adopted Local Plan was based on the main outcomes arising from the Masterplan process. Important conclusions were a reliance on two key Sustainable Urban Extensions to deliver a high proportion of the growth. Delivery of one of these sites (Sleaford Southern Quadrant (Handley Chase)) is now coming forward, with development accelerating as more developers take on phases of development. The second site (Sleaford Western Quadrant) is subject to a planning application, for which a resolution to approve was made in 2017, but little progress has been made to finalise the decision since that time. Delays in delivering these two key sites will potentially undermine delivery of the required level of growth.</p> <p>The previous strategy for Sleaford was dependent upon delivery of some key infrastructure for the town, including a new bridge and link road to join the south of the town across the railway line to the town centre, via Boston Road, increase in foul sewerage treatment capacity and delivery of a new secondary school. The development approved under decision 18/0745/OUT removes the opportunity to deliver the new link road. The link road is of particular importance because there is only one main road connection over the railway line which is subject to delays caused by a level crossing. Although the consent is not implemented and will lapse in December 2022, it casts doubt on the ability to deliver improvements to the highways network to support growth. The delays in progressing the Sleaford West SUE, however, cast doubt on the ability to deliver growth in accordance with the Masterplan, as formalised in the adopted Central Lincolnshire Local Plan.</p> <p>The draft Local Plan continues allocations and has not reviewed the highways safety issue or</p>		No	No

									<p>explored any alternative ways to link the south of the town other than relying on the existing level crossing. A review is underway of the Masterplan for the town, but this is expected to be completed after the adoption of the Local Plan. The Local Plan is unsound, therefore, because the choice of allocations in and around Sleaford has not taken into account the inability to deliver key infrastructure that underpinned the adopted Local Plan.</p> <p>Policy S3 focuses Growth within the developed footprint of Sleaford, with development outside of, but immediately adjacent to the developed footprint being treated on their merits. Whereas a focus on the town is considered appropriate, the current wording of the policy discourages growth adjacent to the settlement. In reality many forms of development may be appropriate adjacent to the developed footprint. Discouraging growth on the edge of the settlement may prejudice the ability to deliver the overall growth agenda.</p> <p>The distribution of growth identified in Policy S1 and S2 is supported in principle, but the choice of sites allocated in the plan needs to be reviewed in light of delays delivering the Urban Extensions, specifically the Sleaford West Urban Extension casts doubt on the ability to deliver the growth Agenda. Other allocations may be required to deliver growth in the lifetime of the plan.</p> <p>The delivery of key infrastructure, that underpinned the growth strategy set in the adopted local plan, has been cast into doubt because the new link road cannot be delivered if development approved under 18/0745/OUT is delivered. Delays in delivering the Sleaford West SUE may cause issues regarding the capacity of secondary education serving the town. The choice of allocations and the distribution around Sleaford should be reviewed in light of these changes in circumstance.</p> <p>Policy S3 should be reworded to more positively welcome development adjacent to the developed footprint of Sleaford, rather than the current approach which will only allow development in exceptional circumstances.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

Home Builders Federation

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1104070	General								<p>As set out in the 2021 National Planning Policy Framework (NPPF), the Councils are under a Duty to Co-operate with other Local Planning Authorities (LPA) and prescribed bodies on strategic matters that cross administrative boundaries (para 24). To maximise the effectiveness of plan-making and fully meet the legal requirements of the DtoC, the Councils engagement should be constructive, active and on-going. This collaboration should identify the relevant strategic matters to be addressed (para 25). Effective and on-going joint working is integral to the production of a positively prepared and justified strategy (para 26). The Councils should demonstrate such working by the preparation and maintenance of one or more SoCG identifying the cross-boundary matters to be addressed and the progress of co-operation in addressing these matters. Therefore, as set out in the 2021 NPPF, the JLPR should be positively prepared and provide a strategy, which as a minimum seeks to meet its own housing needs in full and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated (para 35a).</p> <p>The National Planning Practice Guidance (NPPG) explains that a SoCG sets out where effective co-operation is and is not happening throughout the plan-making process. The NPPG confirms that a SoCG is a way of demonstrating that Local Plan is deliverable over</p>		Yes	No

								<p>the plan period and based on effective joint working across LPA boundaries. It also forms part of the evidence required to demonstrate compliance with the DtoC (ID 61-010-20190315).</p> <p>The Central Lincolnshire JLPR is itself a demonstration of collaborative working between Lincoln City Council, North Kesteven District Council and West Lindsey District Council. The JLPR pre-submission consultation is also accompanied by a Draft SoCG dated March 2022 (Document STA007.1), which sets out co-operation with neighbouring authorities. Agreement 1 confirms that “the JLPR will meet the housing need for the plan period (2018 – 2040) in full.</p> <p>Central Lincolnshire does not require neighbouring authorities to assist in meeting this need and does not propose to meet the needs of any neighbouring authorities”. At Examination, the Inspector will use all available evidence including SoCG to determine whether the Duty to Co-operate has been satisfied (ID 61-031-20190315).</p>			
1104083	S2							<p>[Representation summarised due to length. See attached for full representation]</p> <p>Local Housing Need (LHN) & Housing Requirement As set out in the 2021 NPPF, strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need and any needs that cannot be met within neighbouring areas can be met over the plan period (para 66). The determination of the minimum number of homes needed should be informed by LHN assessment using the Government’s standard methodology unless exceptional circumstances justify an alternative approach (para 61). In Central Lincolnshire, there are no exceptional circumstances to justify an alternative approach.</p> <p>The Councils assessment of LHN is set out in Housing Need Assessment (HNA) dated April 2020 by Turley (Document HOU001). The LHN for Central Lincolnshire is calculated as minimum 1,086 dwellings per annum. As set out in the NPPG, the LHN is calculated at the start of the plan-making process, but this number should be kept under review and when appropriate revised until the JLPR is submitted for examination (ID 2a-008-20190220). The minimum LHN for Central Lincolnshire may change as inputs are variable. Using the standard methodology, the minimum LHN for Central Lincolnshire is 1,103 dwellings per annum based on 2014 SNHP, 2022 as the current year and 2021 affordability ratios of 5.97 in Lincoln, 8.16 in North Kesteven and 6.85 in West Lindsey respectively.</p> <p>The NPPG clearly states that the standard methodology is the minimum starting point in determining the number of homes needed. In Central Lincolnshire, there is justification for a housing requirement above the minimum LHN.</p> <p>To support the long-term sustainability of Central Lincolnshire, the Councils are seeking to achieve a sustainable balance between employment and housing growth. As set out in the Employment Need Assessment (ENA) Update (Document ECO001), Central Lincolnshire continues to experience employment growth of about 1,850 jobs per annum, with certain sectors performing considerably better than was previously forecast, assisted by an increasing supply of floorspace within commercial properties and reduced unemployment amongst the resident labour force. Bespoke modelling prepared by Edge Analytics suggests that housing provision in line with the standard methodology (1,083 dwellings per annum) could support the creation of circa 14,890 new jobs (677 jobs per annum) across Central Lincolnshire between 2018 - 2040. This will enable some job growth, but it is unlikely to provide the labour force needed to fully support anticipated levels of job growth. Forecasts sourced from Experian and Oxford Economics show the</p>	Before the JLPR is submitted for examination, further clarity on the deliverability of the Councils HLS should be provided including confirmation that 10% of the housing requirement will be accommodated on sites of less than one hectare. A detailed housing trajectory and 5 YHLS Statement should also be provided.	Yes	Yes

									<p>creation of circa 714 jobs per annum and circa 420 jobs per annum respectively. After adjustments to a more locally representative outlook for Central Lincolnshire, the creation of circa 992 jobs annually is indicated. Housing provision in alignment with the standard methodology would provide the labour force to support only two thirds (68%) of the jobs that could be created in Central Lincolnshire over the JLPR plan period. Therefore, housing provision would act as a constraint to economic growth. A jobs-led modelling scenario to achieve alignment with the forecast jobs growth set out in the ENA Update indicates that approximately 1,323 dwellings per annum are needed, which would also boost the rate of housing delivery towards previously recorded delivery rates.</p> <p>The adopted Joint Local Plan has a housing requirement for 1,540 dwellings per annum. Historically, housing delivery has also been significantly greater than the minimum LHN, over both the long-term between 1996 - 2012 and in the more recent years. The 2021 Housing Delivery Test (HDT) shows completions of 1,586 dwellings in 2018/19, 1,807 dwellings in 2019/20 and 1,532 dwellings in 2020/21 (despite adjustments for Covid 19 lockdowns). This implies that there has been a higher sustained level of demand for new homes than suggested by the standard methodology.</p> <p>Furthermore, the 2014-based SNPP anticipated that the population of Central Lincolnshire would grow by around 7,700 people between 2014 and 2018. Subsequently released ONS population estimates show actual population growth of approximately 10,900 persons, which means that the population of Central Lincolnshire is already larger and growing to a greater extent than assumed in the standard methodology demographic baseline assumptions.</p> <p>The HNA identifies an overall affordable housing need of 592 dwellings per annum. This is a significant proportion (56%) of the minimum LHN. The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. As set out in the NPPG, an increase in the total housing figures may be considered where it could help deliver affordable housing (ID 2a-024-20190220). The HBF acknowledge that the Councils may not be able to meet all affordable housing needs but a housing requirement above the minimum LHN will make a greater contribution to delivering more affordable housing.</p> <p>As set out in the NPPG, the Government is committed to ensuring that more homes are built and supports ambitious Councils wanting to plan for growth (ID 2a-010-20201216). The NPPG states that a higher figure “can be considered sound” providing it “adequately reflects current and future demographic trends and market signals”. The Councils have demonstrated that “circumstances” exist to justify a housing need higher than indicated by the standard methodology.</p> <p>The HBF support the Councils in identifying a housing need, which is greater than the minimum standard methodology LHN figure. However, the NPPG does not set any limitations on a higher figure, which is a matter of judgement. The Government’s objective of significantly boosting the supply of homes set out in the 2021 NPPF remains (para 60). The HBF believe that the Councils could have been more ambitious. The upper end of the proposed housing requirement range is below previously achieved housing delivery rates and misaligned with the strategic aim of creating 24,000 new jobs (1,090 jobs per annum). The proposed housing requirement range is not a significant boost to the supply of homes. A higher housing requirement would support economic growth and deliver more affordable housing.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

									<p>The HBF also note that the housing requirements set out in Policy S2 are not expressed as minimum figures. Before the JLPR is submitted for examination, the Councils should consider a more ambitious housing requirement. Policy S2 should also be amended to set out the housing requirement as a minimum figure.</p> <p>Housing Land Supply (HLS) The JLPR should ensure the availability of a sufficient supply of deliverable and developable land to meet the Central Lincolnshire's housing requirement, ensure the maintenance of a 5 Year Housing Land Supply (YHLS) and achieve HDT performance measurements.</p> <p>The Councils windfall allowance of 75 dwellings per annum should be robustly evidenced. National policy only permits an allowance for windfall sites if there is compelling evidence that such sites have consistently become available and will continue to be a reliable source of supply.</p> <p>There is a headroom of 3,522 dwellings (12%) between the overall HLS of 32,672 dwellings and Central Lincolnshire's upper end of the housing requirement range of 29,150 dwellings. The HBF always advocates as large a contingency as possible to facilitate optimum flexibility. There is no numerical formula to determine an appropriate amount of headroom but where HLS is highly dependent upon one or relatively few large strategic sites and / or localities, greater flexibility is necessary than where HLS is more diversified.</p> <p>There are also delivery concerns about brownfield sites in all Value Zones and non-strategic greenfield sites and SUEs in mid lower and lower Value Areas (see HBF representations on Viability and Deliverability below). Under these circumstances, a headroom of only 3,522 dwellings may provide insufficient flexibility.</p> <p>Housing delivery is optimised by the widest possible range of housing site sizes and market locations, which provides suitable land buying opportunities for small, medium and large housebuilding companies. On SUEs, there may be long lead in times before the commencement of on-site development and build up to optimum delivery rates. To ensure a continuous short to medium term HLS, SUEs should be complimented by smaller non-strategic sites. The widest mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice & competition in the land market. A diversified portfolio of housing sites also offers the widest possible range of products to households to access different types of dwellings to meet their housing needs.</p> <p>The Councils Housing Trajectory is not site-specific, which provides insufficient detail to check the realism of the Councils delivery assumptions. The Councils have not provided the clear evidence necessary to satisfy the 2021 NPPF Glossary definition of deliverable. The insertion of a more detailed housing trajectory would assist in the annual monitoring of housing delivery from SUEs and non-strategic sites.</p> <p>A 5 YHLS Statement has not been provided. If the Councils cannot demonstrate a 5 YHLS on adoption of the JLPR and maintain a 5 YHLS throughout the plan period, the JLPR should not be found sound. Furthermore, it is not clear if the Councils are wishing to demonstrate their 5 YHLS via adoption of the Central Lincolnshire JLPR as set out in 2021 NPPF (para 74b).</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

1104095	S6								<p>Under Policy S6, the following design principles should be used :-</p> <ul style="list-style-type: none"> • (3) Fabric of buildings – using materials and building techniques that reduce heat and energy needs ; • (4) Heat supply – net zero carbon content of heat supply (for example this means no connection to the gas network or use of oil or bottled gas); and • (5) Renewable energy generated – generating enough energy from renewable sources onsite (and preferably on plot) to meet reasonable estimates of all regulated and unregulated total annual energy demand across the year. 		Yes	No
1104098	S7								<p>Under Policy S7, unless covered by an exceptional basis clause set out below, all new residential development proposals must include an Energy Statement, which confirms that in addition to the requirements of Policy S6 all residential units :-</p> <ul style="list-style-type: none"> • (1) Can generate at least the same amount of renewable electricity on-site (and preferably on-plot) as the electricity they demand over the course of a year, such demand including all energy use (regulated and unregulated), calculated using a methodology proven to accurately predict a building's actual energy performance ; and • (2) To target achieving a space heating demand of around 15- 20kWh/m2/yr and a total energy demand of 35 kWh/m2/yr, achieved through a 'fabric first' approach to construction. No unit to have a total energy demand in excess of 60 kWh/m2/yr, irrespective of amount of on-site renewable energy production. (For the avoidance of doubt, 'total energy demand' means the amount of energy used as measured by the metering of that home, with no deduction for renewable energy generated on site). <p>The Energy Statement must include details of assured performance arrangements. As a minimum, this will require :-</p> <ul style="list-style-type: none"> • (a) The submission of 'pre-built' estimates of energy performance ; and • (b) Prior to each dwelling being occupied, the submission of updated, accurate and verified 'as built' calculations of energy performance. <p>Such a submission should also be provided to the first occupier (including a Non-Technical Summary of such estimates). Weight will be given to proposals which demonstrate a deliverable commitment to on-going monitoring of energy consumption, post-occupation, which has the effect, when applicable, of notifying the occupier that their energy use appears to significantly exceed the expected performance of the building and explaining to the occupier steps they could take to identify the potential causes of such high energy use.</p> <p>Exceptional Basis Clauses</p> <p>These three clauses may allow certain developments to not meet in full the Policy 6 & 7 requirements, though in all cases the energy performance arrangements of points a) and b) are still required.</p> <p>Clause 1 (Technical or Policy Reasons). Where, on an exceptional basis, Points 1 - 2 cannot be met for technical (e.g. overshadowing) or other policy reasons (e.g. heritage), then the Energy Statement must demonstrate both why they cannot be met, and the degree to which each of Points 1 - 2 are proposed to be met. A lack of financial viability will not be deemed either a technical or policy reason to trigger this exceptional basis clause. Where Clause 1 is utilised, and the proposal is for 10 or more units, the applicant must either (a) enter into an appropriate legal agreement which will either provide renewable energy infrastructure offsite equivalent to at least offsetting the additional</p>	<p>Before the JLPR is submitted for examination, Policies S6 & S7 should be modified to align with the Government's intention to set standards through Building Regulations. Further viability testing should be undertaken to include costs for 2021 Part L interim Uplift, 2025 Future Homes Standards and any other policy option for zero regulated & unregulated carbon in the baseline viability assessment appraisal.</p>	Yes	No

									<p>energy requirements not achieved on site or (b) enter into an appropriate legal agreement to provide a financial contribution to the applicable LPA of a value sufficient to enable that LPA to offset (via off site renewable energy infrastructure or other offsite infrastructure to deliver a reasonable carbon saving) the remaining performance not achieved on site (with this being a minimum contribution of £5k and a maximum of £15k per dwelling unit) or (c) demonstrate that the residential units will be connected to a decentralised energy network or combined heat and power unit, in accordance with Policy S9.</p> <p>Clause 2 (Accreditation Scheme). To simplify the decision-making process, applicants are able to demonstrate that they have met the requirements of Points 1 – 2 if they provide certified demonstration of compliance with Passivhaus Plus, Premium or Classic or any other recognised national independent accreditation scheme, provided such scheme is demonstrated to be consistent with the requirements of this Policy.</p> <p>Clause 3 (Viability). In Value Zones C & D, it is acknowledged that the full delivery of Point 1 & 2 requirements may not be possible in some cases for viability reasons. Consequently, the applicable LPA will continue to require an Energy Statement to be submitted, and, if full delivery of requirements are not proposed to be met, such a Statement must set out the degree to which Points 1 and 2 are proposed to be met in order to enable the development to become viable.</p> <p>Today's new homes are already very energy efficient with lower heating bills for residents in comparison to older existing homes. Energy performance data has shown that 8 out of 10 new build dwellings have an A or B energy efficiency rating, compared to only 3% of existing properties. Nevertheless, the HBF recognise the need to move towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable. It is the Government's intention to set standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers.</p> <p>The Councils do not need to set local energy efficiency standards to achieve the shared goal of net zero emissions because of the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift, which are effective from June 2022, and proposals for the 2025 Future Homes Standard. The 2021 Interim Uplift to Part L (Conservation of fuel and power) Regulations will deliver homes that are expected to produce 31% less CO2 emissions compared to current standards. From 2025, the Future Homes Standard will ensure that new homes will produce at least 75% lower CO2 emissions than one built to current energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises. The HBF support the Government's approach to a nationally consistent set of standards via the Building Regulations but there are difficulties and risks to housing delivery, which include the immaturity of the supply chain for the production / installation of heat pumps and the additional load that would be placed on local electricity networks in combination with Government changes to Part S of the Building Regulations for the installation of Electric Vehicle Charging Points (EVCPs) in new homes.</p> <p>In autumn 2020, the HBF established a Future Homes Task Force to develop workable</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

								<p>solutions for the delivery of the home building industry's contribution to meeting national environmental targets and objectives on Net Zero. Early collaborative work focussed on tackling the challenges of implementing the 2021 and 2025 changes to Building Regulations successfully and as cost-effectively as possible, in particular providing information, advice and support for SME developers and putting the customer at the centre of thinking. In July 2021, the Future Homes Delivery Plan was published. In September 2021, the Future Homes Delivery Hub supported by involvement from Government was launched. The Hub will help facilitate a sector-wide approach to identify the metrics, more detailed targets where necessary, methods and innovations to meet the goals and the collaborations required with supply chains and other sectors. It will incorporate the needs of all parties including the public and private sector and crucially, consumers, such that they can all play their part in delivering environmentally conscious homes that people want to live in.</p> <p>The Councils supporting evidence in Documents CLC001 – CLC010 set out a contextual background for Policies S6 & S7 but this evidence does not set out specific local circumstances to justify a requirement for standards above and ahead of 2021 Part L Interim Uplift and 2025 Future Homes Standard.</p> <p>Furthermore, the Councils baseline viability assessment appraisal excludes any costs associated with the requirements of Policies S6 & S7. The baseline viability assessment appraisal shows that non-strategic greenfield typologies and strategic sites in mid lower and lower Value Zones are unviable. Brownfield sites are unviable in all Value Zones. Surpluses generated in higher and mid Value Zones are insufficient to cover additional costs for exclusions and further outstanding infrastructure requirements (see HBF comments on Viability & deliverability). Additional excluded costs are estimated as (see Table 6-6) :-</p> <ul style="list-style-type: none"> • 2021 Part L Interim Uplift £4,847 per house (£2,256 per apartment) to take effect in June 2022 ; and • The cost to achieve zero regulated carbon, the cost of achieving net zero regulated carbon (by employing energy efficiency, on site carbon reduction and other allowable solutions (carbon offsetting)) for a detached home circa £10,000 when using either gas or air sourced heat pump heating. The cost of the zero regulated and unregulated carbon policy option is around £14,500 per home as set out in Research by Currie & Brown for Centre for Sustainable Energy dated December 2018. 			
1104100	S11							<p>Under Policy S11, all development should, where practical and viable, take opportunities to reduce the development's embodied carbon content, through the careful choice, use and sourcing of materials.</p> <p>Presumption against demolition. To avoid the wastage of embodied carbon in existing buildings and avoid the creation of new embodied carbon in replacement buildings, there is a presumption in favour of repairing, refurbishing, re-using and re-purposing existing buildings over their demolition. Proposals that result in the demolition of a building (in whole or a significant part) should be accompanied by a full justification for the demolition. For non-listed buildings demolition will only be acceptable where it is demonstrated to the satisfaction of the LPA that :-</p> <ul style="list-style-type: none"> • (1) the building proposed for demolition is in a state of such disrepair that it is not practical or viable to be repaired, refurbished, re-used, or re-purposed ; or • (2) repairing, refurbishing, re-using, or re-purposing the building would likely result in similar or higher newly generated embodied carbon than if the building is demolished 	Before the JLPR is submitted for examination, Policy S11 should be deleted because impacts on development have not been fully considered.	Yes	No

								<p>and a new building is constructed ; or</p> <ul style="list-style-type: none"> • (3) repairing, refurbishing, re-using, or re-purposing the building would create a building with such poor thermal efficiency that on a whole life cycle basis (i.e. embodied carbon and in-use carbon emissions) would mean a lower net carbon solution would arise from demolition and re-build ; or • (4) demolition of the building and construction of a new building would, on an exceptional basis, deliver other significant public benefits that outweigh the carbon savings which would arise from the building being repaired, refurbished, re-used, or re-purposed. Applications within the countryside relating to the re-use or conversion of existing buildings will only be acceptable where they also meet the requirements of Policy S5, S34, or S43 as applicable. <p>Major development proposals: All major development proposals should explicitly set out what opportunities to lower a building's embodied carbon content have been considered, and which opportunities, if any, are to be taken forward.</p> <p>In the period to 31 December 2024, there will be no requirement (unless mandated by Government) to use any specific lower embodied carbon materials in development proposals, provided the applicant has at least demonstrated consideration of options and opportunities available.</p> <p>From 1 January 2025, there will be a requirement for a development proposal to demonstrate how the design and building materials to be used have been informed by a consideration of embodied carbon, and that reasonable opportunities to minimise embodied carbon have been taken. Further guidance is anticipated to be issued by the LPA on this matter prior to 1 January 2025.</p> <p>The Councils should confirm that brownfield sites included in its HLS are not subject to the presumption against demolition. If brownfield sites are subject the presumption, the Councils should confirm that such sites have been included in the HLS as refurbishment rather than redevelopment opportunities and viability assessments were undertaken on this basis. Furthermore, the Councils Viability Assessment excludes any additional costs associated with embodied carbon such as commissioning reports or the use of specific low carbon materials.</p>			
1104085	S22							<p>Policy S22 – Affordable Housing</p> <p>Under Policy S22, affordable housing will be sought on sites of 10 or more dwellings or 5 or more dwellings within Designated Rural Area in North Kesteven District. The percentage sought will be based on the Value Zones indicated on Map 3, which are 25% in Value Zone A, 20% in Value Zone B, 15% in Value Zone C and 10% in Value Zone D.</p> <p>The HBF is supportive of the Councils differentiated policy approach to the provision of affordable housing, which is justified by the Councils Viability Assessment. However, the Councils own viability evidence suggests that there should also be a differentiation between greenfield and brownfield sites (see HBF comments on Viability & Deliverability above).</p> <p>Under Policy S22, the exact tenure mix should be identified through discussions with the Councils and informed by the latest up to date HNA. The starting point for discussions will be based on delivery of 25% of all affordable housing delivered through planning obligations as First Homes, after which priority will be for delivery of affordable rent, subject to satisfying national policy requirements for 10% all housing being for affordable home ownership.</p>		Yes	No

								<p>The HBF note that the Councils Viability Assessment tests an affordable housing tenure mix of 25% First Homes, 50% affordable rent and 25% intermediate (shared ownership). However, the impacts of First Homes on viability have not been fully considered. The Councils proposed affordable housing tenure mix will increase marketing costs and increase risk as developers will not be able to sell First Homes in bulk to a Registered Provider thereby no longer obtaining a more reliable up front revenue stream. The 6% developers return on GDV of affordable housing does not reflect this risk. Furthermore, First Homes may impact on the ability of developers to sell similarly sized open market units. First Homes may dampen the appetite of first-time buyers for one, two & three bedroomed open market dwellings as some households, who would have purchased a home on the open market may opt to use the discounted First Homes route instead. This may result in slow sales of similar open market units, increased sales risk and additional planning costs (if sites have to be re-planned with an alternative housing mix).</p> <p>Before the JLPR is submitted for examination, further viability testing should be undertaken. Policy S22 should be modified to differentiate between greenfield and brownfield sites.</p>			
1104094	NS24							<p>Policy NS24 - Custom & Self Build Housing</p> <p>Under Policy NS24, sites for 100 or more dwellings will provide serviced plots to deliver at least 5% of the total number of dwellings on the site as self-build or custom build homes. If plots remain unsold after a thorough and proportionate marketing exercise over a period of at least 36 months from the date at which the plots are made available, these plots may be built out as conventional market housing subject to detailed permission being secured and the relevant Council being satisfied that the marketing exercise has been satisfactorily concluded.</p> <p>There is no legislative or national policy basis for imposing an obligation on landowners or developers of sites of more than 100 dwellings to set aside at least 5 serviced plots for self & custom build housing. Under the Self Build & Custom Housebuilding Act 2015 and 2021 NPPF (para 62), it is the Councils responsibility, not the landowner or developer, to ensure that sufficient permissions are given to meet demand. The Councils are not empowered to restrict the use of land to deliver self & custom build housing. The NPPG sets out ways in which the Councils should consider supporting self & custom build by “engaging” with developers and landowners and “encouraging” them to consider self & custom build “where they are interested” (ID 57-025-201760728).</p> <p>As set out in the NPPG, the Councils should use their Custom & Self Build Registers and additional data from secondary sources to understand and consider future need for this type of housing (ID 57-011-20210208). The Councils evidence is set out in Policy Evidence Report (Document EVR024). Between 2016 – 2021, across Central Lincolnshire, there was an mean average of 50 entries per annum comprising 14 entries in Lincoln, 21 entries in North Kesteven and 15 entries in West Lindsey. This evidence demonstrates that there is minimal demand for custom & self build housing. Indeed Document EVR024 (Tables 2 – 4) show that granted permissions have met demand except in Lincoln where the built form of development is not conducive to self & custom build. Furthermore, a simple reference to the headline number of entries on the Register may over-estimate actual demand. The Register may indicate a level of expression of interest in self & custom build but it cannot be reliably translated into actual demand should such plots be made available. The Register’s entries may have insufficient financial resources to undertake a project, be registered in more than one local authority area and have specific preferences.</p>		Yes	No

									<p>In Table 5 of Document EVR024 a preference for locations in Larger, Medium and Small Villages is shown. Therefore, it is unlikely that self & custom build serviced plots on larger residential sites will appeal to those wishing to build their own home. The Councils should ensure that the JLPR will result in a wide range of different self & custom build housing opportunities. Numerous policy mechanisms could be used to ensure a reliable and sufficient provision of self & custom build opportunities across Central Lincolnshire including allocation of small and medium scale sites specifically for self & custom build housing and permitting self & custom build outside but adjacent to settlement boundaries on sustainable sites especially if the proposal would round off the developed form.</p> <p>The site threshold of 100 or more dwellings and the 5% provision are unjustified. The provision of self & custom build plots on sites of more than 100 dwellings adds to the complexity and logistics of developing these sites. It is difficult to co-ordinate the provision of self & custom build plots with the development of the wider site. Often there are multiple contractors and large machinery operating on-site, the development of single plots by individuals operating alongside this construction activity raises both practical and health & safety concerns. Any differential between the lead-in times / build out rates of self & custom build plots and the wider site may lead to construction work outside of specified working hours, building materials stored outside of designated compound areas and unfinished plots next to completed and occupied dwellings resulting in consumer dissatisfaction.</p> <p>It is important that unsold plots are not left empty to the detriment of neighbouring dwellings or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible because the consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. The proposed marketing period of at least 36 months is too long and the wording “thorough and proportionate” is too vague.</p> <p>As well as on-site practicalities impacts on viability should be tested. The Councils Viability Assessment does not consider such impacts. The HBF believe that the provision of serviced self & custom build plots will have a bearing on the development economics of developments of more than 100 dwellings. It is unlikely that up front site promotion costs (including planning & acquisition costs) and fixed site externals, site overheads and enabling infrastructure costs will be recouped because the plot price a self & custom builder is able to pay may be constrained by much higher build costs for self-builders. There are also impacts of not recouping profit otherwise obtainable if the dwelling was built and sold on the open market by the site developer, disruption caused by building unsold plots out of sequence from the build programme of the wider site and a worst-case scenario of unsold plots remaining undeveloped.</p> <p>Policy NS24 is unsound because it is not positively prepared, effective, nor consistent with national policy. Before the JLPR is submitted for examination, the requirement for at least 5% serviced plots for self-build or custom build housing on sites of 100 or more dwellings should be deleted.</p>			
1104101	S51								Under Policy S51, all new residential developments of 10 or more dwellings will be required to provide new or enhanced publicly accessible open space, sports and leisure facilities to meet the needs of their occupiers in accordance with this policy, the standards set out in Appendix 3, and in compliance with the latest Central Lincolnshire Developer Contributions Supplementary Planning Document (SPD) (or similar subsequent	Before the JLPR is submitted for examination, Policies S51 and S59 should be	Yes	No

								<p>document).</p> <p>The policy wording reference to “compliance with the latest Central Lincolnshire Developer Contributions SPD” and “in accordance with the Developer Contributions SPD” should not be interpreted by the Councils Development Management Officers as conveying the weight of a Development Plan Document (DPD) onto this guidance, which has not been subject to examination and does not form part of the JLPR.</p> <p>The Town and Country Planning (Local Planning) (England) Regulations 2012 are clear that development management policies, which are intended to guide the determination of applications for planning permission should be set out in policy in the Local Plan. The Councils approach of requiring compliance with an SPD is giving DPD status to a document, which is not part of the JLPR and has not been subject to the same process of preparation, consultation and examination.</p> <p>To ensure a policy is effective, it should be clearly written and unambiguous so it is evident how a decision maker should react to development proposals. The Councils requirements should be set out in sufficient detail to determine a planning application without relying on, other criteria or guidelines set out in a separate SPD. National policy clearly defines the scope and nature of an SPD in the planning process as providing more detailed advice and guidance on adopted Local Plan policies. The NPPG confirms that an SPD cannot introduce new planning policies nor add unnecessarily to the financial burdens on development (ID: 61-008-20190315).</p>	modified to remove the inappropriate reference to the Central Lincolnshire Developer Contributions SPD, which is unsound.		
1104102	S59							<p>Under Policy S59, development will be expected to make a contribution proportionate to their scale towards the establishment, enhancement and going management of green and / or blue infrastructure by contributing development of the strategic green infrastructure network within Central Lincolnshire, in accordance with the Developer Contributions SPD. The policy wording reference to “compliance with the latest Central Lincolnshire Developer Contributions SPD” and “in accordance with the Developer Contributions SPD” should not be interpreted by the Councils Development Management Officers as conveying the weight of a Development Plan Document (DPD) onto this guidance, which has not been subject to examination and does not form part of the JLPR. The Town and Country Planning (Local Planning) (England) Regulations 2012 are clear that development management policies, which are intended to guide the determination of applications for planning permission should be set out in policy in the Local Plan. The Councils approach of requiring compliance with an SPD is giving DPD status to a document, which is not part of the JLPR and has not been subject to the same process of preparation, consultation and examination. To ensure a policy is effective, it should be clearly written and unambiguous so it is evident how a decision maker should react to development proposals. The Councils requirements should be set out in sufficient detail to determine a planning application without relying on, other criteria or guidelines set out in a separate SPD. National policy clearly defines the scope and nature of an SPD in the planning process as providing more detailed advice and guidance on adopted Local Plan policies. The NPPG confirms that an SPD cannot introduce new planning policies nor add unnecessarily to the financial burdens on development (ID: 61-008-20190315).</p>	Before the JLPR is submitted for examination, Policies S51 and S59 should be modified to remove the inappropriate reference to the Central Lincolnshire Developer Contributions SPD, which is unsound.	Yes	No
1104103	Evidence							<p>In plan-making, viability is inseparable from the deliverability of development. At Examination, viability will be a key issue in determining the soundness of the Central Lincolnshire JLPR. The viability of individual developments and plan policies should be tested at the plan making stage. As set out in the 2021 NPPF, the contributions expected from development including the level & types of affordable housing provision required and other infrastructure for education, health, transport, flood & water management, open space, digital communication, etc. should be set out in the JLPR (para 34). As stated in the 2021 NPPF, development should not be subject to such a scale of obligations that</p>	Before the JLPR is submitted for examination, the Councils overall policy requirements should be revisited and reduced.	Yes	No

								<p>the deliverability of the JLPR is threatened (para 34). Viability assessment should not be conducted on the margins of viability especially in the aftermath of uncertainties caused by the Covid-19 pandemic and Brexit. Without a robust approach to viability assessment, the JLPR will be unsound, land will be withheld from the market and housing delivery targets will not be achieved.</p> <p>The Councils viability evidence is set out in Whole Plan Viability Assessment dated June 2021 by Aspinall Verdi (Document INF002a), which assesses generic site typologies together with the individual separate testing of 9 larger strategic sites (see Table 5-7). Document INF002a is also accompanied by Whole Plan Viability Addendum dated March 2022 by Aspinall Verdi (Document INF003), which re-runs the June 2021 appraisals using BCIS cost and residential sales value updates as of February 2022. Document INF003 also provides an explanation of how Policy S6 in the Draft JLPR renumbered as Policy S7 in the pre-submission JLPR is reflected in the Councils Viability Assessment.</p> <p>Central Lincolnshire is sub-divided into 4 Value Areas (higher, mid, mid lower and lower), which the HBF assume correlate with Value Zones of Map 3 set out in Policy S22 – Affordable Housing. It is estimated that the percentage of greenfield HELAA sites located in each Value Zone are 25% in higher, 63% in mid, 5% in mid lower and 8% in lower (see Table 5-4). The percentage of brownfield HELAA sites located in each Value Zone are 10% in higher, 23% in mid, 19% in mid lower and 48% in lower (see Table 5-5). The 9 strategic sites are located in mid (5 strategic sites), mid lower (2 strategic sites) and lower (2 strategic sites) Value Zones (see Table 6-7). Of proposed allocations 146 sites for circa 44,335 dwellings are greenfield and 18 sites for circa 2,963 dwellings are brownfield (see Table 6-13).</p> <p>It is noted that the Councils Viability Assessment uses lower quartile BCIS build costs, which may not be most applicable to smaller developers. The Councils acknowledge that there is a prevalence of smaller rather than national housebuilding companies operating across Central Lincolnshire.</p> <p>The Councils viability assessment should accurately account for all costs for affordable housing provision, CIL, S106 contributions and policy requirements sought. Viability assessment is highly sensitive to changes in its inputs whereby an adjustment or an error in any one assumption can have a significant impact. The Council's baseline viability assessment appraisal is based on the following assumptions (see Table 6-6) :-</p> <ul style="list-style-type: none"> • 5%, 10%, 15%, 20% & 25% affordable housing provision ; • specified housing mix ; • minimum 10% biodiversity net gain as set out in Policy S61 - Biodiversity Opportunity & Delivering Measurable Net Gains <p>There are significant additional costs associated with biodiversity gain. The Councils Viability Assessment (see Table 6-6) uses the DEFRA Biodiversity Net Gain & Local Nature Recovery Strategies : Impact Assessment Table 16 : Net gain delivery costs per greenfield development (residential) East Midland cost of £1,011 per dwelling (based on 2017 prices and the central estimate). However, the Councils have not sensitivity tested cost increases to £3,562 per dwelling for off-site delivery under Scenario C nor the impact on gross to net site acreage ratios;</p> <ul style="list-style-type: none"> • optional water efficiency standards required under Policy S12 – Water Efficiency & Sustainable Water Management (£9 per dwelling) ; • air quality assessments ; • Sustainable Urban Drainage ; and • adopted open space standards. 	Without revision, trade-offs between policy requirements, affordable housing and infrastructure provision will be necessary. The Councils will have to accept site specific viability assessments at development management stage. Such negotiations at planning application stage causes uncertainty for developers and may result in significant delay to housing delivery or even non-delivery.		
--	--	--	--	--	--	--	--	---	--	--	--

									<p>It is explicitly stated that the baseline viability assessment appraisals exclude costs for (see Table 6-6) :-</p> <ul style="list-style-type: none"> • Primary school education (£1,200 per primary pupil) ; • NHS contributions (£632.50 per dwelling) ; • Accessible & adaptable dwellings (£420 per dwelling). Under Policy S23 – Meeting Accommodation Needs, there is no reference to the optional standard of M4(2) but M4(3) is encouraged. The Councils Policy Evidence Report (Document EVR023) assumes that the Government’s proposed changes to Part M of the Building Regulations as set out in the “Raising Accessibility Standards for New Homes” consultation will become a mandatory requirement of the Building Regulations. The Government estimated an additional cost of £1,400 per dwelling for M4(2). The figure of only £420 per dwelling is based on the adopted JLP policy requirement for only 30% of dwellings to meet M4(2) standard (see Table 6-6). Additional costs for M4(3) compliant dwellings are not referenced. During the Government’s Housing Standards Review (September 2014), EC Harris estimated the cost impact of M4(3) per dwelling as £7,607 - £8,048 for apartments and £9,754 - £23,052 for houses (Table 45). Both M4(2) and M4(3) compliant dwellings are also larger in size (see DCLG Housing Standards Review Illustrative Technical Standards Developed by the Working Groups August 2013), which should be accounted for in any appraisal inputs based on square meterage ; • Future Homes Standard (2021 Interim Part L Uplift of £4,847 per dwelling and the yet to be quantified additional costs for 2025 Future Homes Standard) ; • Electric Vehicle Charging Points (£500 per house & £2,500 per apartment). Policy NS18 - Electric Vehicle Charging requires provision as set out in the Building Regulations. From June 2022, Part S of Building Regulations will require the mandatory provision of Electric Vehicle Charging Points (EVCPs) in residential developments as set out in the Department of Transport Consultation Response : EVCP in Residential & Non-Residential Buildings dated November 2021. The Councils cost of only £550 per house / £2,500 per apartment (see Table 6-6) is not aligned with the Government’s estimated installation cost of approximately £976 per EVCP plus any costs for upgrading local electricity networks. The HBF and its Members have serious concerns about the capacity of the existing electrical network in the UK. The supply from the power grid is already constrained in many areas across the country. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard. Under the Government’s current proposals, a capped figure of £3,600 for network improvements is automatically levied on developers, which is not included in the Councils Viability Assessment ; • Zero Regulated Carbon (£10,000 - £14,500 per dwelling). <p>The HBF have submitted separate comments on the Viability Study assumptions for specific policy requirements contained in following policies :-</p> <ul style="list-style-type: none"> • Policy S22 – Affordable Housing ; • Policy NS24 - Custom & Self Build Housing ; • Policy S6 - Design Principles for Efficient Buildings ; • Policy S7 - Reducing Energy Consumption – Residential Development ; and • Policy S11 – Embodied Carbon. <p>Using the Councils baseline viability assessment appraisal :-</p> <ul style="list-style-type: none"> • greenfield sites in higher Value Zone with 25% affordable housing provision as set out in Policy S22 result in a surplus of £26,000 - £34,000 per dwelling (see Table 7-1) ; • greenfield sites in mid Value Zone with 20% affordable housing provision as set out in Policy S22 result in a surplus of £8,000 - £12,000 per dwelling (see Table 7-2) ; 			
--	--	--	--	--	--	--	--	--	---	--	--	--

									<ul style="list-style-type: none"> • greenfield sites in mid lower Value Zone with 15% affordable housing provision as set out in Policy S22 are unviable (see Table 7-3) ; • greenfield sites in lower Value Zone with 10% affordable housing provision as set out in Policy S22 are unviable (see Table 7-3) ; • brownfield sites in all Value Zones are unviable (see Table 7-4) ; and • only 5 strategic sites in mid Value Zone with 20% affordable housing as set out in Policy S22 result in a surplus of £4,000 - £6,000 per dwelling. The remaining strategic sites are unviable (see Table 7-5). <p>These results demonstrate viability challenges for brownfield sites in all Value Zones and greenfield sites in mid lower and lower Value Zones. The results also show that the surpluses generated in the mid and higher Value Zones will be insufficient to cover the costs excluded from the baseline viability assessment appraisal plus the addition of further outstanding infrastructure costs.</p> <p>The Infrastructure Delivery Plan identifies that the infrastructure requirements for non-strategic sites will be higher than £10,000 per dwelling. The potential outstanding infrastructure requirement of £26,751 per dwelling will wipe out any available surpluses even in the higher Value Zone (see para 9.12). Furthermore, the infrastructure requirements for the strategic sites cannot be supported by the development surpluses alone (see para 9.15).</p> <p>It is noted that none of the HBF concerns raised in response to the Draft JLPR consultation and repeated above have been addressed in the Councils re-running of viability appraisals. Whilst the Whole Plan Viability Addendum (Document INF003) shows an improvement in viability because residential sales values have increased by 9% and build costs have increased by only 6%, viability remains challenging. Most sites should be deliverable at planning application stage without further viability assessment negotiations.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

Horizon Park Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103433	General	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>Legal Compliance</p> <p>As a starting point it is noted that Local Plans needs to demonstrate compliance with the relevant legal requirements of the Town & Country Planning (Local Planning) (England) Regulations 2012 and the 'Duty to Cooperate' before conducting a test of 'soundness' in line with the provisions of the National Planning Policy Framework (NPPF, 2021).</p> <p>Since the review of the Local Plan began in 2019, it is evident that the Central Lincolnshire Local Plan has been subject to considerable consultation to date in line with the clear stages required by the regulations and the collaborative approach between the joint authorities has only assisted significant cross-boundary engagement between the local authorities and key stakeholders within the wider area.</p> <p>Accordingly, HPL supports the CLC efforts in preparing the New Local Plan and is confident that CLC has worked collaboratively and effectively with its neighbours and key stakeholders in the preparation of the New Local Plan to satisfy the legal obligations of the regulations and the Duty to Cooperate. It is our considered position that the new Local Plan and supporting Sustainability Appraisal are legally compliant and as such should not present any impediment</p>		Yes	No

									<p>to the adoption of the Local Plan.</p> <p>Test of Soundness In line with the provisions of the NPPF (2021) Local Plans will be examined against whether they have been prepared in accordance with legal and procedural requirements and whether they are 'sound'. HPL supports the CLC Local Plan and considers the Plan to be sound on grounds that it is:</p> <p>i) Positively Prepared – being based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities, consistent with delivering sustainable development;</p> <p>ii) Justified – that the Plan is the most appropriate strategy when considered against the reasonable alternatives presented during previous consultations and has been informed by proportionate evidence;</p> <p>iii) Effective – the Plan is deliverable over its period and based on effective joint working on cross-boundary strategic priorities;</p> <p>iv) Consistent with national planning policy – to enable the delivery of sustainable development, including the potential for major mixed use development and supporting infrastructure on previously developed (brownfield) land at RAF Scampton.</p>			
1103407	S1	Yes	Yes	Yes	Yes	Yes	Yes	Yes	HPL supports the general provisions of Policy S1 (The Spatial Strategy and Settlement Hierarchy) of Policy S2 (Growth Levels and Distribution) as consistent with national planning policy to deliver sustainable and accessible development, a key focus of the Plan being to direct the majority (approx. 61%) of planned new development towards the most sustainable area within the district, being the 'Lincolnshire Strategy Area', within which RAF Scampton is located.		Yes	No
1103408	S2	Yes	Yes	Yes	Yes	Yes	Yes	Yes	HPL supports the general provisions of Policy S1 (The Spatial Strategy and Settlement Hierarchy) of Policy S2 (Growth Levels and Distribution) as consistent with national planning policy to deliver sustainable and accessible development, a key focus of the Plan being to direct the majority (approx. 61%) of planned new development towards the most sustainable area within the district, being the 'Lincolnshire Strategy Area', within which RAF Scampton is located.		Yes	No
1103411	S7	Yes	Yes	Yes	Yes	Yes	Yes	Yes	HPL recognises the importance of environmental sustainability and supports the provisions of the 'draft development management-type' policies being promoted in the New Local Plan in terms of the renewed focus on reducing energy consumption and adapting the climate change, ensuring the prudent use of resources, supporting the generation of renewable energy, flood risk management, delivering biodiversity net gain and sustainable and adaptable design (Policies S7, S8, S9, S10, S11, S12, S13, S14, S20, S21 & S61). Such sustainability objectives will be necessary to meet the Government's legislative targets to become carbon neutral by 2050 and Lincolnshire County Council's more recent commitments to reducing the County's 1990 carbon emissions by 68% by 2025, 5 years earlier than the Government target of 2030. Indeed, HPLs objectives are for RAF Scampton to become a carbon zero development, generating more energy than is consumed.		Yes	No
1103412	S8	Yes	Yes	Yes	Yes	Yes	Yes	Yes	HPL recognises the importance of environmental sustainability and supports the provisions of the 'draft development management-type' policies being promoted in the New Local Plan in terms of the renewed focus on reducing energy consumption and adapting the climate change, ensuring the prudent use of resources, supporting the generation of renewable energy, flood risk management, delivering biodiversity net gain and sustainable and adaptable design (Policies S7, S8, S9, S10, S11, S12, S13, S14, S20, S21 & S61). Such sustainability objectives will be necessary to meet the Government's legislative targets to become carbon neutral by 2050 and Lincolnshire County Council's more recent commitments to reducing the		Yes	No

									County's 1990 carbon emissions by 68% by 2025, 5 years earlier than the Government target of 2030. Indeed, HPLs objectives are for RAF Scampton to become a carbon zero development, generating more energy than is consumed.			
1103414	S9	Yes	Yes	Yes	Yes	Yes	Yes	Yes	HPL supports the general provisions of Policy S1 (The Spatial Strategy and Settlement Hierarchy) of Policy S2 (Growth Levels and Distribution) as consistent with national planning policy to deliver sustainable and accessible development, a key focus of the Plan being to direct the majority (approx. 61%) of planned new development towards the most sustainable area within the district, being the 'Lincolnshire Strategy Area', within which RAF Scampton is located. Moreover, HPL recognises the importance of environmental sustainability and supports the provisions of the 'draft development management-type' policies being promoted in the New Local Plan in terms of the renewed focus on reducing energy consumption and adapting the climate change, ensuring the prudent use of resources, supporting the generation of renewable energy, flood risk management, delivering biodiversity net gain and sustainable and adaptable design (Policies S7, S8, S9, S10, S11, S12, S13, S14, S20, S21 & S61). Such sustainability objectives will be necessary to meet the Government's legislative targets to become carbon neutral by 2050 and Lincolnshire County Council's more recent commitments to reducing the County's 1990 carbon emissions by 68% by 2025, 5 years earlier than the Government target of 2030. Indeed, HPLs objectives are for RAF Scampton to become a carbon zero development, generating more energy than is consumed. It is recognised that any major new development proposals should be designed to the highest standards and will need to be supported by appropriate infrastructure and as such the general provisions of Policies S45 (Strategic Infrastructure Requirements) and Policy S50 (Community Facilities) and the Transport Policies (S47, S48 & S49) are further supported in principle. With particular reference to the known constraints and opportunities at RAF Scampton, it will be important for any future development proposals to respect and reflect the unique history of the former RAF base and ensure development proposals sit comfortably with the sensitive local landscape context. As such, Policies S57 (The Historic Environment) and Policy S62 (Areas of Great Landscape Value) are supported whereby proposals are required to protect, conserve and enhance the historic and natural environment, consistent with national planning policy.		Yes	No
1103415	S10	Yes	Yes	Yes	Yes	Yes	Yes		HPL supports the general provisions of Policy S1 (The Spatial Strategy and Settlement Hierarchy) of Policy S2 (Growth Levels and Distribution) as consistent with national planning policy to deliver sustainable and accessible development, a key focus of the Plan being to direct the majority (approx. 61%) of planned new development towards the most sustainable area within the district, being the 'Lincolnshire Strategy Area', within which RAF Scampton is located. Moreover, HPL recognises the importance of environmental sustainability and supports the provisions of the 'draft development management-type' policies being promoted in the New Local Plan in terms of the renewed focus on reducing energy consumption and adapting the climate change, ensuring the prudent use of resources, supporting the generation of renewable energy, flood risk management, delivering biodiversity net gain and sustainable and adaptable design (Policies S7, S8, S9, S10, S11, S12, S13, S14, S20, S21 & S61). Such sustainability objectives will be necessary to meet the Government's legislative targets to become carbon neutral by 2050 and Lincolnshire County Council's more recent commitments to reducing the County's 1990 carbon emissions by 68% by 2025, 5 years earlier than the Government target of 2030. Indeed, HPLs objectives are for RAF Scampton to become a carbon zero development, generating more energy than is consumed. It is recognised that any major new development proposals should be designed to the highest standards and will need to be supported by appropriate infrastructure and as such the general provisions of Policies S45 (Strategic Infrastructure Requirements) and Policy S50 (Community Facilities) and the Transport Policies (S47, S48 & S49) are further supported in principle. With particular reference to the known constraints and opportunities at RAF Scampton, it will		Yes	No

									be important for any future development proposals to respect and reflect the unique history of the former RAF base and ensure development proposals sit comfortably with the sensitive local landscape context. As such, Policies S57 (The Historic Environment) and Policy S62 (Areas of Great Landscape Value) are supported whereby proposals are required to protect, conserve and enhance the historic and natural environment, consistent with national planning policy.			
1103416	S11	Yes	Yes	Yes	Yes	Yes	Yes	Yes	HPL recognises the importance of environmental sustainability and supports the provisions of the 'draft development management-type' policies being promoted in the New Local Plan in terms of the renewed focus on reducing energy consumption and adapting the climate change, ensuring the prudent use of resources, supporting the generation of renewable energy, flood risk management, delivering biodiversity net gain and sustainable and adaptable design (Policies S7, S8, S9, S10, S11, S12, S13, S14, S20, S21 & S61). Such sustainability objectives will be necessary to meet the Government's legislative targets to become carbon neutral by 2050 and Lincolnshire County Council's more recent commitments to reducing the County's 1990 carbon emissions by 68% by 2025, 5 years earlier than the Government target of 2030. Indeed, HPLs objectives are for RAF Scampton to become a carbon zero development, generating more energy than is consumed.		Yes	No
1103418	S12	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>HPL supports the general provisions of Policy S1 (The Spatial Strategy and Settlement Hierarchy) of Policy S2 (Growth Levels and Distribution) as consistent with national planning policy to deliver sustainable and accessible development, a key focus of the Plan being to direct the majority (approx. 61%) of planned new development towards the most sustainable area within the district, being the 'Lincolnshire Strategy Area', within which RAF Scampton is located.</p> <p>Moreover, HPL recognises the importance of environmental sustainability and supports the provisions of the 'draft development management-type' policies being promoted in the New Local Plan in terms of the renewed focus on reducing energy consumption and adapting the climate change, ensuring the prudent use of resources, supporting the generation of renewable energy, flood risk management, delivering biodiversity net gain and sustainable and adaptable design (Policies S7, S8, S9, S10, S11, S12, S13, S14, S20, S21 & S61). Such sustainability objectives will be necessary to meet the Government's legislative targets to become carbon neutral by 2050 and Lincolnshire County Council's more recent commitments to reducing the County's 1990 carbon emissions by 68% by 2025, 5 years earlier than the Government target of 2030. Indeed, HPLs objectives are for RAF Scampton to become a carbon zero development, generating more energy than is consumed.</p> <p>It is recognised that any major new development proposals should be designed to the highest standards and will need to be supported by appropriate infrastructure and as such the general provisions of Policies S45 (Strategic Infrastructure Requirements) and Policy S50 (Community Facilities) and the Transport Policies (S47, S48 & S49) are further supported in principle. With particular reference to the known constraints and opportunities at RAF Scampton, it will be important for any future development proposals to respect and reflect the unique history of the former RAF base and ensure development proposals sit comfortably with the sensitive local landscape context. As such, Policies S57 (The Historic Environment) and Policy S62 (Areas of Great Landscape Value) are supported whereby proposals are required to protect, conserve and enhance the historic and natural environment, consistent with national planning policy.</p>		Yes	No
1103419	S13	Yes	Yes	Yes	Yes	Yes	Yes	Yes	HPL recognises the importance of environmental sustainability and supports the provisions of the 'draft development management-type' policies being promoted in the New Local Plan in terms of the renewed focus on reducing energy consumption and adapting the climate change, ensuring the prudent use of resources, supporting the generation of renewable energy, flood risk management, delivering biodiversity net gain and sustainable and adaptable design (Policies S7, S8, S9, S10, S11, S12, S13, S14, S20, S21 & S61). Such sustainability objectives will be necessary to meet the Government's legislative targets to become carbon		Yes	No

									neutral by 2050 and Lincolnshire County Council's more recent commitments to reducing the County's 1990 carbon emissions by 68% by 2025, 5 years earlier than the Government target of 2030. Indeed, HPLs objectives are for RAF Scampton to become a carbon zero development, generating more energy than is consumed.			
1103420	S14	Yes	Yes	Yes	Yes	Yes	Yes	Yes	HPL recognises the importance of environmental sustainability and supports the provisions of the 'draft development management-type' policies being promoted in the New Local Plan in terms of the renewed focus on reducing energy consumption and adapting the climate change, ensuring the prudent use of resources, supporting the generation of renewable energy, flood risk management, delivering biodiversity net gain and sustainable and adaptable design (Policies S7, S8, S9, S10, S11, S12, S13, S14, S20, S21 & S61). Such sustainability objectives will be necessary to meet the Government's legislative targets to become carbon neutral by 2050 and Lincolnshire County Council's more recent commitments to reducing the County's 1990 carbon emissions by 68% by 2025, 5 years earlier than the Government target of 2030. Indeed, HPLs objectives are for RAF Scampton to become a carbon zero development, generating more energy than is consumed.		Yes	No
1103422	S20	Yes	Yes	Yes	Yes	Yes	Yes	Yes	HPL recognises the importance of environmental sustainability and supports the provisions of the 'draft development management-type' policies being promoted in the New Local Plan in terms of the renewed focus on reducing energy consumption and adapting the climate change, ensuring the prudent use of resources, supporting the generation of renewable energy, flood risk management, delivering biodiversity net gain and sustainable and adaptable design (Policies S7, S8, S9, S10, S11, S12, S13, S14, S20, S21 & S61). Such sustainability objectives will be necessary to meet the Government's legislative targets to become carbon neutral by 2050 and Lincolnshire County Council's more recent commitments to reducing the County's 1990 carbon emissions by 68% by 2025, 5 years earlier than the Government target of 2030. Indeed, HPLs objectives are for RAF Scampton to become a carbon zero development, generating more energy than is consumed.		Yes	No
1103423	S21	Yes	Yes	Yes	Yes	Yes	Yes	Yes	HPL recognises the importance of environmental sustainability and supports the provisions of the 'draft development management-type' policies being promoted in the New Local Plan in terms of the renewed focus on reducing energy consumption and adapting the climate change, ensuring the prudent use of resources, supporting the generation of renewable energy, flood risk management, delivering biodiversity net gain and sustainable and adaptable design (Policies S7, S8, S9, S10, S11, S12, S13, S14, S20, S21 & S61). Such sustainability objectives will be necessary to meet the Government's legislative targets to become carbon neutral by 2050 and Lincolnshire County Council's more recent commitments to reducing the County's 1990 carbon emissions by 68% by 2025, 5 years earlier than the Government target of 2030. Indeed, HPLs objectives are for RAF Scampton to become a carbon zero development, generating more energy than is consumed.		Yes	No
1103425	S45	Yes	Yes	Yes	Yes	Yes	Yes	Yes	It is recognised that any major new development proposals should be designed to the highest standards and will need to be supported by appropriate infrastructure and as such the general provisions of Policies S45 (Strategic Infrastructure Requirements) and Policy S50 (Community Facilities) and the Transport Policies (S47, S48 & S49) are further supported in principle.		Yes	No
1103427	S47	Yes	Yes	Yes	Yes	Yes	Yes	Yes	It is recognised that any major new development proposals should be designed to the highest standards and will need to be supported by appropriate infrastructure and as such the general provisions of Policies S45 (Strategic Infrastructure Requirements) and Policy S50 (Community Facilities) and the Transport Policies (S47, S48 & S49) are further supported in principle.		Yes	No
1103428	S48	Yes	Yes	Yes	Yes	Yes	Yes	Yes	It is recognised that any major new development proposals should be designed to the highest standards and will need to be supported by appropriate infrastructure and as such the general provisions of Policies S45 (Strategic Infrastructure Requirements) and Policy S50 (Community Facilities) and the Transport Policies (S47, S48 & S49) are further supported in principle.		Yes	No
1103430	S49	Yes	Yes	Yes	Yes	Yes	Yes	Yes	It is recognised that any major new development proposals should be designed to the highest standards and will need to be supported by appropriate infrastructure and as such the general provisions of Policies S45 (Strategic Infrastructure Requirements) and Policy S50 (Community Facilities) and the Transport Policies (S47, S48 & S49) are further supported in principle.		Yes	No

1103426	S50	Yes	Yes	Yes	Yes	Yes	Yes	Yes	It is recognised that any major new development proposals should be designed to the highest standards and will need to be supported by appropriate infrastructure and as such the general provisions of Policies S45 (Strategic Infrastructure Requirements) and Policy S50 (Community Facilities) and the Transport Policies (S47, S48 & S49) are further supported in principle.		Yes	No
1103431	S57	Yes	Yes	Yes	Yes	Yes	Yes	Yes	With particular reference to the known constraints and opportunities at RAF Scampton, it will be important for any future development proposals to respect and reflect the unique history of the former RAF base and ensure development proposals sit comfortably with the sensitive local landscape context. As such, Policies S57 (The Historic Environment) and Policy S62 (Areas of Great Landscape Value) are supported whereby proposals are required to protect, conserve and enhance the historic and natural environment, consistent with national planning policy.		Yes	No
1103424	S61	Yes	Yes	Yes	Yes	Yes	Yes	Yes	HPL recognises the importance of environmental sustainability and supports the provisions of the 'draft development management-type' policies being promoted in the New Local Plan in terms of the renewed focus on reducing energy consumption and adapting the climate change, ensuring the prudent use of resources, supporting the generation of renewable energy, flood risk management, delivering biodiversity net gain and sustainable and adaptable design (Policies S7, S8, S9, S10, S11, S12, S13, S14, S20, S21 & S61). Such sustainability objectives will be necessary to meet the Government's legislative targets to become carbon neutral by 2050 and Lincolnshire County Council's more recent commitments to reducing the County's 1990 carbon emissions by 68% by 2025, 5 years earlier than the Government target of 2030. Indeed, HPLs objectives are for RAF Scampton to become a carbon zero development, generating more energy than is consumed.		Yes	No
1103432	S62	Yes	Yes	Yes	Yes	Yes	Yes	Yes	With particular reference to the known constraints and opportunities at RAF Scampton, it will be important for any future development proposals to respect and reflect the unique history of the former RAF base and ensure development proposals sit comfortably with the sensitive local landscape context. As such, Policies S57 (The Historic Environment) and Policy S62 (Areas of Great Landscape Value) are supported whereby proposals are required to protect, conserve and enhance the historic and natural environment, consistent with national planning policy.		Yes	No
1103406	S75	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>In 2018 the Ministry of Defence (MOD) announced their intention to decommission the base at RAF Scampton in 2022 as part of the rationalisation of its assets. HPL has considerable experience of developing ex-MOD sites and intends to bid for the purchase of circa 800 acres of land at the former site of RAF Scampton in Lincolnshire. If successful, HPL will be an important partner in the delivery of Central Lincolnshire Council's (CLC) Local Plan and is therefore keen to work positively and proactively with the Local Planning Authorities to deliver on the future spatial and strategic objectives for the site.</p> <p>HPL supports the designation of the former RAF site as an 'Opportunity Area' which recognises at a strategic level that the site is expected to come forward for redevelopment and that having a planning policy framework in place would help to deliver the significant opportunities presented by the site in a sustainable way.</p> <p>It is essential that the disposal of RAF Scampton by the MOD is done so in an appropriate manner and HPL recognises the significant opportunities presented by the site to deliver a comprehensive mixed use and sustainable development on a previously developed (brownfield) site, within a relatively accessible location just off the A15, approx. 5km north of the principal city of Lincoln and adjacent to a major local destination (the Lincolnshire Showground). Such an approach to development is consistent with the Frameworks presumption in favour of sustainable development which seeks to make effective use of land in a way that makes as much use as possible of previously developed (brownfield) land (NPPF, para 119).</p> <p>The whole of RAF Scampton is considered to comprise brownfield land given the functional</p>		Yes	No

								<p>and ancillary inter-relationship between existing built-up and the more open areas of the site. Moreover, there are obvious and clear benefits associated with a comprehensive approach to site remediation and redevelopment which can act as a catalyst for environmental improvement consistent with the draft policy requirements to deliver Biodiversity Net Gain and provide a stimulus and encouragement for prospective new occupiers, be they residents or businesses. As such, it is considered that Policy S75 should take the opportunity to define RAF Scampton as a wholly brownfield site for the avoidance of doubt, to encourage investment and to foster a comprehensive approach to the future planning of the site.</p> <p>HPL supports the masterplan approach set out in draft Policy S75 to the future development of the site as key to ensuring that any future development of the site is holistically planned. HPL further supports in principle the guiding criteria for what the site and masterplan will be expected to deliver, whilst also recognising that the policy is worded in such a way as to ensure flexibility of potential future land uses.</p> <p>HPL supports the draft policy wording insofar as it requires the airspace above the site to be fully understood, including for the ongoing need for airspace for use by the Red Arrows and other ancillary needs. Where a value for the retained use of the airspace can be attributed it may be appropriate to incorporate such factors into the masterplan for the site, however it is not considered that such use of the airspace should be 'prioritised' as currently drafted such that this comes at the expense of delivering sustainable development which might otherwise deliver significant environmental, social and economic improvements at the site. It is important that the emerging policy takes a more balanced approach and provides flexibility so as not to miss the unique opportunity presented by the site.</p> <p>Safeguarding flexibility of land uses in the emerging policy wording is key to ensure future proposals can deliver on ever changing social, environmental and economic circumstances, market conditions and the priorities of the local community and key stakeholders following the formal disposal of the site by the MOD. HPL is developing exciting concepts for the site to deliver a comprehensive major mixed use development which would create a new destination for residents, businesses and visitors. Such proposals would involve an appropriate proportion of new residential development to help strengthen the existing community, to support any commercial and recreational land uses and to help fund the necessary infrastructure improvements to serve the site and wider community. Accordingly, HPL supports the recognition within the draft policy wording that the redevelopment of RAF Scampton would comprise a 'new settlement' and as such an element of new residential development is considered to be appropriate provided this is appropriately served by supporting infrastructure.</p> <p>Indeed, whilst the New Local Plan makes provisions to meet the local authorities identified housing needs through the proposed site allocations, it is considered that the redevelopment of RAF Scampton provides a unique opportunity to complement the Local Plan and deliver additional new homes over and above identified needs to provide choice and flexibility in the market and also provide flexibility in housing supply should any of the proposed site allocations not deliver as expected (as is so often the case) and therefore assist the Central Lincolnshire Councils to further defend against speculative (unplanned) development proposals. Residential development is therefore considered to play a key role in the future of the site, which is supported by draft Policy S75.</p> <p>Key to delivering a successful place is to understand and reflect the site's context. RAF Scampton holds a unique and special importance in the nation's military and social history and HPL recognises the site's rich heritage and supports the draft policy requirements for future proposals to fully evaluate the historic character of the site to inform and influence future</p>			
--	--	--	--	--	--	--	--	--	--	--	--

									proposals. HPL is committed to engaging and working positively with the local community and key stakeholders through the masterplanning process to develop and comprehensive, viable and exciting new carbon zero vision for the site which respects the existing community and protects and enhances the sites historical significance and landscape setting. Indeed, HPL considers that proposals at RAF Scampton could further complement the adjacent Lincolnshire Showground to help create a new and exciting destination for residents, businesses and visitors to drive economic growth and prosperity for the region for generations to come.			
--	--	--	--	--	--	--	--	--	--	--	--	--

IGas Energy PLC

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103753	Intro; Context; Strategic Priorities; Vision; Objectives								We submit that the Local Plan Proposed Submission Draft requires amendment in order to balance the aspirations for carbon net neutrality with the strategic role that the area plays in supplying market demand. We submit that a greater balance needs to be struck between the Local Plan's role in supporting sustainable economic growth whilst safeguarding and conserving the natural environment. The plan should refer to the important role that Central Lincolnshire has with regards to both renewable and non-renewable energy and acknowledge the importance of having a mix of energy sources within Central Lincolnshire.			No
1103769	Intro; Context; Strategic Priorities; Vision; Objectives								As a final point, we wish to emphasise that the NPPF with which the emerging Local Plan must be in accordance has recently been updated (July 2021) and retains the clear message that "the purpose of the planning system is to contribute to the achievement of sustainable development" (paragraph 7). It emphasises that the planning system has three overarching objectives: economic, social, and environmental. We submit that the Local Plan Submission Draft as it is currently worded does not attribute sufficient weight to the economic benefits of the onshore oil and gas minerals industry in Central Lincolnshire.			No
1103754	S1								<p>Policy S1 states that development in 'countryside' is restricted unless it is demonstrably essential to the effective operation of:</p> <ul style="list-style-type: none"> • agriculture, horticulture, forestry, outdoor recreation, transport or utility services; • the delivery of infrastructure; • renewable energy generation; and • "minerals or waste development in accordance with separate Minerals and Waste Local Development Documents." <p>We note that there have been no changes to the wording for Policy S1 since the Local Plan Consultation Draft. With regard to the first bullet point above, we would like to reiterate that development that is essential to the effective operation of the existing onshore oil and gas minerals industry should be specifically listed as an exception to the general restriction on development in the countryside.</p> <p>Furthermore, we wish to re-emphasise that Policy M9 of the Lincolnshire Core Strategy and Development Management Policies document (CS&DMP) (adopted June 2016) should be included under the wording of Policy S1, as per the final bullet point. Policy M9 'Energy Minerals' of the adopted CS&DMP states that planning permission will be granted for the exploration, appraisal and/or production of conventional and unconventional hydrocarbons provided that proposals accord with all relevant development management policies set out in the adopted Plan.</p>			No
1103761	Climate change						No		Further to the above comments relating to specific Draft Policies within the Local Plan Submission Draft, the introduction and preamble within Section 3 of the Local Plan Consultation Draft contains discussion to provide context to the Draft Policies that we wish to comment on. In			No

									<p>particular, paragraph 3.1.3 of the document states that “this Local Plan would be unlawfully produced if it did not meaningfully contribute to reducing emissions, help mitigate against climate change and help society adapt to a changing climate”.</p> <p>We welcome the removal of the wording ‘radical’ from the Local Plan Consultation Draft and whilst proactive steps towards carbon net zero are welcomed, they should not result in conflict between the Local Plan and the national policy with which it should be prepared in accordance.</p>			
1103762	Climate change								<p>Paragraph 3.1.5 outlines the ‘CO2 budget’ for Central Lincolnshire in the context of its “fair share” as a proportion of the world’s total CO2 budget as calculated by the Tyndall Centre. We would again wish to support the transition to a lower carbon future but would stress that with regard to Central Lincolnshire’s “fair share” of CO2 emissions, it is inevitable that certain areas may emit comparatively more CO2 as fossil fuels / hydrocarbons can only be exploited where they are naturally located. We want to reiterate the minerals can only be worked where they are found and Central Lincolnshire benefits from such resources.</p>			No
1103763	Climate change						No		<p>Finally, paragraph 3.1.6 states that only development that is “fit for a zero-carbon future” is welcome in Central Lincolnshire. It is not made clear what constitutes development fit for a zero-carbon future, however the wording alludes to any development necessitating carbon as unwelcome. We would state that it is not only impossible to only facilitate development proposals that are fit for a zero-carbon future but is also not consistent with national policy.</p>			No
1103755	S6								<p>The current wording of Policies S6, S7 and S8 are comparable to a blanket ban on the use of fossil fuels in all new built development where the Exceptional Basis Clauses cannot be adhered to. We do not consider that the wording of Policies S6, S7 and/or S8 are deliverable or consistent with Central Government’s agenda of promoting low-emission alternatives to the use of fossil fuels for heating new homes by 2025.</p>			No
1103756	S7								<p>The current wording of Policies S6, S7 and S8 are comparable to a blanket ban on the use of fossil fuels in all new built development where the Exceptional Basis Clauses cannot be adhered to. We do not consider that the wording of Policies S6, S7 and/or S8 are deliverable or consistent with Central Government’s agenda of promoting low-emission alternatives to the use of fossil fuels for heating new homes by 2025.</p>			No
1103757	S8								<p>The current wording of Policies S6, S7 and S8 are comparable to a blanket ban on the use of fossil fuels in all new built development where the Exceptional Basis Clauses cannot be adhered to. We do not consider that the wording of Policies S6, S7 and/or S8 are deliverable or consistent with Central Government’s agenda of promoting low-emission alternatives to the use of fossil fuels for heating new homes by 2025.</p>			No
1103758	S11						No		<p>Policy S11 is too broad a policy and is not in accordance with national planning policy. There is no presumption against demolition in either the NPPF or planning practice guidance. Demolition of buildings is also permitted development under Parts 10 and 17 of the General Permitted Development Order 2015. For the Plan to be sound we recommend that Policy S11 is deleted.</p>			No
1103760	S19						No	No	<p>Policy S19 states that “any proposal for fossil fuel based exploration, extraction, production or energy generation for the determination by City of Lincoln, North Kesteven District Council or West Lindsey District Council will normally be refused on the basis that any remaining fossil fuels should remain under the ground as part of the area’s commitment to a net zero-carbon society and economy.”</p> <p>We acknowledge that wording has been changed since the Local Plan Consultation Draft to emphasise refusal will only be on the basis of applications being determined by local authorities and majority of applications are the County Council responsibility however the policy itself is still contrary to national policy.</p> <p>Within the policy justification text Paragraph 3.5.7 and 3.5.8 states that the ‘current Lincolnshire Minerals and Waste Local Plan, adopted in 2016, includes a policy which supports the ‘exploration, appraisal and/or production of conventional and unconventional hydrocarbon (Policy M9).’ However, the text further states at Paragraph 3.5.9 that ‘Central Lincolnshire Joint</p>			No

								<p>Strategic Planning Committee has taken the view that both the legislative and policy context has evolved considerably since then...extraction and burning of fossil fuels is no commensurate with delivering a net zero carbon Central Lincolnshire'</p> <p>Firstly, the justification for the policy is the view that 'legislative and policy context has evolved', however the NPPF was recently adopted in July 2021 and the approach to fossil fuel development was considered sound. Policy S1 of this emerging plan also supports 'mineral and waste development within the countryside' which hasn't specified specific type of mineral and waste development and therefore this would also include fossil fuel exploration and extraction under guidance contained in the NPPF.</p> <p>Secondly, Paragraphs 3.5.7 – 3.5.9 are overall contrary to national and energy policy. Paragraph 210 of the NPPF states that planning policies should provide for the extraction of mineral resources of local and national importance which includes oil and gas and Paragraph 215 states that '(mineral) planning authorities should plan for on-shore oil and gas development, including "plan positively for, the three phases of development (exploration, appraisal and production)'. Furthermore, Government energy policy recognises that the UK is not currently in a position to rely solely on renewable energy sources and therefore fossil fuels will continue to have a role in the UK energy system.</p> <p>Policy S19 is therefore contrary to national policy and is not beneficial to the emerging Local Plan. Within the justification text, Policy S19 emphasises that the District Authority's will predominantly not deal with mineral applications, and this will be handled by the County Council, yet a policy has been produced which states the District Authority will blanket refuse all fossil fuel and gas applications. Considering the NPPF and County Council support fossil fuel development and District Authorities involvement in the decision process of applications will be as statutory consultees, this policy can be seen as a failure of duty to cooperate.</p> <p>We would reiterate that this policy approach is not consistent with national planning policy and guidance to effectively impose a blanket ban on new fossil fuel exploration, extraction, production, or energy generation. To do so would directly conflict with adopted policies established by the local MPA, Lincolnshire County Council. For these reasons Policy S19 and supporting paragraphs 3.5.7, 3.5.8 and 3.5.9 should be deleted.</p> <p>We would reiterate that this policy approach is not consistent with national planning policy and guidance to effectively impose a blanket ban on new fossil fuel exploration, extraction, production, or energy generation. To do so would directly conflict with adopted policies established by the local MPA, Lincolnshire County Council. For these reasons Policy S19 and supporting paragraphs 3.5.7, 3.5.8 and 3.5.9 should be deleted.</p> <p>We submit that in light of the above, the Plan cannot be considered 'sound' as it has not been prepared in a manner consistent with NPPF (2021).</p> <p>We also wish that officers note the comments made by the Inspector on Egdon Resources' appeal for the Wressle development regarding national energy policy: 'National energy policy, most succinctly set out in NPS EN-1 and the Framework, is aimed at reducing demand by end users, and in that way reducing both demand and consumption. It is no part of national policy to attempt to reduce emissions by restricting the production of hydrocarbons in the UK, as was implied or stated by some objectors. Nor was such an approach suggested by the Committee on Climate Change when dealing with the net zero 2050 position – and there is no policy which provides that a net zero carbon economy in 2050 would be hydrocarbon-free.'</p> <p>The inspector's decision in the Wressle appeal also stated, 'In line with the NPPG on Minerals I am</p>			
--	--	--	--	--	--	--	--	---	--	--	--

								entitled to assume that other regulatory regimes will operate effectively and that it is not necessary for me to carry out my own assessment because I can rely on the assessment of the other regulatory bodies. There is no evidence that other regimes are incapable of operating effectively and adequately regulating the development.[1]’ Reference: https://acp.planninginspectorate.gov.uk/ViewCase.aspxCaseID=3221694&CoID=0			
1103768	S76; S77; S78; S79; S80; S81; S82						No	In addition to the points made above, we wish to reiterate the importance of mineral safeguarding at a District Level and the requirement for District Councils to consider policies set out within the relevant Minerals Local Plan. We submit that the emerging Central Lincolnshire Local Plan should, when considering policies and potential land for allocations / designations ensure that due regard is had to the need to safeguard mineral resources, mineral infrastructure sites, and all locations whereby new non-minerals development could harm the exploration, extraction, and production of hydrocarbons. The ability to meet hydrocarbon demand can only be met where the hydrocarbons naturally occur. It is therefore important to ensure that these resources are safeguarded and not needlessly sterilised by non-mineral development or any development that would prejudice existing or future operations In our view, the Plan still at present conflicts with NPPF (July 2021) Paragraph 210 (parts c and e) and Minerals PPG. The NPPF (July 2021) is clear at paragraph 210 (parts c and e) that planning policies should: • adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development (part c); and • define Mineral Safeguarding Areas and Mineral Consultation Areas to safeguard, inter alia, “existing, planned and potential sites for the bulk transport, handling and processing of mineral” (part e). This responsibility is not limited to Mineral Planning Authorities. Paragraph: 005 (Reference ID: 27-005-20140306) of the Planning Practice Guidance (Minerals) identifies that, ‘whilst district councils are not mineral planning authorities, they have an important role in safeguarding minerals in three ways: • having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans. District councils should show Mineral Safeguarding Areas on their policy maps; • in those areas where a mineral planning authority has defined a Minerals Consultation Area, consulting the mineral planning authority and taking account of the local minerals plan before determining a planning application on any proposal for non-minerals development within it; and • when determining planning applications, doing so in accordance with development policy on minerals safeguarding, and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction.’ As a minimum a ‘tier two’ Local Plan should cross reference with the adopted Minerals and Waste Local Plan (in this case the adopted Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies (June 2016) and Site Locations (December 2017) documents) to outline the relationship of mineral planning and mineral safeguarding within two tier authority areas. These concerns were raised during the Local Plan Consultation Draft stage and have not been rectified within the Proposed Submission Draft Plan. The NPPF and PPG also suggest that minerals should be more than just referenced in ‘tier two’ plans; NPPF paragraph 210c states planning policies should: “safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas ⁷⁰ ; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked)”. Footnote 70 indicates that this particularly applies in two tier areas. We are aware that the Local Plan Proposed Submission Draft does make reference to the Lincolnshire Minerals and Waste Plan development plan documents throughout, although more explicit reference to the Minerals and Waste policies should be made within the Local Plan Proposed Submission Draft with specific regard to Policy S1. Minerals Safeguarding Areas (as shown on Figure 1 of the Minerals and Waste Local Plan Core Strategy and Development Management Policies document) should be shown on the emerging Proposals Map to provide visible clarification regarding the locations within Central Lincolnshire that are at risk of either direct sterilisation by future non-minerals development, or sterilisation by proximity. Furthermore, Policy M11 of the MWLPCSDMP			No

									requires applications on non-minerals development in a minerals safeguarding area to be accompanied by a Mineral Assessment. Reference to this should be made within the Local Plan Submission Draft to ensure that developers and applicants are aware of this requirement.			
1103766	Map						No		<p>In addition to the points made above, we wish to reiterate the importance of mineral safeguarding at a District Level and the requirement for District Councils to consider policies set out within the relevant Minerals Local Plan.</p> <p>We submit that the emerging Central Lincolnshire Local Plan should, when considering policies and potential land for allocations / designations ensure that due regard is had to the need to safeguard mineral resources, mineral infrastructure sites, and all locations whereby new non-minerals development could harm the exploration, extraction, and production of hydrocarbons.</p> <p>The ability to meet hydrocarbon demand can only be met where the hydrocarbons naturally occur. It is therefore important to ensure that these resources are safeguarded and not needlessly sterilised by non-mineral development or any development that would prejudice existing or future operations</p> <p>In our view, the Plan still at present conflicts with NPPF (July 2021) Paragraph 210 (parts c and e) and Minerals PPG. The NPPF (July 2021) is clear at paragraph 210 (parts c and e) that planning policies should:</p> <ul style="list-style-type: none"> • adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development (part c); and • define Mineral Safeguarding Areas and Mineral Consultation Areas to safeguard, inter alia, “existing, planned and potential sites for the bulk transport, handling and processing of mineral” (part e). <p>This responsibility is not limited to Mineral Planning Authorities. Paragraph: 005 (Reference ID: 27-005-20140306) of the Planning Practice Guidance (Minerals) identifies that, ‘whilst district councils are not mineral planning authorities, they have an important role in safeguarding minerals in three ways:</p> <ul style="list-style-type: none"> • having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans. District councils should show Mineral Safeguarding Areas on their policy maps; • in those areas where a mineral planning authority has defined a Minerals Consultation Area, consulting the mineral planning authority and taking account of the local minerals plan before determining a planning application on any proposal for non-minerals development within it; and • when determining planning applications, doing so in accordance with development policy on minerals safeguarding, and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction.’ <p>As a minimum a ‘tier two’ Local Plan should cross reference with the adopted Minerals and Waste Local Plan (in this case the adopted Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies (June 2016) and Site Locations (December 2017) documents) to outline the relationship of mineral planning and mineral safeguarding within two tier authority areas. These concerns were raised during the Local Plan Consultation Draft stage and have not been rectified within the Proposed Submission Draft Plan.</p> <p>The NPPF and PPG also suggest that minerals should be more than just referenced in ‘tier two’ plans; NPPF paragraph 210c states planning policies should: “safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas⁷⁰; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked)”. Footnote 70 indicates that this</p>			No

									<p>particularly applies in two tier areas.</p> <p>We are aware that the Local Plan Proposed Submission Draft does make reference to the Lincolnshire Minerals and Waste Plan development plan documents throughout, although more explicit reference to the Minerals and Waste policies should be made within the Local Plan Proposed Submission Draft with specific regard to Policy S1. Minerals Safeguarding Areas (as shown on Figure 1 of the Minerals and Waste Local Plan Core Strategy and Development Management Policies document) should be shown on the emerging Proposals Map to provide visible clarification regarding the locations within Central Lincolnshire that are at risk of either direct sterilisation by future non-minerals development, or sterilisation by proximity.</p> <p>Furthermore, Policy M11 of the MWLPCSDMP requires applications on non-minerals development in a minerals safeguarding area to be accompanied by a Mineral Assessment. Reference to this should be made within the Local Plan Submission Draft to ensure that developers and applicants are aware of this requirement.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

J F Dean 1989 Settlement

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103455	S1; App 1			No	No	Don't know	No	Don't know	<p>S1 states that growth will be allowed in large villages (such as Ruskington) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be.</p> <p>Appendix 1 of the draft plan provides a list of housing targets, which can be used to guide Neighbourhood Plans (as required by paragraph 65 of the NPPF). This figure, however, is derived from adding dwellings, completed since the start date of the plan, sites with extant planning permission and sites allocated in the Local Plan. This approach does not result in a target for growth to be met by a Neighbourhood Plan. Nor does it provide a context for considering windfall developments</p> <p>There is no evidence to suggest the growth targets have taken into consideration evidence of local housing need or the population for the area, as required by paragraph 67 of the NPPF, which requires targets to be set based on an assessment of demand and the role of the settlement.</p> <p>There is, therefore, no justification for setting growth targets for individual settlements. It is left for the reader to conclude that the “appropriate” level is that which is already built, permitted or allocated, rather than an assessment of any “need” for growth to support the settlement, not any capacity of the settlement to support growth.</p> <p>This approach may well be pragmatic, but does not provide any justification for why specific sites are allocated. What role do the settlements play? How will growth assist in meeting that role? Could other smaller or larger sites be allocated just as readily, and better meet the needs of the settlement? Paragraph 66 of the NPPF requires Strategic policy making authorities to set targets to provide a minimum target to be met by a Neighbourhood Planning process.</p> <p>Setting targets based on existing commitments (past development, current permissions and local plan allocations) is not providing guidance for the</p>	<p>The derivation of settlement targets for different settlements should be based on an assessment of demand and the role of the individual settlements. This target should then be used to inform the choice of allocations. If no further target is identified to be met through a Neighbourhood Plan process this position should be clarified, and guidance provided for any potential Neighbourhood Planning Group.</p> <p>The process of allocations in large villages, as identified in policy S1, should be informed by the growth target. The draft plan appears to set the target based on past consents, previous development and allocations already</p>	Yes	No

									<p>Neighbourhood Plan process, contrary to Paragraph 66 of the NPPF.</p> <p>Policy S4 sets criteria for windfall sites in large villages, including a cap of 10 dwellings (because allocations are over 10 dwellings) and sites must be within the developed footprint of the settlement. Neither of these reasons are justified. It is not unreasonable to expect windfall sites within the same village to accommodate more than 10 dwellings. An arbitrary cap can lead to an inefficient use of land.</p> <p>Restricting development to the developed footprint may lead to ‘town cramming’ by directing development into a settlement, or may, alternatively, prejudice developments, all or part of which may need to be outside the footprint - this could include a new access, drainage attenuation, open space, landscaping and not just new dwellings or commercial properties.</p> <p>The approach to the distribution of growth across individual settlements, and henceforth the justification for the allocation of sites within or adjacent to these settlements is not justified. Without a clear growth target for a settlement such as Ruskington it is not clear why site RUSK/005a, RUSL/007 and RUSK/018 were chosen to be allocated rather than, for instance, our client’s land at Smiths Farm, Land off Fen Road, Ruskington (RUSK 003), other than the three allocated sites had planning permission or were already allocated in the adopted plan.</p> <p>The plan has failed to demonstrate how it is positively prepared, as settlement targets are restricted to the capacity of previous development, current consents and allocated sites. The growth targets for each settlement have not been justified. The Plan is not consistent with national policy because it fails to set a target for growth to be met through the Neighbourhood Plan process. The targets that are set are not based on an assessment of local demand and the role of individual settlements.</p> <p>The choice of allocations is not justified in policy S80, nor are the restrictions imposed on windfall developments in large villages in policy S4.</p>	<p>identified.</p> <p>The process for selecting sites to be allocated in Large Villages (under Policy 80) should be revisited to take into consideration the needs and capacity of each settlement.</p> <p>The criteria for windfall sites set out in Policy S4 should be amended to remove the arbitrary cap on the capacity of windfall sites and restriction on development outside the settlement footprint.</p>		
1103458	S4			No	No	Don't know	No	Don't know	<p>S1 states that growth will be allowed in large villages (such as Ruskington) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be. Appendix 1 of the draft plan provides a list of housing targets, which can be used to guide Neighbourhood Plans (as required by paragraph 65 of the NPPF). This figure, however, is derived from adding dwellings, completed since the start date of the plan, sites with extant planning permission and sites allocated in the Local Plan. This approach does not result in a target for growth to be met by a Neighbourhood Plan. Nor does it provide a context for considering windfall developments There is no evidence to suggest the growth targets have taken into consideration evidence of local housing need or the population for the area, as required by paragraph 67 of the NPPF, which requires targets to be set based on an assessment of demand and the role of the settlement. There is, therefore, no justification for setting growth targets for individual settlements. It is left for the reader to conclude that the “appropriate” level is that which is already built, permitted or allocated, rather than an assessment of any “need” for growth to support the settlement, not any capacity of the settlement to support growth. This approach may well be pragmatic, but does not provide any justification for why specific sites are allocated. What role do the settlements play? How will growth assist in meeting that role? Could other smaller or larger sites be allocated just as readily, and better meet the needs of the settlement? Paragraph 66 of the NPPF requires Strategic policy making authorities to set targets to provide a minimum target to be met by a Neighbourhood Planning</p>	<p>The derivation of settlement targets for different settlements should be based on an assessment of demand and the role of the individual settlements. This target should then be used to inform the choice of allocations. If no further target is identified to be met through a Neighbourhood Plan process this position should be clarified, and guidance provided for any potential Neighbourhood Planning Group. The process of allocations in large villages, as</p>	Yes	No

									<p>process. Setting targets based on existing commitments (past development, current permissions and local plan allocations) is not providing guidance for the Neighbourhood Plan process, contrary to Paragraph 66 of the NPPF. Policy S4 sets criteria for windfall sites in large villages, including a cap of 10 dwellings (because allocations are over 10 dwellings) and sites must be within the developed footprint of the settlement. Neither of these reasons are justified. It is not unreasonable to expect windfall sites within the same village to accommodate more than 10 dwellings. An arbitrary cap can lead to an inefficient use of land. Restricting development to the developed footprint may lead to ‘town cramming’ by directing development into a settlement, or may, alternatively, prejudice developments, all or part of which may need to be outside the footprint - this could include a new access, drainage attenuation, open space, landscaping and not just new dwellings or commercial properties. The approach to the distribution of growth across individual settlements, and henceforth the justification for the allocation of sites within or adjacent to these settlements is not justified. Without a clear growth target for a settlement such as Ruskington it is not clear why site RUSK/005a, RUSL/007 and RUSK/018 were chosen to be allocated rather than, for instance, our client’s land at Smiths Farm, Land off Fen Road, Ruskington (RUSK 003), other than the three allocated sites had planning permission or were already allocated in the adopted plan. The plan has failed to demonstrate how it is positively prepared, as settlement targets are restricted to the capacity of previous development, current consents and allocated sites. The growth targets for each settlement have not been justified. The Plan is not consistent with national policy because it fails to set a target for growth to be met through the Neighbourhood Plan process. The targets that are set are not based on an assessment of local demand and the role of individual settlements. The choice of allocations is not justified in policy S80, nor are the restrictions imposed on windfall developments in large villages in policy S4.</p>	<p>identified in policy S1, should be informed by the growth target. The draft plan appears to set the target based on past consents, previous development and allocations already identified. The process for selecting sites to be allocated in Large Villages (under Policy 80) should be revisited to take into consideration the needs and capacity of each settlement. The criteria for windfall sites set out in Policy S4 should be amended to remove the arbitrary cap on the capacity of windfall sites and restriction on development outside the settlement footprint.</p>		
1103459	S80			No	No	Don't know	No	Don't know	<p>S1 states that growth will be allowed in large villages (such as Ruskington) to an “appropriate” level via sites allocated in the Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be. Appendix 1 of the draft plan provides a list of housing targets, which can be used to guide Neighbourhood Plans (as required by paragraph 65 of the NPPF). This figure, however, is derived from adding dwellings, completed since the start date of the plan, sites with extant planning permission and sites allocated in the Local Plan. This approach does not result in a target for growth to be met by a Neighbourhood Plan. Nor does it provide a context for considering windfall developments. There is no evidence to suggest the growth targets have taken into consideration evidence of local housing need or the population for the area, as required by paragraph 67 of the NPPF, which requires targets to be set based on an assessment of demand and the role of the settlement. There is, therefore, no justification for setting growth targets for individual settlements. It is left for the reader to conclude that the “appropriate” level is that which is already built, permitted or allocated, rather than an assessment of any “need” for growth to support the settlement, not any capacity of the settlement to support growth. This approach may well be pragmatic, but does not provide any justification for why specific sites are allocated. What role do the settlements play? How will growth assist in meeting that role? Could other smaller or larger sites be allocated just as readily, and better meet the needs of the settlement? Paragraph 66 of the NPPF requires Strategic policy making authorities to set targets to provide a minimum target to be met by a Neighbourhood Planning process. Setting targets based on existing commitments (past development, current permissions and local plan allocations) is not providing guidance for the Neighbourhood Plan process, contrary to Paragraph 66 of the NPPF. Policy S4 sets criteria for windfall sites in large villages, including a cap of 10 dwellings (because</p>	<p>The derivation of settlement targets for different settlements should be based on an assessment of demand and the role of the individual settlements. This target should then be used to inform the choice of allocations. If no further target is identified to be met through a Neighbourhood Plan process this position should be clarified, and guidance provided for any potential Neighbourhood Planning Group. The process of allocations in large villages, as identified in policy S1, should be informed by the growth target. The draft plan appears to</p>	Yes	No

									<p>allocations are over 10 dwellings) and sites must be within the developed footprint of the settlement. Neither of these reasons are justified. It is not unreasonable to expect windfall sites within the same village to accommodate more than 10 dwellings. An arbitrary cap can lead to an inefficient use of land. Restricting development to the developed footprint may lead to ‘town cramming’ by directing development into a settlement, or may, alternatively, prejudice developments, all or part of which may need to be outside the footprint - this could include a new access, drainage attenuation, open space, landscaping and not just new dwellings or commercial properties. The approach to the distribution of growth across individual settlements, and henceforth the justification for the allocation of sites within or adjacent to these settlements is not justified. Without a clear growth target for a settlement such as Ruskington it is not clear why site RUSK/005a, RUSL/007 and RUSK/018 were chosen to be allocated rather than, for instance, our client’s land at Smiths Farm, Land off Fen Road, Ruskington (RUSK 003), other than the three allocated sites had planning permission or were already allocated in the adopted plan. The plan has failed to demonstrate how it is positively prepared, as settlement targets are restricted to the capacity of previous development, current consents and allocated sites. The growth targets for each settlement have not been justified. The Plan is not consistent with national policy because it fails to set a target for growth to be met through the Neighbourhood Plan process. The targets that are set are not based on an assessment of local demand and the role of individual settlements. The choice of allocations is not justified in policy S80, nor are the restrictions imposed on windfall developments in large villages in policy S4.</p>	<p>set the target based on past consents, previous development and allocations already identified. The process for selecting sites to be allocated in Large Villages (under Policy 80) should be revisited to take into consideration the needs and capacity of each settlement. The criteria for windfall sites set out in Policy S4 should be amended to remove the arbitrary cap on the capacity of windfall sites and restriction on development outside the settlement footprint.</p>		
--	--	--	--	--	--	--	--	--	---	--	--	--

J H Baxter and Sons

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103165	S31; S80	Don't know			No	No			<p>We would like to seek clarification on the interactive map in relation to our client’s property at Bone Mill Farm which has hitherto been allocated for employment purposes and is shown coloured purple on the interactive map which would suggest the same. However, when you hover over that particular site it refers to:</p> <p>Proposed housing site allocation(policies 69,70.,71,76,77,79,80,81,82 and 206)</p> <p>Employment – E26 So far as we are aware this has not previously been allocated as a housing site and the references do not seem to accord with the current Local Plan. At what point does the Local Plan interactive map change to reflect Reg 19 deposit version Plan policies and indeed other policies indicated correct.</p> <p>There are active discussions taking place over this site and its allocation needs to be retained in support of the uses proposed.</p>	<p>This is to reserve our client’s position in connection with the continued allocation of this land.</p> <p>We wish to reserve our position in relation to participation in the oral examination hence both boxes have been ticked in Q6 below.</p>	Yes	No
1103162	S80	Don't know		No	No	No			<p>For reasons previously explained in connection with other Plan issues. The purpose of this response is also to reserve our position in respect of our client’s land at Ruskington which is within Policy S80 and the continuing allocation of the land at Ruskington under reference NK/RUSK/007. An arrangement is in the process of being negotiated for</p>	<p>This is to reserve our client’s position if other objections are received in relation to the allocation of the site NK/RUSK/007.</p> <p>We wish to reserve our position in</p>	Yes	No

									the development of this site which will come forward very soon for development and it should continue to be an allocated site in the Plan.	relation to participation in the oral examination hence both boxes have been ticked in Q6 below.		
--	--	--	--	--	--	--	--	--	--	--	--	--

Jockey Club Racecourses Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EIP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1104134	S42								<p>I act on behalf of Jockey Club Racecourses (JCR) and have been instructed to submit representations to the above consultation. I request that the contents of this letter are taking into consideration in the review of the Local Plan.</p> <p>Background JCR is the owner and operator of Market Rasen Racecourse which is located in the administrative area of West Lindsey District Council. JCR is governed by Royal Charter and its profits are reinvested in the long term development and enhancement of its venues and racing as a sport.</p> <p>Market Rasen Racecourse is one of the 15 racecourses forming part of JCR's national portfolio and hosts 21 race meetings annually. The racecourse is a major tourist attraction in the region, and is a significant contributor to the local and regional economy.</p> <p>In addition to the principal business of the Racecourse as a racing venue, it also hosts and operates a wide range of complementary functions and activities, which are integral to JCR's businesses all year round outside the racing calendar and all profits are reinvested in to racing. Complementary functions include but not limited to:</p> <ul style="list-style-type: none"> • hosting outdoor events and recreation, including but not limited to Run Club, UK cycling events, equine events and pony club; • Hosting weddings, dinners and conferencing; and • Outdoor leisure and tourism, including a 51 pitch caravan site. <p>Racing and complementary non-racing functions at Market Rasen Racecourse are longstanding and established and contribute significantly to the tourism economy and recreational social infrastructure in the region. It is a major leisure, recreation and sporting venue and tourist attraction in the region, which is particularly important in rural areas such as Market Rasen.</p> <p>Representations JCR engaged in the preparation of the adopted Central Lincolnshire Local Plan (2017) and submitted representations to the Issues and Options consultation in relation to the Review of the Local Plan in 2019. In the adopted Local Plan, Policy LP7 on sustainable visitor economy supports and seeks to manage development and activities relating to visitor facilities including sporting attractions and accommodation. The policy generally directs visitor facilities to existing settlements and existing visitor facilities (regardless of its location within or outside existing settlements). Market Rasen Racecourse is an existing visitor facility and therefore its redevelopment or expansion is permissible in principle subject to satisfying the other requirements of the policy and development management policies.</p> <p>We note that in the current Local Plan Review consultation document, the policy on visitor economy (ie the review of Policy LP7) is split into sustainable urban tourism and sustainable rural tourism under Policies S42 and S43 respectively. Policy S42 supports, in principle,</p>			No

									<p>development and activities which will deliver high quality sustainable visitor facilities, including leisure facilities, sporting attractions and visitor accommodation within the urban areas of Lincoln, Gainsborough, Sleaford and the Market Towns. Paragraph 7.1.4, which supports Policy S42 refers to Market Rasen Racecourse as one of visitor attractions within the Market Towns. As the draft Policies Map does not define the urban area of Market Rasen as a market town, we welcome and support the specific reference to Market Rasen in the supporting paragraph for Policy S42, which is considered necessary to provide clarification on the application of the policy. On this basis, we support Policy S42 which supports the principle of future works, improvements or enhancement of Market Rasen Racecourse as a visitor and sporting attraction.</p> <p>Conclusion We request that our representations to the current consultation are taken into account in the next stage of the Local Plan process, and that we will be given an opportunity to comment if any amendments are proposed to Policy S42 and its supporting paragraphs.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

Leafbridge Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103606	S31; Map	No			No				<p>1. These representations are prepared by Globe Consultants Limited on behalf of the landowner, Leafbridge Limited, and formally object to emerging Policy S31: Important Established Employment Areas (IEEA) of the Central Lincolnshire Local Plan Proposed Submission Draft (March 2022) 'Proposed Submission Draft CLLP (Regulation 19 Consultation). Specifically, the objection relates to the failure to ensure that the land allocated as Important Established Employment Area Reference E18 corresponds with that granted planning permission by Reference: 17/0351/OUT.</p> <p>2. Planning Permission Reference: 17/0351/OUT was granted outline planning permission by North Kesteven District Council on 1 February 2018 for the following development "Erection of industrial development comprising 14,000 m2 of flexible B1 (a) and (b)/B2 uses, 14,000 m2 B8 uses and associated accesses, parking and open spaces (outline with means of access)". The approved Site Location Plan1 is included below (Figure1) and included at Appendix 1. The land edged in red in Figure 1 is hereinafter referred to as 'the Site'.</p> <p>3. Representations were also made by Globe Consultants Limited on behalf of Leafbridge Limited at the Regulation 18 stage. These representations were submitted to the Central Lincolnshire Joint Strategic Planning Committee ('CLJSPC') on 23 August 2021 and formally objected to emerging Policy S30 – Important Established Employment Areas of the Consultation Draft Central Lincolnshire Local Plan (June 2021).</p> <p>4. Following the approval of Planning Permission Reference: 17/0351/OUT in February 2018, Planning Permission Reference: 18/0581/FUL2 was subsequently granted to allow the applicant to undertake engineering operations on the site to precede and prepare the land for development. This involved removing contaminated topsoil and therefore reducing the ground level of development. A number of discharge of condition applications have been submitted and approved which include details in relation to pre-commencement conditions on the outline planning permission. Applications for the detailed scheme for the various phases have been approved under the following references:</p> <ul style="list-style-type: none"> • 18/1476/RESM - Unit K • 19/0124/RESM - Units F and G • 19/0514/RESM - Unit D2 	Based on the content of these representations it is considered that the Proposed Submission Draft CLLP is not considered to be sound. Specifically, the objection relates to the failure to ensure that the land allocated as Important Established Employment Area Reference E18 corresponds with that granted planning permission by Reference: 17/0351/OUT. To be considered sound and effective, Policy S31 and Policies Map (45 – Lincoln Urban Area and neighbouring villages) should be amended to ensure that boundary of the allocation is consistent with land edged red by the approved Site Location Plan associated with Planning Permission Reference:	Yes	Yes

									<ul style="list-style-type: none"> • 19/01770/RESM - Unit E • 21/0419/RESM – Unit H <p>5. The Employment Policies within the Proposed Submission Draft CLLP are addressed through a series of Policies ranging from defined and identified Strategic Employment Sites, allocations within the SUEs, Important Established Employment Areas and then unidentified recognition of other local employment areas (S28-S34).</p> <p>6. Proposed Submission Draft CLLP Policy S31 is carried forward from the adopted Local Plan (adopted 2017) Policy LP5 which was originally drafted in advance of the significant approval at land formerly part of Lincoln Castings north of the railway and now known as Leafbridge. The approved Leafbridge development gives permission for some 300,000 sqft of development with the Site extending to some 22 acres. Only the eastern most 3 acres, as previously identified in the adopted Local Plan, is acknowledged with an allocation as falling within Reference E18 – the LN6 Industrial Area.</p> <p>7. It follows that the Policies Map should be amended to include the whole site within the E18 designation. An alternative approach might be to consider the opportunity as a further strategically significant opportunity rather than defining it within a policy that simply reflects an ‘existing, established’ industrial area. Either way, it cannot make sense, or be ‘sound’, for the current consultation to ignore the status of this substantial employment site within the Local Plan.</p> <p>8. We are mindful that, when reviewing this particular opportunity - and in the context of recent changes to the Use Classes Order, the 3 acres of land identified adjacent to the Transport Hub offers placemaking and amenity opportunities to deliver development that better services this locality. A more creative, mixed-use development on this brownfield land could, arguably should, be supportive of the neighbouring developments and the locality in general by locating additional services and amenities here. These could include uses that support the local residential and business community within an efficient and attractive ‘hub’ related form of development, possibly with flats on upper floors.</p>	17/0351/OUT. For the avoidance of doubt, the approved Site Location Plan (Drawing Reference: 584-2-A-100) is provided at Appendix 1.		
--	--	--	--	--	--	--	--	--	---	--	--	--

Leasingham and Roxholme Parish Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103095	S81								<p>At the Leasingham & Roxholm Parish Council meeting held on Wednesday 27th April 2022 the members recorded the following in response to the Central Lincolnshire Local Plan Proposed Submission Draft Document March 2022.</p> <p>The Parish Council have very serious concerns at the inclusion of the following proposals in the Central Lincolnshire Local Plan –</p> <p>1. Page 191 NK/LEAS/001 Land off Meadow Lane proposed 25 properties –</p> <p>Area totally unsuitable for housing development low lying and in proximity to flood risk area with serious access problems along with public health issues regarding the sewage works. Would create loss of valuable countryside habitat and grazing land. Leasingham does not have or is likely to have in the future the infra structure to deal with or provide improved local community services for an increased population.</p> <p>2. Page 192 NK/LEAS/006 Land north of Moor Lane Leasingham proposed 78 properties.</p> <p>The Parish Council strongly object to the proposal for allocation of 78 properties in what is an</p>			No

								<p>open countryside site on the outer boundary edge of the village. A small section of the site was granted planning permission which the Parish Council made strong objections to – the request for pedestrian access to the village was not approved. Please note attached report [text below] submitted by the PC and for which the members continue to consider all the points raised to be relevant to the site.</p> <p>LEASINGHAM & ROXHOLM PARISH COUNCIL response to Planning Application Reference 21/1908/RESM Proposal: Reserved matters application for the erection of nine dwellings with design, scale appearance, layout and landscaping to be considered pursuant to application 19/0136/OUT – Erection of nine dwellings (Outline with access for consideration) Location: Land North of Moor Lane Leasingham Sleaford Lincs At the Parish Council meeting held on Monday 19th January 2021 the Leasingham & Roxholm Parish Council recorded the following to the above planning application. The plans show a proposal for nine large four bedroomed properties all surrounded by hard standing and minimum green areas. This type of housing does not concur with the results of the Neighbourhood Plan (in the final stages of completion) which recorded the requirement from the residents’ survey for two to three bedroomed to enable local families to grow and live in the village. It should be noted that “An emerging neighbourhood plan may be a material consideration”. The present proposals for the site will not in any way meet this need. It is further noted that the size of the properties completely fills the individual plots with very little provision for natural public green open spaces - surely a requirement for following the current green Agenda. An expanded environmental scheme should be produced as a requirement for proceeding with the development. It is also recorded that there is a stipulation, as a direct consequence of the size of the properties, for more hardstanding for the parking of vehicles at six of the properties, thus again reducing the soft landscaping provision for the area.</p> <p>The Parish Council continue to have serious concerns reference drainage and possible flood risk as the beck frequently floods from higher parts of the village (where the Moor Lane site is situated) into the lower section resulting in overflowing drains and manholes particularly in the Washdyke Lane area. Evidence of mitigation measures should be a condition of proceeding with the development.</p> <p>The requirement, if the site is to be adopted, for a flood risk assessment, drainage Strategy & Geo technical Report etc indicates that the application is falling short of statutory requirements and for which the Parish Council would wish to have the opportunity to comment on.</p> <p>The PC members stressed in the strongest possible terms that the provision of an extended footpath from the site to the top of Gorse Lane enabling residents and visitors to the new site to travel by foot, wheelchair, children’s cycles and scooters, disabled vehicles, safely into the village should be reconsidered. In January 2020 a Community Speed Watch was set up – financed by the Parish Council and full training and support given the Police – the findings for speeding traffic in that area of Moor Lane are very serious and concerning with vehicles recorded exceeding the speed limit from 47 to 57 mph. As noted previously past records show two fatal accidents in this area of Moor Lane. All of which has a detrimental effect on the safety and well being of residents and visitors alike. Provision must be made for safe pedestrian travel from the new development into the village. The Parish Council urge the NK Planning Authority to give serious consideration to all the points raised by the Parish Council as representatives of the residents of the village.</p>			
--	--	--	--	--	--	--	--	--	--	--	--

Leasingham Hall Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103158	S81				No		No		<p>Leasingham Hall Ltd has recently secured planning permission and listed building consent for the refurbishment of Leasingham Hall to provide 7no residential apartments (ref 21/1664/FUL & 21/1665/LBC). Work is currently underway to undertake these approved works.</p> <p>In addition, my client has engaged with the Planning and Conservation Officers at North Kesteven Council through pre-application discussions regarding the proposed development of the land adjacent to Leasingham Hall to provide new high quality, sensitively designed residential dwellings to meet the needs of the local community. These discussions are ongoing, and my client will be preparing and submitting a full planning application for the proposals at the earliest opportunity.</p> <p>As part of my clients work in promoting the site, representations have been submitted to the draft Leasingham & Roxholm Neighbourhood Plan (LRNP) promoting the site for development. The Plan is currently at draft stage, with further consultation (Regulation 16) expected later this year. Policy 1 of the draft LRNP supports development proposals within the developed footprint of the village, in principle.</p> <p>The LRNP identifies at page 22 that the parish would prefer development to be built on brownfield and infill sites, however it also rightly identifies that there are very few brownfield sites remaining within Leasingham village which are available for development.</p> <p>Consequently, the next most appropriate form of sites which can most sustainably accommodate new housing will be greenfield 'infill' sites in the village.</p> <p>In this respect it is noted that planning permission (ref 20/0577/FUL) has recently been granted to the west of the land adjacent to Leasingham Hall for the development of 9no new homes.</p> <p>The development of the approved housing pursuant to planning permission ref 20/0577/FUL will have the effect of extending the built-up area of the village to the west, towards the A15 Lincoln Road.</p> <p>Consequently, the land adjacent to Leasingham Hall (as shown in red outline on the attached Location Plan) will constitute an infill site, within the boundary of the built-up area of the village, and will therefore represent, in sequential terms, a preferable and sustainable location for new residential development in the village, given that there are no brownfield sites available within the village.</p> <p>Furthermore, in promoting this site for development, a Call for sites submission in relation to the draft CLLP has been made on behalf of my client (this was made in January 2022, as NL Jones Planning was not representing the landowner at the time of the call for sites exercise undertaken in 2019).</p> <p>n accordance with NPPF 'tests of soundness' (Para 182), Local Plan policies must be, sound, meaning they should be (inter alia):</p> <ul style="list-style-type: none"> • Justified – representing the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence • Consistent with national policy – enabling the delivery of sustainable development in accordance with policies of the NPPF 		Yes	Yes

									<p>In these terms it is considered that Policy S81 (Site Allocations) does not represent the ‘most appropriate strategy’ specifically in terms of the proposed site allocations for the village of Leasingham.</p> <p>The Land Adjacent to Leasingham Hall represents a suitable, appropriate, achievable and sustainable site for residential development. This has been demonstrated through the previous representations to the Neighbourhood Plan and the Call for Sites submission enclosed with these representations.</p> <p>In particular, it should be noted from these previous submissions that:</p> <ul style="list-style-type: none"> • The site is located within the built footprint of the village, and therefore its development would not result in the expansion of the village onto valuable agricultural land • The site is in the control on one owner • There are no environmental constraints precluding development • There are no flood risk or drainage constraints precluding development • Heritage impacts associated with the Grade II listed Leasingham Hall can be managed and mitigated through appropriate and sensitive design • Access to the site is achievable from Captain’s Hill • The site is available within the first five years of the Plan period <p>Notwithstanding the above, from our review of the evidence base documents, it does not appear to have been assessed by the Council as part of the site assessment process for the draft Local Plan, and therefore has not been included in the draft Plan.</p> <p>In addition, Table 1 enclosed with these representations provides an assessment of the sustainability credentials of the Land Adjacent to Leasingham Hall, using the criteria applied in the Council’s Sustainability Assessment work as part of the Local Plan evidence base. This demonstrates that the site provides a sustainable location for new residential development.</p> <p>Given the location of this site in the developed footprint of the village, the inclusion of this land as a residential allocation in the Plan would represent a more sustainable form of development in the Village over the Plan period when compared to the current draft allocations, (Ref NK/LEAS/001 and NK/LEAS/006) which are both located outside the existing developed footprint of the Village.</p> <p>Furthermore, the development of the Land Adjacent to Leasingham Hall represents sustainable development on an ‘infill’ site, whilst the current draft allocations in the Leasingham result in the loss of Grade 3 agricultural land. On this basis, the allocation of the Land Adjacent to Leasingham Hall can reduce the requirement to develop on land outside the existing settlement boundary of the Village.</p> <p>In summary therefore, it is demonstrated that the Land Adjacent to Leasingham Hall is suitable, available and achievable, and therefore deliverable in planning policy terms, and can provide new residential dwellings in a sustainable location in Leasingham in the Plan period. The allocation of this site would therefore represent the most appropriate strategy for Leasingham for inclusion in the Local Plan.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

Leasingham Steer Group

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				

1103822	S81	No	Don't know	No	Don't know	Don't know	Yes	No	<p>The CLLP is a monster of a document. It is complicated and adopts a very wide range of technical language that baffles most lay people. It is too technical. No thought or effort has been made to keep the CLLP reasonably simple - I know of people who are highly educated who struggle with the complexity of the CLLP. The County Council should have held public meetings across the County with overhead projectors thus encouraging the public to participate. Every household and business should have had a leaflet outlining the threat of development to their respective village / town.</p> <p>[Attached to this response is a petition titled: From Leasingham & Roxholme Neighbourhood Development Plan. We the undersigned herewith give our support in objecting to the CLLP allowing housing developments in excess of 10 dwellings within our village. There are 115 signatures]</p>	<p>Written submission offering a critique against the above. This critique is NOT against a natural expansion of our village - it is against housing development that is not needed and happens to be in the wrong place.</p> <p>General Outline</p> <p>The 2017 Plan envisaged that Leasingham would endeavour to accommodate 108 dwellings. Where the land was to come from was never explained.</p> <p>I questioned the proposed housing numbers and was told, "...the percentage approach in the adopted in the Local Plan whilst functioning well in some areas, was causing problems where suitable sites were being rejected on a simple basis of numbers delivered on other sites in sustainable villages and provide a criteria-based policy context to provide protection from harmful development in villages, whilst allowing suitable sites of an appropriate scale to be delivered through windfall development or in neighbourhood plans".</p> <p>Objection: So, if one village can't accommodate housing numbers go and dump them on someone else!</p> <p>I was then informed that, "Leasingham has been proposed to receive to receive two allocations to the east of the village, partly because of its sustainable location in proximity Sleaford and so development on suitable sites at this location is aligned to the strategy of the Local Plan."</p> <p>Objection: The overwhelming majority of the village is very much against this approach given that there is no shortage of development land in Sleaford - the Maltings could probably accommodate a high number of affordable housing on what is a large Brown Field Site.</p> <p>TORT</p> <p>"The name given to the branch of law that imposes civil liability for breach of obligations imposed by law. The most common tort is the tort of negligence which imposes an obligation not to breach the duty of care (that is, the duty to behave as a reasonable person would behave in the circumstances). The classic example is when a LA gives planning permission for housing development knowing that it is prone to flooding.</p> <p>With respect to the two sites in the Local Plan.</p> <p>Proposed Development Site: 2ha in size, much of it in zone 2 or 3 in the flood map. This land has known issues as the landowner has previously dug ditches from the low spots in the field to outfall into Leasingham Beck (probably without the consent of the Environment Agency) to remove standing water. As a minimum any development must require a like for like replacement of any land lost within the Hood zone 2 or three. This compensatory floodplain must be of the same level and area as that lost. Incidentally, this is unlikely to be easily found in the Leasingham Beck</p>	Yes	No
---------	-----	----	------------	----	------------	------------	-----	----	---	--	-----	----

										<p>catchment.</p> <p>Leasingham Beck at this juncture is main river, however upstream from the Main River designated length it runs past St Andrew's school and other property. In 2012 the village suffered significant inundation including from the Beck and its tributaries, (The Lead Local Flood Authority undertook Flood investigations under Section 19 of the Flood and Water Management Act) and these are rarely referenced in planning documents. The investigation highlighted deficiencies in Leasingham Beck. No change has been made as the sewer system continues to 'pop' manhole lids in Washdyke lane on a regular basis as the sewer is unable to discharge into the beck.</p> <p>Any development that will either increase existing rates of discharge or hydraulically discharge their water in preference to the flow that comes along the Leasingham Beck is likely to increase the risk of flooding to the school and other properties in the village. This cannot be acceptable.</p> <p>The other proposed development site, on land opposite the horses field lies higher than the majority of the village that was previously flooded by the beck and as such its discharge will take precedence over that Beck flow, increasing water levels upstream thereby increasing flood risk. Elements of this site lie in areas designated zone 2 and 3.</p> <p>All regulation systems should be located outside these flood zones but retain influence from the water levels in the Leasingham Beck, otherwise existing properties will be placed at increased risk of flooding.</p> <p>It has been noted that works have taken place recently on the beck adjacent to Washdyke Lane but it is unknown if these works have been consented by the Lead Local Flood Authority nor if they are designed to improve channel capacity.</p> <p>Unfortunately, development will come to the village, but these two sites are in the wrong place. The development areas should be proposed in locations where the surface water discharge route is more stable and less likely to increase flood risk elsewhere. The land in the Horses field is too small for many technical solutions to be provided. The developer will rely on using 'de minimis' options which will increase discharge rates and increase flood risk to existing properties. This should not be allowed.</p> <p>The other site, if combined with the area that currently has outline planning consent, may be able to have some technical ability to mitigate the potential increased in flood risk but if it is developed in two or three independent parcels then the increase in existing property flood risk will not be able to be mitigated. The current outline planning consent was passed, in part probably, because the planning committee was advised that some RMAs supported the development however, when, on reviewing the documentation, the LPA did not receive comment as it was a minor application. It is likely that those RMAs would not have considered the implications.</p> <p>(NB The above has been submitted by a flood expert & civil engineer).</p>		
--	--	--	--	--	--	--	--	--	--	--	--	--

										<p>Access & Egress. There are only two access and egress routes - Meadow Lane and Deepdale Drive.</p> <p>Meadow Lane: this is 4.23 m in width. Plainly large vehicles would have a problem. Fire Engine access: a minimum of 3.7m between kerbs.</p> <p>Deepdale Drive: subject to noise from through traffic. Please note: if the residents should decide to park their vehicles outside of their properties no other traffic would get through. There are no parking restrictions so it might mean that residents take matters into their own hands.</p> <p>Sewage Works Who would want to build or live next door to a sewage works? What investigation have been carried out to ascertain its ability for expansion? If it needed to be enlarged what would the impact be on this development? Please note: when our village experiences heavy rain manhole covers are lifted because the 50-year-old sewage system can't cope as it is.</p> <p>Leasingham & Roxholm Neighbourhood Plan I instigated the above because I was naive in thinking that it would offer some protection against Town Planners whims, but it appears that this isn't the case at all because they can overrule it if its suites them.</p> <p>Our NP does have a great deal of support - public meetings have attendance numbers around the seventy mark. The overwhelming fear of our village is that our village will be desecrated and end up joined to Holdingham or indeed ending up looking like Ruskington. The latter has been ruined and the Planners have ensured that it has been grossly over developed with ugly, faceless buildings.</p>		
--	--	--	--	--	--	--	--	--	--	---	--	--

LEDA Properties Limited

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103467	S5	Yes	Yes	Yes	No	Yes	No	Yes	<p>LEDA Properties Limited is keen to work closely with the local community and the Local Planning Authority to participate actively in the plan making process to ensure that the former MOD Nocton Hospital Site is sustainably redeveloped.</p> <p>LEDA Properties Limited support the objectives of Policy S5 which seek to focus development within the urban areas and to a lesser extent in villages, however, some proposals and some uses may be wholly appropriate in some scenarios within the countryside. We consider that Policy S5 should be expanded to include such uses.</p> <p>The former MOD Nocton Hospital site is one such site. The site is sustainably located immediately adjacent to the defined settlement limits of the Village of Nocton and has been identified as being in need of redevelopment within the adopted Nocton and Potterhanworth</p>	<p>[Additional policy wording put forward by representation]</p> <p>Part H – Redevelopment or Change of use of land and facilities The redevelopment or change of use of land and facilities which are well related to existing settlements will be supported provided that:</p> <p>a) the majority of the proposal is on brownfield land; b) any increase in traffic likely to arise as a result of the development can be safely accommodated on the</p>	Yes	No

									<p>Neighbourhood Plan. It is considered appropriate that a clear policy basis to facilitate the re-use of the site should be included within the Local Plan.</p> <p>Policy S5 as drafted does not make any provision for the redevelopment of a site of this nature. Policy S84 provides guidance on the re-development or changes of use of select MOD land and facilities, but for those that are not directly named, the policy cross references to Policy S5 as the basis for decision making. However, Policy S5 as drafted does not provide a clear and positive framework for the redevelopment of a site of the scale and nature of Nocton Hospital.</p> <p>We would suggest amendments (shown in red) to the wording of Policy S5 to make specific reference to the support for the sustainable redevelopment of (non-agricultural) previously developed sites that fall outside of development limits. By implementing these changes, the Policy would provide a positive basis against which to 'test' development proposals on sites that whilst falling outside development limits have a strong relationship to existing settlements. Such sites, which may be classified as previously developed land, will then accord with policies within the National Planning Policy Framework that seek to encourage their reuse and redevelopment. We respectfully contend that such changes would ensure that Policy S5 is consistent with national planning policy, and in terms of the tests of soundness is justified.</p>	<p>local road infrastructure;</p> <p>c) the proposal would not conflict with the existing land uses on neighbouring land; and</p> <p>d) in cases where large scale redevelopment of a site is planned, a comprehensive masterplan is prepared which demonstrates how the site will be redeveloped to ensure the holistic planning of the site and avoid piecemeal development.</p> <p>e) include appropriate infrastructure and community facilities for the new development and any existing community remaining; and</p> <p>f) demonstrate that the new development is sustainably located with reasonable access to essential services such as jobs, education, leisure, retail and culture either within the development or at other nearby settlement(s) by sustainable modes of travel; and</p> <p>g) through satisfying the above criteria a-f clearly demonstrate how the proposal supports the spatial strategy of the Local Plan.</p>		
1103464	S84	Yes	Yes	Yes	No	Yes	No	Yes	<p>LEDA Properties Limited, supports the objectives of Policy S84 which seek to facilitate the redevelopment or change of use of any MOD land and facilities which are surplus to MOD requirements. However, whilst Policy S84 of the emerging local plan addresses sites currently in MOD use which may present opportunities for future redevelopment it does not provide clear guidance for a former MOD site such as Nocton Hospital. Given the Nocton Hospital Site is sustainably located immediately adjacent to a defined medium village and has been identified as being in need of redevelopment within the adopted Nocton and Potterhanworth Neighbourhood Plan, it is considered appropriate that a clear statement with regard to the re-use of the site should be included within the Local Plan. As drafted the Local Plan suggests in para 15.1.6 that sites such as Nocton Hospital would be considered under other policies in the plan (including but not limited to Policy S5: Development in the Countryside) and in line with the policy for the relevant tier of the Settlement Hierarchy, established in Policy S1. This is a somewhat ambiguous policy position for a site with the characteristics and development potential of Nocton Hospital. As a matter of principle, a site remains 'a former MOD site' up to the point at which it is redeveloped. We would respectfully note that in planning terms the nature of ownership does not alter this matter of principle. As such, Policy S5 as drafted does not provide a clear steer on the re-use of brownfield sites that fall outside defined development limits.</p> <p>The National Planning Policy Framework is supportive of brown field</p>	<p>It is considered important that the positive statements in respect of the development of this area established within the adopted Neighbourhood Plan are reflected in the Local Plan, adding further weight to local aspirations to secure investment and positive change to the site.</p> <p>We would suggest the following amendments to the wording of the supporting paragraph 15.1.6 to make specific reference to the support for the sustainable redevelopment of former MOD sites alongside those specifically named within the policy, which we respectfully consider would assist the Plan in terms of achieving the tests of soundness, principally that of being justified and in compliance with National Policy.</p> <p>15.1.6. The following policy will assist in determining such proposals. Policy S84 will apply to the MOD</p>	Yes	No

								<p>development, in that Paragraph119 states that: ‘Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or ‘brownfield’ land’ The Nocton Hospital site is previously developed and sits adjacent to a medium village as identified within the emerging Local Plan. It offers great potential for a sustainable mixed-use development that can be successfully integrated into the existing settlement whilst providing environmental and social benefits by replacing currently dated and underused buildings and structures. Nocton and Potterhanworth Neighbourhood Plan 2016 – 2036 states:</p> <p>Community Action: RAF Hospital Nocton Hall*</p> <p>5.1.8 The Parish Councils will seek to work with other parties to promote appropriate development at Nocton Hall. The Parish Councils are keen to see that sustainable development at the site achieves the following:</p> <ul style="list-style-type: none"> ● delivers an appropriate solution for Nocton Hall, in line with the agreed outcome of the 2011 Options Appraisal (or subsequent updated reports) to restore the main house as a ruin and fully restore the service wing, with an agreed management plan to ensure the proposals for the Hall are sustainable; and ● includes an agreed comprehensive masterplan to ensure the holistic planning of the site and to avoid piecemeal development; and ● delivers solutions for the currently empty outbuildings in Nocton Hall grounds that are appropriate to their heritage status and relationship with the heritage assets on the site; and ● appropriately restores the ‘pleasure gardens’ commensurate with being a local green space as part of the wider scheme and in relationship to the heritage assets on the site, ensuring that appropriate levels of public access is available; and ● includes proposals to clear the RAF Hospital site of the derelict buildings; and ● provides for safe and suitable vehicular access, as appropriate to the nature of the development, between the site and an adopted highway; and ● ensures that the increase in traffic generated by the development can be safely accommodated on the local road infrastructure; and ● provides for safe and suitable pedestrian access, as appropriate to the nature of the development, between the site and a public footpath or footway; and ● ensures that any such development is proportional to the character and size of the surrounding village and does not place an unacceptable burden on the existing (very limited) infrastructure; and ● be for ‘enabling development’* only <p>*A ‘Community Action’ is not a policy within the Neighbourhood Plan, but it is a statement of the community’s intent supported through consultation on the Neighbourhood Plan. Its purpose is to demonstrate that Nocton and Potterhanworth Parish Councils will seek to work with</p>	<p>establishments listed above and those former MOD sites which are or are known to be shortly surplus to MOD operational purposes. Such sites can present a significant opportunity for new housing, economic development and/or regeneration. The following policy will assist in considering the determination of such proposals.</p>		
--	--	--	--	--	--	--	--	--	--	--	--

									the landowner with a view to influencing any plans which may emerge for the site. Whilst the Community Action is a material consideration in determining planning applications it carries very limited weight.			
--	--	--	--	--	--	--	--	--	--	--	--	--

Lincoln Diocesan Trust and Board of Finance

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102168	S80				No				<p>The site (WL/BARD/008) was submitted to CLLP in 2019 and is considered to represent a good development opportunity due to its proximity to the existing school, which is immediately opposite. The full detail of the site's opportunities are included within Appendix 1.</p> <p>The site assessment published as part of the evidence base to support the CLLP consultation in November 2021 confirmed that that there were no technical reasons for the site being discounted. This also reflects the fact that part of the site was previously included as an allocation in the 1998 Local Plan for West Lindsey.</p> <p>A further site assessment of WL/BARD/008 is included within the 'Sustainability Appraisal Report for the Central Lincolnshire Local Plan Proposed Submission Draft (March 2022) Appendix 5.3: Sustainability Appraisal of Preferred Housing Site Allocations and Reasonable Alternatives Considered'.</p> <p>Overall, the site is assessed as a 'Reasonable Alternative', however, a number of conclusions within this report are queried and a response is provided within the attached (Appendix 2).</p> <p>It is therefore considered that that approach to omit WL/BARD/008 as a housing allocation for Bardney is insufficiently justified.</p> <p>The scale of the site could present an opportunity for a mixed use scheme and could also incorporate a community facility alongside new housing to create a truly sustainable and integrated development. A masterplan which explores how the uses could work together would be an appropriate next step and it is the intention of the landowner to continue discussions with the community group to set the brief for this work.</p>	<p>It is considered that site WL/BARD/008 should be included within the emerging Local Plan as a further allocation in the Large Village of Bardney. The case in relation to the site is set out within the attached representations made to the previous consultation in 2021 and this remains the position of our client.</p> <p>It is anticipated that the site could accommodate approximately 100-120 new homes on part of the land, with the remainder available for commercial or community-related uses, including those which would complement the adjacent school.</p>	Yes	Yes
1102165	S81								<p>The LDTBF support the proposed allocation of site WL/BLYT/006 Land to south of Rowan Drive, Blyton and note the increased requirement for it to deliver 62 dwellings.</p> <p>The draft policy notes the following in relation to the site:</p> <ul style="list-style-type: none"> • Design to be low density and in keeping with the local vernacular of the area. • Development of the site will need to assess drainage and surface water flood risk on the site • Improvements to highway/access required, including maintaining/enhancing the public right of way and maintaining pedestrian access to Martin's Close. • Retain and enhance the allotments to support these. • Within a Sand and Gravel Area of Search <p>These criteria are supported. The allotments are an important community facility</p>	None required	Yes	No

									<p>and their retention is desirable to create an attractive and sustainable scheme. The relevance of highways is noted and will be a key technical consideration when it comes to moving the site forward for planning and will inform any development proposals.</p> <p>At the present time, it is not anticipated that the proposed policy requirements would have any impact on the achievability of the site for housing nor from it coming forward within the first five years of the plan period.</p> <p>Subject to the continued allocation of the site as the emerging plan progresses, our client is committed to moving the site forward, working with Savills development team to seek a suitable development partner as soon as possible.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

Lincolnshire Agricultural Society

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103639	S1	Yes	Yes	Yes	No	No	Yes	Yes	<p>Site Details</p> <ul style="list-style-type: none"> · Site Address Trafford Farm, Land at the northeast corner of Carlton Le Moorland adjacent Bassingham Road · Parish Carlton Le Moorland · District North Kesteven · Hierarchy Small Village · Land Type “Greenfield” – Developed Land in the form of a disused agricultural yard with traditional farm buildings worthy of retention and modern agricultural buildings that could be converted using Class Q Permitted Development Rights. · Site Area (ha) 1.1 · Potential Capacity Approximately 14 dwellings <p>Carlton Le Moorland is closely associated with Bassingham to the north and is directly linked with a very popular shared footway/cycleway. Bassingham is a medium village with a wide selection of facilities including shops, schools, pubs, nursing home etc. There is significant pressure for additional development in Bassingham as a very popular village close to Lincoln. Carlton Le Moorland is very much an outlier to Bassingham being ¾ of a mile to the south of the medium village. Residents of Carlton make regular use of the facilities in Bassingham, making it a more sustainable location than the average small village. For this reason there is significant unmet demand for housing in the village of Carlton, it is a very popular place to live and various residents tried to offer deposits on dwellings at the consultation exercise, even before a planning application had been formally submitted.</p> <p>Trafford Farm was put forward during the June-July 2019 call for sites (copy of submission attached for detail of the site not repeated here.), but was not included in the</p>	<p>For this specific site the answer would be to allocate it – Allocate the area outlined in red on the attached plan for up to 14 dwellings.</p> <p>A more general approach would be to re-introduce into the draft policy S4 the ability to develop over and above a quantum of 5 with local community support, to cover situations such as this and make good use of land that has been partially developed, is an eyesore and has support for development of more than 5, but requires a sensitive approach due to local interest.</p>	Yes	Yes

									<p>latest draft plan for allocation.</p> <p>The owner submitted a policy compliant application for 4 dwellings on part of the site, but NKDC and the local parishioners wanted to see the whole site developed. The owner has worked with NKDC and the local parishioners under existing policy LP2 where “demonstration of clear local community support is required for development over “around 4 dwellings”. During discussion of the submitted application a number of material considerations (e.g access, non-designated heritage assets, trees) all of which could individually be dealt with to the satisfaction of the individual specialist, but the professional accepted answer contradicted a local view. For example access totally acceptable to Lincolnshire County Highways, but slightly more than 50% of locals wish to see an alternative access that would have impacted upon the traditional barns. A situation not acceptable to the Conservation Officer.</p> <p>NKDC did not want to entertain a planning application that did not deal with the whole site – thus the need for local support.</p> <p>The one issue that was agreed during public consultation was that the site should be developed for housing (59%) and the quantum should be sufficient to enable affordable housing contributions i.e more than 10. The public consultation (see a summary attached) found 43.5% in support of a quantum of 16, 45.8% disagreed (many thought 12 – 14 was better and a vociferous few wanted 10, but still required affordable housing delivered).</p> <p>The proposed policies relating to small villages restrict development to 5 dwellings and so would appear not to support what has been clearly requested by NKDC and supported by the local community – a development of the whole site with affordable Housing contribution.</p>			
1103640	S4	Yes	Yes	Yes	No	No	Yes	Yes	<p>Site Details · Site Address Trafford Farm, Land at the northeast corner of Carlton Le Moorland adjacent Bassingham Road · Parish Carlton Le Moorland · District North Kesteven · Hierarchy Small Village · Land Type “Greenfield” – Developed Land in the form of a disused agricultural yard with traditional farm buildings worthy of retention and modern agricultural buildings that could be converted using Class Q Permitted Development Rights. · Site Area (ha) 1.1 · Potential Capacity Approximately 14 dwellings Carlton Le Moorland is closely associated with Bassingham to the north and is directly linked with a very popular shared footway/cycleway. Bassingham is a medium village with a wide selection of facilities including shops, schools, pubs, nursing home etc. There is</p>	<p>For this specific site the answer would be to allocate it – Allocate the area outlined in red on the attached plan for up to 14 dwellings. A more general approach would be to re-introduce into the draft policy S4 the ability to develop over and above a quantum of 5 with local community support, to cover situations such as this and make good use of land that has been partially developed, is an eyesore and has support for development of more than 5, but requires a sensitive approach due to local interest.</p>	Yes	Yes

									<p>significant pressure for additional development in Bassingham as a very popular village close to Lincoln. Carlton Le Moorland is very much an outlier to Bassingham being ¾ of a mile to the south of the medium village. Residents of Carlton make regular use of the facilities in Bassingham, making it a more sustainable location than the average small village. For this reason there is significant unmet demand for housing in the village of Carlton, it is a very popular place to live and various residents tried to offer deposits on dwellings at the consultation exercise, even before a planning application had been formally submitted. Trafford Farm was put forward during the June-July 2019 call for sites (copy of submission attached for detail of the site not repeated here.), but was not included in the latest draft plan for allocation. The owner submitted a policy compliant application for 4 dwellings on part of the site, but NKDC and the local parishioners wanted to see the whole site developed. The owner has worked with NKDC and the local parishioners under existing policy LP2 where “demonstration of clear local community support is required for development over “around 4 dwellings”. During discussion of the submitted application a number of material considerations (e.g access, non-designated heritage assets, trees) all of which could individually be dealt with to the satisfaction of the individual specialist, but the professional accepted answer contradicted a local view. For example access totally acceptable to Lincolnshire County Highways, but slightly more than 50% of locals wish to see an alternative access that would have impacted upon the traditional barns. A situation not acceptable to the Conservation Officer. NKDC did not want to entertain a planning application that did not deal with the whole site – thus the need for local support. The one issue that was agreed during public consultation was that the site should be developed for housing (59%) and the quantum should be sufficient to enable affordable housing contributions i.e more than 10. The public consultation (see a summary attached) found 43.5% in support of a quantum of 16, 45.8% disagreed (many thought 12 – 14 was better and a vociferous few wanted 10, but still required affordable housing delivered). The proposed policies relating to small villages restrict development to 5 dwellings and so would appear not to support what has been clearly requested by NKDC and supported by the local community – a development of the whole site with affordable Housing contribution.</p>			
1103623	S44; Map	Yes	Yes	No	No	No	No	Yes	<p>[Representation summarised due to length. See attached for full representation]</p> <p>The charity is supportive of the continued inclusion of the specific Lincolnshire Showground policy. However, the charity considers the policy, in its current form,</p>	<p>[Representation summarised due to length. See attached for full representation]</p> <p>Increasing the floor space for the Agricultural College Functions As stated in the charity’s response to the</p>	No	Yes

								<p>unnecessarily restricts the potential for other types of sustainable development being delivered in this location that could help sustain and support the wider function of the Showground.</p> <p>The charity considers one area of the policy which is restrictive is its wording in relation to expanding the Agricultural College's functions at the Showground. The Agricultural College has developed the northern half of the Showground over recent years and has utilised nearly all the land they have purchased from the charity and over the 8,000 sqm floor area allocated under the adopted policy LP8 of the 2017 CLLP. It is noted that this identified floor area for the Agricultural College functions has remained unchanged during the previous consultation stage and this latest stage (Proposed Submission Draft – Regulation 19). The college has ambitions to further expand their facilities over the next 5 to 10 years to include an extension to the animal sciences and refectory buildings; new indoor arena and tractor sheds; and further student accommodation blocks. The expansion of such facilities provides opportunities for graduates to secure skilled employment that meets their level of education thereby assisting in halting the departure of skilled/qualified individuals from the area and out-commuting.</p> <p>It is considered any future expansion of the College's facility will provide a significant contribution to an important sector of the economy, of not only Central Lincolnshire but also Lincolnshire as a whole. Restricting the College's functions to a floor area which has already nearly being reached is considered as not being positively prepared nor effective at providing higher education for graduates to remain in the County and provide an invaluable contribution to an important economic sector for Central Lincolnshire and the whole of the county. In addition, restricting the floor area to 8,000 sqm also does not meet the requirements of Policy S52 (Universities and Colleges). This policy actively supports and promotes the ongoing development of higher and further education establishments which facilitates their continued growth and assist in maximising the economic benefits the Colleges bring to Central Lincolnshire. It is considered any expansion of the College facilities at the Showground meets this policy and draft Policy S44 not catering for future expansion by not increasing the existing floor area means the policy is not positively prepared nor effective. Furthermore, paragraph 83 of the NPPF (July 2021) advises that planning policies and decisions should recognise and address the specific locational requirements of different sectors, which includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries. The</p>	<p>Regulation 18 Consultation last July, the College has undertaken some initial master-planning work and considers a suitable area for the expansion of the campus is the predominately triangular area between the southern boundary of the existing campus and the northern side of the Showground's main area. However, the potential expansion of its facilities, together with the existing campus buildings and facilities means the total combined floor area of the College's functions will exceed the "up to 8,000sqm" identified in the wording of the draft policy. Without an increase in the identified floor area, the future expansion of the College, which will provide significant economic benefits to the Central Lincolnshire area as discussed above, will not be possible.</p> <p>Therefore, the charity is proposing an increase in the floor area of the agricultural college functions from "up to 8,000sqm" to "up to 10,000sqm", meaning the charity suggests the revised wording of the relevant bullet point should read as follows:-</p> <p>"Expansion of Agricultural College functions (C2 Use Classes) (up to 10,000 sqm)"</p> <p>Inclusion of Education and Training Facilities</p> <p>A second change the charity considers necessary, is the inclusion of education and training facilities in the development types suitable within the policy. The Showground's substantial links to the environmental, food and agricultural sectors makes it an ideal location to educate, not only children but also adults, on such topics. The charity is continuing the potential of charitable organisations locating and building their training facilities at the Showground. It is considered the Showground is an ideal location for such a facility, given its existing educational facilities situated on the site; close proximity to Lincoln City Centre and numerous other educational facilities in the city; excellent road network links with the busy A15 trunk road passing immediately adjacent the site which provides a major link northwards out of the Lincoln City Centre; and the availability of space.</p> <p>It is considered that the inclusion of education and training facilities within the policy will provide a significant contribution to the CLLP aims of continuing to improve the skills and educational attainment of people living in the Central Lincolnshire area.</p> <p>The inclusion of education and training facilities within the policy demonstrates the</p>		
--	--	--	--	--	--	--	--	---	---	--	--

								<p>establishment and expansion of the College at the Showground has shown it has become an ideal location for its specialism in the agricultural, food and nutrition sectors. It has also formed an important cluster of knowledge in such areas given its uses are intrinsically linked to the other education and training programmes at the Showground. Therefore, it is considered that the Showground policy not catering for future expansion in terms of floor area of the College functions is also not consistent with national policy.</p> <p>The charity also considers the policy is too restrictive for the types of development which could be supported in principle in the future. One such development type is the inclusion of Education and Training Facilities. In the last 5 years, the charity has significantly expanded its own education and training programmes at the Showground with the inclusion of a multi-purpose building to provide more on-site classroom-based programmes for children and their teachers. As stated later in this representation, the Showground’s substantial links to the environmental, food and agricultural sectors makes it an ideal location to educate children and adults on such topics. Such programmes have included Schools Challenge; Teacher CPD; Agri-Food Careers Event; Farmhouse Breakfast Week; Countryside Lincs; and Impact Group. It is considered by the charity that the inclusion of education and training facilities fit well with the current uses at the Showground and will provide a significant contribution to the CLLP aims of continuing to improve the skills and education attainment of people living in the Central Lincolnshire area. Furthermore, it is also considered that such uses on site meet the requirements of paragraph 83 of the NPPF, given the continued expansion of education and training facilities at the Showground shows it is an ideal location and an important cluster with its direct links to the Agricultural College for educating children and adults on environmental, nutrition and agricultural topics. Therefore, it is considered that the Showground policy not including education and training facilities means the policy is not positively prepared nor consistent with national policy.</p> <p>As detailed in the charity’s response to the last consultation (Regulation 18 Consultation), the charity is also considering the option of a roadside services facility (including an electric vehicle charging hub) to be provided on a parcel of land on the very outer edge of the showground that is used for car parking on less than 10 days of the year, parking that can be readily relocated to other land the charity owns.</p> <p>By putting this land into active use as a roadside services</p>	<p>charity’s continued commitment to meeting their objective of promoting food, farming and the countryside in an environmentally sustainable way. Therefore, the charity is proposing the addition of educational and training facilities listed in the policy and suggests the following wording is included in draft Policy S44:-</p> <p>“Educational and training related development (F1(a) Use Class)”</p> <p>Inclusion of a Roadside Services Facility A third change the charity considers necessary, is the inclusion of a roadside services facility in the development types listed within the wording of the policy as supporting the wider use of the Showground.</p> <p>The charity considers the Showground is ideally positioned on the existing Lincolnshire road network to help, not only Central Lincolnshire but the entire county, to transition away from fossil fuel combustion engines to sustainable forms of energy for powering vehicles.</p> <p>The charity is proposing the inclusion of a roadside services facility which includes an electric vehicle charging hub that meets the current demand for petrol and diesel vehicles but also the growing demand for other fuel types, such as the current preferred choice of electric. It is envisaged that any such facility will incorporate passive infrastructure to provide additional charging facilities as demand increases in the future. It is considered that the inclusion of such a development type would overcome the charity’s concerns, outlined earlier in this document, of the policy not being positively prepared, effective and consistent with national policy of encouraging residents and businesses of Central Lincolnshire to transition to a net-zero lifestyle.</p> <p>It is envisaged that the roadside services facility would also provide supporting food and drink uses to cater for motorists, including those using the charging facilities. Indeed, food and drink use form an essential and intrinsic part of modern roadside services schemes, allowing road users the opportunity to have refreshments whilst they take a break from a journey or wait for charging to complete.</p> <p>In light of the above, the charity requests that the following is added to policy S44:</p>		
--	--	--	--	--	--	--	--	---	---	--	--

									<p>facility, this would not only address a deficit of such facilities along this particular stretch of the A15, but also serve visitors to and from the Showground who are otherwise required to travel to alternative facilities 12km to the north at Caenby Corner or to the south within the urban area of Lincoln.</p> <p>Theme 4 of the Proposed Submission Draft of the CLLP relates directly to facilitating a transition to net-zero carbon lifestyles. The paragraphs of this section of the Proposed Submission Draft CLLP document states transport is the largest source of carbon dioxide in the UK and small increases in fuel efficiency have been cancelled out by an increase in mileage. Furthermore, it is one of the main human impacts which is causing a climate change emergency, as outlined an ICC Report published in June 2021. In this context, the electric vehicle charging hub that would be delivered as part of the roadside services facility would assist with the transition to net-zero carbon lifestyles and, in accordance with paragraph 104 of the NPPF, assist in the roll-out of new transport infrastructure needed to address changing transport technology and usage.</p> <p>It is considered that the CLLP Policy Team excluding such a use from the policy would be contrary to many of their other policies in the Proposed Submission Draft which is actively encouraging residents and businesses to transition to a net-zero carbon lifestyle. Such policies include S16 (Wider Energy Infrastructure) and NS18 (Electric Vehicle Charging) which actively encourage proposals that are necessary for, or form part of, the transition to a net zero-carbon sub-region and the inclusion of electric vehicle charging points which are situated in easy and convenient locations. Furthermore, it would also be contrary to paragraph 112 of the NPPF which looks to deliver schemes that are designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations. A roadside services facility that included an EV charging hub in this location would, therefore, help ensure that draft policies S16 and NS18 are effective and capable of being delivered, in accordance with paragraph 35 of the NPPF.</p> <p>Although the charity is supportive of the area allocated for the Showground, they feel the area restricts future development at the Showground. As detailed in the last consultation response, the charity has significantly developed and expanded the uses and functions at the Showground in recent years, in line with adopted policy LP8 of the 2017 CLLP. These have included improvements to the Showground's buildings together with the expansion of the Agricultural College and the construction of "eco" dwellings in the northern half of</p>	<p>"Roadside services facility to support the wider function of the Showground".</p> <p>Increasing the Showground Area in Policies Map 47 The final change the charity considers necessary, is increasing the area of the Showground allocated in Policies Map 47. The charity considers that two areas owned by the charity, should be included in the Showground's allocated area on Policies Map 47 to overcome their concerns of Policy S44 not being positively prepared nor effective at encouraging future development.</p> <p>Area 1 Area 1 is the triangular area immediately to the south of the Showground's existing southern boundary which extends 6.17ha in area (outlined in blue on the accompanying plan). This area of land has been owned by the charity since 2015 and permission was granted by WLDC (planning reference: 133238) for its change of use from agricultural land to vehicular parking for the Showground in October 2015. The work was completed by the charity and it has been used for vehicular parking for the Showground since.</p> <p>Given its use in recent years for vehicular parking ancillary to the Showground and its close proximity to the Epic Centre and Exhibition Hall, it is considered that this area of land is appropriate and suitable for its inclusion in the Showground area in Policies Map 47. The land is situated in flood zone 1 and, therefore, in a sequentially preferred location for development. It is also situated some distance away from the Area of Great Landscape Value situated to the west and the existing landscaping on the site and southern section of the showground means there will be no adverse impact on the landscape with this area of land being included. Furthermore, given the permission of the 2015 application, this area of land is now seen as being physically and visually part of the existing Showground area and is considered by the charity to make sense for it to be included in the allocated area on Policies Map 47.</p> <p>Area 2 Area 2 is a rectangular area of land immediately to the west of the Showground's existing western boundary and extends 38ha in area (outlined in red on the accompanying plan). The charity has owned this area of land since 1957 and has been used for vehicular parking for the majority of the</p>		
--	--	--	--	--	--	--	--	--	---	---	--	--

									<p>the site. The expansion and improvements to the buildings has led to the Showground to attract and hold many events enabling two or three to be held at the same time, particularly during the peak summer “outdoor” season. Such events require more areas for vehicular parking and when two or three events are being held at the same time, each one requires its own sperate vehicular parking to enable each event to be managed safely. In addition, any future development at the Showground and the uses supported by Draft Policy S44 will take place on the existing Showground site, meaning an expansion to the area is required. The likely area for such development is in the Showground’s northern and eastern sections, immediately adjacent the existing Agricultural College facilities, which provides one of the main and largest vehicular parking areas for events. If this area is developed, it will reduce the area for vehicular parking for events on site. Therefore, the charity, in their Regulation 18 Consultation response, identified areas owned by the charity to where the allocated area could be expanded. The previous response provided reasoning for this and the CLLP Policy Team have noted the comments but have not extended the area nor provided any reasoning for why it has not been included. For the uses in Draft Policy S44 to be developed on the Showground it is considered that the area needs to be extended.</p>	<p>Lincolnshire Shows since the first in 1959.</p> <p>Its eastern half is grassland which has been utilised for vehicular parking for several years when larger events occur at the Showground (e.g Lincolnshire Show). Although the western half is agricultural land, it is considered that this area of land should be included as any future expansion of the Agricultural College will take place on existing vehicular parking in the northern half of the site, meaning this area needs to be included to mitigate the potential loss of land for vehicular parking. It is also considered that this area of land would have no adverse impact of the Area of Great Landscape Value (AGLV), given its distance from the B1398.</p> <p>To summarise, the charity suggests the following changes to the Lincolnshire Showground policy (Policy S44) and Policies Map 47 in the Proposed Submission Draft (Regulation 19) Consultation March 2022 for the reasons set out above and hopes the Planning Inspector will look favourably upon this representation: -</p> <ul style="list-style-type: none"> • Amend the wording of the policy to allow a larger floor area identified for the Agricultural College and amend the wording to: ““Expansion of Agricultural College functions (C2 Use Classes) (up to 10,000 sqm)”; • Inclusion of a Roadside Services Facility by proposing the following addition to the policy: “Roadside Services Facility to support the wider function of the Showground)”; • Inclusion of education and training facilities by proposing the following addition to the policy: “Education and training related development (F1(a) Use Class)”; • Extending the existing area of the Showground site identified in Policies Map 47 to include land owned by the charity immediately to the south and west of the existing showground area. <p>In the context of this policy, the charity considers that the amendments suggested above would make the Local Plan positively prepared, justified, effective and consistent with national policy for Policy S44 and Policies Map 47.</p> <p>For the avoidance of doubt, the charity continues to be supportive of the other development types listed within the policy and propose that these remain unchanged. To clarify, these include the following:-</p> <ul style="list-style-type: none"> • Facilities directly linked to the functioning of 		
--	--	--	--	--	--	--	--	--	---	--	--	--

										<ul style="list-style-type: none"> • shows on the showground itself; • Conference facilities (E Use Class) (up to 4,000 sqm); • Employment related development (E Use Class) (up to 3,500 sqm); • A hotel (C1 Use Class) (up to policy other development types listed in the policy; and • Other minor ancillary development linked to the above uses. 		
1103641	S81	Yes	Yes	Yes	No	No	Yes	Yes	<p>Site Details · Site Address Trafford Farm, Land at the northeast corner of Carlton Le Moorland adjacent Bassingham Road · Parish Carlton Le Moorland · District North Kesteven · Hierarchy Small Village · Land Type “Greenfield” – Developed Land in the form of a disused agricultural yard with traditional farm buildings worthy of retention and modern agricultural buildings that could be converted using Class Q Permitted Development Rights. · Site Area (ha) 1.1 · Potential Capacity Approximately 14 dwellings Carlton Le Moorland is closely associated with Bassingham to the north and is directly linked with a very popular shared footway/cycleway. Bassingham is a medium village with a wide selection of facilities including shops, schools, pubs, nursing home etc. There is significant pressure for additional development in Bassingham as a very popular village close to Lincoln. Carlton Le Moorland is very much an outlier to Bassingham being ¾ of a mile to the south of the medium village. Residents of Carlton make regular use of the facilities in Bassingham, making it a more sustainable location than the average small village. For this reason there is significant unmet demand for housing in the village of Carlton, it is a very popular place to live and various residents tried to offer deposits on dwellings at the consultation exercise, even before a planning application had been formally submitted. Trafford Farm was put forward during the June-July 2019 call for sites (copy of submission attached for detail of the site not repeated here.), but was not included in the latest draft plan for allocation. The owner submitted a policy compliant application for 4 dwellings on part of the site, but NKDC and the local parishioners wanted to see the whole site developed. The owner has worked with NKDC and the local parishioners under existing policy LP2 where “demonstration of clear local community support is required for development over “around 4 dwellings”. During discussion of the submitted application a number of material considerations (e.g access, non-designated heritage assets, trees) all of which could individually be dealt with to the satisfaction of the individual specialist, but the professional accepted answer contradicted a local view. For example access totally acceptable to Lincolnshire County Highways, but slightly more than 50% of locals wish to see an alternative access that would</p>	<p>For this specific site the answer would be to allocate it – Allocate the area outlined in red on the attached plan for up to 14 dwellings. A more general approach would be to re-introduce into the draft policy S4 the ability to develop over and above a quantum of 5 with local community support, to cover situations such as this and make good use of land that has been partially developed, is an eyesore and has support for development of more than 5, but requires a sensitive approach due to local interest.</p>	Yes	Yes

									have impacted upon the traditional barns. A situation not acceptable to the Conservation Officer. NKDC did not want to entertain a planning application that did not deal with the whole site – thus the need for local support. The one issue that was agreed during public consultation was that the site should be developed for housing (59%) and the quantum should be sufficient to enable affordable housing contributions i.e more than 10. The public consultation (see a summary attached) found 43.5% in support of a quantum of 16, 45.8% disagreed (many thought 12 – 14 was better and a vociferous few wanted 10, but still required affordable housing delivered). The proposed policies relating to small villages restrict development to 5 dwellings and so would appear not to support what has been clearly requested by NKDC and supported by the local community – a development of the whole site with affordable Housing contribution.			
--	--	--	--	--	--	--	--	--	---	--	--	--

Lincolnshire County Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EIP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102995	Vision; Objectives; General	Yes	Yes						Notwithstanding Lincolnshire County Council's (LCC) concerns made in its representations to some policies included in the Energy, Climate Change and Flooding Chapter, as a statutory partner in the Central Lincolnshire Joint Strategic Planning Committee, LCC fully supports the vision, objectives, and overall approach to delivering sustainable growth across Central Lincolnshire.		No	No
1102996	S6	Yes	Yes	Yes	Yes	Yes	No	Yes	<p>Whilst we applaud the intentions of the policy, the proposed design principles cannot be universally applied to all development types. Principle 5, for example, is not appropriate for minerals and waste developments, which by their nature, may have significant energy demands that may often exceed what could reasonably be generated by renewable sources on site. They will instead be reliant, to a greater or lesser degree, on the decarbonisation of the wider national energy networks. Minerals and waste developments are an essential part of a sustainable society, and should not be penalised because they cannot meet the requirements proposed in the policy.</p> <p>Policy S6 infers that it relates to all development, and LCC DM officers have regard to policies in District Local Plans (as well as the Minerals and Waste LP) when determining applications, as part of the wider development plan, so we think its necessary to flag that these policies are not compatible with minerals and waste proposals. This is why we have requested that minerals and waste development should be specifically identified in the CLLP as exempt from these policies, for the avoidance of any doubt, and to prevent policy conflicts and potential added barriers to essential minerals and waste development.</p> <p>Policy S6 fails the soundness test (consistent with national policy) because it would present unreasonable burdens on the delivery of a steady and adequate supply of minerals, and delivery of waste management infrastructure pursuant to the requirements of the NPPF and NPPW (National Planning Policy for Waste).</p>	Minerals and waste developments should be specifically exempt from the requirements of Policy S6.	No	No
1102998	S7	Yes	Yes	No	No	No	No	Yes	Lincolnshire County Council (LCC) believes Policy S7 Clause 3 (viability) is unsound as it discriminates against areas with relatively low house prices (Map 3 in Chapter 4) and ultimately against lower cost housing occupied by lower income households. This will only exacerbate fuel poverty in a period of unprecedented increases in energy costs. The objective of the Local Plan (para. 3.2.7) is that no homes are built that must be retrofitted for energy efficiency at a later date. An analysis of the Committee for Climate Change report on the 6th Carbon Budget	Delete Clause 3 (viability) in Policy S7:	No	No

								<p>shows that the extra cost of meeting the FHS during construction is around £4,800. If the same measures are retrofitted at a later date the cost was £26,300 – which means that it would probably be unviable to retrofit the house. LCC does not believe we need these exceptions – the energy efficiency requirements can quickly become standard practice in the construction industry.</p> <p>There are several concerns which need to be addressed in the evidence provided to justify Clause 3 (viability): values (house prices), construction costs and developer profit.</p> <p>Residential Sales Values: the Whole Plan Viability (WPV) Addendum published in March 2022 (Ref: INF003) points to increasing house prices in the Gainsborough and Sleaford areas. Paragraph 7.2 states:</p> <p>“The net increase in sales values has resulted in viability improvements across Central Lincolnshire. Some typologies that were previously unviable now display a viability surplus. All typologies that previously displayed viability deficits also now show smaller deficits based on our updated costs and values.”</p> <p>It is accepted that the updated report provides a snapshot but it is clear that the Sleaford mid-lower (+ 11%) and Gainsborough lower (+ 14%) value areas are increasing at a faster percentage rate than the other areas (para. 2.34) reflecting the attractiveness of these locations to the market and better affordability offered compared to other regions.</p> <p>Construction Costs: the use of Building Cost Information Service (BCIS) data is highly problematic when trying to determine an accurate assessment of viability. The Central Lincolnshire Whole Plan Viability (WPV) Assessment published 18 June 2021 (Ref: INF002a) states in paragraph 8.5:</p> <p>“Build costs – we know from RICS that housebuilders do not typically feed into the BCIS data, as shown in Figure 8-1 it is primarily consultants and government agencies. Therefore, the underlying data for BCIS may not necessarily reflect how development is delivered locally and the associated costs”</p> <p>In addition, paragraph 8.6 states:</p> <p>“For a study of this nature, it is difficult to deviate away from using BCIS as a data source, despite its limitations; the PPG supports the use of BCIS88 as a data source, and it is not proportionate to have costs plans created for all the proposed allocations. Therefore, these costs unveil a disconnect between how the market operates and the viability process under the PPG.”</p> <p>This raises questions regarding the true cost of development in areas such as Gainsborough and Sleaford, especially when set against rapidly improving sales values and viability.</p> <p>Regarding the costs of energy saving technologies, there is increasing evidence of falling prices for heat pumps: https://www.hvpmag.co.uk/Heat-pump-costs-could-fall-by-up-to-40-research-finds/12780#:~:text=HVP%20Magazine%20%2D%20Heat%20pump%20costs,up%20to%2040%25%2C%20research%20finds&text=Research%20by%20De%20lta%20reveals,margins%20across%20the%20supply%20chain. and solar panels: A comprehensive guide to solar panels - Energy Saving Trust.</p> <p>Developer Profit: there are concerns raised regarding the appropriate amount of profit on market housing (20% Gross Development Value) used in the viability assessment (WPV 2021, para. 6.8, Table 6.4). MHCLG, 05 May 2019, PPG, Paragraph: 018 Reference ID: 10-018-20190509 states:</p> <p>“For the purpose of plan making, an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies. Plan makers may choose to apply alternative figures where there is evidence to support this according to the type, scale, and risk profile of planned development”.</p> <p>No attempt is made to justify the higher figure of 20% GDV in the WPV Assessment which has the effect of artificially increasing the cost of development (profit is a cost to the home buyer) thereby reducing viability.</p> <p>In summary, Policy S7 (Clause 3 – viability) is considered unsound in terms of being:</p> <ul style="list-style-type: none"> • Not positively prepared (does not meet infrastructure requirements in lower value areas); 	Reducing Energy Consumption – Residential Development		
--	--	--	--	--	--	--	--	---	---	--	--

									<ul style="list-style-type: none"> • unjustified (evidence used is not proportionate); • ineffective (does not deliver energy efficient homes across all Central Lincolnshire); and, • is not consistent with national policy (NPPF) and guidance (PPG) as it fails to deliver sustainable housing across all Central Lincolnshire. 			
1102 999	S8	Yes	Yes	Yes	Yes	Yes	No	Yes	<p>The requirements of this policy and the conditions required to meet its exceptions are not appropriate for minerals and waste developments, which by their nature, may have significant energy demands that may often exceed what could reasonably be generated by renewable sources on site or provided/financed through offsetting measures. They will instead be reliant, to a greater or lesser degree, on the decarbonisation of the wider national energy networks. Minerals and waste developments are an essential part of a sustainable society, and should not be penalised because they cannot meet the requirements proposed in the policy.</p> <p>Policy S8 fails soundness test (consistent with national policy) because it would present unreasonable burdens on the delivery of a steady and adequate supply of minerals, and delivery of waste management infrastructure pursuant to the requirements of the NPPF and NPPW (National Planning Policy for Waste).</p>	Minerals and waste developments should be specifically exempt from the requirements of Policy S8 and its exceptions.	No	No
1103 000	S11	Yes	Yes	Yes	Yes	Yes	No	Yes	<p>LCC questions whether policy S11 can be realistically applied to minerals and waste developments, which are classed as ‘major development’ but which by their nature involve extraction of materials with embodied carbon, or processing of wastes which involves significant embodied carbon in pursuit of circular economy objectives.</p>	Amendments required: Minerals and waste developments should be specifically exempt from the requirements of Policy S11, or it should be acknowledged that such developments may have more limited scope to meet the policy’s objectives.	No	No
1103 001	S12	Yes	Yes	Yes	No	Yes	Yes	Yes	<p>LCC questions how reasonable it is to have a blanket requirement that all development comprising new buildings with a flat roofed area should be a green roof. This may not be appropriate, viable or achievable for minerals and waste developments.</p> <p>S12 infers that they relate to all development. Since Lincolnshire County Council DM officers have regard to policies in District Local Plans (as well as the Minerals and Waste Local Plan) when determining applications, as part of the wider development plan, so we think it’s necessary to flag that these policies are not compatible with minerals and waste proposals. We request that minerals and waste development should be specifically identified in the CLLP as exempt from this policy, for the avoidance of any doubt, and to prevent policy conflicts and potential added barriers to essential minerals and waste development.</p>	Amendments required: Minerals and waste developments should be specifically exempt from the requirements of Policy S12, or it should be acknowledged that such developmen	No	No

										ts may have more limited scope to meet the policy's objectives.		
1103 002	S14		Yes	Yes	No	No	No	Yes	<p>In 2013 Lincolnshire County Council (LCC) agreed a Wind Energy Position Statement due to the enormous public concern over large scale industrial wind farms coming into the County area and the harm they would cause to our visual amenity and landscape settings which are a significant attraction for our visitor economy. In 2015 the government's own Written Ministerial Statement (WMS) made it clear that communities must support any local application for wind turbines before it could be approved and this is explicit in Paragraph 158 (b) of the National Planning Policy Framework (NPPF). Subsequently, the turbines which were of concern in 2013 have been replaced by much bigger units having a much greater visual impact.</p> <p>LCC has made its position clear in its approach to wind turbines in its Council Motion carried on 19 February 2021. As a council we object to all applications for on-shore wind turbines, other than for small scale (1-2 turbines), which are specifically linked to development and business sustainability issues and subject to them complying with all other planning policy considerations. LCC recognises the importance of our landscape and big open skies as a significant economic driver for our Visitor economy and for the role of the RAF in the County and this must be protected for future generations to enjoy and use.</p> <p>The proposed Submission Local Plan includes a policy which supports the provision of large-scale commercial wind farms comprising turbines much larger than previously seen in the County. In terms of height, a typical 2MW turbine is perhaps 90-100m tall to the hub, whereas the tip of the blade to the ground is perhaps 125-150m in height. Broad "areas of suitability" have been identified on a map but still leave relatively large amounts of land vulnerable, especially on the eastern boundary of North Kesteven.</p> <p>There is an inconsistency in the language used in the Plan between supporting text and policy. Para. 3.3.4 states, "whilst not set as either a cap or a ceiling, the aim of the Joint Committee that prepared this Plan is to facilitate the delivery of [380 MW]". Policy S14 states the Committee, "will seek to maximise (LCC emphasis) appropriately located renewable energy". This suggests an open-ended policy which has the potential to deliver far more renewable energy capacity than is needed to meet targets.</p> <p>Policy S14 includes the statement, "following appropriate consultation, it can be demonstrated that the planning impacts identified by affected local communities have been fully addressed and therefore the proposal has their backing (it being a planning judgement by the local planning authority as to whether or not the proposal has their backing)". The emboldened (LCC emphasis) text is not included in the NPPF (2021) footnote 54 and raises the question of how any community objection would be defined or accepted by the local planning authority. It should be made clear in the Local Plan that sovereignty resides with local people as expressed through written objections, petitions or referendums. In addition, the word "therefore" does not appear in the footnote and alters the meaning of the sentence. As accurately written, it is logically possible for a development's planning impacts to be fully addressed and still be objected to by a local community. This is not pedantry – language matters.</p> <p>Since the issue of WMS 2015, the current planning regime is considered hostile by the industry. According to RenewableUK data, only eight onshore wind farm applications for new or extended sites were submitted in England between 2016 and 2020. In comparison, 237 applications were submitted between 2011 and 2015 – a 96% decrease. Only 16 new turbines were granted planning permission between 2016 and 2020, in seven separate locations. Between 2011 and 2015, 435 turbines were permitted to be built on 108 sites – another 96% fall. The drying up of planning applications for wind turbines suggests a de facto local veto. Given the amount of pre application consultation required it would appear to be too costly and too much risk for developers. Clearly, the Local Plan Policy S14 is not deliverable as is indicated in para. 3.3.4 which indicates that zero wind energy capacity is currently installed. On the other hand, 149 MW of solar PV capacity has already been installed in Central Lincolnshire.</p> <p>The government's British Energy Security Strategy (published 7 April 2022) states: "In the more densely populated England, the government recognises the range of views on onshore wind. Our plans will prioritise putting local communities in control. We will not introduce wholesale changes to current planning regulations for onshore wind but will consult this year on developing local partnerships for a limited number of supportive communities who wish to host new onshore wind infrastructure in return for benefits, including lower energy bills. The consultation will consider how clear support can be demonstrated by local communities, local authorities, and MPs." There are no supportive communities in rural Central Lincolnshire.</p>	Delete paragraphs 3.3.3 – 3.3.16 inclusive and Map 2, and replace with new paragraphs and modified Policy S14 [see attached for wording]	Yes	Yes

									<p>In summary, proposed policy S14 is considered unsound in terms of being:</p> <ul style="list-style-type: none"> • Unjustified (this is not the most appropriate strategy when considered against reasonable alternatives) • Ineffective (S14 is not considered to be deliverable because of reasons given above) • Inconsistent with national policy (NPPF footnote 54) <p>LCC is proposing solar as an alternative to large scale wind energy because it provides:</p> <ul style="list-style-type: none"> • limited visual intrusion similar in appearance to glass houses or poly tunnels; • the ability to be screened effectively by natural boundary treatments (such as trees and hedges) on flat land; • a proven technology which is continuously improving in efficiency and reducing in cost; • deployable at scale and speed, capable of generating zero carbon renewable energy in the short to medium term; and, • local economic benefits for assembly and maintenance. <p>The government's British Energy Security Strategy (published 7 April 2022) states: "With the sun providing enough daily energy to power the world 10,000 times over, solar power is a globally abundant resource. There is currently 14GW of solar capacity in the UK split between large scale projects to smaller scale rooftop solar. The cost of solar has fallen by around 85% over the past decade and can be installed in just one day on a domestic roof. We expect a five-fold increase in deployment by 2035". LCC's preference for solar energy is consistent with the government's strategy. A technical report produced by IPV Flexgen is attached to this representation to provide background for LCC's alternative approach.</p>			
1103 003	S19	Yes	Yes	No	No	No	No	Yes	<p>Policy S19 Fossil Fuel Exploration, Extraction, Production or Energy Generation is considered unacceptable. It acknowledges its own limitations (para. 3.5.8) as it attempts to influence the proper planning of minerals in this part of the county. Lincolnshire County Council (LCC) has the sole power to decide such proposals as the Mineral Planning Authority, using the adopted Lincolnshire Minerals and Waste Local Plan (LMWLP). If Central Lincolnshire wishes to change the relevant policy, it should work with LCC during the forthcoming review of the LMWLP. As it stands, the policy will be confusing to developers and the public as it creates a parallel narrative. Nor does it provide any examples of development which could realistically be addressed by the policy. The approach is also at odds with the spirit of paragraph 1.5.3 of the proposed submission Local Plan which seeks to ensure that the Local Plan and other plans are 'as closely aligned as possible and that strategies support each other' (with the Lincolnshire Minerals and Waste Local Plan specifically identified).</p> <p>Paragraph 3.5.7 implies that Policy M9 of the LMWLP is out of date. It then tries to justify this by stating that the legislative and policy context has evolved but fails to identify any such changes. The fact that Nottinghamshire County Council has recently adopted (25 March 2021) a similar policy to Lincolnshire's is testament to the fact that Policy M9 is still in conformity with the NPPF (para. 215) which states: "Minerals planning authorities should: a) when planning for on-shore oil and gas development, clearly distinguish between, and plan positively for, the three phases of development (exploration, appraisal and production), whilst ensuring appropriate monitoring and site restoration is provided for;"</p> <p>The background evidence report for Policy S19 is misleading and misapplies the NPPFs objectives in relation to mitigating and adapting to climate change, moving to a low carbon economy, and its stricter stance on coal extraction, to justify a blanket presumption against all fossil fuel exploration, extraction, production or energy generation. The government's Energy White Paper: 'Powering our net zero future' published December 2020 includes a key commitment in relation to oil and gas to "take powers to ensure we maintain a secure and resilient supply of fossil fuels during the transition to net zero emissions." The proposed blanket refusal for any proposal for fossil fuel-based exploration, extraction, production or energy generation in Policy S19 is clearly contrary to the NPPF.</p> <p>In summary, S19 and associated paragraphs are unsound as they are:</p> <ul style="list-style-type: none"> • not positively prepared (does not meet need); • unjustified (inappropriate); • ineffective (not deliverable); and, • inconsistent with national policy (NPPF). 	Policy S19, paras. 3.5.7, 3.5.8 and 3.5.9 should all be deleted and replaced with the following text: "The Central Lincolnshire Joint Strategic Planning Committee will work in partnership with Lincolnshire County Council when reviewing fossil fuel extraction in the Lincolnshire Minerals and Waste Local Plan".	No	No

Lincolnshire Independents

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103214	General								Sleaford is a significant conurbation and deserves enhanced health and further education facilities and businesses that encourage graduate jobs.			No
1103184	S1	Don't know	Don't know	Don't know	No	No	Don't know	Don't know	<p>Sustainability and the Rate of Growth S1 “The Spatial strategy and settlement hierarchy”</p> <p>We aim to reach the target of net zero emissions by 2030, but consultants to the Central Lincolnshire Local Plan Panel state, “Under current practices after seven years, Central Lincolnshire would have a carbon debt...” highlighting that this plan is ineffective, and even these targets are now deemed inadequate by the Intergovernmental Panel on Climate Change (IPCC). An increase of over a thousand new dwellings every year will inevitably increase carbon emissions, both in their construction and in their occupation. We therefore need a much slower rate of construction to give time for technology to overcome what the IPCC state is already a dangerous expected outcome. Although technology is moving fast and new low carbon opportunities will no doubt arrive, until they do, we do not have the ability to build at this proposed rate without substantially increasing carbon emissions.</p> <p>The policies calling for higher building standards, charging points etc. are all subject to the viability assessments. These are already compromised in the largest developments as evidenced by lower Community Infrastructure Levy (CIL) requirements in the Sustainable Development Extensions of Sleaford, Gainsborough and Lincoln. In reality, the level of CIL delivered to Parish Councils who have been subjected to significant amounts of new housing is totally inadequate to provide any meaningful infrastructure improvements to mitigate the impact of increased population on road usage, parking near shops, etc.</p> <p>The plan does not go far enough in its environmental ambitions to off-set the increased environmental impact of increased development. For these reasons, the plan is not sound and not effective.</p>	We believe that the building should be ‘back end’ rather than ‘front end’ loaded to try to tackle this failing, and therefore a phasing or ‘capping’ mechanism is required. The total number of dwellings is too high to accommodate without impact on the character of our local places and should be at the lower end of Government requirements.	Yes	No
1103180	S2	Don't know	Don't know	Don't know	No	No	Don't know	Don't know	<p>Number of new dwellings required S2 Growth Levels and distribution</p> <p>We welcome the reduction in the number of new dwellings required, noted at between 1,060 and 1,325 every year. However, it is still too high to retain the character of our areas and should not be “front-loaded”, but phased to allow development to be sustainable in terms of jobs, services and facilities and environmental impact. The vision target and Policy S2 state 29,150 total which calculates out at 1,325 every year for 22 years. To tally, the lower range figure of 23,320 dwellings based on the lower figure of 1060 new homes, needs to be included for clarity. We support the addition in 2.2.8 that the lower figure will be used in the calculation of the five-year land supply. The higher figure is used to fulfil “economic ambition”, where in the interests of sustainability, we must instead necessarily require economic, environmental, and social wellbeing and meet the carbon emission targets. For these reasons the plan is not sound and not justified.</p>	Focus on the lower level of development to ensure development is sustainable in terms of jobs, environmental consideration, matching facilities and services and retention of the character of our local areas.	Yes	No
11946581	S4	Y				No			There appears to be nothing to prevent affordable housing or first time housing being placed outside the urban village footprint, furthest from the facilities. That would mean that those least able to cope were put in the most difficult and most unsustainable locations. What if a developer chose to put all of the affordable housing outside the area and perhaps abutting another village altogether?	We need to ensure that the affordable housing associated with a development is within the same area as the rest of the housing	No	No

										development in a "pepper pot" approach.		
1103181	S4	Don't know	Don't know	Don't know	No	No	Don't know	Don't know	<p>1. Pressure on villages S4 Housing development in and adjacent to villages</p> <p>We object to the heavier pressure on villages which have fewer or minimal facilities and little capacity to provide the community services and facilities needed to support an increasing population. This pressure is created by two policies, removing the maximum growth cap on villages and by allowing First Time and affordable homes to be built outside the current village footprint. Although the policy S2a claims in development in the urban extensions are higher in the "priority order", there is no mechanism to enable prioritisation of the urban regeneration. A capping or phasing mechanism is needed. S4 states that development is intended to be "limited" in these locations, but have not set any mechanisms that are effective in limiting or controlling the rate of development.</p> <p>Small and medium villages only take up to 5 or 10 dwellings per application which do not attract 106 monies nor affordable housing. It does attract CIL monies but these are limited in what they can be used for and are sums that are small relative to the need.</p> <p>For example, in seven Cliff Villages, 138 dwellings generated just £7,000 in total for the villages. Some other monies went to education and highways but have not resulted in any visible improvements locally.</p> <p>Yet these developments create a cumulative impact on the character of the area and the pressure on facilities, infrastructure such as roads and services, and the environment, which is not sustainable. The cap of 10% maximum growth over the life of the plan needs to be reapplied. This is the key mechanism for controlling the rate of growth to a sustainable level. both of which are much needed in all our village and town communities.</p> <p>To date, the cap has been lifted where there was clear local support, so the policy has been effective. A clearer definition of local support needs to be reworked.</p> <p>In both urban and rural areas, the continued requirement for more dwellings, without any guarantee of matching services and facilities, is highly controversial and difficult to implement without undermining sustainability of the rural populations. The rate of development needs to be slower to combat the adverse impact of increased traffic levels on air pollution, carbon emissions and quality of life. Whilst a gradual increase in new electric vehicles is taking place, there is no likelihood that existing use of fossil fuels in vehicles or household heating will decrease significantly before 2030, according to Government guidance.</p> <p>For these reasons the plan is not sound and not effective.</p> <p>Lincoln Strategy Area Policy S2 a iii "Growth at settlements which serve and are serviced by Lincoln" The commuting data used to calculate the Lincoln Strategy area is now out of date. The fact that many more people are working from home is not included post covid. Although the policy says in "priority area", there is no mechanism to enable prioritisation of the urban regeneration. A capping or phasing mechanism is needed. There is also no mechanism for a cohesive approach where development in one village affects another. For example, seven Cliff Villages share facilities and infrastructure such as the one GP practice serving a population of over 4,000 patients per GP, more than double the required number</p>	Therefore development needs to take account of impacts on neighbouring areas. A "cap" of expected growth to say 10% would help achieve this, and a duty to co-operate between villages to ensure adequate facilities is important.	Yes	No

1103185	S5								<p>Proposal: Tighter control on the scale of industrial development in the open countryside as in S33</p> <p>Industrial development in the open countryside should be better controlled, even if associated with agriculture under part f, “agricultural diversification” and part g “agricultural development”.</p> <p>Industry is best suited to industrial sites with good road links and applications in the open countryside, even associated with agricultural activities, should be discouraged.</p> <p>For applications under f and g, a sequential test should be applied to test if the development could reasonably be accommodated on a designated industrial site.</p> <p>New developments should not materially alter the character of the rural location, so the size and scale is important.</p> <p>Where vehicular traffic is significantly increased, a sequential test should be applied to consider if the development should be closer to major roads and settlements, or to the source.</p> <p>The policy needs to clarify that lagoons of digestate need permission if above a certain size and to fulfil criteria relating to proximity to dwellings, watercourses etc.</p> <p>This policy of a “scale proportionate to the proposed functional need” is not effective. Huge industrial-sized developments in the open countryside are allowed, while a single dwelling is not, unless accompanied by significant development. For example the Chicken Broiler units on a greenfield site near Leadenham and Brant Broughton, which cover over 15,000sq.m, more than two football pitches.</p>			No
1103186	S6; S7; S8								<p>We welcome these proposals. Could they be implemented before the legislation requires it?</p> <p>We suggest that there needs to be some flexibility without compromising the objective in 2, for example, other zero carbon forms of energy may be delivered, such as green hydrogen, so the infrastructure such as gas pipes, need to be allowed.</p>			No
1103196	S11								Broadly support			No
1103197	S12								Broadly support			No
1103182	S14	Don't know	Don't know	Don't know	No	No	Don't know	Don't know	<p>Support the move to encourage housing to be sustainable in its energy use, hence a need to be closer to carbon neutral in future. The policy should not allow an easy option of paying into private renewable energy companies instead.</p> <p>Object to the reliance of wind turbines for renewable energy</p> <p>Lincolnshire is already well supplied with offshore turbines. Electricity is easily transportable. The need for each planning authority to be self-sufficient in renewable energy is not evidenced and is not necessary.</p> <p>The renewable energy companies say that 40m turbines are not cost-effective. This puts heavy pressure to build much larger turbines in the very small parts of the area that are more than 2km from any settlement. For example, the Navenby lowfields area and Metherringham heathland that will both have significant impact on the neighbouring protected cliff edge environment and on wildlife corridors.</p> <p>This is not an appropriate form of development in a flat landscape, as upheld in the previous planning refusals of turbine applications, such as at Nocton. The cooling towers at Cottam Power Station 25 miles away from the Cliff Edge are 114.3m. If larger turbines are allowed, and efficiency is “maximised”, then turbines will be at their tallest, over 200m high less than two miles from the Cliff Edge. The Cliff Edge is</p>	Large turbines should be taken out of the plan. Smaller turbines should be only subject to support from all the affected Parish Councils and the majority of the public. Consultation should be run by the Councils, albeit funded the developers.	Yes	No

									<p>approximately 50m above the adjacent white turbine area, so turbines over 50m would be an alien industrial feature in the landscape, overshadowing the protected areas and significantly changing the character of those areas.</p> <p>Two of the white areas for large turbines shown on map 2 page 39 are in the red value zone shown on Map 3 on page 52, damaging opportunities for economic gain through housing development.</p> <p>The larger turbines are required to be more than 2km from a settlement (para 3.3.12). The impact of turbines on the value of the red zones should be considered. The industrialisation of the countryside does have an adverse impact on tourism and quality of life for residents, contrary to the NK Plan.</p> <p>The Cliff Edge is an area of Great Landscape Value because it is the views from the Cliff Edge, which are significant. The white area (Map 2) to the west of the Cliff Edge should therefore be excluded, because of their significant impact on the Cliff Edge. Previous turbine applications at Nocton and Potterhanworth Fen were refused. The document accepts there is a need to require a 2km minimum gap between settlements and large turbines because of the impact on health and visual intrusion. Proposal: An individual dwelling also suffers significant disadvantage of proximity to large turbines and must also be allowed a similar buffer zone.</p> <p>3.3.4 This paragraph suggests a further 81MW of solar energy, but a further 150MW from wind. There is too much emphasis on turbines where we get huge objections to the visual intrusion of industrialising the countryside, effects of noise on mental health and impact on wildlife. We receive far less objection to solar panels, to which our landscape is better suited, hidden behind high hedges in flat landscape. The land under the panels significantly enhances our biodiversity. They are less permanent than the concrete base of large turbines and can be returned to farmland as more efficient renewable energy sources develop. Solar energy has proven deliverability, but wind power has not. By 2040, we will be a third short on energy because this is no evidence that it is deliverable.</p> <p>All new dwellings and industrial buildings should have solar panels and be angled accordingly as far as possible.</p> <p>A policy for dismantling renewable energy structures when no longer required needs to be included.</p> <p>Demonstrable local support should need to apply to all dwellings within sight of the turbine. The difficulty with assessing local community support has been previously identified, especially where money can be made available for local projects by energy companies in a way not done by housing development companies. We do not see community support as a viable mechanism when the impact of what could be very high turbines is so far reaching.</p> <p>The heights of the turbines are unlikely to be as low as suggested in the text, since the newer turbines are over 200m, creating an impact which cannot be mitigated in our landscape.</p> <p>Similar objections are well explained in the submission from one of our members. Peter Lundgren, following group discussions, and which we support.</p> <p>We support solar panels when well screened and we have seen very successful increase in biodiversity underneath. The Natural Environment Research Council has identified the need for an increase in biodiversity which should be supported here in this policy.</p> <p>The U-turn on wind turbines from being a general presumption against, to a general presumption in favour, is highly controversial. We note the definition between small scale and large-scale developments but even turbines up to 40m have a significant impact on industrialising the open countryside. The invitation to much larger turbines, although "local" support is required, could involve support from just a small village, while the impact covers a much greater area.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

									<p>The definition of local support over such a wide area would be very hard to define, especially where proposed wind farm developments are by necessity in rural areas and could impact on communities that do not have a say in their development. For example, the former Nocton wind farm proposal was in Nocton parish but geographically much closer to Bardney which is in a different district council area. It is also worth noting that many objections to the Nocton wind farm proposal came from Lincoln some 10 miles away because of the potential loss of views towards and away from Lincoln Cathedral.</p> <p>There is sufficient potential for energy production in Central Lincolnshire from solar and anaerobic digestion without the use of these wind turbines. (Appendix A of the Task C: Emissions Reductions Targets evidence report)</p> <p>The challenges of gaining planning permission for commercial scale wind turbines are well documented. We recognise the necessity to ensure a guaranteed increase in renewable energy generation within the district, to be delivered in a relatively short time. There is a very real likelihood that wind power will fail to deliver its share of the required increase in power generation. Therefore, large-scale wind turbines should be taken out of the plan as they are not deliverable. For this reason, the plan is not sound because it is not effective.</p> <p>There is sufficient energy production in Central Lincolnshire without the use of these turbines. For example, there are three significant applications in the pipeline in West Lindsey, close to Cottam Power Station. Just one of those solar installations covers 1,690 acres and an estimated 5 acres of batteries, which is likely to fill the grid to capacity and prevent further development of solar panels or wind energy.</p> <p>Large turbines should be taken out of the plan.</p>			
1103191	S17								<p>We welcome the focus on peatland and the importance of peatland in carbon sequestration. The Local Plan states in policy S17 that existing carbon sinks must be protected. All trees are carbon sinks. This should be clearer in the opening paragraphs of S17.</p> <p>The carbon sequestration value of a mature tree of a meter across, for example, between 1.3 and 1.8 metric tonnes of Carbon per year. Source. Forestry Commission 2003. Trees absorb carbon at different rates, but as a rule of thumb, a typical hardwood tree can absorb as much as 48 pounds of carbon dioxide per year. Cutting down a forty year-old tree releases about a ton of carbon. Hence the need for any mitigation to involve the replacement of tree's carbon footprint allowing for mortality.</p> <p>Proposals: The clause a) in Policy S17 that suggests carbon sinks can be removed for development should be deleted.</p> <p>High value carbon sinks such as mature trees and broad-leaved woodlands, are priority habitats under the Natural Environment Research Council's Biodiversity Action Plan and should be protected in this local plan. Priority habitats should not be allocated for development or if already allocated, they should be deallocated and an alternative site offered.</p>			No
1103188	S22								<p>This local plan does not address the need for affordable homes in the number required. Affordable housing levels need to be higher to closer match local demand, closer to the 50% of calculated need and in all locations where it is needed, including small villages.</p> <p>Proposal: The policy needs to be clear that housing needs to be genuinely affordable, not just cheap, built to a lower specification, and in perpetuity.</p> <p>Land values are depressed by the rate of development and this diminishes the opportunities for the affordable housing needed. A policy should be included to prevent developers paying too much and then requiring the Council to reduce their</p>			No

									<p>infrastructure contributions.</p> <p>The contribution to affordable housing is far too low, leaving too big a gap in the evidenced need for affordable housing and what is found from development. The requirements need to be raised.</p> <p>Proposal: Proportionate contributions should be made by all new dwellings, not a ten new dwelling threshold. For smaller contributions, it should be a commuted sum paid to the District or City Council.</p>			
1103195	S23								<p>Support and proposal: There is no need to restrict residential care accommodation to only tier 1-4. This should be extended to within 100m of a shop and a pub. Residential care can every usefully be placed in lower tier villages as long as they have a shop and a pub. It is important for people who need care not to be extracted from their existing support networks. For example, Welbourn housing for the elderly or infirm works very well. Homes for older people in the bigger villages 1-4</p>			No
1103192	NS24								<p>We welcome the custom or self-build policy.</p> <p>The definition of self-build needs to be clearly defined to ensure it is genuinely a self-build.</p> <p>The self-build sites on a development should be made available in a phased manner. These sites need to be subject to the same sustainable locations and design constraints as other new dwellings.</p>			No
1103200	S26								Caravan pitches or park homes supported if acceptable for permanent dwellings			No
1103202	NS27								Broadly support. Employment areas large p 65 to small ½ ha			No
1103204	S39								Broadly support. Shop and pub protected- village centres			No
1103206	S42								Broadly support. Local Tourism encouraged.			No
1103207	S44								Broadly support.			No
1103193	S48								Proposal: Point b) mentions attractive routes, but also important are routes connecting communities and facilities which should be added in point b or in a new point c.			No
1103208	S51								Broadly support.			No
1103189	S51; S66								<p>We support this policy as open spaces are vital for our health and that of the natural world.</p> <p>Proposals: This should be proportionate to all new development, not just making up a shortfall as in a) in Policy S50. This can be by an agreed commuted sum offsite, working through the Parish or Town Council.</p> <p>Funding mechanisms should include a proportionate contribution from all dwellings, not just when in batches of ten.</p> <p>Developments need to leave sufficient space for all trees, newly planted or existing mature trees, to grow to their full capacity without root impairment and housing density will need to take this into account.</p> <p>New developments should contribute to a proportion of the required tree canopy for the District and Central Lincolnshire as their contribution to the green infrastructure as well as open space.</p> <p>The open space requirement was higher in the previous plan. This should be reinstated. Need for open space is increasing with more people working from home. With new pressures on Biodiversity Net Gain and on developing better tree canopy, each dwelling should make a proportionate contribution.</p>			No
1103209	S52								Broadly support			No
1103210	S53								Broadly support			No
1103211	S56								Broadly support			No
1103199	S58; S59; S60; S61;								Support recognition of the land and water protection, already in habitat regulations			No

	S62; S63; S64										
1103194	S62								Support the protection of the Cliff Edge Proposal: Please include note it is the views from the Cliff Edge that give it its quality and need protection, as well as views of the Cliff Edge.		No
1103198	S63								Broadly support		No
1103212	S65								Broadly support		No
1103190	S66								<p>Mature trees are vital for health, carbon capture, aesthetics and important in schools. Protection of trees needs to be much stronger to stop the trees being felled.</p> <p>Mitigation Proposal: The mitigation measures need to be much more stringent to prevent the trees being cut down and added as a simple cost on the development. Any removal of trees needs to be immediately compensated by an equivalent carbon footprint of trees. Otherwise it would be a net loss. This could be connected to the diameters of the standards with a significant increase to allow for attrition and planted with space to become mature.</p> <p>The suggestion that you can cut down a 300 year oak a meter across and replace it with 11 “standards” that may or may not survive is not adequate.</p> <p>The policy does not say how far apart they need to be, and therefore how much land is allocated, nor a commitment to the maintenance needed. This needs to be prescribed.</p> <p>If a commuted sum were to be payable, it would need to be significant as the carbon value, biodiversity supported by the tree, visual impact and the impact on people’s health and wellbeing are important.</p> <p>Under the National Planning Policy, footnote 48, the local plan would be “unlawfully produced if it was not ‘radical’ and did not meaningfully contribute to reducing emissions, help mitigate against climate change and help society adapt to a changing climate”. Thus the mitigation measures must at least immediately replace what is lost.</p> <p>Support and propose long term protection: Because there are relatively few trees in North Kesteven, at least as much emphasis should be put on protecting those that are already mature in the landscape. (1.1 para 3 NK Tree Strategy). Decaying trees should be protected and made safe, rather than removed. Removing decaying trees up uses fossil fuel and, in many cases, does not yield a useful crop for heat generation. (see 3.3.16 Pests and diseases NK Tree Strategy). Trees need protection during construction.</p>		No
1103213	App 1; App 2								<p>The allocations listed in appendix 1 and 2 already have permission. The new sites are currently not included. Our members would need to properly engage if the sites were actually coming forward for development.</p> <p>Large housing estates tacked onto villages are very difficult to incorporate without changing the character of the village and putting heavy pressure on the facilities. The distance from new dwellings to the shop or pub means that people are travelling by car to get to the local facilities, which detracts from character of being in a village. These additional plots are extremely large in proportion to the current village. The proposed external sites are therefore not supported.</p> <p>Proposal: In the previous plan, it was deemed a 10% increase in villages was reasonable without changing the character of the village. The allocations need to be included under the same premise, included in the 10% increase in the life of the plan.</p> <p>Proposal: The distances of dwellings from amenities that are given are misleading,</p>		No

									and need to be corrected. For example, some of the ‘approximations’ are half the true distances. For example, most of the distances quoted for Bassingham Ward for villages to urban areas & other villages are way out. For example, Bassingham to North Hykeham – document states 5km when it’s 10km Brant Broughton to Witham St Hughs - 7km when it’s 13km Brant Broughton to North Hykeham 11km when it’s 15km and so on....			
--	--	--	--	--	--	--	--	--	--	--	--	--

Lincs Wolds Joint Advisory Committee

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103581	Intro								Page 9: 1.2.10. Central Lincolnshire has a varied and contrasting natural environment including gentle chalk and limestone uplands as well as low lying vales and fenland. The nationally protected Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB) falls partly within Central Lincolnshire and has a distinctive landscape of rolling hills and nestling villages. However, the wider rural landscape of Central Lincolnshire, with its sweeping character and famously big skies, is a highly valued asset throughout the area and contributes greatly to its local distinctiveness and attractiveness. The escarpment of the Jurassic Lincolnshire Limestone, known locally as the Lincoln Edge, runs for the full length of Central Lincolnshire, forms a unifying topographic feature, and as a key factor in the origins and historic development of the City contributes strongly to the City’s present quality and character.	Recommend adding “nationally protected” Lincolnshire Wolds Area of Outstanding Natural Beauty in the above context setting paragraph to highlight the importance of the designation and rebalance the narrative, which arguably as worded currently underplays the value of the AONB. This is also the first reference to the designated landscape within the document.		No
1103582	S4								2.4. Housing in Villages Page 23: Policy S4: Housing Development in or Adjacent to Villages 3. Proposals for residential development on unallocated land immediately adjacent to the developed footprint will only be supported where this is: a) a First Homes exception site in accordance with the NPPF and provided it is outside of the Lincolnshire Wolds Area of Outstanding Natural Beauty and not within a location that is subject of a Designated Rural Area as defined in Annex 2 of the NPPF; or b) exclusively for a rural affordable housing exception site. Confirming our general support for Proposal 3. as detailed above which includes recognition of the planning constraint of avoiding residential development in unallocated sites which are adjacent to settlements within the Lincolnshire Wolds AONB.			No
1103584	S14								3.3. Theme 2 - Increase Renewable Energy Generation Page 41: 3.3.12. Mapping of principal constraints – The next step is identifying and mapping strategic level constraints to broadly identify the areas potentially suitable for wind turbine development. Includes the Lincolnshire Wolds Area of Outstanding Natural Beauty.			No

								<ul style="list-style-type: none"> • The LWCS supports the inclusion of the Lincolnshire Wolds AONB as a significant mapping constraint for future wind turbine development. As per our previous response, in terms of wind energy development the Lincolnshire Wolds AONB is especially vulnerable to any potential visual intrusion and harmful impacts from wind turbines on account of the relatively modest height of the Wolds. Its close juxtaposition with the widely flat terrain of the Lincolnshire Central Vale accentuates the very open and dramatic westerly views from the Lincolnshire Wolds North-West Escarpment. This position has been tested and endorsed through several Planning Appeals that considered the landscape impacts upon the AONB setting as part of the planning balance; including an appeal for a single wind turbine to blade tip of 102 metres above ground level that was subsequently dismissed by the Secretary of State (8th March 2016) under the Town and Country Planning Act 1990 – Section 78 Appeal by EDP land west of Moor Lane, Caistor, Lincs and section 79 of, and paragraph 3 of Schedule of the 1990 Act (original West Lindsey District Council planning application reference 130876; Appeal Reference: APP/N2535/W/15/3010086). A further single wind turbine application of the same height was also dismissed at appeal (30th March 2016) – Appeal Reference: APP/N2535/W/15/3005003 for Land south of Caistor Road, South Kelsey. • On reflection, for the above reasons we would welcome the inclusion of a wider buffer zone beyond the AONB boundary to help protect the important setting and key viewpoints from the Lincolnshire Wolds western escarpment. We take this opportunity to register our concerns in respect of three of the areas on Map 2 (page 43) to the immediate west of the AONB that have been deemed to be of potential for locating medium to large wind turbines - namely the sites near Caistor, Holton le Moor and Willingham Woods. 			
110358 5	S43							<p>7. Tourism and Visitor Economy</p> <p>Page 93: 7.0.1 Central Lincolnshire, with historic Lincoln at its core, has a thriving, growing, visitor economy with visitors arriving for education, business and leisure purposes. Alongside historic Lincoln and its cathedral and castle, there are a number of significant visitor economy assets within the city, including its annual Christmas Market. Central Lincolnshire also has a draw for its aviation history, access to the open countryside (including the Lincolnshire Wolds Area of Outstanding Natural Beauty) and the Lincolnshire Showground. The Employment Needs Assessment (ENA) (2020) sets out that between 2012 and 2018 the number of people employed in ‘Accommodation and Food Service’ jobs has risen by 36%. Linked to this as a sector that attracts visitors to the area, jobs in the ‘arts, entertainment, recreation and other services’ have increased by 47%. Further growth is also predicted within the ENA for both jobs sectors.</p> <p>7.2. Sustainable Rural Tourism</p> <p>Page 95: 7.2.2. The Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB) is a popular visitor destination for walking, cycling and outdoor pursuits. The AONB extends into Central Lincolnshire between Market Rasen and Caistor, and is surrounded by a locally designated Area of Great Landscape Value (AGLV).</p> <ul style="list-style-type: none"> • Welcome the reference to the Lincolnshire Wolds AONB as an additional tourism and visitor economy draw within the wider countryside. We support the need for any rural tourism/recreation development to be of a type, scale and design that is sympathetic to the locality as directed through subsequent Policy S43 Sustainable Rural Tourism and part E of Policy S5. We would caution that a number of tourism development proposals within or adjacent to villages/hamlets may often lead to potential conflicts and perceived concerns in term of local traffic problems, and general late-night noise which may be difficult to monitor and control. In terms of tourism/recreation development in the wider countryside, such proposals, of an appropriate nature, may well be better placed as a sustainable farm diversification project enabling the enhancement of the wider visitor infrastructure through eco-tourism, glamping or similar camping facility, where the application is deemed to be sympathetic and appropriate to the local landscape character and can clearly demonstrate that it enhances rather than detracts from the wider countryside. 			No
110358 6	S62							<p>11.3. Responding to Landscape Character</p> <p>Page 140: 11.3.1. Central Lincolnshire is a predominantly rural landscape interspersed by the City of Lincoln, market towns and smaller settlements and characterised by its contrasting chalk and limestone uplands, low lying vales and fenland landscapes. The Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB) is a nationally designated area with the highest status of landscape protection, and the Lincoln Hillside is recognised as one of the most historic townscapes in the East Midlands.</p>			No

								<p>Policy S62: Area of Outstanding Natural Beauty and Areas of Great Landscape Value</p> <p>Page 140: The Lincolnshire Wolds Area of Outstanding Natural Beauty</p> <p>The Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB) is a nationally designated landscape and has the highest level of protection. Great weight should be given to conserving and enhancing the landscape and scenic beauty in this area. All development proposals within, or affecting the setting of, the AONB shall:</p> <p>a) be compatible with the special character of the area and have had high regard to conserving and enhancing the special quality and scenic beauty of the landscape; and</p> <p>b) respect the landscape character, topography, and context in relation to the siting, design, scale and extent of development; and</p> <p>c) protect and enhance important views into, out of and within the AONB; and</p> <p>d) retain and enhance existing natural, historic and cultural features that contribute to the special quality of the landscape.</p> <p>Proposals which will result in an adverse impact on the AONB or which fail to demonstrate that they will not have an adverse impact taking into account any mitigation proposed will not be supported.</p> <p>Areas of Great Landscape Value</p> <p>Areas of Great Landscape Value (AGLV) are locally designated landscape areas recognised for their intrinsic character and beauty and their natural, historic and cultural importance. A high level of protection will be afforded to AGLV reflecting their locally important high scenic quality, special landscape features and sensitivity.</p> <p>Development proposals within, or within the setting of, AGLV shall:</p> <p>e) conserve and enhance the qualities, character and distinctiveness of locally important landscapes; and</p> <p>f) protect, and where possible enhance, specific landscape, wildlife and historic features which contribute to local character and landscape quality; and</p> <p>g) maintain landscape quality and minimise adverse visual impacts through high quality building and landscape design; and</p> <p>h) demonstrate how proposals have responded positively to the landscape character in relation to siting, design, scale and massing and where appropriate have retained or enhanced important views, and natural, historic and cultural features of the landscape; and</p> <p>i) where appropriate, restore positive landscape character and quality.</p> <p>Where a proposal may result in adverse impacts, it may exceptionally be supported if the overriding benefits of the development demonstrably outweigh the harm – in such circumstances the harm should be minimised and mitigated through design and landscaping.</p> <ul style="list-style-type: none"> •We reiterate our support for the inclusion of a specific planning policy for the Lincolnshire Wolds AONB as expressed within Policy S62 – Area of Outstanding Natural Beauty with the additional recommendation below for Policy S62 a). We welcome the reference to Areas of Great Landscape Value as proposed within the accompanying policy statement. •The National Association for AONBs, Lincolnshire Wolds Joint Advisory Committee and a number of other AONBs from around the country have recently highlighted to Government that the current duty of regard for AONBs is weak and that this should be strengthened in legal terms; in this context we recommend that there is need for including “high” or “special” regard as highlighted for the policy wording under S62a . Discussions are currently ongoing with Defra to seek legal reform in this area as part of the wider response to the National Protected Landscapes Review (2019). • Please note that Defra has now published its response to the national review, we await further news on the wider consultation findings and future changes to the legislation and governance for both National Parks and Areas of Outstanding Natural Beauty. 			
--	--	--	--	--	--	--	--	--	--	--	--

									Glover Review Report (2019): https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/833726/landscapes-review-final-report.pdf And the Government response to the Landscapes Review (2022) and accompanying public consultation.			
--	--	--	--	--	--	--	--	--	---	--	--	--

Lindum Group Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102615	S63; Map	No			No				<p>This representation should be read in combination with the Lindum Group representation in regard to the omission of Land to the rear of 352 Brant Road Waddington as an allocation in Policy S77 of the proposed submission document.</p> <p>The Lindum Group do not consider that the Land to the rear of 352 Brant Road in Waddington (location plan attached) performs the functions of the Green Wedge as detailed in Policy S63 of the Proposed Submission Local Plan. This is well demonstrated by the officer report to planning application 21/0495/FUL which is also included with this representation. Paragraph 1.15 of the officer's report for the planning application deals with the Green Wedge, with the planning officer finding that the site does not have a recreational use nor is a designated wildlife site. The officer also found that due to the land to the west of the site being limited for development by flood risk, the site would also not impact on the principle purpose of the Green Wedge in this location which is the physical separation of Waddington Low Fields and North Hykeham. It is clear therefore that the site does not function as part of the Green Wedge in this location.</p> <p>Based on the above, we do not consider the sites inclusion in the Green Wedge on the Policies Map to be an appropriate strategy and is not based on proportionate evidence. Consequently, we do not believe that this area of the Policies Map can be considered to be Justified when judged against the requirements of paragraph 35 of the NPPF and should not be considered to be sound.</p>	To make this area of the Policies Map sound the area identified on the attached Location Plan should be removed from the Green Wedge annotation. In line with our other representations, the site should be noted as a housing allocation on the policies map.	Yes	Yes
1102566	S77	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>The Lindum Group strongly supports the allocation of Land at Cathedral Quarry (COL/MIN/005) for residential development. We are working in partnership with the owner of the site, Lincoln Cathedral, to bring the site forward including production of an Outline Planning application due to be submitted to the City of Lincoln Council in the coming weeks. A detailed evidence base will be included in that planning submission.</p> <p>The allocation of the site for residential development will make a noteworthy contribution to the identified housing requirement for Central Lincolnshire identified in proposed Policy S2 and is therefore Positively Prepared in line with Paragraph 35 of the NPPF.</p> <p>Paragraph 35 also requires policies in the Local Plan to be Justified in terms of being based on an appropriate strategy which is evidence based. Again, we strongly support the allocation of the Cathedral Quarry for residential development and consider the allocation of the site to be appropriate and evidence based. Residential development of the site, which is already surrounded by other residential development is a very logical proposal for what</p>	As detailed in question 4 the Lindum Group fully support the allocation of the Cathedral Quarry for residential development. However, we do not agree with the site-specific requirements included for the site in Policy S77. Specifically, the requirement for the retention of the bunds on site. Site specific considerations like the retention of bunds should be dealt with through the Development Management process and it is not necessary for such	Yes	Yes

								<p>is an extremely sustainable site in terms of its location. We therefore strongly support the summary in appendix 7 of the Sustainability Appraisal, which considers the reasons for selecting the preferred options, and states that the Cathedral Quarry is “previously developed land (as a mineral site) within the built footprint of the city and close to existing services and facilities”</p> <p>As detailed above, the Lindum Group are working towards a full planning application on the site which will be submitted shortly. The evidence base supporting the application includes the reports identified in the below bullet points. At the time of submission of this response form the full evidence base is not available for inclusion, however a layout plan, site sections, remediation strategy and draft biodiversity net gain calculation are included in support of this representation.</p> <ul style="list-style-type: none"> • Remediation Strategy – A thorough remediation strategy for the restoration of the quarry site for residential development has been produced. This strategy has been approved by NHBC in pre-application discussions, helping to demonstrate the site is deliverable. • Transport Assessment (Including access) – A Transport Assessment, including access design, has been produced by Clancy Consulting. The assessment identifies suitably access points alongside demonstrating that development can be delivered without negatively impacting the local highway network. • Flood Risk and Drainage Strategy – Clancy Consulting have also produced a drainage strategy for the site which shows that the site is not at risk from flooding and suitable solutions for both foul and surface water can be achieved. • Layout Plan – Franklin Ellis Architects have worked on the scheme. Drawing number CQL-FEA-S1-XX-DP-A-1202 included with this submission clearly shows that residential development of the site is feasible and can be delivered in a way that is appropriate when considering neighboring houses. • Site Sections – The site sections included with this submission help to show that housing development on site can be achieved without adversely impacting the amenity of neighboring housing. The sections also demonstrate that bund retention on site is not required (see question 5 below). • Biodiversity Net Gain – A biodiversity net gain calculation has been produced on site which is based on the broad principles of the layout referenced above. A copy of this work is included with this submission and the conclusion of the analysis is that a net gain of +3.5% can be achieved on site. • Ecology and Tree Surveys – Ecology and Tree surveys of the site have also been completed and will be submitted in support of the planning application. The surveys identified no ecological or arboricultural features that would limit the development of the site for housing. <p>The above evidence clearly shows that allocating the site is justified and based on proportionate evidence.</p> <p>The above evidence also helps to demonstrate that the site is deliverable for residential development over the plan period and should therefore be considered as Effective when considered against NPPF paragraph 35. Particularly important in this is the remediation strategy and transport assessment that show that the quarry site can be remediated to a level that is acceptable with NHBC and building regulations and that a suitable access to the site can be achieved. It is also important to note that the Lindum Group, an experienced local building and development company, are involved in and</p>	<p>considerations to be included in the allocation within Policy S77. This is particularly relevant given other policies included in the Local Plan that would guide Development Management decisions on submitted planning applications. A good example of this is Policy S53 which is a very thorough Design policy which would guide the decision maker when considering features on site including the bunds.</p> <p>We do not consider it necessary to retain the bunds on site and think a satisfactory design solution can be achieved if the bunds are removed from the periphery of the site and used as part of the fill exercise for the quarry. Such an approach is included in the planning application due for submission and allows for a viable scheme to be delivered on site. Included with this submission are site sections taken through the site which help to show the suitability of a strategy which includes the removal of the bunds. Keeping the bunds in situ would result in raised finished floor levels for the units proposed and would increase the potentially for amenity impacts on the surrounding residential dwellings. Rather than improve privacy for these units, levels on site would need to be raised to account for the bunds and the end result would be detrimental to both the proposed units and</p>		
--	--	--	--	--	--	--	--	--	---	--	--

									<p>committed to the site, helping to further demonstrate the deliverability of the residential development proposed for allocation.</p> <p>The final requirement of paragraph 35 is that proposed policy is consistent with national policy. The Cathedral Quarry site is in a highly sustainable location in a predominantly residential area. The development would result in the use of previously developed land in line with paragraph 119 of the NPPF and conforms with the drive for boosting housing supply central to chapter 5 of the Framework.</p> <p>Whilst the Lindum Group fully support the sites allocation in Policy S77, as identified above, we have concerns about some of the Site-Specific Requirements included in the allocation. We have therefore recommended some changes to these requirements in question 5 below.</p>	<p>neighboring properties.</p> <p>On this basis, the Lindum Group consider it necessary for the first bullet point of the site-specific requirements for allocation COL/MIN/005 should be deleted from the plan.</p>		
1102579	S77	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>The Lindum Group strongly supports the allocation of Land South of Station Road, Waddington Low Fields (NK/WAD/004a) for residential development. The Lindum Group have a legal interest in around 4 hectares of the site and are actively working together with the remaining landowners to bring the site forward.</p> <p>Paragraph 35 of the NPPF indicates that Local Plans should be prepared in accordance with Legal and Procedural requirements and whether they are sound. These representations consider each of the points in Paragraph 35, which deal with whether plan policy is legally sound, in relation to the allocation of the Land South of Station Road. Concluding that in all aspects the allocation of the site is legally sound policy.</p> <p>Paragraph 35 of the NPPF requires that Local Plan Policies are Positively Prepared and by being positively prepared as a minimum seek to meet the area's objectively assessed needs. The allocation of the land to the South of Station Road in Waddington for the development of 321 dwellings will make a significant contribution to meeting the identified housing requirement for Central Lincolnshire included in Policy S2 of the submission version of the plan. Therefore, the proposed allocation, in a highly sustainable location, conforms with the NPPF requirement that local plan policies are positively prepared.</p> <p>Paragraph 35 of the NPPF also requires for policies in the Local Plan to be Justified in terms of being based on an appropriate strategy which is evidence based. Again, the Lindum Group strongly support the allocation of the Land to the South of Station Road in Waddington and consider the sites allocation to be based on an appropriate strategy. The site is in a sustainable location in a predominantly residential area of Waddington Low Fields and its development for housing is very logical. The Lindum Group also support the evidence base produced in support of the sites allocation including the Sustainability Appraisal for the proposed submission draft which includes detailed consideration of the Preferred Housing Site allocations in Appendices 5 and 7. Appendix 7 of the report notes that the site is "close to existing services and facilities, would retain the shape and character of the settlement and has good connections to Lincoln". We fully support these findings and consider the evidence base sufficient to justify the sites allocation in line with the NPPF requirement.</p> <p>As with all allocations in the plan, developer involvement is an important factor when considering whether a site can be brought forward. In terms of the</p>	n/a	Yes	No

								<p>proposed allocation at Station Road in Waddington, the Lindum Group are actively involved in the promotion of the site with the intention of bringing the site forward for residential development. Lindum have valuable experience of development in the area having previously delivered the affordable housing scheme of 51 dwellings directly across Station Road from the proposed allocation (NKDC Planning Reference 17/1448/FUL). Through this development the Lindum Group have good working knowledge of local ground conditions, drainage and highways infrastructure and therefore are well placed to bring forward development within the allocation which is less than 3 miles from the company's head office. The group have a legal interest in almost half of the proposed allocation and a good relationship with the other landowners. Therefore, the involvement of the Lindum Group in the site is a clear demonstration that development can be delivered over the plan period and should be considered as Effective when considered against the requirements of paragraph 35 of the NPPF.</p> <p>The final requirement of paragraph 35 is that proposed policy is consistent with national policy. The site is in a highly sustainable location with no constraints that would limit its development. Development of the site would therefore conform with the central requirement of the NPPF, which is the achievement of sustainable development. The delivery of 321 dwellings on site would also make a significant contribution towards the drive for boosting housing supply central to chapter 5 of the Framework.</p>			
1102581	S77	No	No		No			<p>It is important to note that the Lindum Group support several allocations included in Policy S77 of the Proposed Submission Document. Those being sites COL/MIN/005 and NK/WAD/004a which are subject to separate supporting reps which deal with individual sites within the Policy. This representation considers another site within the Lincoln Urban Area which has not been included, with our view being that this omission is not legally sound.</p> <p>The site in question is land to the rear of 320-378 Brant Road, Waddington (NK/WAD/001) which is not included as a housing allocation in Policy S77.</p> <p>We do not consider the information included in the Sustainability Appraisal in regard to the Brant Road site to be correct or justified when considered in line with the requirements of Paragraph 35 of the NPPF and therefore do not consider both the sites exclusion from Policy S77 and the justification for this exclusion within the Sustainability Appraisal to be sound.</p> <p>Appendix 7 of the Sustainability appraisal rightly identifies that Planning Application 21/0495/FUL was refused, but what the appraisal fails to consider is the reason for refusal. The Lindum Group were the applicants on the planning application which was for a fully affordable housing scheme of 53 dwellings. Included with this representation are the officers report and decision notice for the application which clearly identify that the sole reason for refusal of the scheme was a conflict with policies LP2 and LP11 of the extant Local Plan, with that conflict being the failure to demonstrate clear local community support for the proposals. This sole reason for refusal highlights that the application was considered to be acceptable in all other aspects, a fact further demonstrated by the fact that no statutory consultees objected to the planning application.</p> <p>The Sustainability Appraisal identifies that the site is located in the Green</p>	<p>Planning application 21/0495/FUL clearly demonstrates that the land to which the application relates is suitable for residential development and was only refused planning permission due to a lack of local community support. The requirement for local support is no longer included in policy within the Proposed Submission document, effectively removing the one reason for refusal for the planning application. The application site is therefore suitable for residential development and should be included as a housing allocation within Policy S77 of the Local Plan.</p> <p>Policy S77 deals with housing allocations within the Lincoln Urban Area, an area rightfully identified as the most sustainable location within Central Lincolnshire. Therefore, the inclusion of</p>	Yes	Yes

									<p>Wedge. Paragraph 1.15 of the officer's report for the above planning application deals with the Green Wedge, with the planning officer finding that the site does not have a recreational use nor is a designated wildlife site. The officer also found that due to the land to the west of the site being limited for development by flood risk, the site would also not impact on the principle purpose of the Green Wedge in this location which is the physical separation of Waddington Low Fields and North Hykeham. It is clear therefore that the site does not function as part of the Green Wedge in this location and Green Wedge policy should not preclude its allocation for residential development.</p> <p>The Sustainability Appraisal goes on to highlight that part of the site is located in Flood Zone 2 and is at risk from surface water flooding. As is demonstrated by the planning application, 53 dwellings can be accommodated on site without using any land located within Flood Zone 2. On this basis, the Lead Local Flood Authority had no objection to the planning application and concern with Flood Risk should not discount the site from allocation.</p> <p>As highlighted above, no statutory consultees objected to the planning application. Therefore, Lincolnshire County Highways had no objection to the proposed access point on Brant Road. This contradicts the statement in the Sustainability Appraisal that the access conflicts with the Hawthorn Avenue junction onto Brant Road. If County Highways had a concern with this conflict, then they would have raised objection to the planning application, which they did not. So, concerns with access and a perceived conflict with the Hawthorn Avenue junction is not a justified reason not to allocate the site.</p> <p>The final reason the site wasn't taken forward as a preferred allocation as referenced in appendix 7 of the Sustainability Appraisal was perceived major negative effects in terms of landscape impact. A landscape impact assessment was submitted as part of the planning application which found that the proposed housing would not have a significant landscape impact, a point accepted by the planning officer in section 2 of their report.</p> <p>Overall, it is evident that the reasons for the site not being taken forward as a preferred option are unfounded. In line with paragraph 35 of the NPPF therefore, we consider the omission of land to the rear of 320-378 of Brant Road in Waddington as a housing allocation is unsound as it is not Justified due to it not being based on proportionate and accurate evidence.</p>	<p>the site as an allocation for 53 dwellings on the 2-hectare site would make a valuable contribution to the housing requirement for Central Lincolnshire identified in Policy S2 of the plan. We therefore recommend a change to Policy S77 that includes the allocation of the site in line with the attached location plan and details included in the bullet points below:</p> <ul style="list-style-type: none"> • Reference – NK/WAD/001 • Site Name/Address – Land to the rear of 352 Brant Road, Waddington Low Fields. • Site Area (ha) – 2.0 • Planning Status – None • Indicative dwellings during the plan period – 53 • Site Specific Requirements – None 		
--	--	--	--	--	--	--	--	--	---	---	--	--

Lindum Homes

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102553	S80; SA	No	No		No				Lindum Homes supports the allocation of sites in large villages such as Branston, which appears to have been an evidenced based decision as outlined in the SA. The site to the north of Lincoln Road, Branston (NK/BRAN/010/10A and 10B) has, however, not been deemed suitable to accommodate development and has instead been given a status of 'reasonable alternative'. This is outlined within Appendix 5.2: Housing Site Allocations – North Kesteven of the SA. The specific reasons for the site not being allocated are outlined in Appendix 7: Reasons for Selecting Preferred Options and discount the site for reasons which we have previously disputed via objections made to earlier consultations.	Policy S80 deals with housing allocations within the large villages, as areas rightfully identified as the sustainable locations within Central Lincolnshire. Therefore, the inclusion of the site as an allocation for a minimum of 185	Yes	Yes

									<p>This site assessment, in our view, reaches erroneous technical conclusions. This assessment does, however, go to the heart of the legal compliance of the Local Plan, specifically as to whether the policies within it are ‘Justified’, and as such feel it appropriate to reiterate the concerns we have previously outlined.</p> <p>On this particular site, Lindum Homes have continually objected to the HELAA and its reasons for not proposing it for allocation. These have since been carried forward in Appendix 7 of the SA. One of these issues related to the site being on the edge of settlement. In the first instance, it cannot be considered a determining factor that the site is on the edge of the settlement – if it was it would rule out most of the sites proposed as part this local plan including the site proposed to be allocated in Branston. Each site needs to be considered on its own merits, and the site sits contiguous with the edge of the village, facing development to the south of Lincoln Road and would extend existing development to the west. It is therefore ideally located as a logical extension to the village, whilst also being within walking and cycling distance of the local schools and the services of the village centre. In addition, it also offers now much improved connectivity to Lincoln City Centre given the sites proximity to the new Eastern Bypass, for all forms of transport. This new road offers a much wider and more sustainable travel choice into Lincoln via an improved and more reliable bus route, as well as the improved and more direct, dedicated cycling and pedestrian routes towards the City.</p> <p>One of the other reasons for not allocating the site also relates to flood risk – a matter we have continually sought to clarify as part of the consultation process. The extent of the flood zone is, however, limited to small slither of the site along the northern boundary. This watercourse offers an ideal connection for surface water, with appropriate attenuation ensuring the run off for the site is much restricted compared to the uncontrolled run off at present. The attached layouts show how an efficient development can take place, protecting the flood risk areas and providing improved sustainable drainage and flood mitigation measures – which would improve the existing situation.</p> <p>The attached layouts also show how the site could be delivered as one, large allocation or could, over time, be phased should this be required. The delivery flexibility afforded by the site therefore further demonstrates its short term and long-term ability to help meet local housing needs. As such smaller areas (BRAN/10A and BRAN/10B) have been promoted as an attempt to phase development. This flexible approach shows an efficient and effective use of land to extend Branston over time.</p> <p>The third and final reason for not allocating the site relates the development would result in the loss of Grade 2 Agricultural land. There are various sources of data which show an area to the front of the site (the area varies depending on which source is used) being Grade 2 – however this has never been confirmed by a site specific assessment. Given the significant amount of better of better farmland available across Central Lincolnshire and within the wider County, it is contended that this cannot be a determining factor – this is evidenced again by various other sites being proposed for allocation with such a classification – including the site proposed in Branston.</p> <p>Paragraph 35 of the National Planning Policy Framework (NPPF) requires policies</p>	<p> dwellings on the 9.89 hectare site would make a valuable contribution to the housing requirement for Central Lincolnshire identified in Policy S2 of the plan. We therefore recommend a change to Policy S80 that includes the allocation of the site in line with the attached location plan (or a smaller area if deemed more appropriate) and details included in the bullet points below:</p> <ul style="list-style-type: none"> • Reference – NK/BRAN/010 • Site Name/Address – Land North of Lincoln Road Branston • Site Area (ha) – 9.89 • Planning Status – None • Indicative dwellings during the plan period – 185 • Site Specific Requirements – None 		
--	--	--	--	--	--	--	--	--	---	---	--	--

								<p>in the Local Plan to be Justified, delivering “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence” (NPPF para 35). As outlined above, we argue that the evidence base used to reject the allocation of this site has reached an erroneous conclusion by not taking into account locational and site specific factors, whilst it appears not to have been applied consistently to all sites across the plan. It has not therefore correctly taken into account this site as a reasonable alternative for allocation, and could not therefore be considered to meet this test. As such, we do not consider the Local Plan to have been sufficiently justified.</p> <p>Finally, we would conclude by stating that the site provides an opportunity to develop up to 9.89 hectares of land and deliver 185 dwellings (which we would argue is significantly below its theoretical capacity), according to the assumptions in the HELAA. The units can be delivered in smaller phases or as one, larger phase. The Lindum Group has an option agreement on this land and is well placed to bring forward development on it in a timely manner and therefore continue to support its allocation.</p>			
1102556	S80; SA	No	No		No			<p>Lindum Homes supports the allocation of sites in large villages such as Navenby, which appears to have been an evidenced based decision as outlined in the SA. The site to the east of Grantham Road, Navenby (NK/NAV/004) has, however, not been deemed suitable to accommodate development and has instead been given a status of ‘reasonable alternative’. This is outlined within Appendix 5.2: Housing Site Allocations – North Kesteven of the SA. The specific reasons for the site not being allocated are outlined in Appendix 7: Reasons for Selecting Preferred Options and continue to discount the site for reasons which we have previously disputed via objections made to earlier consultations.</p> <p>This site assessment, in our view, reaches erroneous technical considerations. This assessment does, however, go to the heart of the legal compliance of the Local Plan, specifically as to whether the policies within it are ‘Justified’, and as such feel it appropriate to reiterate the concerns we have previously outlined.</p> <p>On this particular site, Lindum Homes objected to the HELAA and its reasons for not proposing it for allocation. These issues appear to have been carried through in Appendix 7 of the SA. One of these issues related to the site being on the edge of settlement. In the first instance, it cannot be considered a determining factor that the site is on the edge of the settlement – if it was it would rule out most of the sites proposed as part this local plan. Specifically, this site is to the north of an allocation in the adopted Local Plan (CL906) which is now completely developed out. The existing site, developed by Linden and Lindum Homes, has successfully assimilated into the village having been carefully designed in conjunction with NKDC planning officers and the Planning Committee. This neighbouring site immediately adjacent is now also under Option by Lindum Homes, who, having successfully developed the existing allocation (all are now sold) have demonstrated their track record of delivery in the area.</p> <p>The NK/NAV/004 site would be screened from views by the existing development to the south and the existing frontage development along the A607. It is an appropriately located site within one of the larger settlements with access to Lincoln. It is noted that many other allocations seek to extend existing allocations or development currently under construction. It is assumed this is due to the fact that these sites have already been assessed as being a suitable extension to the existing built form of the settlement. This site follows that narrative, sitting</p>	<p>Policy S80 deals with housing allocations within the large villages, as areas rightfully identified as sustainable locations within Central Lincolnshire. Therefore, the inclusion of the site as an allocation for a minimum of 87 units on 4.62 hectares of the land would make a valuable contribution to the housing requirement for Central Lincolnshire identified in Policy S2 of the plan. We therefore recommend a change to Policy S80 that includes the allocation of the site in line with the attached location plan and details included in the bullet points below:</p> <ul style="list-style-type: none"> • Reference – NK/NAV/004 • Site Name/Address – Land East of Grantham Road, Navenby • Site Area (ha) – 4.62 • Planning Status – None • Indicative dwellings during the plan period – 87 • Site Specific Requirements – None 	Yes	Yes

								<p>behind existing development along the A607 and extended the recently developed part of the village.</p> <p>The second main issue with the allocation is that the site has been assessed as having inappropriate access from the A607 to the west. This ignores the fact, however, that access has been retained from the allocated site to the south by Lindum Homes (as per the attached plan), from Rollitt Close, so a further access from the A607 is not required – we have continually sought to clarify this point as part the consultation. Agreeing access from that existing development will not be an issue in highway terms: the existing site has two accesses to the wider road network, to both Green Man Road and the A607, and, as such, the development would not be in the form of a cul de sac.</p> <p>Finally, the SA references lack of access to employment. This relates to the whole village of Navenby and most other large villages, which continue to be prioritised for development and this is not, therefore, a site specific issue – it goes to the heart of the approach taken and if this was to be a determining factor, it would rule out numerous sites proposed to be allocated.</p> <p>Paragraph 35 of the National Planning Policy Framework (NPPF) requires policies in the Local Plan to be Justified, delivering “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence” (NPPF para 35). As outlined above, we argue that the evidence base used to reject the allocation of this site has reached an erroneous conclusion by not taking into account locational and site specific factors, whilst it appears not to have been applied consistently to all sites across the plan. It has not therefore correctly taken into account this site as a reasonable alternative for allocation, and could not therefore be considered to meet this test.</p> <p>Finally, we would conclude by stating that the site provides an opportunity to develop up to 4.62 hectares of land and deliver 87 dwellings (which we would argue is significantly below its theoretical capacity), according to the assumptions in the HELAA. Lindum Homes has an option agreement on this land and is well placed to bring forward development on it in a timely manner and therefore continue to support its allocation.</p>			
1102562	S80; SA	No	No		No			<p>Lindum Homes supports the allocation of sites in large villages such as Heighington, which appears to have been an evidenced based decision as outlined in the SA. The site to the north of Park Lane, Heighington (NK/HEI/003A) has, however, not been deemed suitable to accommodate development and has instead been given a status of ‘reasonable alternative’. This is outlined within Appendix 5.2: Housing Site Allocations – North Kesteven of the SA. The specific reasons for the site not being allocated are outlined in Appendix 7: Reasons for Selecting Preferred Options and continues to discount the site for reasons which we have previously disputed via objections made to earlier consultations.</p> <p>This site assessment, in our view, reaches erroneous technical considerations. This assessment does, however, go to the heart of the legal compliance of the Local Plan, specifically as to whether the policies within it are ‘Justified’, and as such feel it appropriate to reiterate the concerns we have previously outlined.</p> <p>On this particular site, Lindum Homes objected to the HELAA and its reasons for not proposing it for allocation. At that time, the site formed part of a much larger site (HEI/003), and the site was promoted in its entirety to allow for different</p>	Policy S80 deals with housing allocations within the large villages, as areas rightfully identified as sustainable locations within Central Lincolnshire. Therefore, the inclusion of the site as an allocation for a minimum of 40 units on 1.6 hectares of the land would make a valuable contribution to the housing requirement for Central Lincolnshire identified in Policy S2 of the plan. We therefore recommend a change to Policy S80 that includes the allocation of	Yes	No

								<p>scales of development to be considered, subject to the demands of Heighington. In our consultation response, it was recommended that further consideration was given to a smaller area fronting Park Lane, and this now forms HEI/003A. Unfortunately, the proposed allocation has been rejected for very similar reasons as the wider allocation, and as such our objections to this remain.</p> <p>In the first instance, the smaller site is now under Option by Lindum Group. As a local company, Lindum Group, through its market housing division Lindum Homes, has successfully developed in neighbouring villages Heighington and Washingborough and therefore has a track record of delivery in the area.</p> <p>The smaller, 1.73 ha area is readily accessible to Park Lane. It relates well to the existing development to the north of Park Lane and the proposed development site ends opposite the existing development to the south of Park Lane. The site is central to the village, within working and cycling distance of the school and the many goods and services of the Village centre.</p> <p>The site frontage is sufficient to allow for the provision of an appropriate junction with adequate visibility splays and a footway to allow pedestrians to cross to the footway into Heighington, as there is no opportunity to provide a footway to the front of 2 and 4 Park Lane. It is noted that the SA notes Park Lane as an access is to constrained to allow development. This is incorrect, as this is a 5m adopted road with footpaths either side at points and on one side for its entirety up to the site.</p> <p>More specifically, however, these concerns would be negated satisfied by a much-reduced development which we proposed. In addition, the smaller site avoids trees that are the subject of TPOs and reduces the loss of Grade 3 agricultural land. Although the site is part of a Minerals Safeguarding area, proximity to existing dwellings would limit the ability to undertake quarrying on this site.</p> <p>Although the SA highlights the distance to a designated employment area on Great Northern terrace, this analysis also ignores the proximity of other employers within Heighington and the surrounding area, including the Five Mile Lane employment site and Potterhanworth Road, Heighington: both of these established sites were allocated for employment use in previous Local Plans and continue to offer employment opportunity.</p> <p>We would also respectfully point out that Heighington as a 'large village' is, once again, not proposed to accommodate any allocations. We find this unusual, given the scale of development proposed in other large villages across Central Lincolnshire, with many villages which have already seen significant development continuing to do so. Heighington, as a large village with two village halls, two pubs, a shop, a nursery and a primary school is well placed to accommodate development of an appropriate scale and nature as is advocated here.</p> <p>Paragraph 35 of the National Planning Policy Framework (NPPF) requires policies in the Local Plan to be Justified, delivering "an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence" (NPPF para 35). As outlined above, we argue that the evidence base used to reject the allocation of this site has reached an erroneous conclusion by not taking into account locational and site specific factors. It has not therefore</p>	<p>the site in line with the attached location plan and details included in the bullet points below:</p> <ul style="list-style-type: none"> • Reference – NK/HEI/003A • Site Name/Address – Land North Park Lane, Heighington • Site Area (ha) – 1.6 • Planning Status – None • Indicative dwellings during the plan period – 40 • Site Specific Requirements – None 		
--	--	--	--	--	--	--	--	---	--	--	--

								<p>correctly taken into account this site as a reasonable alternative for allocation, and could not therefore be considered to meet this test.</p> <p>Finally, we would conclude by stating that the site provides an opportunity to develop up to 1.6 hectares of land and deliver 40 dwellings. Lindum Homes has an option agreement on this land and is well placed to bring forward development on it in a timely manner and therefore continue to support its allocation.</p>			
1102576	S80; SA	No	No		No			<p>Lindum Homes supports the allocation of sites in large villages such as Navenby, which appears to have been an evidenced based decision as outlined in the SA. The site to the east of High Dyke, Navenby (NK/NAV/002) has, however, not been deemed suitable to accommodate development and has instead been given a status of ‘reasonable alternative’. This is outlined within Appendix 5.2: Housing Site Allocations – North Kesteven of the SA. The specific reasons for the site not being allocated are outlined in Appendix 7: Reasons for Selecting Preferred Options and continues to discount the site for reasons which we have previously disputed via objections made to earlier consultations.</p> <p>This site assessment, in our view, reaches erroneous technical considerations. This assessment does, however, go to the heart of the legal compliance of the Local Plan, specifically as to whether the policies within it are ‘Justified’, and as such feel it appropriate to reiterate the concerns we have previously outlined.</p> <p>On this particular site, Lindum Homes objected to the HELAA and its reasons for not proposing it for allocation. This site is to the south of Jubilee Way, a successful development of affordable housing delivered by the Lindum Group. A similar sized scheme of affordable housing could be provided on this land, and we have an Option Agreement on this site.</p> <p>The site would be screened from views by the existing development to the south and the existing frontage development along the A607. It is an appropriately located site within one of the larger settlements with access to Lincoln. As such, Lindum Group are currently working with local stakeholders on bringing forward development of the site, to respond to local housing needs. This could take the form of a market lead exception site, development of affordable over 55s accommodation or an archetypal rural exception site.</p> <p>Although the site is identified as a Minerals Safeguarding area, the proximity of development to the north would indicate any minerals reserves are already sterilised. The impact of development would be minimal and there appears no justifiable reason for it not to be allocated.</p> <p>Paragraph 35 of the National Planning Policy Framework (NPPF) requires policies in the Local Plan to be Justified, delivering “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence” (NPPF para 35). As outlined above, we argue that the evidence base used to reject the allocation of this site has reached an erroneous conclusion by not taking into account locational and site specific factors. It has not therefore correctly taken into account this site as a reasonable alternative for allocation, and could not therefore be considered to meet this test.</p> <p>Finally, we would conclude by stating that the site provides an opportunity to develop up to 1 hectare of land and deliver 19 dwellings (which we would argue</p>	<p>Policy S80 deals with housing allocations within the large villages, as areas rightfully identified as the sustainable locations within Central Lincolnshire. Therefore, the inclusion of the site as an allocation for a minimum of 19 units on 1 hectare of the land would make a valuable contribution to the housing requirement for Central Lincolnshire identified in Policy S2 of the plan. We therefore recommend a change to Policy S80 that includes the allocation of the site in line with the attached location plan [not provided] and details included in the bullet points below:</p> <ul style="list-style-type: none"> • Reference – NK/NAV/002 • Site Name/Address – Land East of High Dyke • Site Area (ha) – 1 • Planning Status – None • Indicative dwellings during the plan period – 19 • Site Specific Requirements – None 	Yes	No

									is significantly below its theoretical capacity), according to the assumptions in the HELAA. Lindum Homes has an option agreement on this land and is well placed to bring forward development on it in a timely manner and therefore continue to support its allocation.			
1102560	S81	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>Lindum Homes strongly supports the allocation of Land off Juniper (not Jupiter as stated in the Local Plan) (WL/SC/004A) for residential development. We are working closely with the land owners to bring forward residential development of the site, should the allocation be successful, and would do so in a timely manner. As a local company, Lindum Homes, has successfully developed in neighbouring villages and therefore has a track record of delivery in the area.</p> <p>The allocation of the site for residential development will make a noteworthy contribution to the identified housing requirement for Central Lincolnshire identified in proposed Policy S2 and is therefore Positively Prepared in line with Paragraph 35 of the NPPF.</p> <p>Paragraph 35 also requires policies in the Local Plan to be Justified in terms of being based on an appropriate strategy which is evidence based. Residential development of the site, which is already in proximity to other residential development to the north and east, has been assessed in detail as part of the Central Lincolnshire Sustainable Appraisal. This identifies no significant barriers to the development.</p> <p>As detailed above, Lindum Homes are working towards a planning application on the site which will be submitted as soon as the allocation is ratified. The evidence base is currently being developed, however initial enquiries with statutory service providers and key technical consultees have again shown the site to be deliverable. Lindum Homes, as an experienced local house builder, are involved in and committed to the site helping to further demonstrate the deliverability of the residential development proposed for allocation. The above evidence also helps to demonstrate that the site is deliverable for residential development over the plan period and should therefore be considered as Effective when considered against NPPF paragraph 35.</p> <p>The final requirement of paragraph 35 is that proposed policy is consistent with national policy. The site is in a sustainable location, adjacent to residential development to the north and east, and would be low density in keeping with the character of the village and its location on the edge of settlement. No technical constraints have been identified, and it would therefore conform with the sustainability strands within the framework, and specifically respond positively with the drive for boosting housing supply central to chapter 5 of the Framework.</p>		Yes	No
1102558	S81; SA	No	No		No				<p>Lindum Homes supports the allocation of sites in medium villages such as Scothern, which appears to have been an evidenced based decision as outlined in the SA. The site to the south of Langworth Road, Scothern (WL/SC/006) has, however, not been deemed suitable to accommodate development and has instead been given a status of 'reasonable alternative'. This is outlined within Appendix 5.3: Housing Site Allocations – West Lindsey of the SA. The specific reasons for the site not being allocated are outlined in Appendix 7: Reasons for Selecting Preferred Options and continue to discount the site for reasons which we have previously disputed via objections made to earlier consultations.</p> <p>This site assessment, in our view, reaches erroneous technical considerations.</p>	Policy S81 deals with housing allocations within the medium villages, as areas rightfully identified as sustainable locations within Central Lincolnshire. Therefore, the inclusion of the site as an allocation for a minimum of 60 units on 4 hectares of the land would make a valuable contribution to the housing	Yes	No

								<p>This assessment does, however, go to the heart of the legal compliance of the Local Plan, specifically as to whether the policies within it are ‘Justified’, and as such feel it appropriate to reiterate the concerns we have previously outlined.</p> <p>On this particular site, Lindum Homes have continually objected to the HELAA and its reasons for not proposing it for allocation. These have since been carried forward in Appendix 7 of the SA – although the site appears to be wrongly identified as land east of Dunholme Road and we would request this is rectified.</p> <p>The main reason for not allocating the site continues to related to the site extending outwards into the open countryside - a matter we have sought to continually clarify. As a starting point, existing development in the settlement extends down much of the western boundary of the site (including development of 8 dwellings under approval number 131757). When approaching from the east, the site is viewed against the context of existing development. It has a narrow frontage and extends some distance south, abutting existing development. As such, the impact on the open countryside would be limited in comparison to the amount of development that could be provided on site.</p> <p>We also note the character of the countryside to the east of Scothern is dominated by an arc of large-scale poultry farms, which ensure there are few, if any, longer distance views of the site; limiting the impact of development on any open character of the countryside. Furthermore, many other allocations seem to be adjacent to previous allocations which have recently been completed or are still under construction. This site sits adjacent to development which has recently been completed, and an allocation which, whilst not yet started, remains in place and projects to the south along the western boundary of this site.</p> <p>This part of the village has therefore been deemed an appropriate location for development, with the impact of built form to the south being deemed an acceptable impact on the countryside. The site provides ready access to services in the village, including the pub, village hall, primary school and employment and, as such, is a suitable location for development in this settlement.</p> <p>Other issues stated related to a risk of surface water flooding, as well as access to employment and education. There is no history of surface water flooding on the site, whilst the village is currently undergoing a significant upgrade to its drainage infrastructure which is designed to alleviate historic issues. Developing this site in isolation, with the appropriate use of SuDs techniques, is likely to actually improve this situation. In relation to access to employment and education, this site has exactly the same access to these services as other sites in Scothern – two of which have been proposed for allocation. It cannot therefore be considered a determining factor, with access to local employment opportunities in the village and in nearby Lincoln, as well as the local primary school in the village and the secondary school in neighbouring Welton.</p> <p>Paragraph 35 of the National Planning Policy Framework (NPPF) requires policies in the Local Plan to be Justified, delivering “an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence” (NPPF para 35). As outlined above, we argue that the evidence base used to reject the allocation of this site has reached an erroneous conclusion by not taking into account locational and site specific factors, whilst it appears not to</p>	<p>requirement for Central Lincolnshire identified in Policy S2 of the plan. We therefore recommend a change to Policy S81 that includes the allocation of the site in line with the attached location plan and details included in the bullet points below:</p> <ul style="list-style-type: none"> • Reference – WL/SC/006 • Site Name/Address – Land South of Langworth Road, Scothern • Site Area (ha) – 4 • Planning Status – None • Indicative dwellings during the plan period – 60 • Site Specific Requirements – None 		
--	--	--	--	--	--	--	--	--	---	--	--

									<p>have been applied consistently to all sites across the plan. It has not therefore correctly taken into account this site as a reasonable alternative for allocation, and could not therefore be considered to meet this test.</p> <p>Finally, we would conclude by stating that the site provides an opportunity to develop up to four hectares of land and deliver 60 dwellings (which we would argue is significantly below its theoretical capacity), according to the assumptions in the HELAA. The Lindum Group has an option agreement on this land and is well placed to bring forward development on it in a timely manner and therefore continue to support its allocation.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

Lockwood Estates

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103850	S2	Yes	Yes	No	No	No	No	Yes	<p>The preamble to Policy S2 (paragraph 2.2.5) explains that 1,325 dwellings per year are needed to support the expected growth in jobs in Central Lincolnshire and that an important part of the Local Plan is delivering economic growth within the region to ensure it is competitive and supports the ambitions of the Greater Lincolnshire Local Enterprise Partnership.</p> <p>The National Planning Practice Guidance (Paragraph: 009 Reference ID: 2a-009-20190220) says that the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area and that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. These include where there are growth strategies for the area that are likely to be deliverable. The Economic Needs Assessment (ENA) (2020) identifies strong growth in recent years, outstripping anticipated growth, and projects forward a growth of approximately 992 jobs per year. In order to provide enough working age population to support the projected level of job growth, 1,325 dwellings per annum would need to be delivered. The Local Plan housing trajectory demonstrates that this figure is achievable, since it has been exceeded over the first three years of the plan period. This is significant evidence to support this housing figure.</p> <p>However, Policy S2 proposes that the Local Plan will use a housing range as its housing requirement, with the national standard method figure (1,060) at the bottom end of the range and the figure needed to match economic growth ambitions (1,325) as the top of the range. The bottom end figure would be the 'housing requirement' and housing would be planned to meet the top end of the range. We disagree with the use of a range, with only the bottom end of the range only being used as the 'official' housing requirement. The figure of 1,325 should be used as the housing requirement as it is the level of planned growth that is required, taking into account the projected level of job growth. If this housing requirement is not achieved then homes will not be provided to match jobs and this would lead to unsustainable outcomes. The National Planning Practice Guidance does not support the approach taken in Policy S2. It does not set out that important economic factors can be taken into account in</p>	<p>The Local Plan housing requirement is not positively prepared, justified, effective and consistent with national policy in meeting identified economic development and affordable housing needs. In order to make the plan sound:</p> <ul style="list-style-type: none"> • The figure of 1,325 should form the minimum planned housing requirement in order to meet identified economic development needs • Consideration should be given to an uplift to meet affordable housing needs • Consideration should be given to a 20% buffer in the overall housing supply against the requirement • The reference to measuring 5-year supply against the standard method figure should be removed 	Yes	No

									<p>determining the housing need, for the local authority to then undershoot the established need with a lower housing requirement.</p> <p>We also disagree with the use of a range for the calculation of the 5-year housing land supply. The Local Plan attempts to justify this at paragraph 2.2.6 as in accordance with the Planning Practice Guidance (PPG). However, the PPG says at Paragraph: 001 Reference ID: 68-001-20190722 that ‘the 5 year housing land supply is a calculation of whether there is a deliverable supply of homes to meet the planned housing requirement [my emphasis] (or, in some circumstances, local housing need) over the next 5 years’. It goes on to say that housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5-year housing land supply figure. Only in other circumstances, i.e. when the planned housing requirement is not up-to-date, will the 5 year housing land supply be measured against the area’s local housing need calculated using the standard method. This does not justify the local authority plan-making on the basis of only securing a deliverable supply of housing against the standard method figure. The 5-year housing requirement is there to ensure that Local Plans maintain a deliverable supply of housing land to meet the housing requirement, where this is up-to-date. Furthermore, when the ‘top end’ figure of 1,325 has been exceeded over the first 3 years of the plan period, it does not make sense to provide circumstances to under-achieve it.</p> <p>In relation to Spatial Issue 1: Housing Need and Ambition for Growth, paragraph 2.4 of the Growth Options Paper STA011.1 recognises that there is an affordable housing need of 592 dwellings per year to 2040. However, it does not provide adequate consideration as to whether the housing requirement should be increased to help to meet this need. This need equates to nearly 44% of the 1,325 dwellings identified as being needed to support expected job growth, but given that affordable housing policies only require between 10-25% of housing development to be affordable housing, a substantial proportion of these needs will go unmet unless affordable housing is delivered in other ways.</p> <p>Paragraph 7.85 of the HOU001 Housing Needs Assessment Central Lincolnshire April 2020 says that ‘it is for the Councils to consider whether an increased housing requirement could help to increase the delivery of affordable housing that is evidently needed in Central Lincolnshire. This judgement should also take into account any specific objectives set by the Councils through their housing strategies to play a more proactive role in directly enabling the provision of social housing as part of fully affordable housing schemes. Evidently this will need to also take into account the extent to which such objectives are reliant upon funding being available to deliver these homes’. Although HOU001 provided a clear mandate for this further consideration, the consideration given to this important matter has been very limited. Paragraph 2.4 of STA011.1 says that delivering this level of affordable housing would clearly be challenging under any likely scenarios, but it is not only delivered through planning obligations. Direct development by districts, or housing associations also occurs which help to deliver homes to meet the needs of those whose needs are not met by the market. This is not underpinned or justified by reference to any housing</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

									<p>strategies and it does not take into account the extent to which such objectives are reliant on funding to deliver the homes needed. Therefore, there is a resulting deficit in meeting affordable housing needs which needs to be given further consideration. Clearly uplifting the housing requirement and making further housing allocations would directly contribute towards meeting affordable housing needs.</p> <p>Paragraph 13.1.9 of the Local Plan confirms that, overall, there is a planned surplus of 2,665 dwellings against the higher end of the housing requirement range. This is a surplus of 9%. We would argue that this is not a sufficient buffer to take account of deliverability issues within the plan period. A buffer of between 10-20% is normally seen as appropriate in plan-making. The circumstances in Central Lincolnshire are such that a buffer at the higher end of this range should be sought. The Local Plan covers a 20-year time period, where much can change and occur in relation to site delivery. Furthermore, the plan relies heavily on the delivery of a number of large SUEs right through to the end of the plan period. Delivery issues on such sites often result in housing numbers 'slipping off the end' of the housing trajectory and then the buffer would quickly diminish.</p>			
1103848	S4	Yes	Yes	No	No	No	No	Yes	<p>Current Local Plan Policies LP2 and LP4 set out the approach to growth in Medium Villages, making provision for 10-15% growth to the villages. Sites must:</p> <ul style="list-style-type: none"> • retain the core shape and form of the settlement; • not significantly harm the settlement's character and appearance; and • not significantly harm the character and appearance of the surrounding countryside or the rural setting of the settlement. <p>Policy LP2 also makes provision for additional growth where there is demonstration of clear local community support. This means that, should housing needs be identified by a community, then there is a proactive policy to ensure that they can be met on suitable sites.</p> <p>The Local Plan Review Policy S4 does not set out a percentage growth allocation for the Medium Villages. Effectively it would remove the allocated growth from many villages which had not yet secured planning permissions during the adopted plan period.</p> <p>Policy S4 says that proposals for up to 5 dwellings will only be supported where they comply with the above bullet points and addition are within the 'developed footprint' of the village. The developed footprint is defined as the continuous built form of the settlement and excludes:</p> <ul style="list-style-type: none"> • individual buildings or groups of dispersed buildings which are clearly detached from the continuous built up area of the settlement; • gardens, paddocks and other undeveloped land within the curtilage of buildings on the edge of the settlement where land relates more to the surrounding countryside than to the built up area of the settlement; • agricultural buildings and associated land on the edge of the settlement; and • outdoor sports and recreation facilities and other formal open spaces on the edge of the settlement. <p>Therefore, where the current Local Plan has allowed some growth to the</p>	<p>The Local Plan is not positively prepared and effective in meeting rural development needs, it does not reflect paragraph 79 of the National Planning Policy Framework and the policy is not justified by the evidence base. Policy 4 should be amended to continue the approach taken in Policies LP2 and LP4 of the adopted Local Plan, so as to ensure that housing needs in Medium Villages are met and those villages do not suffer a decline in their local facilities and services due to a declining population.</p>	Yes	No

									<p>edge of villages where this has not encroached harmfully on the countryside and has been in keeping with the pattern of surrounding development, this new policy is much stricter and only envisages 'infill' development. In reality such infill opportunities will be very limited. Coupled with the lack of new housing allocations (as referred to in our representations to Policy S81) this presents a scenario where the natural growth of Medium Villages is heavily restricted and this is likely to mean that rural housing needs will go unmet and local services will decline in many villages.</p> <p>The EVR004 Policy Evidence Report for Policy S4 provides limited explanation of this key decision to restrict further growth and curtail the growth allocated in the existing Local Plan. Paragraph 7.3 of EVR004 considers the option (3) of continuing with the application of a percentage growth allowance, as in the current Local Plan. However it dismisses this option by saying that a number of settlements have already reached the growth allowance with some proposals now needing to apply a community consultation process. Surely this demonstrates a successful policy, delivering growth where needed and ensuring the vitality and vibrancy of communities?</p>			
1103852	S81	Yes	Yes	No	No	No	No	Yes	<p>Medium Villages are defined in Policy S1 as well-connected or well-served villages and it is said that they may receive some limited growth through allocations in the plan in order to achieve a balance between ensuring the vitality of the village and protecting the rural character. Paragraph 2.4.1 of the Local Plan says that it is important to maintain and enhance the services and features of the rural area in order to sustain the vibrancy of rural settlements and the quality of life experienced by those living in such areas. It is therefore important that the Local Plan makes provision for the growth to medium villages in order to sustain the local services and village life in Medium Villages.</p> <p>Upon first glance the Local Plan makes a large number of housing allocations. However, on closer examination many of these sites are existing allocations being carried forward, or they already have planning permission or are under construction. Document HOU007 confirms that, of the 32,672 dwellings planned for in total over the plan period, only 2,321 are new allocations which don't already have planning permission. The Local Plan therefore makes very limited provision for new growth, instead relying very heavily on committed sites including planning permissions and carried forward allocations. This is a risky strategy because such sites, particularly those that have been allocated or have had planning permission for a long time without coming forward for development, may have problems with their deliverability. No review has been made in the Local Plan evidence base of the deliverability of these sites and why they have not come forward thus far.</p> <p>Furthermore, a plan which makes such limited provision for new allocations is not proactive in pursuing growth and ensuring it takes place where needed, particularly over such a long plan period. Out of 36 Medium Villages only 11 have received new housing allocations. This means that many villages would have to wait another 20 years to see any growth. Over such a long period there is significant potential for decline in local services and facilities and real impacts on village vitality and viability.</p>	The Local Plan says that it is important to maintain and enhance the services and features of the rural area in order to sustain the vibrancy of rural settlements and the quality of life experienced by those living in such areas. However, it falls far short of meeting these objectives for Medium Villages. Therefore, the Local Plan is not positively prepared and effective in meeting rural development needs, it does not reflect paragraph 79 of the National Planning Policy Framework and the policy is not justified by the evidence base. Policy 81 should be amended to include further site allocations at Medium Villages.	Yes	No

									<p>There is no specific assessment of rural housing needs in the Local Plan evidence base and the approach taken is likely to mean that rural housing needs will go unmet in many villages.</p> <p>The Sustainability Appraisal and Housing & Economic Land Availability Assessment do not separate out the new allocations for assessment and therefore do not explain why choices have been made to allocate sites at only a handful of Medium Villages, or why such sites have been chosen for new allocations instead of other potential sites at the Medium Villages.</p> <p>In order that the vitality and viability of Medium Villages is sustained over the plan period, new housing allocations should be made, or Neighbourhood Plans should be mandated to make provision for housing allocations, unless it is robustly demonstrated that the villages have sufficient committed growth to meet their needs over the plan period.</p>			
1103858	SA	Yes	Yes	Don't know	No	Don't know	Don't know	Don't know	<p>These representations will consider whether the Local Plan is justified by the Sustainability Appraisal (SA) and the other evidence reports that have informed the SA. First the representations will consider evidence in the EVR076-082 Residential Allocations Evidence Report 2021, where site WL/ING/005 has been assessed. Then Appendices 5.3 and 7 of the SA will be considered in terms of how they take that evidence forward in the SA, where decisions regarding site allocations are justified. These representations will explain that the Local Plan is not justified by the SA as key evidence regarding site WL/ING/005 has been ignored and, were the site to be properly and fairly assessed as a reasonable alternative, then the SA would justify that the site is selected as an allocation.</p> <p>EVR076-082 Residential Allocations Evidence Report 2021</p> <p>This document includes assessment of Lockwood Estates' site WL/ING/005 - Land east of Saxon Way, Ingham. The site's indicative capacity is given as 18, whereas my client is promoting the site for the development of only 10 dwellings, having undertaken assessment and design work in relation to the site's residential development. Potentially the assumption that the site would be developed for 18 dwellings has led those assessing the site to conclude that the development would be much more impactful, with much less scope for mitigation of landscape and other impacts. Therefore, we would request that the site is fully re-assessed for the development of 10 dwellings. In doing so, we would request that account is taken of the following assessment and the supporting documents attached to these representations.</p> <p>Review of the above plans and information will demonstrate that environmental constraints such as landscape, trees, drainage and ecology have all been taken account of and impacts can be mitigated to achieve a sensitive and well-designed development, retaining features of importance and creating an attractive place to live that would integrate well with the village.</p> <p>It is very frustrating that all of this evidence was submitted to the Regulation 18 consultation but has been entirely ignored by the Council and the SA has not been updated.</p> <p>Fundamentally, the site integrates very well to the existing built-up-area of</p>	<p>[Continued from q4] We are confused as to where this reference to a bowling green has come from. The site has never been a bowling green; it was formerly a sheepwash with a small agricultural building in the centre of it. Given the former agricultural use the presence of contamination is unlikely. Therefore the assessment should be updated accordingly.</p> <p>Development on this site could have an impact on medieval remains associated with the settlement of Ingham. We would recommend that the site should be subject to archaeological evaluation prior to determination.</p> <p>We agree that archaeological evaluation should be undertaken prior to determination of a planning application for the site. However this is a normal planning requirement and should not be held against the site as a constraint in the assessment.</p> <p>In conclusion, the review and correction of the site assessment as set out above should result in the site being considered as a potential</p>	Yes	Yes

								<p>Ingham. As demonstrated by the attached Accessibility Plan, it is close to the village core, within a short walking distance of key local services such as the doctor's surgery, mini-market and primary school. It benefits from a public footpath link to Church Hill and footway connections (including a short-cut) via Saxon Way and Glebe Close such that walking routes are direct and offer convenient access to local services.</p> <p>The site is surrounded on two sides by existing housing and on a third by solar development. The site's development would result in a compact addition to the built-up-area of the village, avoiding significant encroachment into the countryside. It has significant locational advantages over other sites in the HELAA, which are more remote from local services, significantly alter the village form (e.g. taking development out 'on a limb' from a ribbon of development to the south of the village core) and encroach extensively into open countryside.</p> <p>Opportunity would be taken to create a new public open space within the site, which would benefit the village and act as an integrator for existing and proposed residential areas. It will also help to provide a buffer to existing dwellings to the west, so that the development makes minimal change to the outlook from those properties.</p> <p>The development would integrate with the adopted highway of Saxon Way and with the public footpath which runs along the eastern and southern boundaries of the site. The access arrangements have been reviewed and confirmed as acceptable by the local highway authority. The development of the site would offer community benefits such as upgrading the public footpath with lighting (if desired by the local community) and surfacing for use as a footpath connection for people of all levels of mobility.</p> <p>The layout as drafted responds well to the pattern of development in the surroundings and allows adequate privacy and amenity to surrounding dwellings. It also allows for retention of boundary hedgerows and trees both within the site and to its boundaries. Existing hedgerows will be gapped up with native species and the creation of a pond and open space within the site and the landscaping of the development allows for further native planting and habitat creation with a resulting net gain to biodiversity.</p> <p>The attached layout demonstrates how 10 dwellings, comprising a mix of housing types and sizes, could be accommodated on the site. As such the site would offer the potential to respond to a variety of housing needs. We object in the strongest terms to the assessment made of the site in HOU002e. There are places where hopefully the above further information will allow review of the assessment, but our greatest concern is that the assessment made of the site in the document contains a number of fundamental errors. Some of those errors are in relation to matters which we have strived to ensure were corrected over the last couple of years and had understood that they had been corrected based on correspondence with the Central Lincolnshire Local Plan Team. I shall comment on aspects of the assessment under headings below, extracted from the assessment.</p> <p>The site contains a Site of Nature Conservation Interest (SNCI)</p> <p>The site does not contain a SNCI, nor is it affected by any other ecological</p>	<p>allocation in the Local Plan. The site should then be included in the SA and assessed in terms of its sustainability relative to other options. Such an assessment would undoubtedly highlight that this site, benefiting from its highly accessible location adjacent to the village core and offering a sensitive development with community benefits, would be suitable for allocation.</p> <p>STA004.1hiii SA Report for the Central Lincolnshire Local Plan Proposed Submission Draft (March 2022) Appendix 5.3: SA of Preferred Housing Site Allocations and Reasonable Alternatives Considered</p> <p>As highlighted in the above representations, site WL/ING/005 - Land east of Saxon Way, Ingham – should be considered for allocation for 10 dwellings. The SA assesses only one site at Ingham, which is proposed for allocation (and which in fact already has planning permission for development so by the terms of the SA should not be included in the SA), and does not assess any reasonable alternatives. The SA is therefore lacking and does not demonstrate that the most sustainable option for growth at Ingham has been chosen. Paragraph: 037 Reference ID: 61-037-20190315 of the Planning Practice Guidance says that 'the Sustainability Appraisal plays an important part in demonstrating that the local plan reflects sustainability objectives and has considered reasonable alternatives'. It is therefore very important that reasonable alternatives are considered through the plan-making process. For the reasons</p>		
--	--	--	--	--	--	--	--	---	--	--	--

								<p>designation. The submitted Ecological Appraisal provides an up-to-date understanding of any ecological designations in the area. While many years ago the site was designated a SNCI, this designation has since been removed and the site has not subsequently met any criteria to allow for any other designation (for example a Local Wildlife Site). Correspondence with the Central Lincolnshire Local Plan Team (see Charlotte Robinson's email of 19/10/20 attached) and the Greater Lincolnshire Nature Partnership (see Margaret Haggerty's email of 02/09/19 attached) has confirmed this and that the Local Plan evidence base would be updated accordingly. However this has not taken place and this has been of serious detriment to the assessment of the site. We would request that this is removed from the assessment and all relevant parts of the Local Plan evidence base are updated accordingly.</p> <p>The site is constrained by the location within the Area of Great Landscape Value</p> <p>The Area of Great Landscape Value (AGLV) relates to the Lincoln Cliff and the views of it and from it. In view of this landscape sensitivity we have had our own landscape assessment carried out by Landscape Architects Urban Wilderness, who produced the attached letter and photomontage. This demonstrates that, in views from the Lincoln Cliff approach, the site is seen against existing development on Saxon Way. It is well contained by the existing hedgerows and, after development (taking into account tree removal), there would be no significant change to the scene enjoyed on this approach to the village. The development would integrate well with the village, avoiding the sensitive slope of the Lincoln Cliff. Therefore we do not agree that the site is constrained by the location within the AGLV and this should not be a reason to dismiss the site. A finer grain of assessment needs to be undertaken which would reveal that there would be no significant landscape harm.</p> <p>Agricultural Land - Grade 3</p> <p>Following correspondence between my client and Juliette Thomas-Cousins of the Central Lincolnshire Local Plan Team, clarifying the specific conditions of the site as a former sheep wash and low quality pasture, it was understood that the site's classification was changed to Grade 5 (very poor quality). This was further confirmed in the attached email from Charlotte Robinson dated 19/10/20 and an updated version of the HELAA was published online in the Central Lincolnshire Local Plan Planning Policy Library with the updated classification. However the HELAA published in the Local Plan consultation still records the site as Grade 3. Again, this may have influenced the assessment of the site and we would request that it is corrected and reviewed.</p> <p>Surface water flood risk: R. The site has predictive surface flooding over circa 50% of it and a surface water flood route through it from east to west.</p> <p>The mapping held by the Lead Local Flood Authority does indeed predict surface water flooding over c50% of the site. However a detailed and site-specific Flood Risk Assessment has been undertaken and is appended to</p>	<p>given in our representations above, site WL/ING/005 is a highly sustainable option, particularly given its accessible location adjacent to the village core. We therefore request that it is included as a reasonable alternative in the SA.</p> <p>STA004.1j SA Report for the Central Lincolnshire Local Plan Proposed Submission Draft (March 2022) Appendix 7: Reasons for Selecting Preferred Policies and Site Allocations</p> <p>STA004.1j sets out the Council's reasoning for not selecting WL/ING/005 as an allocation. It simply says that Ingham is considered to be unsuitable for site allocations. There is no reasoning given as to why this Medium Village is unsuitable for site allocations and hence why the continued growth of the village is being brought to a halt. The SA is deficient in justifying this decision.</p> <p>Furthermore, in view of the above examination of the SA evidence, it is clear that site WL/ING/005 has not been adequately or fairly assessed on the basis of submitted information and, were this to be rectified, this 'reasonable alternative' should be chosen for allocation.</p> <p>Enclosures:</p> <ul style="list-style-type: none"> • Charlotte Robinson (CLLP Team) email of 19/10/20 • Margaret Haggerty (GLNP) email of 02/09/19 • Proposed Sketch Layout J2015 SK10 • J2015 SK11 Proposed Sketch Perspective • Accessibility Plan J2015 SK05A • Ecological Appraisal, ESL Ecological Services, September 		
--	--	--	--	--	--	--	--	---	---	--	--

									<p>these representations. This report concluded that the surface water flood risk mapping has significantly overstated the flood risk to the southern boundary of the site as it appears it has not considered the capacity of the existing watercourse. The report recommended mitigation measures including roadside swales, an attenuation pond and an inception berm to manage surface water runoff. These mitigation measures mean that there would be no increase in the rate of surface water runoff from the site as a result of the development and the currently uncontrolled surface water flooding would be managed and regulated within the new drainage system such that they would not impact the residential development, nor surrounding areas. These proposals have been subject of consultation with the Lead Local Flood Authority which has confirmed they are acceptable. Therefore surface water flooding does not present an insurmountable constraint to the proposed development and the HELAA assessment of the site should be updated accordingly.</p> <p>The site is indicated to be a former bowling green and has a structure upon it which could suggest a potential for contamination.</p> <p>[continued below]</p>	<p>2020</p> <ul style="list-style-type: none"> • Flood Risk & Drainage Assessment, SLR, September 2020 • Arboricultural Impact Assessment and Arboricultural Method Statement, ESL Ecological Services, May 2020 • Urban Wilderness letter dated 19th October 2020 • Urban Wilderness photomontage 361-P-001 Rev C <p>The SA evidence should be updated to take into account submitted information with regard to site WL/ING/005 and consideration should be given to making the site an allocation for 10 dwellings, rather than dismissing Ingham as 'unsuitable for site allocations' without any explanation.</p>		
--	--	--	--	--	--	--	--	--	--	--	--	--

M C Mountain & Sons

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103876	S76; S78	Don't know		No	No	No	No		<p>As an addendum to the representation submitted earlier today, we would also wish to draw to your attention the fact that it would appear the full extent of our site has not been correctly assessed as part of the review process and it is not covered by the site identified as NK/SLEA/013. That only covers part of the land which our clients own and which is available.</p> <p>We attach two plans. The first shows the site in its entirety edged in red. The other plan is from an earlier assessment undertaken by NKDC and in January 2015 (SHELAA). As can be seen on that plan, the site was identified as property reference CL1001 which includes the employment areas which on the London Road side of the property.</p> <p>This is a significant strategic site for the reasons previously explained and would deliver long-term strategic growth to Sleaford and could produce other benefits as alluded to in earlier representations.</p>	<p>To follow on from the earlier submission the whole of the land shown edged red and on the previous SHELAA plan designated to CL1001 should be allocated for development.</p> <p>Comments as before about representation at the Local Plan Inquiry.</p>	Yes	Yes
1103114	S78	Don't know		No	No	No			We maintain our continuing objections to the omission of the site at Quarrington for which representations have been submitted before. For ease of reference we attach a copy of the consultation response form submitted in	To provide for the allocation of the site of Quarrington. This will make sure that there is choice in the housing delivery sites and particularly in view of the fact that some of the housing sites are not delivering in line with	Yes	Yes

									August 2021 which identifies the nature of our objection and the reasons for that.	<p>expectations despite having been allocated/consented for at some considerable time.</p> <p>We reserve our position on participating at the oral examination and at this stage we have indicated that wish to partake in the discussion because of the magnitude of the issue in question.</p> <p>For ease of reference we attach a copy of our previous representations.</p>		
--	--	--	--	--	--	--	--	--	--	---	--	--

Marine Management Organisation

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EIP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103878	S21								No further comment is required at this stage from the MMO regarding the proposed Local Plan, as there is a sound understanding of the East Inshore and Offshore Marine Plans and the Local Plan does not suggest any anticipated impacts on the marine plans. We advise that you consider any relevant policies within the East Marine Plan Documents in regard to areas within the plan that may impact the marine environment, including the tidal extent of any rivers. We recommend the inclusion of the East Marine Plans when discussing any themes with coastal or marine elements. When reviewing the East Marine Plans to inform decisions that may affect the marine environment, please take a whole-plan approach by considering all marine plan policies together, rather than in isolation.			Yes

McCarthy Stone / Churchill Retirement Living

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EIP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103270	S22								<p>The Central Lincolnshire Local Plan (Regulation 18 Consultation) is one of an alarmingly limited number of emerging Local Plans that have set a differential affordable housing rates. These are set in 5% increments ranging from 10% to 25% across four value areas (A to D) in the region. This is, of itself, highly commendable and suggests a greater focus on viability at the Plan making stage.</p> <p>The value areas do not follow settlement boundaries and as such requires a clear map to help developers understand the required level of affordable housing contributions.</p> <p>Map 3 on page 57 would be beneficial.</p> <p>It is noted that Part Two: Specialist housing for older people of Policy S22 advises that affordable housing contributions will be sought from older persons' housing typologies, including residential institutions.</p> <p>Part Two: Specialist housing for older people Where specialist housing for older people is provided as private provision, including within a residential care home setting and including dwellings falling within Use Class C2, an affordable housing contribution will be sought in line with the requirements set out above.</p> <p>The affordable housing targets set out in Policy S22: Affordable Housing are informed by the evidence base - namely the Whole Plan Viability Assessment (WPVA) undertaken by Aspinall Verdi. We note that the WPVA has assessed the</p>	<p>The Central Lincolnshire Local Plan (Regulation 19 Consultation) is one of an alarmingly limited number of emerging Local Plans that have set a differential affordable housing rates. These are set in 5% increments ranging from 10% to 25% across four value areas (A to D) in the region. This is, of itself, highly commendable and suggests a greater focus on viability at the Plan making stage.</p> <p>The Central Lincolnshire Whole Plan Viability</p>	Yes	No

									<p>viability of older persons' housing typologies, which is welcomed.</p> <p>In reviewing the methodology for assessing specialist older persons' housing, we note that many of the inputs align with the methodology detailed in the Briefing Note on Viability Prepared for the Retirement Housing Group (hereafter referred to as the RHG Briefing Note) by Three Dragons, although a number do not. Our concerns are that the Viability Assessment may have overplayed the viability of older persons' housing.</p> <p>The results of the viability modelling for older persons' housing typologies are provided in the Elderly Viability Testing Results in Tables 7.6 to 7-9 (page 92) and Appendix 6 - Appraisals Older Persons' Housing. This concludes that ' Our testing shows that elderly accommodation is unviable across all zones - appraisals can be found in Appendix 6. But as summarised in Table 7-6 through to Table 7-9 small changes in the sales values tested (the scale to the left shows changes in sale values, with 100% being the baseline value).</p> <p>(Paragraph 7.10)</p> <p>The WPVA then goes on to conclude that:</p> <p>Our testing has shown that elderly and student accommodation is very sensitive to small changes to the viability inputs. Development of this type of accommodation does come forward in the CL area but the economics are determined by the scheme specifics. It is recommended that CL should take a flexible policy approach to these types of development and the scheme specifics should be assessed at the planning application stage. As for strategic sites, the local plan will need to carefully consider what level of contribution might be sought from such developments across CL, and on our analysis, there should not be an expectation that funding from the surpluses from such developments will routinely be secured. (Paragraph 9.16)</p> <p>The conclusions of the WPVA reflect the experiences of the respondents in bringing forward specialist older persons' accommodation in Central Lincolnshire. We note that the WPVA was recently supplemented by an Addendum Report in March 2022 (hereafter referred to as the Addendum). This concludes that sales values increased by 9% outstripping build costs which increased over the same period by 6%. This has improved the viability of many housing typologies supporting the Council's position on affordable housing.</p> <p>We note that the addendum reappraises many housing typologies, specialist older persons' housing does not appear to be included. We do note however that in Tables 7-6 to 7-9 of the WPVA, the sensitivity testing increased the sales values in increments of 20%.</p> <p>With a 20% increase in sales values (less than the reported increase of 9% in sales values reported in the Addendum), specialist older persons' housing could not support an Affordable Housing contribution in the lower and mid-lower value area. Mid and high value areas could support an affordable housing contribution, but it was finely balanced.</p> <p>While we acknowledge the PPG does states that circumstances that justify the need for a viability assessment at application stage can include where particular types of development are proposed which may significantly vary from standard models of development for sale (for example build to rent or housing for older people) (Paragraph ID: 10-007-20190509).</p> <p>The guidance in the NPPF and the PPG however state that the role for viability assessment is primarily at the Plan making stage: Where up-to-date policies have set out the contributions expected from development, planning applications that comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability</p>	<p>Assessment concludes that neither sheltered housing or extra care accommodation can support affordable housing contributions. We are therefore strongly of the view that it would be more appropriate to set a lower, potentially nil, affordable housing target for sheltered and extra care development, particularly in urban areas</p> <p>As a suggestion we would recommend an addition to Policy S22: Affordable Housing which is as follows:</p> <p>Part Two: Specialist housing for older people</p> <p>Specialist older persons' housing including sheltered and extra care accommodation will not be required to provide an affordable housing contribution.</p> <p>In the event the Council retains a speculative affordable housing requirement for specialist older persons' housing we would like to state our intention to appear at Examination in Public.</p>		
--	--	--	--	--	--	--	--	--	--	---	--	--

								<p>assessment at the application stage. The weight to be given to a viability assessment is a matter for the decision maker, having regard to all the circumstances in the case, including whether the plan and the viability evidence underpinning it is up to date, and any change in site circumstances since the plan was brought into force (paragraph 57.)</p> <p>Council Members, Officers and the general public will assume that applications for sheltered or extra care housing will be able to support a policy compliant level of affordable housing. This would however be at odds with the viability evidence underpinning the Local Plan. Furthermore, no reference is made to the inability of older persons' housing typologies providing policy compliant levels of affordable housing in either the text of the Policy S22 or its justification. Burdening specialist forms of accommodation with an unrealistic affordable housing requirement on the presumption that viability will be considered on a site-specific basis, but not making this clear to either developers or Council Officers in the wording of the policy creates both uncertainty and a significant opportunity for conflict. This is particularly concerning as the NPPF and the PPG both make it clear that the weight attributed to a viability assessment is at the discretion of the decision maker.</p> <p>Policy S22 clearly states it will seek affordable housing contributions from specialist older persons' housing typologies, including residential care homes, at the same level of general needs housing. The requirement for affordable housing contributions from specialist older persons' housing typologies is therefore speculative and not based on the WPVA.</p> <p>The Local Plan is therefore considered to be unsound on the grounds the affordable housing targets are not justified, positively prepared or effective. We are strongly of the view that it would be more appropriate to set a nil affordable housing target for sheltered and extra care development, at the very least in urban areas. This approach accords with the guidance of the PPG which states that 'Different (affordable housing) requirements may be set for different types or location of site or types of development1 (Paragraph: 001 Reference ID: 10-001-20190509).</p> <p>To that end, we would like to draw the Council's attention to Paragraph 5.33 of Policy HP5: Provision of Affordable Housing in the emerging Fareham Borough Local Plan which advises that:</p> <p>5.33 ... The Viability Study concludes that affordable housing is not viable for older persons and specialist housing. Therefore, Policy HP5 does not apply to specialist housing or older persons housing.</p> <p>A nil affordable housing rate could facilitate a step-change in the delivery of older person's housing in the Central Lincolnshire helping to meet the diverse housing needs of the elderly as detailed in Policy S22: Meeting Housing Needs. The benefits of specialist older persons' housing extend beyond the delivery of planning obligations as these forms of development contribute to the regeneration of town centres and assist Council's by making savings on health and social care.</p>			
1103268	S23							<p>McCarthy Stone and Churchill Retirement Living are independent and competing housebuilders specialising in sheltered housing for older people. Together, we are responsible for delivering approximately 90% of England's specialist owner-occupied retirement housing.</p> <p>Paragraph 1 of the PPG Housing for Older and Disabled people states: "The need to provide housing for older people is critical. People are living longer lives and the proportion of older people in the population is increasing Offering older people, a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their</p>	<p>The respondents commend the Council for the positive and proactive manner they have approached meeting the housing needs of older people in the Local Plan. However, the following amendments should be made</p>		No

								<p>communities and help reduce costs to the social care and health systems. Therefore, an understanding of how the ageing population affects housing needs is something to be considered from the early stages of plan-making through to decision-taking".</p> <p>Paragraph: 001 Reference ID: 63-001-20190626</p> <p>The Central Lincolnshire Local Housing Needs Assessment details that the population aged 65 and over in Central Lincolnshire is projected to increase by 31,365 people (48%) between 2018 and 2040. The 75+ age range, who are more likely to be frail and have long term health issues, are projected to see a significant increase in population over the Plan period of 24,774 persons (85%).</p> <p>Table 8.4 of the Housing Needs Assessment details older persons' housing requirements in Central Lincolnshire to 2035 which can be broadly summarised as: 7,416 units of 'housing for older people' (i.e. sheltered and retirement housing) and 1,201 dwellings defined as 'housing with care' (i.e. extra care accommodation). These are very significant numbers of units and it will be challenging for the Council to meet the diverse housing needs of the elderly over the Plan period. A supportive local planning policy framework will be crucial in increasing the delivery of specialist older persons' housing.</p> <p>While we consider the wording of Policy S22 to be, for the most part positive, and commend the Council for it accordingly.</p> <p>We would however highlight that, despite the positive manner in which the Council has addressed specialist older persons housing needs, it is undermined by inconsistencies in the viability assessment older persons' housing typologies in the Central Lincolnshire Whole Plan Viability Assessment (WPVA). This matter is addressed comprehensively in our representation to Policy S22.</p>	<p>That requirement to demonstrate the need for these forms of specialist housing in Paragraph 4.2.9 is deleted.</p> <p>That the inability of older persons' housing typologies to deliver affordable housing is referenced in Paragraph 4.2.9 (See representation to Policy S22).</p>		
1103279	S49							<p>The Council's commitment to sustainable transport modes is commendable. The Council's proposed parking standards are not detailed in the wording of Policy 27 but rather are detailed in Appendix 2 of the Local Plan. The parking requirement for specialist older persons' housing are summarised in the table below: [attached]</p> <p>Car Parking</p> <p>McCarthy Stone and Churchill Retirement Living have unrivalled experience in developing retirement housing for the elderly, having implemented well over 1000 Category II sheltered housing developments throughout England, Scotland and Wales. Whilst we appreciate the parking standard for specialist older persons' housing are lower than the requirement for 'general needs' housing, we are strongly of the view that the standards currently proposed would constitute overprovision of parking provision.</p> <p>Retirement Living (Category II sheltered housing) has been defined as "grouped flatlets to meet the needs of the less active elderly people". The key wording here is "less active elderly people", although residents are not normally so frail as to be wholly inactive. Based on survey work it was found that the average age of entry to the respondent's developments is 76 years.</p> <p>It has been found that, of those residents who have given up car ownership, as the majority eventually will, a very significant proportion, of about 18%, do so at, or close to, the time that they enter this form of housing.</p>	<p>1. That the Council's parking standards for older persons' housing typologies are reduced in Appendix 2</p>		Yes

								<p>This reduction in car ownership is more pronounced for residents of 'Extra Care accommodation' which is specialist older persons' accommodation that is aimed at the 'frail' elderly. The average age of a resident in a McCarthy & Stone 'Retirement Living Plus' (Extra Care) development is currently 83 years old.</p> <p>As the highway authority may likely to seek the residential car parking standards in Appendix 2 this would constitute a significant level of over provision in our view and would make it extremely difficult to deliver these types of development, particularly Extra Care, in the most sustainable locations (i.e. within 0.5 miles of a town or local centre) as such locations tend to be spatially constrained. While we note that the parking standards are reduced in Lincoln City Centre, the parking standard constitute an overprovision of parking in the remainder of the Plan area. We would like to respectfully highlight that the overprovision of car parking spaces in sustainable locations will encourage continued car ownership and unnecessary private vehicle journeys. Given the substantial emphasis on reducing carbon emissions in the Local Plan this is a surprising stance (we refer the Council back to para 3.5.3).</p> <p>To aide the Council we consider a good example of parking standards for specialist accommodation for the elderly to be: 1 space per every 4 dwellings for Extra Care accommodation 1 space per every 3 dwellings for Sheltered Housing.</p>			
1103280	S54							<p>We welcome the Council's commitment to the health and wellbeing of its residents.</p> <p>As detailed in our representation to Policy S22: Meeting Housing Needs, the demographic profile of Central Lincolnshire is ageing with the population aged 65 projected to increase by 31,365 people (48%) between 2018 and 2040 individuals over the Plan period. An ageing population inevitably results in an increase in frail individuals and persons with long term health issues. There is a commensurate pressure on care and health services accordingly with many local authorities spending over a third of their budgets on adult social care currently.</p> <p>It is well established that poor housing can exacerbate health problems in old age, with enormous resultant costs to the NHS and social care. For example:</p> <p>Falls - Public Health England statistics show that in 2017/18 falls accounted for 335,000 hospital admissions in England of people aged 65 and over.</p> <p>Cold Homes - Millions of older people in the UK are living in homes that are too cold. A cold home can cause chronic and acute illnesses and lead to reduced mobility, falls and depression.</p> <p>Social Isolation - 1.5 million people aged 50 and over are always or often lonely, researchers have calculated. Loneliness makes it harder for people to regulate behaviours such as drinking, smoking, and over-eating, which in turn have their own significant negative outcomes.</p> <p>Specialist older persons' housing has been developed with the needs of the elderly in mind, enabling them to remain independent for longer. These homes are designed to be warm and with features to alleviate the physical impact of ageing (such as level access throughout) and offer opportunities for residents to access support, care, and companionship. The recently published Healthier and Happier Report by WPI Strategy (September 2019) calculated that the average person living</p>	1. We would suggest that the role of specialist older persons' housing in improving the health and wellbeing of the District's elderly residents is acknowledged in the supporting text of the policy		No

									<p>in specialist housing for older people saves the NHS and social services £3,490 per year.</p> <p>The Council's aspirations to improve the health and wellbeing of its residents is commendable and we are strongly of the view that increasing the delivery of specialist older persons' housing is wholly aligned with this objective.</p>			
1103281	S66								<p>The benefits of tree planting and their role in the Government's target to reach net zero by 2050 has been widely publicised. It is commendable that the Council is looking to engage proactively with this matter in the Local Plan.</p> <p>We note that the number of replacement trees is based on the trunk diameter measurement and that up to 11 trees may be required to replace one, large, specimen.</p> <p>It is also noted that the replacement tree planting requirements would normally be expected to be met within the development site. A significant on-site replanting requirement can therefore be generated through the loss of very few trees. The aim of the replacement tree planting standards would appear to a long-term increase in tree cover rather than like-for-like replacement, which will be an impediment to building at higher densities, particularly on previously developed sites in urban areas. We note that the local planning authority will waiver the on-site requirement in instances it agrees are not feasible or desirable and that commuted sums will be sought in lieu, on a per tree basis. This appears to be taken on a case- by-case basis with input from Council stakeholders.</p> <p>We note that the Central Lincolnshire Whole Plan Viability Assessment does not allow for the cost of replacement tree planting. In our experience a semi-mature tree specimen can cost circa £2,000 so the level of contribution is potentially quite significant.</p> <p>While we appreciate there are benefits to providing trees in urban areas, building at higher densities in urban areas reduces greenfield land-take and is a highly sustainable outcome accordingly. A reduced tree standard for sites in urban areas would be more appropriate.</p>	<p>1. Reduce the requirement for additional tree planting in urban locations.</p> <p>2. To include a separate cost for tree planting in the Central Lincolnshire Whole Plan Viability Assessment.</p>		No

National Grid

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102758	S6						No		<p>Utilities Design Guidance</p> <p>The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Grid infrastructure.</p> <p>National Grid advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines, underground gas transmission pipelines, and other National Grid assets.</p>	<p>Therefore, to ensure that Policy S6: Design Principles for Efficient Buildings is consistent with national policy we would request the inclusion of a policy strand such as:</p> <p>"x. Development will take a comprehensive and co-ordinated approach including respecting existing site constraints including utilities situated within sites."</p>		Yes

1102749	S69					No			Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets. Details of the sites affecting National Grid assets are provided below. [See attached] A plan showing details of the site locations and details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only. Without appropriate acknowledgement of the National Grid assets present within the site, these policies should not be considered effective as they cannot be delivered as proposed; unencumbered by the constraints posed by the presence of National Grid infrastructure.	We propose that the following site allocations and/or associated policies include wording to the following effect: Site Allocation NK/NHYK/001 "A strategy for responding to the National Grid electricity assets present within the site is required which demonstrates the National Grid Design Guide and Principles have been applied at the masterplanning stage and how the impact of the asset has been reduced through good design." Please see attached information outlining further guidance on development close to National Grid assets.		Yes
---------	-----	--	--	--	--	----	--	--	--	--	--	---------------------

National Highways

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103602	S46								<p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this consultation, our principal interest is safeguarding the operation of the A46 (T) which routes through the Plan area.</p> <p>With regard to transport infrastructure, the Plan refers to the North Hykeham Relief Road which will link the Eastern Bypass (at the A15 Sleaford Road) with the existing A46 Western Bypass (at A46 Hykeham roundabout junction), creating a complete Lincoln Ring Road. Policy S46 safeguards the land for this as it is key infrastructure.</p> <p>We would welcome continued engagement particularly with regards to the progression of North Hykeham Relief Road.</p>			No
1103603	S47								<p>National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this consultation, our principal interest is safeguarding the operation of the A46 (T) which routes through the Plan area.</p> <p>Sites with the potential to have an impact on the SRN will be required to submit a transport assessment to demonstrate the impacts on the highway network and determine the need for mitigation.</p> <p>We have previously acknowledged that the base model produced to assess the Local Plan development proposals for Lincoln and the A46 around Lincoln is suitable. We understand that the level of growth has not changed significantly to what was allocated in the previous Local Plan. Also, the 2040 forecast year is suitable. However, we recommend that Central Lincolnshire notes that the GLTM is not sufficiently extensive and detailed for testing the Local Plan impacts on the A46 between the A1 and A46 Hykeham roundabout given that this link of the SRN falls within the buffer zone of the model.</p> <p>To mitigate and manage this matter we would recommend that suitable procedures are</p>			No

									<p>established, including a potential need for assessment on the A46 junctions between the A1 and Lincoln, if this part of the network shows stress due to forthcoming growth.</p> <p>A key aspiration for Midlands Connect is to improve the A46 Corridor. National Highways has recently commissioned a study on the A46 corridor and would welcome engagement with the council to understand the local needs of Central Lincolnshire.</p> <p>Particularly, this engagement will help to identify the scale of improvements needed to realise growth aspirations and transport needs to strengthen connectivity along the corridor.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

National Trust

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101323	S6			Yes	Yes	Yes	Yes		<p>National Trust strongly supports Policy S6 Design Principles for Efficient Buildings, which seeks to build in energy efficiency from the start of a building's life through a set of design principles.</p> <p>Bearing in mind that the heading of Theme One refers to 'new build', whereas Policy S6 does not, it is currently unclear whether Policy S6 applies only to new build, or also to retrofit of existing buildings including potentially historic buildings. If the latter, then greater flexibility will need to be employed when applying the policy to ensure that energy efficiency measures are consistent with conservation of the building.</p>	Clarify whether Policy S6 relates to new build only. If not then consider incorporating text to indicate that greater flexibility will be required when applying the principles to historic buildings of significance.	No	No
1101326	S11			Yes	Yes	Yes	Yes		National Trust supports Policy S11 Embodied Carbon which seeks to avoid unnecessary demolition. While demolition does not require planning permission in every case, this does not negate the fact that demolition and rebuilding have environmental and resource implications that are often overlooked in the development process.		No	No
1101327	S13						No		<p>National Trust supports Policy S13 Reducing Energy Consumption in Existing Buildings, however, this contains a minor but important policy inconsistency relating to the following text:</p> <p>'*Note: for any heritage asset, any improvements to the energy efficiency of that asset must not cause harm to, or loss of, the significance of the asset. This may limit any feasible energy efficiency improvements.'</p> <p>The statement that energy efficiency improvements 'must not cause harm' is inconsistent with NPPF Policies 201-203 regarding decision making in relation to designated and non-designated heritage assets. Under these policies, energy efficiency measures ought to be considered as a public benefit that will weigh in the planning balance against any harm.</p> <p>We are also concerned that the following statement may deter developers from investigating appropriate measures: 'This may limit any feasible energy efficiency improvements'. In our experience as a developer of historic buildings, we have found that there is some scope for energy efficiency and retrofit measures in appropriate contexts, for example appropriate breathable insulation (e.g. insulated lime plaster or wood fibre board), secondary glazing and air source heat pumps on rural barn conversions. We therefore consider that it would be preferable that the policy is</p>	<p>We suggest the alternative wording:</p> <p>Note: for any heritage asset, any improvements to the energy efficiency of that asset should be generally consistent with the assets conservation, and in accordance with national and local policies for the conservation of heritage assets. Further advice on energy efficiency measures that may be appropriate in historic buildings can be found in Historic England guidance, such as https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/.</p>	No	No

								adjusted to sign post appropriate guidance such as Historic England's Energy Efficiency in Historic Buildings: https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/ .			
110133 3	S14; Map			Yes	Don't know	No	Don't know	<p>National Trust is supportive of the inclusion of a policy to promote renewable energy development. However, we consider that there are several issues with this policy at present, and that as a whole it would benefit from careful review and clarification to avoid potential policy conflicts or issues of interpretation.</p> <p>We generally support the first section of the policy which contains decision making criteria and expands on how these will be applied. Where the policy refers to 'areas that have been designated for their national importance', it would be helpful if clarification could be provided as to which designations this is referring to, e.g. biodiversity/geodiversity sites such as SSSIs.</p> <p>Additional matters for solar energy This section refers to a 'presumption in favour of permission' unless there is 'significant harm'. It is unclear how this relates to the NPPF 'presumption in favour of sustainable development' and whether it could result in any policy conflict or issues of interpretation.</p> <p>It is also unclear whether the policy effectively represents a moratorium on solar energy development on Best and Most Versatile Agricultural Land. According to Natural England's Agricultural Land Classification Map of the East Midlands (http://publications.naturalengland.org.uk/publication/143027?category=5954148537204736), this would potentially rule out a very significant proportion of Central Lincolnshire, and there is therefore a question as to whether such a policy can be considered 'justified' or 'effective', particularly in mind that (i) a solar farm will not result in permanent loss of the agricultural land, and (ii) there may be opportunities for agriculture such as grazing to be incorporated within the scheme. A more nuanced approach may therefore be preferable.</p> <p>Additional matters for wind energy There are some issues of consistency of terminology across the Local Plan policy wording, supporting text and Policies Map with references to 'locations suitable in principle for large scale wind turbines', 'Broad area suitable for larger scale wind energy turbines' and locations 'potentially suitable' for 'medium-large scale wind turbines'. It may be beneficial that the Local Plan and evidence base are cross-checked to ensure that any inconsistencies will not create issues of interpretation when applying the policies.</p> <p>We also recommend that the local authority investigates and ensures that areas identified as 'potentially suitable' or 'suitable in principal' are likely to meet the NPPF (footnote 54) requirement of areas that are 'suitable' for wind energy development.</p> <p>The policy distinguishes 'small to medium' and 'medium to large' wind developments, applying different principles to the determination of planning applications. In relation to the identification of suitable areas, this may be justified having regard to the evidence base. However, this section of the policy then becomes inconsistent with the NPPF stating that larger turbines will be tested against 'National Planning Policy' followed by additional wording which relates to NPPF footnote 54. The NPPF does not distinguish between wind developments according to their size and its policies and footnote 54 will be a material consideration in all cases.</p>	<p>We suggest that the policy clarifies which types of designated areas are referred to by 'areas that have been designated for their national importance'.</p> <p>We are concerned that the way in which section of the policy relating to solar energy is to be applied is unclear and may not be justified or effective – we suggest that revision/clarification of the requirements would be beneficial. In particular we suggest that the use of a 'presumption in favour unless...' is reconsidered. In relation to BMV agricultural land we suggest that its benefits are recognised in accordance with NPPF paragraph 174, but that this is weighed with other factors including whether the land can continue to support agriculture alongside renewable energy.</p> <p>Within the section on wind development, the policy wording will need to be adjusted to reflect the fact that the NPPF and footnote 54 apply to all wind developments, rather than only medium-large developments as implied.</p> <p>Finally we believe that as the map of areas potentially suitable for wind identifies a large tract of land on the direct line of sight between Lincoln Castle/Cathedral and Tattershall Castle, the exceptional importance of these heritage assets as Lincolnshire landmarks is identified and protected. This could be achieved with the following additional wording:</p> <p>The direct line of site between Lincoln Castle/Cathedral, Tattershall Castle and Boston Stump should be maintained, ensuring that any wind farms within the wider view do not undermine the prominence of these heritage landmarks or unduly dominate the surrounding landscape.</p>	Yes	No

									We note that while the evidence base has taken account of settlement buffers, the Lincolnshire Wolds AONB, various wildlife sites and certain heritage assets, it does not take account of listed buildings or their settings. We understand that mapping each individual listed building and attempting to map its setting may be impractical at the Local Plan preparation stage. However, we believe that there are certain assets of such exceptional importance from both a landscape/landmark and heritage perspective that they warrant inclusion within the policy wording. Specifically, the heritage assets of Lincoln Cathedral and Castle towards the northwest of the plan area, and Tattershall Castle and Boston Stump just outside of the southeast of the plan area, are exceptional for their height/mass and presence within the landscape. This significance is elevated by the direct line of site between these assets on a northwest to southeast axis across the flat Lincolnshire fens. We believe that Policy S14 could be significantly improved by a direct reference to the importance of maintaining the landscape prominence and direct line of sight between these assets. Without doing so the policy might be considered 'ineffective' as the mapping of potentially suitable areas steers proposals for medium-large scale wind to some focused areas, one of which is a large tract of land on the direct line between Lincoln and Tattershall.			
110133 6	S57					No			National Trust is generally supportive of Policy SP57: The Historic Environment. However, we have some concerns about the fourth paragraph which is introduced as relating to both change of use and proposals that would affect an assets setting. However the following bullet points relate mainly to change of use applications. In relation to setting we consider that stronger protection is provided by the NPPF and by part (d) of Policy SP57, and that the fourth paragraph may therefore result in issues of interpretation. The relationship between the fourth paragraph of the policy and the section relating to Listed Buildings (which also focuses on change of use) should also be carefully considered.	Amend the fourth paragraph so that it relates to applications for change of use, and not to development within a heritage asset's setting.	No	No
110133 7	S58								Reflecting our comments on Policy S14 (renewable energy) which highlights a significant view of Lincoln Cathedral from Tattershall Castle, we believe that part (a) of Policy S58: Protecting Lincoln, Gainsborough and Sleaford's Setting and Character could be beneficially adjusted to ensure that significant views of uphill Lincoln on the skyline, other than the approach views currently mentioned, are also afforded protection.	Suggested wording of part (a): a) Protect the dominance, and approach views and other significant views of Lincoln Cathedral, Lincoln Castle and uphill Lincoln on the skyline;	No	No
110133 9	S59			Yes	Yes	Yes	Yes		National Trust supports Policy S59: Green and Blue Infrastructure Network.		No	No
110134 2	S60	Don't know		Yes	Yes	Yes	Don't know		National Trust supports Policy S60: Biodiversity and Geodiversity. However, as a minor point of accuracy, where Part One(1) outlines the role of the Habitats Regulations it does not account for potential 'imperative reasons of overriding public interest (IROPI)' with associated compensatory measures.	Incorporate reference to IROPI, or (preferably) remove the last sentence of Part One(1) deferring to the requirements of the Habitats Regulations to avoid paraphrasing the regulations.	No	No
110134 3	S62						No		While National Trust supports the aims of Policy S62: Area of Outstanding Natural Beauty and Areas of Great Landscape Value, we are concerned to ensure that all landscapes are given protection, commensurate with their value and special features. NPPF paragraph 20 states that 'strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for... (d) conservation and enhancement of the natural, built and historic environment, including landscapes...'. 	Incorporate provisions within Policy S62 that conserve all landscapes (not only those identified for special protection) in a manner commensurate with their value, character and any special features that they contain.	No	No

									NPPF paragraph 130 states that 'Planning policies and decisions should ensure that developments... (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting...'			
--	--	--	--	--	--	--	--	--	--	--	--	--

Natural England

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103604	HRA								<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England welcomes the opportunity to comment on the Habitats Regulations Assessment of the Central Lincolnshire Proposed Submission Local Plan, as a statutory consultee and specialist adviser on the application of the Conservation of Habitats and Species Regulations 2017.</p> <p>We are satisfied that the Screening Report follows accepted methodology and is in line with appropriate legislation and guidance. We also acknowledge that policies that may have a Likely Significant Effect on a European Site have been identified and further considered through an Appropriate Assessment.</p> <p>We can therefore confirm that we agree with the HRA report's conclusions that the Central Lincolnshire Local Plan would not be likely to have a significant effect on a European Site either alone or in combination with other plans or projects, and no further assessment work is required.</p>			No

Nettleham Parish Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
11932949	S1	Y		No	No				The previous consultation responses were basically ignored with regards to S2 and S4. S1 states that development will be focused on the major urban developments with limited development in the large villages. The reality of the site allocations shows massive growth in the large villages surrounding Lincoln, especially when combined with growth achieved in the past 5 years. S4 housing in villages was objected to by 11 Parish Councils and supported by just 1. In general S4 received 64 objections and was supported by only 12 respondents, yet no significant changes were made to reflect the concerns expressed. It is clearly unreasonable to increase new housing by a further 10% in large villages when the overall housing requirement is reducing by 14%, how is that focussing housing growth in urban areas?	Housing growth in the large villages should be set at the level established as appropriate in the 2017 CLLP to ensure that the new housing pressure on our large villages does not destroy their character and make them unsustainable by placing undue pressure on local resources.	No	No

Network Rail

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				

1101651	S14	Yes	Yes	Yes	Yes	No	Yes	Don't know	<p>The policy is not effective as it does not consider the impacts upon the railway in the tests set out.</p> <p>The impacts upon highway safety are considered as part of the policy but the impact and severity of any incident upon highway or road safety would be as significant as such there is a shortfall in that railway safety must be stated.</p>	<p>Policy S14: Renewable Energy</p> <p>The Central Lincolnshire Joint Strategic Planning Committee is committed to supporting the transition to a net zero carbon future and will seek to maximise appropriately located renewable energy generated in Central Lincolnshire (such energy likely being wind and solar based).</p> <p>Proposals for renewable energy schemes, including ancillary development, will be supported where the direct, indirect, individual and cumulative impacts on the following considerations are, or will be made, acceptable. To determine whether it is acceptable, the following tests will have to be met:</p> <p>i. The impacts are acceptable having considered the scale, siting and design, and the consequent impacts on landscape character; visual amenity; biodiversity; geodiversity; flood risk; townscape; heritage assets and their settings; and highway safety; and railway safety; and</p>	No	No
1101647	S69	Yes	Yes	Yes	Yes	No	Yes	No	<p>The policy is not effective as it does not consider the impacts upon the railway of the proposed development. Which given the large scale of the allocation is a significant omission. Network Rail commented on the draft plan that it was important to consider the impacts of the allocation upon the railway and level crossing safety however this has not been considered included or discussed in contrary to a Duty to Co-operate.</p>	<p>Policy S69: Lincoln Sustainable Urban Extensions</p> <p>In addition to the generic requirements for Sustainable Urban Extensions in Policy S68, development at the following strategic sites will be required to meet the following locally specific requirements:</p> <p>COL/BOU/001 – Western Growth Corridor SUE (WGC) – Land at Swanpool, Fen Farm and Decoy Farm</p> <p>Proposals for the WGC area, as identified on the Policies Map, should provide:</p> <p>a) Approximately 3,200 houses;</p> <p>b) Approximately 20 ha of land for mixed employment (B Use Classes) and leisure (D2 Use Class) serving the wider Lincoln area for significant local growth and inward investment of strategic importance complimentary to that on the adjacent Lincoln Science and Innovation Park;</p> <p>c) A distinctive place to live that has its own identity and respects its local surroundings including key views and vistas of and from Lincoln Cathedral and the historic core of the City and the setting of Decoy Farm scheduled monument and Hartsholme Registered Park;</p> <p>d) Comprehensive solutions to drainage and flood risk, guided by an agreed flood risk assessment and water management plan;</p> <p>e) A direct route incorporating priority for public transport linking Skellingthorpe Road through to the city centre via the Beevor Street area with connection onto the A46 if required;</p> <p>f) Transport infrastructure, such as measures to encourage walking, cycling and use of public transport (which might include park and ride facilities) in order to maximise opportunities for sustainable modes of travel, in line with the aims of the Lincoln Integrated Transport Strategy;</p> <p>g) A wide range of community facilities including a new Local Centre;</p> <p>h) A wide range of open space, recreation and leisure uses, together with consideration of the provision of a regional leisure complex;</p> <p>i) A development that maximises the opportunities for low carbon and sustainable design including, if feasible, use of the heat from the Energy from Waste plant at North Hykeham;</p> <p>j) Comprehensive solutions to reclaim and remediate the former tip on</p>	No	No

										<p>the eastern part of the site; and</p> <p>k) Improved linkages, enhancement and support of green wedges and other green infrastructure. As this SUE is within or includes an area of Biodiversity Opportunity proposals on this site should incorporate the relevant Principles for Development within Biodiversity Opportunity Areas set out in Appendix 4</p> <p>l) a comprehensive solution to mitigate the impacts the proposed development may have upon railway infrastructure in particular Oak Farm, Coulson Road and Rustons Tip level crossings.</p>		
1101643	S71	Yes	Yes	Yes	Yes	No	Yes	No	<p>The policy is not effective as it does not consider the impacts upon the railway of the proposed development. Which given the large scale of the allocation is a significant omission. Network Rail commented on the draft plan that it was important to consider the impacts of the allocation upon the railway and level crossing safety however this has not been considered, included or discussed in contrary to a Duty to Co-operate.</p> <p>Network rail is concerned about the impacts that the proposed Sleaford SUE may generate, specifically the impacts of traffic through the town and any potential increase in “rat running” along King Edward Street and over Sleaford West crossing. This must be considered as part of any allocation and included within the policy itself.</p>	<p>Policy S71: Sleaford Sustainable Urban Extensions</p> <p>The growth and regeneration of the Sleaford area will be delivered through a co-ordinated and sustainable approach to planning and development, linking housing and economic growth with infrastructure improvements, whilst protecting and enhancing Sleaford’s natural environment, heritage assets and local distinctiveness.</p> <p>In addition to the generic requirements for Sustainable Urban Extensions in Policy S68, development at the following strategic sites will be required to meet the following specific requirements:</p> <p>NK/SLEA/014 – Sleaford South Quadrant SUE (Handley Chase)</p> <p>Development at Handley Chase, as identified on the Policies Map, should result in the creation of a comprehensively planned, new sustainable neighbourhood to the South of Sleaford, comprising around 1,450 dwellings. The first phase of development should take place on the land immediately adjoining the existing built up area of Sleaford and include the provision of the new Local Centre.</p> <p>Development of this SUE is likely to come forward in accordance with the outline planning permission granted for the site in 2015. However, should an alternative permission be sought for the site, then in addition to the requirements for SUEs in Policy S68, proposals for this area should:</p> <p>a) deliver a new Local Centre of a sufficient scale to meet the day-to-day needs of the Sleaford South new community and nearby residents, and to include:</p> <ul style="list-style-type: none"> i. a community centre; ii. retail units; iii. a public house; iv. a care home site; and v. provision for small start-up offices. <p>b) provide vehicular access via London Road only, but incorporate cycle and pedestrian connections into the adjoining Southfields Estate;</p> <p>c) provide appropriate transport mitigation measures, having particular regard to measures to mitigate any adverse transport impacts on Holdingham Roundabout, Silk Willoughby, Quarrington, King Edward Street and Castle Causeway, the junction between London Road and Grantham Road and minor roads linking London Road to Grantham Road;</p> <p>d) deliver an extension of a shared footpath and cycleway along London Road;</p> <p>e) maximise the opportunities associated with the proximity of the site to the Sleaford Railway Station and include measures to encourage rail travel; the urban extension should take into account impacts on stations and railway infrastructure and contribute to improvements where appropriate. Where there is interaction between road and rail these should be assessed and mitigated.</p> <p>f) provide on-site a network of green infrastructure and public open</p>	No	No

										space which links into the wider green infrastructure network for the Sleaford area, maximising the potential (and mitigates the impacts) associated with Moor Drain, and which achieves strong, though carefully planned, connections to Mareham Pastures Local Nature Reserve; g) provide on-site sports pitches, a site for a pavilion/changing facility and allotments.		
--	--	--	--	--	--	--	--	--	--	---	--	--

Newton on Trent Parish Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103592	S4				No				<p>Newton on Trent Parish Council object to how the draft local plan allocates new housing across the plan area. Too much focus seems to be on big urban extensions around Lincoln. We question whether these ever deliver as much housing as is promised, surely developers aren't going to compete with each other to sell houses? And some of these sites, like Swanpool/Eastern Growth Corridor have been supposed to be coming forward for decades and no results are apparent.</p> <p>All this seems to be at the expense of small villages like Newton on Trent. We value our local facilities like the village school, and we've seen our village pub close and post office/shop about to close. Why are we expected to travel by car to Lincoln in future to find alternatives? I recall the last Local Plan allowed some flexibility to support village growth, but now we are only to be allowed small, up to 5 dwelling, sites in the existing footprint of the village? Is it the case that these restrictions are being proposed in the hope it will force the owners of the big sites to start developing, because we see that as a risky policy at the expense of our villages future.</p>	Review policy S4 to make it far less restrictive so as to allow villages more say in how much we grow and allow us to protect and from our local facilities and services.	Yes	No
1103595	S82				No				<p>Newton on Trent Parish Council object to the fact that the draft plan doesn't consider the Manor Farm garden village proposal. The Parish Council and the local community supported the site through 2 appeals, including voting in favour of it through a referendum, and I recall at the last hearing the Inspector stating that this was really a matter that would be more properly considered when the Local Plan is next reviewed.</p> <p>We are aware that Bassetlaw Council is proposing a mixed use regeneration scheme at the former Cottam power stations site across the Trent from Newton. Surely if there is going to be nearby future investment in sustainable transport, flood defences, new facilities etc, then Manor Farm ought to be reconsidered in light of the Cottam scheme?</p> <p>We also hear that all the Bassetlaw Garden Village land at Apleyhead isn't going to come forward now, surely some of that unmet demand is going to have to be accommodated on the Lincolnshire side of the Trent?</p> <p>If the joint local plan team don't consider Manor Farm should be allocated in the Local Plan, do the new policies let the Parish Council bring it forward ourselves through a Neighbourhood Plan?</p>	The Manor Farm garden village proposal should be reconsidered for inclusion in the Local Plan.	Yes	No

NHS Lincolnshire

Rep ID		Q2: Legal Compliance	Q3: Tests of Soundness	Q4: Please give details.			
--------	--	----------------------	------------------------	--------------------------	--	--	--

	Comment on	Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate		Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
1102761	S2								64% of growth will be in the Lincoln area, 12% in Gainsborough, 12% in Sleaford and 12% elsewhere. The hierarchy of villages to show what will be permissible in each area is a useful planning tool.			No
1102762	S6; S7; S8; S9; S10; S11; S12; S13; S14; S15; S16; S17								There is quite a few new policies relating to the environment and climate change including new future homes standards, future building standards, energy efficiency etc which we would support from a wider determinants of health and wellbeing perspective. The benefits of our delivering care closer to home and integrating services at a community level supports the Greener NHS agenda. Greener NHS (england.nhs.uk)			No
1102763	S35; S36 S37; S38; S39; S40								Within these policies there needs to be reference to the need to engage at an early stage with the local NHS with regard to the health care needs/opportunities as part of these centres. We are responsible for not only GP/Primary Care services but also dental, pharmacy and optometry services. We are currently working with District Council partners on the integration of community assets including our role as an anchor partner in the high street. There are no references to pharmacy, optometry, dental provision. One example of this is the planning underway regarding the potential GP Practice within the Lincoln Carlton Centre. As you are hopefully aware our Practices are working together within Primary Care Networks and developing integrated community based care through Neighbourhood Integrated Teams .			No
1102760	S45								We note that this plan replaces the current plan and goes out to 2040. It is for City of Lincoln Council, NKDC and WLDC and therefore will impact across a number of our Primary Care Networks. We note the 35,400 additional residents by 2040 with between 23,320 and 29,150 additional houses between 2018 and 2040. These number will have significant impact on local health services and therefore on-going dialogue regarding the where, when, type of development and the impact on local health infrastructure and services will be key.			No
1102765	S51								We welcome the reference to the need for this and the links to physical and mental health. As plans come forward we look forward to working with local planning teams and developers regarding the accessibility and utilisation of these spaces. There are significant levels of inactivity in our residents leading to both physical and mental health issues. COVID 19 has emphasised this issue.			No
1102764	S54								Health policy is S54 and is limited in its scope but we are comfortable with the wording.			No
1102767	S68								The growth corridors urban extensions are listed in policies S68-70 . S68, the overarching policy, talks about working with stakeholders but doesn't reference health as part of the infrastructure needed, but references education. I am therefore asking that health is explicitly included.			No
1102768	S75								Where they are developing civilian communities there is no reference to health services. We ask that there is specific reference to the need for discussions with the local NHS to agree the needs. We are already engaged in the Prince William of Gloucester Barracks master planning in Grantham and would want to see this replicated across the Central Lincolnshire Local Plan area.			No
1102771	S84								Where they are developing civilian communities there is no reference to health services. We ask that there is specific reference to the need for discussions with the local NHS to agree the needs. We are already engaged in the Prince William of Gloucester Barracks master planning in Grantham and would want to see this replicated across the Central Lincolnshire Local Plan area.			No

	Comment on	Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate		Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
1103027	S1	Yes	Yes	Yes	Yes	No	Yes	Yes	We are broadly happy with those housing policies that affect the future growth of Nocton. As before we are concerned that Policy S1 in conjunction with Policy S4 fails to place sufficient emphasis on the evident demand for affordable housing.	A strategy is needed to free up land that can be sold below market value, in order to make the provision of affordable housing a realist prospect (see also Nocton Parish Council's comments re Policy S7).	No	No
1103030	S4	Yes	Yes	Yes	Yes	No	Yes	Yes	We are broadly happy with those housing policies which affect the future growth of Nocton. As before we are concerned that policy S4 in conjunction with Policy S1 fails to place sufficient emphasis on the evident demand for affordable housing. We are particularly encouraged the policies emphasize that the open green and tree covered character of our Conservation Area should be acknowledged and maintained in any developments.	A strategy is needed to free up land that can be sold below market value, in order to make the provision of affordable housing in realistic project.	No	No
1103026	S7	Yes	Yes	Yes	Yes	No	Yes	Yes	We have some concerns about the apparent clash between Policy S7 Reducing Energy Consumption and the need to build housing for sale or rent that are by definition truly affordable.	The requirement for on-site or on-plot sustainable electricity generation will be a prime obstacle to producing affordable housing. The policy should insist on the latest standards of insulation but, in the case of affordable housing, the sustainable electricity generation requirement should be loaded onto the electricity suppliers and thereby their customers in order to spread the cost.	No	No
1103023	S8; S14	Yes	Yes	Yes	Yes	No	Yes		Alongside HMG's Zero Carbon Target, the impact of sustainable electricity generation on the security of food production is becoming increasingly relevant. In the light of recent Government proposals Central Lincolnshire relatively modest policy may have to be revised upwards during the life of this plan. Even though food security demands that we buy from a wide range of global suppliers, we must retain the ability to supply and retain at home. Safeguarding our agricultural land and production capacity will become increasingly important during the implementation of this plan especially in the light of recent events.	An estimate of the extent to which each proposal for sustainable electricity generation would impact local food production should be an important par of each assessment.	No	No

North Kesteven District Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102310	NS18	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council fully supports the ambition for the CLLP to be a net-zero carbon local plan in respect of the climate emergency. Accordingly, the Council supports policies S6-S21 of the plan as presented. Moreover, the Council notes the evidence base for the plan demonstrates that the full range of the policies presented are together and collectively all required to meet this key ambition such that there is little or no margin for reducing or removing constituent parts without seriously undermining the net-zero carbon aim for the plan.		Yes	No
1102265	S1	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Support is offered to the updated settlement hierarchy, including revision of certain villages based on clear size thresholds. The provisions within the policy to the approach to the		Yes	No

									determination of housing development proposals on non-allocation sites in Lincoln, main towns and market towns to Policy S3 is welcome.			
1102268	S2	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Support is offered for the strategic aims to deliver 29,150 dwellings and around 24,000 new jobs over the plan period. Also the Council supports the continued proportionate distribution of growth in the Lincoln Strategy Area (c.64%) and Sleaford (c.12%).		Yes	No
1102270	S4	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council supports the revision of the First Home and affordable housing exception sites to 5% at part 3 of the policy as this will enable a proportionate growth of an existing village without the new development proposed having an undue dominating impact upon the character of the existing settlement and its surrounding countryside. The Council supports and welcomes the policy approach to housing in or adjacent villages in how, in principle, it seeks to protect the character of village and its surrounding countryside.		Yes	No
1102273	S6	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council fully supports the ambition for the CLLP to be a net-zero carbon local plan in respect of the climate emergency. Accordingly, the Council supports policies S6-S21 of the plan as presented. Moreover, the Council notes the evidence base for the plan demonstrates that the full range of the policies presented are together and collectively all required to meet this key ambition such that there is little or no margin for reducing or removing constituent parts without seriously undermining the net-zero carbon aim for the plan. In respect of policy S6, the Council welcomes and supports this new policy in providing the key criteria for design principles for energy efficient new buildings. The policy provides a clear and concise set of criteria on delivering climate responsive new development, setting a context for policy S7 for residential and policy S8 for non-residential development proposals in the delivery of energy efficient new buildings.		Yes	No
1102275	S7	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council fully supports the ambition for the CLLP to be a net-zero carbon local plan in respect of the climate emergency. Accordingly, the Council supports policies S6-S21 of the plan as presented. Moreover, the Council notes the evidence base for the plan demonstrates that the full range of the policies presented are together and collectively all required to meet this key ambition such that there is little or no margin for reducing or removing constituent parts without seriously undermining the net-zero carbon aim for the plan. The intent to publish guidance on the detailed operation of policy S7 is supported. Adopting a step change in net zero carbon policy places additional technical and skills demands on all participants in the planning process and therefore a commitment to provide detailed criteria-based guidance, rooted in the evidence base for the plan, to assist with the consistent determination of planning applications and in advising applicants and agents is welcome.		Yes	No
1102276	S7	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council fully supports the ambition for the CLLP to be a net-zero carbon local plan in respect of the climate emergency. Accordingly, the Council supports policies S6-S21 of the plan as presented. Moreover, the Council notes the evidence base for the plan demonstrates that the full range of the policies presented are together and collectively all required to meet this key ambition such that there is little or no margin for reducing or removing constituent parts without seriously undermining the net-zero carbon aim for the plan. In respect of policy S7, the Council supports the policy and its ambition to deliver energy efficient new residential development across all of Central Lincolnshire. The policy is well-conceived and provides the appropriate balance in terms of viability clearly articulating that it falls to an applicant in Value Zones C and D to justify where criteria 1 and 2 of the policy cannot be met. Essentially all development proposals begin with the full requirements of the policy being 'turned on' and only where viability is demonstrably evidenced might lesser requirements be accepted.		Yes	No
1102277	S8	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council fully supports the ambition for the CLLP to be a net-zero carbon local plan in respect of the climate emergency. Accordingly, the Council supports policies S6-S21 of the plan as presented. Moreover, the Council notes the evidence base for the plan demonstrates that		Yes	No

									<p>the full range of the policies presented are together and collectively all required to meet this key ambition such that there is little or no margin for reducing or removing constituent parts without seriously undermining the net-zero carbon aim for the plan.</p> <p>In respect of policy S8, the Council supports the policy and its ambition to deliver energy efficient new non-residential development across all of Central Lincolnshire.</p>			
1102278	S9	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council fully supports the ambition for the CLLP to be a net-zero carbon local plan in respect of the climate emergency. Accordingly, the Council supports policies S6-S21 of the plan as presented. Moreover, the Council notes the evidence base for the plan demonstrates that the full range of the policies presented are together and collectively all required to meet this key ambition such that there is little or no margin for reducing or removing constituent parts without seriously undermining the net-zero carbon aim for the plan.		Yes	No
1102279	S10	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council fully supports the ambition for the CLLP to be a net-zero carbon local plan in respect of the climate emergency. Accordingly, the Council supports policies S6-S21 of the plan as presented. Moreover, the Council notes the evidence base for the plan demonstrates that the full range of the policies presented are together and collectively all required to meet this key ambition such that there is little or no margin for reducing or removing constituent parts without seriously undermining the net-zero carbon aim for the plan.		Yes	No
1102280	S11	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council fully supports the ambition for the CLLP to be a net-zero carbon local plan in respect of the climate emergency. Accordingly, the Council supports policies S6-S21 of the plan as presented. Moreover, the Council notes the evidence base for the plan demonstrates that the full range of the policies presented are together and collectively all required to meet this key ambition such that there is little or no margin for reducing or removing constituent parts without seriously undermining the net-zero carbon aim for the plan.		Yes	No
1102281	S12	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council fully supports the ambition for the CLLP to be a net-zero carbon local plan in respect of the climate emergency. Accordingly, the Council supports policies S6-S21 of the plan as presented. Moreover, the Council notes the evidence base for the plan demonstrates that the full range of the policies presented are together and collectively all required to meet this key ambition such that there is little or no margin for reducing or removing constituent parts without seriously undermining the net-zero carbon aim for the plan.		Yes	No
1102282	S13	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council fully supports the ambition for the CLLP to be a net-zero carbon local plan in respect of the climate emergency. Accordingly, the Council supports policies S6-S21 of the plan as presented. Moreover, the Council notes the evidence base for the plan demonstrates that the full range of the policies presented are together and collectively all required to meet this key ambition such that there is little or no margin for reducing or removing constituent parts without seriously undermining the net-zero carbon aim for the plan.		Yes	No
1102284	S14	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>The Council fully supports the ambition for the CLLP to be a net-zero carbon local plan in respect of the climate emergency. Accordingly, the Council supports policies S6-S21 of the plan as presented. Moreover, the Council notes the evidence base for the plan demonstrates that the full range of the policies presented are together and collectively all required to meet this key ambition such that there is little or no margin for reducing or removing constituent parts without seriously undermining the net-zero carbon aim for the plan.</p> <p>The evidence base for the plan makes a strong and compelling case that to achieve the ambition for a net-zero carbon local plan it is important for Central Lincolnshire to facilitate large-scale renewable energy generation. The scale of this provision is identified in the evidence base and forms a key part of the ambition for the plan set out at paragraph 3.3.4.</p> <p>Two main forms of large-scale renewable energy are promoted in the plan, these being wind and solar, which at this time remain those forms of renewable energy that have a track record of delivery at scale. The choice of these two main sources of renewable energy is therefore deliverable in the Central Lincolnshire context, with other forms of renewable energy such as anaerobic digestion of biomass crops, while viable, simply cannot replicate the scale of</p>		Yes	No

									<p>renewable energy production compared to wind and solar schemes. That being said, the policy does not rule out other forms of large-scale renewable energy sources being considered.</p> <p>The policy rightly takes a balanced approach to the two forms of proven large scale renewable energy production since relying on one form only in preference to the other would not optimise renewable energy production and would jeopardise the aim to generate renewable energy to meet the needs of new development promoted in the plan as a whole.</p> <p>The Council recognises and supports the criteria based approach to the production of Map 2 as explained in paragraphs 3.3.12 to 3.3.14, in how it indicates areas across Central Lincolnshire that might be potentially suitable for large-scale wind developments. As an aside and for clarity, RAF Cranwell should be listed in the appropriate bullet point at paragraph 3.3.12 albeit it is clear that the land surrounding the base has been excluded. The supporting text in the plan makes it abundantly clear that this is however only a first sift to identify the areas potentially suitable for wind development (paragraph 3.3.15) and then sets other detailed criteria for the assessment of individual applications embedded within the policy itself. It is not therefore a policy of allocation but a policy that sets out a series of thorough and appropriate criteria based tests for any wind energy development proposal. The Council is satisfied that the policy and its supporting evidence, commentary, and through the identification of land potentially suitable for wind energy developments, meets the requirements of paragraph 155 of the National Planning Policy Framework 2021.</p> <p>Likewise, in respect of solar energy developments, the Council is satisfied that the criteria in the assessment of such applications for large scale solar energy developments is appropriate. The policy is consistent with the emerging Energy NPSs EN-1 and EN-3 in addressing key issues such as landscape and visual impact, heritage, soil quality etc amongst a range of material considerations and provides a sound and robust basis upon which the Central Lincolnshire Authorities can determine planning applications for such development proposal.</p> <p>The policy as a whole is therefore supported.</p>			
1102285	S15	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council fully supports the ambition for the CLLP to be a net-zero carbon local plan in respect of the climate emergency. Accordingly, the Council supports policies S6-S21 of the plan as presented. Moreover, the Council notes the evidence base for the plan demonstrates that the full range of the policies presented are together and collectively all required to meet this key ambition such that there is little or no margin for reducing or removing constituent parts without seriously undermining the net-zero carbon aim for the plan.		Yes	No
1102288	S16	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council fully supports the ambition for the CLLP to be a net-zero carbon local plan in respect of the climate emergency. Accordingly, the Council supports policies S6-S21 of the plan as presented. Moreover, the Council notes the evidence base for the plan demonstrates that the full range of the policies presented are together and collectively all required to meet this key ambition such that there is little or no margin for reducing or removing constituent parts without seriously undermining the net-zero carbon aim for the plan.		Yes	No
1102290	S17	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council fully supports the ambition for the CLLP to be a net-zero carbon local plan in respect of the climate emergency. Accordingly, the Council supports policies S6-S21 of the plan as presented. Moreover, the Council notes the evidence base for the plan demonstrates that the full range of the policies presented are together and collectively all required to meet this key ambition such that there is little or no margin for reducing or removing constituent parts without seriously undermining the net-zero carbon aim for the plan.		Yes	No
1102293	S19	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council fully supports the ambition for the CLLP to be a net-zero carbon local plan in respect of the climate emergency. Accordingly, the Council supports policies S6-S21 of the plan as presented. Moreover, the Council notes the evidence base for the plan demonstrates that the full range of the policies presented are together and collectively all required to meet this key ambition such that there is little or no margin for reducing or removing constituent parts		Yes	No

									without seriously undermining the net-zero carbon aim for the plan.			
									The Council notes the revision to the policy such that the primacy of the County Council as the Mineral and Waste Planning Authority is not compromised. However, the policy provides the Central Lincolnshire Authorities pursuant to the net-zero carbon local plan ambition with the appropriate means to afford material weight in their decision making on the incompatibility of further fossil fuel exploration across the plan area with the climate change thread of the suite of policies S6-S21. As such the policy represents a material consideration in decisions that will be made that facilitate fossil fuel exploration or indeed how the Central Lincolnshire Authorities might choose to respond to consultation on planning applications. The approach in providing a policy context is well-reasoned and viable in representing a material consideration for mineral applications and is therefore supported.			
1102295	S20	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council fully supports the ambition for the CLLP to be a net-zero carbon local plan in respect of the climate emergency. Accordingly, the Council supports policies S6-S21 of the plan as presented. Moreover, the Council notes the evidence base for the plan demonstrates that the full range of the policies presented are together and collectively all required to meet this key ambition such that there is little or no margin for reducing or removing constituent parts without seriously undermining the net-zero carbon aim for the plan.		Yes	No
1102298	S21	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council fully supports the ambition for the CLLP to be a net-zero carbon local plan in respect of the climate emergency. Accordingly, the Council supports policies S6-S21 of the plan as presented. Moreover, the Council notes the evidence base for the plan demonstrates that the full range of the policies presented are together and collectively all required to meet this key ambition such that there is little or no margin for reducing or removing constituent parts without seriously undermining the net-zero carbon aim for the plan.		Yes	No
1102299	S34	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council offers support for the network and hierarchy of retail centres including plotting on the proposal and inset maps.		Yes	No
1102300	S38	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council offers support for city/town centre policies S36, S37 and S38 relating to Lincoln, Gainsborough and Sleaford respectively. Specifically for Sleaford and policy S38 the Council is pleased to note that the policy provisions will support the ambitions for the renewal and regeneration of key town centre sites, providing for the continued viability and success of the town centre and in providing a place making theme. In this regard the policy provides a significant and robust framework for the current work being undertaken by the Council to refresh the Sleaford Masterplan that will serve to assist in the collaboration of key partners within the town in investing in new development and infrastructure.		Yes	No
1102301	S47	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council welcomes the updated reference to the emerging 5th Local Transport Plan for the County (LTP5) and the 6 key themes identified.		Yes	No
1102304	S53	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council welcomes the updated reference to the National Model Design Guide and supports the structure of the policy in its references to the ten characteristics set out in the National Design Guide. The Council believes the policy will strengthen the way in which design matters will be dealt with in all planning decisions in Central Lincolnshire.		Yes	No
1102305	S61	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council recognises that with the Environment Act 2021 there is significant change in how biodiversity will be assessed and will inform individual planning decisions. Whilst the Act proposes that Biodiversity Net Gain will come in to effect in November 2023, the policy in the plan is a welcome and necessary step that will ensure the CLLP will be ready to address in full the new biodiversity requirements.		Yes	No
1102306	S68	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council supports the inclusion in the overarching SUE policy matters relating to design coding, biodiversity net gain and the role of green infrastructure as important parts of the delivery of place-making in these large-scale developments.		Yes	No
1102307	S69	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council support and welcome the updated SWQ policy that strikes an appropriate balance in terms of delivery of the new community and the construction of the NHRR.		Yes	No

									The Council notes the scope of the permission now granted for the WGC and confirms that, subject to completion of S106 agreements, the Council is minded to grant planning permission for two residential led development that include wider infrastructure provision.			
1102308	S71	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council support the policy framework for the delivery of the two Sleaford SUEs. The Handley Chase SUE (Sleaford South) demonstrates the role the delivery of large scale development can have in promoting housing land supply across varied house types and tenures.		Yes	No
1102311	NS74	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council supports the policy framework for the various opportunity and regeneration areas within Sleaford and at Greyless as a proportionate means to build a consensus on the redevelopment of the listed sites. For ROA7 and ROA8 there is again a synergy with the current Sleaford Masterplan refresh and together the local plan and the masterplan will provide a robust planning framework for the delivery of place making change within the town.		Yes	No

North Lincolnshire Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102323	Intro								It is also supported that the plan acknowledges Central Lincolnshire has strong economic and service linkages with the surrounding areas, including Scunthorpe and Grimsby in the Humber area to the north.			No
1102322	S1								North Lincolnshire Council is generally supportive of the Plan and its approach. In particular, its strategy to accommodate the area's full objectively assessed needs and concentrate growth on the main urban areas of Lincoln, Gainsborough and Sleaford, and in settlements that support their roles, with remaining growth being delivered elsewhere in Central Lincolnshire, is supported. This should ensure a more sustainable pattern of growth is promoted resulting in less pressure on North Lincolnshire's services and facilities.			No
1102324	S14								It is noted that land to the south west of Messingham and to the east of Redbourne are identified as being potentially suitable for large scale wind turbine development in the Plan abutting the North Lincolnshire boundary. Whilst these areas come as a result of the mapping of 'principal constraints', such as settlements (with buffer) and various landscape constraints, it should be noted that this is not the approach taken in the Proposed Submission North Lincolnshire Local Plan. This Council's approach is to address proposals for wind energy development by supporting these if it is located in an area that is identified as potentially suitable for wind energy development in an adopted neighbourhood plan or the Council is satisfied that local communities are supportive of the proposal; or, that the development is a renewable energy proposal associated with an existing operational water/sewage treatment site.			No
1102325	S47								The Proposed Submission North Lincolnshire Local Plan recognises that the A15 between Junction 4 of the M180 and the A46 at Lincoln is a key north-south strategic transport corridor. The A15/A46 connects the Humber ports into the wider network to Newark and the A1, or to the A17 and access to the food production areas of southern Lincolnshire and Norfolk beyond. There has been continued decline in the performance of the A15, with slow journey times impacting upon journey reliability, safety and the resilience of the network. This holds back productivity and is also a barrier to future growth. As a result, North Lincolnshire Council and partner authorities have prioritised investigating improvements to the A15. Further work is required to produce a feasibility study for upgrading the route, and North Lincolnshire Council will work with partner authorities to improve the A15. The Central Lincolnshire Plan does not appear to recognise or support the need for improvements to the A15, which is of concern given the largest part of the stretch of A15 concerned sits within the Central Lincolnshire Plan area.			No

1102326	S75								<p>RAF Scampton is identified as an opportunity area (ROA10) and subject to policy S75 to 'safeguard RAF Scampton in the event that the Ministry of Defence withdraw from the site and to provide a framework to help ensure any redevelopment is sustainable and holistically planned'. This council is generally supportive of the RAF Scampton base coming forward for redevelopment but has concerns over the proposed use of a masterplan and its relationship with the Local Plan.</p> <p>Policy S75 states the preparation of a masterplan in conjunction with, and for approval by, the District Council will be required prior to a planning application being submitted. Major development proposals on the site not detailed in a masterplan would not be supported. The site masterplan will be expected to (amongst other things): Set out the layout, mix and scale of uses; assess impacts on the landscape and infrastructure and proposed mitigation to make any impacts acceptable and provide a clear demonstration that the proposed scheme will be deliverable and viable.</p> <p>It is important to note that these key issues cannot be devolved down to a Masterplan to address, unless the Masterplan is produced as a Development Plan Document and goes through the same legal process as the Local Plan. For example, the setting out of the broad type and scale of development is something the Local Plan should do as this would provide the community and other stakeholders, such as neighbouring planning authorities, the opportunity to have their say on how the site should be developed.</p> <p>The site is just 10 miles away from the North Lincolnshire boundary down the A15, which, depending on what is proposed, might not have adequate capacity to accommodate development. Depending on what is eventually proposed there may be other cross boundary impacts that would need to be addressed through the Duty to Cooperate and Statements of Common Ground.</p>			No
---------	-----	--	--	--	--	--	--	--	--	--	--	----

Obsidian Strategic Asset Management Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103468	S1			No	No	No			<p>Obsidian considers that the Spatial Strategy and Settlement Hierarchy expressed in Policy S1 does not fully reflect the spatial growth intentions of the Preferred Growth Option that is set out in the Central Lincolnshire Local Plan Review Growth Options Paper (June 2021). In this context, Obsidian considers that the Local Plan does not meet the tests of soundness in being positively prepared, fully justified or will be effective, particularly in achieving its Preferred Growth Option.</p> <p>Of the five growth options discussed in that Growth Options Paper, Option 5 is identified as the Preferred Growth Option that combines Option 1: “Urban focus” with Option 2: “Small site focus” and Option 3: “Transport / infrastructure corridor focus”. Option 5 is described as: focusing development towards Lincoln Urban Area, then the Main Towns and Market Towns and then smaller settlements along transport corridors and in settlements with a good range of facilities and services (our emphasis). Option 5 has also been considered to perform best against the sustainability objectives in the accompanying Sustainability Appraisal.</p>	<p>Obsidian considers that for the Large Villages, it is necessary for the spatial strategy and settlement hierarchy to be consistent with the clear approach set out by the Preferred Growth Option. Accordingly, it is considered that the spatial strategy and settlement hierarchy should be amended to clearly differentiate and prioritise development at those Large Villages that are well connected along transport corridors.</p> <p>Obsidian also considers that particular emphasis should be given to those transport corridors that offer a number of sustainable travel options – particularly those that benefit from frequent bus and rail services and cycle routes which themselves can be enhanced in conjunction with new development and a greater population catchment, and that also offer a good range of services and facilities that can be further supported. In turn, for other</p>	Yes	No

								<p>Whilst supportive of the Preferred Growth Option, Obsidian’s concern relates to its translation into the relevant policies of the Plan. The Preferred Growth Option is not considered to be adequately reflected in Policy S1: Spatial Strategy and Settlement Hierarchy nor fundamentally is it carried through into and expressed clearly in Policy S2: Growth Levels and Distribution and related policies, including Policy S4: Housing Development adjacent to Villages, or the site allocations in Chapter 13, particularly those for the Large Villages (Policy S80), Medium Villages (Policy S81) and Small Villages (Policy S82).</p> <p>The Growth Options Paper clearly states that “Option 5: Balanced combination of options 1-3 is arguably the best performing and is amongst the most deliverable options. It is therefore proposed that option 5 forms the basis for distributing growth in Central Lincolnshire with the exact amount and locations of development to occur within these sub areas to be considered through the detailed site assessment process”.</p> <p>The limited reflection of the Preferred Growth Option within Policy S1 becomes clear when setting out the strategy in tiers 4-6 for Large, Medium and Small Villages respectively. For Large Villages, the policy fails to differentiate between those Large Villages that are better connected with Market Towns, Main Towns and the Lincoln Urban Area and others – becoming acutely evident where the proposed strategy is simply “to maintain and enhance their role as large villages which provide housing, employment, retail, and key services and facilities for the local area” then merely listing all Large Villages regardless of location. Accordingly, amongst the proposed allocations, certainly in Large Villages as set out in Policy S80, it is difficult to distinguish between those that are well connected with Lincoln and / or Main Towns and / or Market Towns or otherwise, and the level of services offered in those settlements, This appears to run counter to a key objective of the Preferred Growth Option, which is for smaller settlements along transport corridors and settlements with a good range of facilities and services to follow on from Market Towns as the next priority locations for accommodating growth. It is in this context that this policy and others that are relied upon to deliver the spatial strategy do not meet the tests of soundness.</p>	<p>Large Villages that are less well connected, it is considered that levels of growth should be more modest.</p> <p>In the context of these considerations, an example of a settlement that merits a higher level of growth is Saxilby. Saxilby is a large settlement in the Lincoln Strategy Area that is close to Lincoln and well connected to both Lincoln and Gainsborough. The settlement provides several key services, including a range of shops and employment opportunities and a medical centre. Relative to other identified Large Villages, it has a railway station and is served by a choice of frequent bus and rail services between Lincoln and Gainsborough and is also directly connected to the A57. A local cycle route also connects Saxilby to National Cycle Route 64 and Lincoln, which would also provide an alternative sustainable travel option to Lincoln, especially if the existing cycle connection to NCR64 is improved to a similar all-weather standard.</p> <p>Overall, Obsidian requests that the spatial strategy and settlement hierarchy is amended to enable those Large Villages that are more sustainably located and serviced to accommodate higher levels of growth in accordance with the Preferred Growth Option.</p>		
1103470	S2			No	No	No	No	<p>Five-year housing land supply</p> <p>Obsidian Strategic does not agree that the calculations associated with demonstrating a five-year housing land supply should be based on the lower end of the range of housing requirements (i.e. an average annual housing supply rate of 1,060 dwellings), particularly when the Housing Needs Assessment (HNA) notes that since 1996 an average</p>	<p>Five-year housing land supply</p> <p>A higher rate of supply, linked to higher delivery rates, and taking into account historic shortfalls would enable suitable well located sites to be brought forward and avoid a cumulative under-build and speculative development proposals in less appropriate locations.</p>	Yes	No

									<p>of 1,339 dwellings have been completed per annum in Central Lincolnshire – 23% above the level arising from the Government’s standard method for assessing local housing need.</p> <p>With regard to the Central Lincolnshire Five Year Housing Land Supply Report 2021 (HOU009), the housing requirement in the current adopted Local Plan is 1,540 dwellings per annum. In calculating the five-year housing land supply in accordance with National Planning Practice Guidance, the five-year housing land supply calculation has also taken into account past supply shortfalls and the delivery of student and other communal accommodation. The shortfall has resulted in 184 dwellings being added to the annualised housing requirement of 1,540 dwellings, resulting in a housing requirement of 1,724 dwellings per year. A buffer of 5% has also been applied, adding 86 dwellings per year leading to a total requirement of 1,810 dwellings per year. According to the report the supply of land is currently 5.34 years.</p> <p>In this context, monitoring a five-year housing land supply based on the lower figure proposed in the Local Plan of 1,060 dwellings is considered to contrast with the current approach and in turn, presents a risk of under-delivery of housing during the plan period. Using a lower figure in this context may compromise the plan in being effective in delivering planned higher levels of growth.</p> <p>Distribution of growth</p> <p>Obsidian supports the broad distribution of housing growth in terms of the percentages allocated to the four areas described under parts a) – d). Obsidian, however, is concerned that Policy S2 does not set out how growth will be apportioned within each of these areas that is aligned with the Preferred Growth Option [Option 5] that underpins the spatial strategy. The Preferred Growth Option is clear in focusing development towards the Lincoln Urban Area, then the Main Towns and Market Towns and then smaller settlements along transport corridors and in settlements with a good range of facilities and services (our emphasis).</p> <p>In the Lincoln Strategy Area, there is concern that urban regeneration sites and sustainable urban extension sites, if delayed in coming forward due to unforeseen constraints, will undermine forecast rates of housing delivery. Under delivery may also be exacerbated if forecast rates of delivery on smaller sites are not realised, again due to unforeseen constraints and if there is a lack of alternative sites within the Lincoln Strategy Area that could be appropriate contingencies for addressing any unexpected shortfalls.</p>	<p>In this context, provision for growth should also seek to include a generous buffer of housing land supply above the upper end of the housing requirement. Past monitoring rates, as recorded in the HNA, suggest that housing supply towards the higher end of the housing requirement is likely to be more realistic. A generous buffer above the level suggested by the housing trajectory in Chapter 13 would provide for more flexibility in terms of meeting housing growth and for housing development to be delivered in a well-planned, managed and monitored manner.</p> <p>Distribution of Growth</p> <p>Obsidian considers that the Local Plan should make provision for contingent sites to come forward in the event that housing delivery fails to meet anticipated rates. Such contingent sites should be in locations that would spatially align with the Preferred Growth Option in that these would include those settlements on transport corridors that provide sustainable connections to Lincoln (and where relevant also connect with other main towns) and have a range of services.</p> <p>Accordingly, it is considered that these settlements should comprise Policy S2, a), iii) and provide contingent sites to be brought forward and be afforded the same priority as locations in i) and ii). Other settlements that are less well connected and have been identified to offer less services should comprise iv) and be afforded lower levels of growth. In effect, Obsidian considers that the distribution strategy should be amended to afford equal rather than sequential priority to the delivery of homes – affording scope for greater growth in those Large Villages that are in close proximity to and well connected to Lincoln, Main Towns and Market Towns and critically that have the capacity to provide contingent opportunities for meeting growth needs.</p> <p>Saxilby is an example of such a Large Village in this context, which provides the opportunity to provide contingent sites for accommodating growth if there are delays to housing delivery in the urban regeneration areas and SUEs. Saxilby is a sustainable location for additional</p>		
--	--	--	--	--	--	--	--	--	---	--	--	--

								<p>Linked to the above are concerns that Policy S2 in part a) sets out a sequential approach to accommodating housing development in the Lincoln Strategy Area. Priority is given to focusing growth at i) urban regeneration sites, then ii) SUEs and thereafter iii) settlements which serve and are serviced by Lincoln. Whilst Obsidian does not dispute the importance of prioritising development at urban regeneration sites and SUEs, they are more likely to be complex to deliver and require long lead-in times and may risk undersupply if unanticipated delays in bringing these sites forward constrain the delivery of growth in settlements which serve and are well served by Lincoln.</p> <p>In this context, Obsidian objects to the lack of contingency in allocating sufficient sites that could be brought forward more immediately, should there be further delays in housing delivery at urban regeneration sites and SUEs. The lack of contingency is considered to undermine the Local Plan in being positively prepared, justified, and effective.</p>	development, with a good range of local services and facilities and is accessible with strong rail, bus and cycle connections that could be enhanced further in conjunction with additional development.		
1103471	S4			No	No	No		<p>In context with and consistent with Obsidian Strategic's response to Policies S1 and S2, Obsidian does not agree with Policy S4 which states that Large, Medium and Small Villages will only "experience limited growth to support their role and function".</p> <p>Our representations on Policies S1 and S2 demonstrate that in delivering development that is aligned with the Preferred [Option 5] Growth Option, there is a rationale for distinguishing between levels of growth at those settlements that are more accessible with sustainable transport connections, from other settlements. There is a further rationale for affording more flexibility in housing growth with contingent sites to bring forward in the event of the delivery of other sites being delayed. Policy S4 otherwise, in not being fully aligned with the Preferred Growth Option, undermines the Local Plan in being positively prepared, fully justified and effective.</p>	<p>Obsidian Strategic considers that Policy S4 should afford greater levels of growth as suggested by the proposed amendment below (requested additional text emboldened and underlined).</p> <p>Policy S4: Housing Development in or Adjacent to Villages</p> <p>Large Villages, as defined in the Settlement Hierarchy in Policy S1, that are located on transport corridors and are accessible by sustainable transport and offer a good range of local services will experience growth that supports the Lincoln Urban Area, Main Towns and Market Towns that they serve or are served by. They will include housing allocations at a scale that is sufficient to support the further enhancement of local services and sustainable transport; and play a role in ensuring that the levels of growth proposed in areas a), b) and c) in Policy S2 are achieved.</p> <p>Other Large, Medium and Small villages will experience limited growth to support their role and function through allocated sites of 10 or more dwellings in the Local Plan, sites allocated in neighbourhood plans, or on sites in appropriate locations* within the developed footprint** of the village that are typically:</p> <ul style="list-style-type: none"> • up to 10 dwellings in Large Villages and Medium Villages; and • up to 5 dwellings in Small Villages. 	Yes	No

										Proposals...		
1103473	S7			No	No	No			<p>Obsidian Strategic disagrees with the requirements of Policy S7 and is concerned that the requirements proposed, which are not aligned with national technical standards, are too onerous and may, in imposing additional costs on development, generate viability issues, which will in turn constrain housing delivery, certainly in the shorter term where investment commitments will have been already made, as informed by requirements to meet current national technical standards, among other wider considerations. In this context the requirements are not considered to be positively prepared, fully justified or will be effective, especially if the requirements act as a constraint to housing delivery.</p> <p>Although efforts to transition to a low carbon future are strongly supported in principle, Obsidian considers that targets and timescales must be aligned with those set at a national level and not before, to set out clearly in advance expectations to applicants and enable such a transition to avoid disruptions to housing delivery. These include the Future Homes Standard that is proposed to be introduced by 2025.</p>	<p>Obsidian would therefore, welcome an alternative policy that seeks to be aligned with national targets and in the meantime encourages rather than requires development proposals to, where possible, meet objectives 1 and 2. As part of this approach, Obsidian would support requirements for development proposals to be 'low-carbon' ready – that is developers have followed the energy hierarchy design principles set out in Policy S6 which, as stated in that policy, "should be used" (our emphasis) in the stated order and respond positively where possible through development layouts and building design; and allowing new development to be adaptable to changes and advancements in technology for heating and renewable energy, making these easy to retrofit.</p>	Yes	No
1103474	Trajectory			No	No	No			<p>Obsidian, in response to Policy S2, has set out concerns about the impacts of delays in the delivery of housing at regeneration sites, SUEs, and other sites and the consequent impacts on housing supply in the Lincoln Strategy Area unless other contingent site allocations can be brought forward that accord with the Local Plan's Preferred Growth Option.</p> <p>In this context, Obsidian is concerned that the Housing Trajectory may be overoptimistic in the levels of housing that are anticipated to come forward during the plan period. If there are sites that are affected by unforeseen constraints, Obsidian is concerned that delays caused could, if significant, contribute to underdelivery, which may undermine the Local Plan in being positively prepared, justified and effective.</p>	<p>As stated in Obsidian's response to Policy S2, the Local Plan should make provision for contingent sites to be released for development should housing delivery fail to meet the levels predicted in the housing trajectory.</p> <p>In considering contingent sites, Obsidian would suggest them to be identified in locations that spatially align with the Preferred Growth Option, especially at those settlements on transport corridors that provide sustainable connections to Lincoln (and where relevant to other Main Towns) and have a good range of local services.</p> <p>Saxilby is an example of such a settlement in this context, which provides the opportunity to provide contingent sites for accommodating growth if there are delays to housing delivery in the urban regeneration areas and SUEs. Saxilby is a sustainable location for additional development, with a good range of local services and facilities; and is accessible with strong rail, bus and cycle connections that could be enhanced further in conjunction with additional development.</p>	Yes	No
1103476	S80			No	No	No			In the context of Obsidian Strategic's responses to Policies S1, S2, S4 and the Housing Trajectory, the lack of focus of	Obsidian considers that Policy S80, in setting out proposed allocations, should be more	Yes	Yes

									<p>proposed site allocations on the most sustainable Large Villages becomes clear by the spatial geography of proposed allocations listed in Policy S80.</p> <p>Obsidian considers that there is no distinction between levels of growth afforded to those settlements that are well connected from those with more limited connections. Despite a reasonable assessment of services and facilities in the Services and Facilities Methodology (2020), the assessment is weak in failing to consider how well sites are connected (i.e. origins and destinations of bus and / or rail services, service frequency, distance and travel times). Obsidian asserts that otherwise basic data on connectivity has informed decisions to allocate sites that may deliver growth that is not necessarily aligned with the Preferred Growth Option: firstly, in Large Villages that are less well connected to the nearest Market Towns, Main Towns or Lincoln; secondly, through the scale of expansion proposed; and thirdly, in terms of the level of services they offer.</p> <p>Obsidian considers that settlements such as Saxilby should be afforded a higher level of growth that is commensurate with its sustainability credentials, similar to other Large Villages that are well connected to transport corridors between Lincoln and the Main and Market Towns. Relative to the number of homes at 1 April 2018, proposed levels of growth are: 44.6% at Welton; 38% at Dunholme; and 32.4% at Cherry Willingham. In contrast, the proposed level of growth at Saxilby is considerably lower at just 18.2%. In Obsidian's view, this approach does not align with the Preferred Growth Option [Option 5], and in turn raises questions as to whether the Local Plan, in this context, has been positively prepared, fully justified, and effective.</p> <p>In the case of Saxilby, Obsidian considers this Large Village to be especially strong in its sustainability credentials, arguably more so than other Large Villages, in terms of being well connected to Lincoln and Gainsborough by bus and rail services and therefore offering significant scope for greater levels of growth than has been proposed. This scope for further growth is reinforced by the village being connected to Lincoln by a local cycle route via NCR64 and through the village containing employment opportunities at Saxilby Enterprise Park.</p> <p>A rationale perhaps for such a comparatively low level of planned expansion can be linked to:</p> <ul style="list-style-type: none"> • The limited availability of sites to date as set out in the HELAA, and of those submitted having planning or technical constraints and therefore not being able to contribute to meaningful expansion. • Capacity issues at the existing primary school – an issue raised as a significant concern in response to recent 	<p>aligned with the Preferred Growth Strategy in differentiating between allocations in Large Villages that are located on transport corridors and with a good range of facilities and services and settlements that do not have those characteristics. Accordingly, allocations should be prioritised to the former locations, which include Saxilby which is strong in its sustainability credentials.</p> <p>An opportunity for the meaningful expansion of Saxilby can be offered by Obsidian Strategic, which is promoting land to the north of the village, The site was submitted for consideration in response to the Regulation 18 consultation and therefore provides an additional or alternative opportunity for accommodating housing growth; and for allowing Saxilby to grow at a more comparable level to those other identified Large Villages that are close and well connected to Lincoln. Moreover, the site has the potential to support a pattern of development that is more closely aligned with the Preferred Growth Strategy. With Saxilby constrained by flood risk to the south, east and west of the village and the Foss Dyke, A57 and railway, the site to the north represents the least constrained opportunity for accommodating carefully planned growth.</p> <p>Further details of this development opportunity are provided in the attached Vision document, which introduces a masterplan concept for the site and demonstrates how development can be accommodated to respond positively to the relevant constraints and opportunities. It demonstrates the key benefits that could be secured that would otherwise be challenging with piecemeal development, and how a masterplan-led approach can creating a place that feels more intrinsic and in context with Saxilby and the wider landscape. In this context the Concept Masterplan seeks to:</p> <ul style="list-style-type: none"> • Accommodate a mix of uses including residential development, primary school, small scale employment spaces and a small retail unit. o The residential offer could include up to 650 new homes that is responsive to local needs, integrates retirement living and provides opportunities for self-build. The range of choice seeks to benefit residents wishing to remain 		
--	--	--	--	--	--	--	--	--	---	---	--	--

									<p>development proposals. Opportunities for the expansion of the school are physically constrained by existing surrounding development.</p> <p>It follows therefore that Obsidian does not consider that the level of development currently proposed at Saxilby is of a scale necessary to respond to these considerations. The Infrastructure Delivery Plan (IDP) (December 2020) does not identify any planned improvements to primary school capacity or healthcare expansion in Saxilby despite the allocations proposed.</p> <p>The Saxilby and Ingleby Neighbourhood Development Plan, however, includes an extensive list of community projects, of which relocating the primary school is notably included, albeit as a longer-term project.</p> <p>The allocations proposed are likely to place additional pressure on existing facilities in Saxilby unless the Local Plan can facilitate further development at the village that is able to deliver capacity improvements which can also be reflected in an updated Infrastructure Delivery Plan. Additional development at scale could support an increase in primary school capacity with a new or relocated and expanded school, care facility and potentially a local retail unit; and more generally could support the delivery of wider community projects identified in the Saxilby within the Ingleby Neighbourhood Development Plan.</p>	<p>local or downsize.</p> <ul style="list-style-type: none"> o Facilitate the development of a primary school that can either be additional to or will allow for the relocation and expansion of the existing school. o Include small scale employment spaces to potentially support new and growing businesses, adding to the offer in the village. o Allow for a local retail unit to complement the range of existing services in Saxilby. <p>Further support and enhance existing local services and facilities in Saxilby village with an increased residential catchment.</p> <p>Support the delivery of community projects that are set out in the Saxilby and Ingleby Neighbourhood Development Plan.</p> <p>Create attractive connections have the potential to make walking and cycling modes of choice to the village centre and new primary school, whilst increasing the choice of recreational routes to encourage more active and healthy lifestyles. These connections will link a range of open spaces, including a central focal point, spaces for play and sport and allotments within a wider network of informal amenity spaces.</p> <p>Retain and enhance the existing field structure and create landscaped buffer zones within a green infrastructure network that can enhance habitats and achieve biodiversity net gain.</p> <p>Contribute to low carbon living through a number of measures, whilst integrating a network of sustainable drainage features, set mainly within the green infrastructure network to manage surface water run-off.</p>		
--	--	--	--	--	--	--	--	--	--	---	--	--

Omnivale Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
11935189	S1	Y							<p>Please see attached a copy of full representations prepared by Boyer on behalf of Omnivale Limited.</p> <p>Policy S1 seeks to concentrate growth in the main urban areas of Lincoln, Gainsborough and Sleaford, with a significant and proportionate of growth in the market towns of Caistor and Market Rasen. This is where the remaining growth will be delivered to support the function of other sustainable settlements, particularly where these are well connected by public transport and where the main centres can be accessed by active travel means. The spatial strategy also sets out a settlement hierarchy which includes large, medium and small villages, hamlets and the countryside. Limited growth in these settlements is supported through allocations in the emerging plan.</p> <p>The principle of Policy S1 is generally supported as it provides certainty and a sustainable</p>		Yes	Yes

								<p>approach to focusing growth in the main urban and market areas as these are the most sustainable and accessible locations for housing. The policy also supports a proportionate amount of growth in the rural areas to help to maintain the vitality of these communities, however these would be through a combination of allocated sites and windfall sites in the emerging plan.</p> <p>This approach presents a risk that could potentially restrict the growth of settlements outside of the main urban areas and market towns as there are suitable and sustainable sites in settlements specifically large and medium villages that have not been allocated. As such additional allocations should be considered beyond those currently proposed to address current and future housing needs in rural areas.</p> <p>The proposed settlement hierarchy set out in Policy S1 is a continuation of the adopted hierarchy set out in Policy LP2. The Settlement Hierarchy Methodology Report (2020) notes this Tier hierarchy reflects a range of settlements across Central Lincolnshire based on their existing number of dwellings. Whilst this approach was considered sound through examination of the Adopted Local Plan, it is important to note that this approach soon becomes out of date as some settlements will facilitate housing development much faster than others particularly those that are more accessible and commercially desirable.</p> <p>As stated in previous representations, it is important the emerging plan does not solely rely on the existing number of dwellings to determine the Tier of settlement. Fundamentally, this should be determined by attributes such as proximity to local services and facilities and towns to ensure it meets the current and future needs of local people in a sustainable manner.</p>			
1103790	S2							<p>Proposed Policy S2 sets out the annual housing requirement for Central Lincolnshire that is required over the plan period 2018 -2040. The annual requirement falls in a range of 1060-1325 dwellings. 23,230 new dwellings are the proposed baseline requirement, which is also used in the 5YHLS, however the emerging plan aims to facilitate the top end of the range totaling to 29,150 dwellings through allocated sites.</p> <p>As set out in the previous representations, the lower end of the annual requirement presents the minimum requirement prescribed by the Government's standard methodology with the higher end of the range representing the figure needed to support the expected growth in jobs. The higher end of the requirement represents the most updated Housing Needs Assessment (2020) and therefore should be adopted as the only requirement for the emerging plan and 5 YHLS.</p> <p>Elsewhere 12% (3,498 dwellings) of this proportion is expected to come forward over the plan period from market towns and settlements identified as 'Elsewhere' in Policy S2, that are well connected villages with a good range of services.</p> <p>The emerging Local Plan's Housing Trajectory forecasts that this proportion of housing provision will be achieved where more than 12% will be provided and 4,999 homes will be delivered. This proportion is informed by the following reported completions and commitments as at 31st March 2021.</p> <p>Completions from 2018 - 2021 - 708 dwellings Small sites with permission - 766 Allocations and other large sites with permission - 1,986 Allocations without permission -1,539 Growth assumptions from windfall sites - 0 Total completions and commitments 4,999</p> <p>Gainsborough Gainsborough is also expected to provide 12% (3,498 dwellings), however the trajectory shows a shortfall of 395 dwellings over the plan period. In consideration of the following commitments and completions in Gainsborough, this is likely due to lack of supply of suitable sites.</p>			No

								<p> Completions from 2018 - 2021 - 222 dwellings Small sites with permission - 25 Allocations and other large sites with permission -2,744 Allocations without permission -112 Growth assumptions from windfall sites - 0 Total completions and commitments 3.103 </p> <p> As suggested in our previous representations (August 2021), it would be appropriate to follow a similar approach to the Lincoln Strategy Area, which in this case would consider the wider 'Gainsborough Area' rather than the town itself to meet this level of growth. A proportionate amount of growth from smaller settlements which serve and are serviced by the Gainsborough Area could be supported to ensure the housing requirement in this area is met. </p> <p> Whilst there are some settlements that are far more constrained than others and settlements that lack suitable sites to accommodate their percentage growth under Policy S2, there are highly accessible villages such as Blyton in close proximity that could accommodate some of Gainsborough's growth. This would ensure the town is not being deprived of its share of growth due merely to the physical constraints of the town. </p> <p> Blyton is a suitable and sustainable location that could facilitate additional growth and would serve to maintain the vitality of Gainsborough as residents of Blyton rely on the town for services and facilities and can easily access it through public transport. </p>			
1103792	S4							<p> This policy relates to windfall sites and supports small scale development of up to 10 or more dwelling in areas outside the main urban settlements, which include large, medium and small villages. </p> <p> Development of 10 or more dwellings would be supported through allocated sites in the emerging plan, sites allocated in neighbourhood plans, or unallocated sites in appropriate locations within the developed footprint only. The policy considers growth of this scale would be proportionate to and support the role and function of these villages. </p> <p> Whilst the principle of the policy is supported for enabling a proportionate amount of development to come forward in these villages of Central Lincolnshire, the policy limits the amount of development that could be achieved on larger and more suitable and sustainable sites. </p> <p> Windfall provision is a valuable supply when contributing towards the overall housing requirement, however given that these provide 1-9 dwellings, the benefits of these small-scale developments in socio economic and environmental terms can be limited. </p> <p> Whilst the emerging plan provides a flexible approach for sites to come forward through proposed Policy S4, the benefits of allocating further sites within these villages over uncertainty of windfall delivery specifically would be much more significant. </p> <p> The provision of medium-scale housing sites (10-100 dwellings) in large and medium villages would facilitate higher levels of S106 contributions for local services, affordable housing and a more comprehensive mix of house types. Larger sites can also offer on-site provision of open space, local play and have more flexibility to provide ecological and biodiversity enhancements than smaller windfall sites. Larger sites also offer a wider variety of local construction jobs while still offering opportunities for small and medium sized developers. </p> <p> Developments at medium to large scale can also support the growth, vitality and viability of large, medium and small villages. There are villages that are much more sustainable than others, due to their proximity to other settlements and access to services and facilities. </p> <p> In the absence of suitable sites and settlements in Gainsborough for example, where a shortfall is identified, it would be prudent to allocate medium -large scale specific sites in the emerging Local Plan and within a potential Gainsborough Area. This would contribute towards the overall growth and distribution of housing in Central Lincolnshire, without relying on windfall development to come forward and more importantly meet the current and future housing needs of the area within suitable and sustainable locations. </p>			No

									<p>Blyton is a perfect example of this due to its proximity and accessibility to Gainsborough coupled with its range of services and facilities. Blyton is a medium village that has undergone very limited housing growth since 2018 and whilst approximately 80 dwellings are allocated over the plan period, this level of growth would not be sufficient to support Blyton's role and function as a village over the emerging plan period, given the attributes linked to its location. Therefore, further medium -large scale specific sites should be allocated in villages such as Blyton within the emerging Local Plan to enable that certainty of growth and housing provision in these villages particularly in the most suitable and sustainable locations.</p>			
1103795	S81								<p>Policy S81 provides a list of allocated sites primarily for residential development within Medium Villages. This policy supports the role, function and vitality of Medium Villages across Central Lincolnshire including Blyton and therefore this approach is supported. Policy S81 also includes the proposed allocation of land south of Rowan Drive, Blyton (WL/BLYT/006) to provide 62 dwellings over the plan period 2022-2040.</p> <p>Further to the proposed settlement hierarchy categorised by existing dwellings, large villages are identified as 750 dwellings or more, Medium Villages are 250 – 749 dwellings and small villages are 50-249 dwellings.</p> <p>This settlement hierarchy approach goes hand in hand with the Site Allocations Settlement Analysis (2021), which looks at the sustainability attributes of a settlement to inform specific site allocations. The SASA provides a deeper understanding of the villages and suitability of development in villages as a whole. The methodology includes the number of dwellings as at 2018, number of completed dwellings, provision of primary and secondary schools and local services and facilities.</p> <p>As noted above, Blyton is identified as a medium village in the emerging Local Plan. In 2018, Blyton comprised of 507 dwellings. Between 2018 – 2019, 4 homes were built, and 30 dwellings had planning permission. Blyton's services and facilities include a primary school, convenience store, post office, dentist, public house, hotel and restaurant, holiday park, fishing lake, takeaway, church, village hall, allotments, playground and sports pitches.</p> <p>The SASA (2021) notes Blyton has good access to Gainsborough, Scotter and Scunthorpe to the north by the A159. A number of smaller villages are in proximity including Laughton, Pilham, Aisby and Corringham. The report also notes there has been very limited housing growth in recent years.</p> <p>Blyton has attributes that push its sustainability towards the higher end of the tier, including its current and approximate population at 6501 dwellings and accessibility to Gainsborough that is located only 4 miles southwest of the village served by a regular bus service. This compares to larger villages such as Bardney and Billinghay that are more remote at approximately 10 miles from Lincoln and Sleaford respectively but have a similar level of services and frequency of public transport.</p> <p>The plan therefore should not solely rely on the existing number of dwellings to determine the Tier of settlement as this limits the growth of future development in settlements that could sustain additional growth.</p> <p>Proposed Allocation - Land South of Rowan Drive, Blyton</p> <p>Land south of Rowan Drive is a proposed site allocation in the emerging above policy, (WL/BLYT/006) to provide 62 dwellings over the plan period 2022-2040, although this has now reduced to 51 due to a desire to enhance the existing on-site allotment and maintain a low-density development on the edge of the village location.</p> <p>A key consideration to the proposed allocation is that it abuts on to land east of Gainsborough Road with both sites assessed as part of the emerging Local Plan review with both considered suitable sites for residential development.</p> <p>The evidence base document to the emerging plan– Residential Allocations Evidence Report (2021)² concludes the proposed allocated site (WL/BLYT/006) is a relatively unconstrained site located close to the existing development and services. It recognises Blyton is well connected to Gainsborough. The site is a proposed allocation with a requirement to retain the existing allotments.</p>			Yes

									<p>The assessment also reports access as a constraint via the Public Right of Way, of which would require significant improvement and reconfiguration. As set out in the previous representations, the Council recognise the access constraint attached to the proposed allocation and refer to the existing PRoW along the access track, and the need for significant improvements and reconfiguration of the access. However, given that no supporting technical evidence has been submitted or considered, there is no clear demonstration of technical suitability in its current form for it to be a proposed allocation.</p> <p>Rowan Drive is an existing field track located on the northside of the proposed allocation. This existing field track utilises a shared point of access to Gainsborough Road with both tracks running parallel to each other, separated by a mature hedgerow set back roughly 5 metres from the edge of the carriageway. It is not clear whether Rowan Drive is adopted however judging by the surface of the road it is unlikely.</p> <p>Further along the track, as you enter the main body of the proposed site, allotments extend to the edge of the existing single track, comprising the west side of the site. To facilitate both the site access and the retention of the existing PRoW, the allotments would need to be relocated further within the site. The ability to do so will depend on the contract with the existing allotment holders who will be reluctant to vacate their existing position.</p> <p>It will need to be demonstrated how this access can be technically reconfigured within the highways boundary and existing ownership and how the allotments can be dealt with before this site can be considered suitable for allocation.</p> <p>We note representations were made by the landowner to the Draft Local Plan Consultation last year but there was no technical evidence submitted, specifically an access appraisal from a suitably qualified transport engineer.</p> <p>Paragraph 35 of the revised National Planning Policy Framework (NPPF) 2021, sets out four tests that must be satisfied in order for Local Plans to be considered sound. These are:</p> <p>‘a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.’</p> <p>Whilst we support development and growth being allocated in Blyton, the absence of robust, and sufficient evidence to support the proposed allocation of land south of Rowan Drive with respect to a suitable access to the site suggests this allocation is not justified in its current form as it is not based on proportionate evidence.</p> <p>It should be concerning to the Council and by virtue the Inspector that no such evidence has been put forward at such an advanced stage of the Local Plan Process. Without such evidence, how can the Council be sure of the technical suitability of this proposed allocation and whether it is sensible to consider access from our client’s land as an expanded allocation.</p> <p>Land East of Gainsborough Road, Blyton – Reasonable Alternative</p> <p>The Residential Allocations Evidence Report (2021) reports land east of Gainsborough Road (site reference WL/BLYT/007) has the potential for future development being relatively unconstrained, however states that land south of Rowan Drive is preferable for initial development. The report also notes that land east of Gainsborough Road is an available and deliverable site, which could provide an alternative access and additional land and open space alongside land south of Rowan Drive. This would therefore become an extension to the proposed allocation, given its suitability and deliverability to provide future development.</p> <p>Other than potential contamination and risk of noise and vibration from the local railway</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

									<p>station located 250m away, which can be mitigated through the application process, no constraints to this site are identified.</p> <p>Whilst we support the principal of development of the proposed allocation, the suitability in access and highway terms is questionable. Notwithstanding this, there is a direct opportunity for both sites to provide a proportionate amount of housing development (approximately 117 new dwellings) over the plan period which would remain a proportionate level of growth for the village. This approach would help facilitate a safe and reasonable access to both sites. Omnivale Limited have prepared an illustrative layout (Appendix 2) and access appraisal (Appendix 3) that demonstrates up to 70 dwellings could be comfortably developed on the site with access from Gainsborough Road as well as the provision of a central green space. These were included in the previous representations and are also attached to support this representation to the emerging Local Plan.</p> <p>Should there be no technically suitable access solution for the proposed allocation (WL/BLYT/006), Omnivale Limited would be willing to provide access through their land to serve both parcels and form one comprehensive development. This development would enlarge the allocation and provide a reasonable amount of housing provision over the plan period, thus supporting the growth and distribution of housing set out in Policy S2. The combination of the two sites could be developed while maintaining the position of the majority of the existing allotments and without interfering with the complex junction of Rowan Drive and Gainsborough Road or the PRoW.</p> <p>Although land east of Gainsborough Road is considered as a reasonable alternative to the emerging Local Plan, we would suggest this site is considered as an allocation to Policy S81 as an adjoining site to the proposed allocation of land south of Rowan Drive.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

Peel L and P

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103718	S77	Yes	Yes	No	No	No	No	Yes	<p>[Representation summarised due to length. See attachment for full representation]</p> <p>This letter has been prepared by Turley on behalf of Peel Land & Property ('Peel'). It sets out Peel's submission to the Regulation 19 Lincolnshire Local Plan Review (Regulation 19 LP) in respect of its ownership of the development site known as 'Land to the Rear of 295 - 297 Newark Road, Lincoln' ('the site'). A Site boundary plan is included at Appendix 1.</p> <p>The Regulation 19 LP seeks to concentrate growth within the main urban areas of Lincoln, Gainsborough and Sleaford. Peel recognises the justification for this approach. This is sought to be applied on a consistent basis through the allocation of land within the urban area as a priority.</p> <p>The Housing Needs Assessment (2020) (HNA)¹ identifies that, at the time of its publication, the Government's standard method for determining future housing requirements confirmed a minimum need to plan for the provision of 1,060 dwellings per year across the plan period. However, the Economic Needs Assessment (2020)² identified strong growth of around 992 jobs growth per year, which requires more homes than the standard method. Resultantly, the HNA concludes that 1,325 dwellings per year are needed to support the expected growth in employment. The housing requirement for Central Lincolnshire is therefore between 1,060 and 1,325 dwellings per year, or between 23,320 and 29,150 dwellings (23,320 baseline housing requirement) between the plan period, 2018 and 2040.</p> <p>The Central Lincolnshire Joint Strategic Planning Committee (CLJSPC) resolved that the Local Plan should seek to allocate sufficient land to meet the requirements at the top end of this</p>		Yes	Yes

								<p>range.</p> <p>The City of Lincoln, within which the subject site is located, is to provide around 64% of the total homes required, delivered through a combined strategy of: urban regeneration; sustainable urban extensions and growth at settlements which serve, and are serviced by, Lincoln. The Regulation 19 LP is progressing on the basis of maximising the residential yield from the urban area, reflected in the allocation of sites within the existing settlement boundaries. This 'urban first' approach underpins the Regulation 19 LP in the interest of achieving a sustainable co-location of homes, employment and services.</p> <p>Whilst a sequential approach is taken, the Regulation 19 LP proposes a series of 'sustainable urban extensions' (SUEs) to the urban area reflecting that the full residential development need cannot be met within the existing urban area.</p> <p>It is Peels view that, in accordance with this sequential approach, the subject site has been omitted as an allocation in error based on an incorrect conclusion that the site is not developable when applying the definition in Annex 2 of the NPPF. This renders the plan unsound. It fails the justified test of soundness in being reliant on a deficient evidence base with respect to the housing land supply, and in particular the evidence base's conclusions in relation to the subject site.</p> <p>Outline planning permission for the development of the subject site to provide 150 apartments was approved in October 2017 (LPA Ref: 2011/0389/O). The approved masterplan of the proposed development submitted with the outline application is provided at Appendix 2. Reflected in this permission, the site has recently been found to be suitable for residential development, occupying a sustainable location and not affected by any insurmountable constraints which would prevent it coming forward in an acceptable manner.</p> <p>The Committee Report for the application (January 2015)³ acknowledged the site was located within part of the District Mixed-Use Centre and the Bracebridge Revival Scheme as designated through the City of Lincoln Local Plan 19804 (CLLP 1980). Furthermore, the report recognised that the site is sustainably located to accommodate additional market and affordable housing, is sited on a main bus route into the centre, would provide increased off-road connectivity for pedestrians and cyclists by providing a link to the riverside path, that the proposed residential use is listed as an acceptable use within Schedule A to Policy 18 of the CLLP 1980 and that its' development as proposed would not undermine the mixed-use character of the area.</p> <p>Following the grant of permission, the Central Lincolnshire Local Plan was adopted (2017), which allocated the site in-line with the consented development of 150 apartments (site allocation Ref: CL704). The Residential Allocations Evidence Report (April 2016)⁵ noted that the site was undeveloped and well located for access to a range of local facilities.</p> <p>Since the granting of permission, reserved matters applications for the consented scheme have not been submitted, and the permission lapsed on the 1st May 2021 having benefitted from an automatic 1 year extension following provisions brought in by the Government during the recent pandemic⁶. Nonetheless the original consent shows that the site is suitable, available, and achievable by virtue of a clear intent to develop the site.</p> <p>In the intervening period, Peel has been marketing the site and is now at an advanced stage of negotiation with a developer to bring the site forward in the short-term, in accordance with the recent outline planning permission. The City Council (via Officers) have engaged in positive and proactive discussions with the developer and are aware of their intentions to bring this scheme forward. The City Council have also shown support for this development and have expressed</p>			
--	--	--	--	--	--	--	--	--	--	--	--

								<p>their desire for this to be brought forward in the short-term.</p> <p>The suitability of the site has been confirmed at various stages: firstly, the granting of planning permission, Ref: 2011/0389/O, the allocation of the site within the CLLP 2017, and the allocation of the site within the Regulation 18 LP.</p> <p>The CLJSPC have chosen not to carry forward the previous allocation on the basis that deliverability is uncertain. However, at the time of granting planning permission Peel was unable to secure a delivery partner – this was further delayed through the restrictions of the COVID-19 pandemic.</p> <p>Peel is a major landowner across the UK, with considerable experience of bringing sites forward for residential development, directly and working with developer partners. The site can be viably delivered in accordance with the 2017 planning permission, including adherence to the conditions imposed. The development of the site is therefore achievable.</p> <p>The combined effect of the above is that the developable urban land supply has been underestimated in the Regulation 19 LP and its evidence base on account of incorrectly concluding that the subject site is not developable, contrary to the evidence presented above.</p> <p>Peel acknowledges the justification for prioritising the development of urban sites before considering the allocation of sites beyond existing urban limits. It also supports the approach of proactively allocating urban sites through the Local Plan. This provides the development industry with certainty over the deliverability of sites and ensures a more robust and achievable Local Plan in setting out a very clear policy position with respect of sites in the urban area. This contrasts with some Local Plans which proceed on the basis that some such sites do not explicitly need to be allocated, albeit still form part of the supply upon which the Local Plan is reliant.</p> <p>The Regulation 19 LP proposes the allocation of a number of SUEs, reflecting that, numerically, there is an insufficient supply of urban sites to meet full residential development needs. However, these are proposed for allocation only to the extent that there is insufficient land within the urban area to meet needs. The approach taken through the Regulation 19 LP is that sites within the urban area take priority.</p> <p>Reflecting this sequential approach, and that the subject site is very evidently developable, available, and achievable, the subject site should be allocated for residential development as a priority and consistent with the approach taken of prioritising urban sites within the emerging Local Plan. It would be for the Council to determine whether such an allocation reduces the requirement for the allocation of land outside of the urban area to meet residential development area, albeit noting that any housing requirement should be treated as a minimum and can be exceed.</p> <p>At present, the Regulation 19 LP is based on a deficient evidence base with respect to the assessment of the subject site. This erroneously concludes that the site is not developable, contrary to the position set out above. The Regulation 19 LP is therefore unsound, failing the ‘justified’ test of soundness. Soundness can be corrected through the allocation of the subject site (through Policy S77) consistent with its treatment through the Regulation 18 LP.</p>			
--	--	--	--	--	--	--	--	--	--	--	--

	Comment on	Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate		Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
1103045	S69	Don't know		No	No	No			We would wish to reserve judgement on the position at the moment in view of the comment following relating to Site NK/NHYK/001 the South West Quadrant SUE. As previously reported, we act for one of the Landowners involved in the SUE and we would wish to consider further at the examination issues relating to the access and sub-paragraphs (d) and (e) which relates to the highway connectivity, etc. It would appear sub-para (e) has not changed, but there have been material changes to sub-para (d) in connection with the identification of points of connection and at the moment the certainty of that is perhaps questionable as further transport assessment, traffic modelling and other matters need to be considered as part of the ongoing work relating to the broad concept plan. We would also wish to maintain our client's position in terms of the delivery of some of the land within this site which hitherto has been restrained by the delay in activating the North Hykeham Relief Road. We understand plans are now being formulated so that may come forward in the not too distant future, but this site needs to deliver houses in the short term.	We are in discussions with other Landowners in connection with the SUE and at this stage it might be that the wording is acceptable, but it is something that is under review and will be informed by the transport assessments, traffic modelling, etc. With that in mind it might be that sub-clause (d) might need to be less specific, but we reserve our position on that in order to facilitate discussion at the Local Plan Inquiry to make sure that the site is deliverable and as soon as is practicable. As alluded to in previous representations, some early delivery can be achieved on this site and that is something we would continue to support.	Yes	No

Persimmon Homes (South Yorkshire)

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
11935669	S1	Y							The settlement hierarchy identifies the Lincoln urban area, including the current built up area of Lincoln and settlements such as North Hykeham, at the top of the hierarchy. The aim is to strengthen the role of Lincoln both regionally and within Central Lincolnshire. This is supported.		No	No
11936565	S2	Y			No	No	No		<p>Policy S2 is considered unsound as it is not justified, effective, positively prepared and consistent with the NPPF. The following response provides a summary to our comments found at paragraphs 4.3 to 4.29 of the attached document.</p> <p>Our client has concerns in relation to two elements of the policy, these are:</p> <ul style="list-style-type: none"> • The housing requirement; and • Housing distribution <p>Each element is considered in turn below.</p> <p>Housing requirement The following represents a summary of our representations (due to limits on comments box). The full representation can be found at paragraphs 4.3 to 4.24 of the attached document.</p> <p>The policy identifies a housing requirement of 23,320 new dwellings as the baseline housing requirement over the plan period. It is stated that the Local Plan's strategic aim is to facilitate the delivery of 29,150 new dwellings and the creation of around 24,000 new jobs over the plan period. The policy identifies the housing requirement as a range of between 1,060 and 1,325dpa.</p> <p>The identification of the requirement as a range is not supported as it is not</p>	Housing requirement To ensure that the plan is positively prepared and to conform with the NPPF requirement to bolster housing supply it is recommended that the policy should simply state a single minimum net need of 1,540dpa.	Yes	Yes

								<p>considered consistent with the NPPF (see paragraphs 4.12 to 4.15 of the attached document).</p> <p>Similarly the upper end of the requirement is considered insufficient to meet needs. The upper end of the range is proposed to be set at 1,325dpa, some 215dpa less than the current requirement or 4,730 dwellings less over the plan period. In terms of recent delivery since the start of the current plan period the Central Lincolnshire authorities have delivered 1,092 net additional dwellings on average. Whilst this is lower than the LHN it must be borne in mind that the extant Central Lincolnshire Local Plan was not adopted until 2017. Prior to its adoption the extant Local Plan would have had limited influence. Since its adoption, it has delivered 1,284dpa on average. This includes 2020/21 where housing delivery was severely hampered by the Covid-19 Pandemic and numerous 'lock-downs'. In the two years prior to the pandemic (2018/19 and 2019/20) housing delivery approximated to the extant Local Plan requirement.</p> <p>In addition, the modelling upon which the assessment is based utilises the 2016-based SNPP as its basis, rather than the more up to date 2018-based SNPP. Whilst the impact of this has not been modelled it is notable that the 2018-based SNPP suggest a greater population in 2018 and 2040 compared to their 2016-based counterparts. This is particularly pronounced in North Kesteven where significantly greater growth is now anticipated.</p> <p>The upper end of the housing requirement range is based upon a jobs-led scenario. This is, therefore, reliant upon having enough working age adults to fill the jobs created. The impact of the lower overall population growth identified within the 2018-based projections will inevitably have implications upon the modelled scenario. In addition the rate of jobs growth in recent years (1,850 jobs per annum) over the plan period to date far outstrips what is proposed in the plan. This strong growth should have been considered with reference to the housing requirement.</p> <p>The housing requirement will also fail to meet the affordable housing need within the area.</p> <p>Housing Distribution For additional detail upon this issue, please see paragraphs 4.25 to 4.29 of the attached document. It is considered appropriate that the Lincoln Strategy Area is allocated by far the greatest number of dwellings. Lincoln is by far the most sustainable settlement within Central Lincolnshire being over 6 times the size and scale of either Gainsborough or Sleaford. Whilst the principle of allocating the greatest number of dwellings to the Lincoln Strategy Area is sound it is unclear why only 64% has been allocated to this area. Lincoln is the economic centre of the area with the most potential to grow. It also has by far the most services and facilities.</p>			
11936693	S3	Y				No		<p>The policy is generally supported; however, it is considered amendments are required to ensure the policy and supporting text remain sound. This policy refers to unallocated sites within or adjacent the urban areas of the Lincoln Urban Area and Main Towns and Market Towns. The policy identifies a permissive approach to sites within the urban area or adjacent to it provided certain criteria are met. It is noted that the policy has been amended from that identified in the previous iteration of the plan (draft plan) through the removal of reference to site size. This</p>	<p>Removal of commentary relating to market saturation.</p> <p>Developed footprint to be defined on the proposals map</p>	Yes	No

								<p>is in accordance with our comments upon the draft plan and as such is supported. It is, however, noted that reference to avoiding market saturation for developers of allocated sites (paragraph 2.3.2) is retained in the supporting text. It is unclear how the council would determine market saturation and how they could act upon it. It is considered that reference to market saturation should be removed as this would not be effective and is an issue for the development industry to consider as opposed to the Local Plan.</p> <p>The policy includes reference to sites being located within the 'developed footprint' and at 'appropriate locations'. Both 'developed footprint' and 'appropriate locations' are defined in the glossary of the plan. Whilst these definitions are useful it is considered that greater clarity would be provided if the 'developed footprint' of a settlement was clearly identified on the proposals map.</p>			
11936725	S6	Y			No		No	<p>The policy is unsound as it is not justified nor consistent with national policy. The policy seeks a series of energy efficiency requirements from new buildings. These relate to orientation, form, fabric, heat supply and renewable energy. Whilst the principles set out are creditable the practicality and viability of elements, particularly heat supply and renewable energy generation are questionable. The issue of renewable electricity is replicated in Policy S7 and as such is dealt with in our comments upon this policy, below.</p> <p>In terms of heat supply the policy requires a net zero carbon content of the heat supply. To achieve this, it identifies the example of no connection to the gas network or use of oil or bottled gas. The supporting text identifies that "...bespoke guidance will be produced for the Central Lincolnshire area upon adoption of this Local Plan". Whilst such guidance would be welcomed it may not be feasible or viable to meet the policy guidance on all occasions. This element of the policy essentially requires all energy to be generated from renewable sources.</p> <p>As noted in our response to Policy S7 below the PPG is clear that whilst the Planning and Energy Act 2008 allows development plan policies to impose a proportion of energy used in development to be from renewable sources in the locality of the development, it requires this proportion to be reasonable. The policy should reflect this.</p>	Policy requirements should be proportionate as described above.	Yes	No
11936757	S7	Y			No		No	<p>The policy seeks to apply stringent new energy standards to all new residential development. Whilst partially in-line with our previous comments the policy has been amended and as such is less onerous the requirements are still considered unjustified and inconsistent with the NPPF.</p> <p>The NPPF (paragraph 152) identifies that the planning system should: "...support the transition to a low carbon future in a changing climate".</p> <p>Paragraph 154 further notes new development should be planned in ways which: "...can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards."</p> <p>The PPG (ID 6-012-20190315) identifies that local planning authorities: "Can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes."</p> <p>The PPG goes on to note that higher energy performance standards should not be applied.</p> <p>The Government consulted upon the Future Homes Standard in 2021, this will come into effect in 2025. This will be introduced via the Building Regulations. The exact nature of the standard remains unknown.</p> <p>Interim uplifts to the standards (Part L, Part F and a new Part O) will be brought into effect in June 2022, with a one-year transition for extant applications. A full technical specification for the Future Homes Standard will be consulted on in 2023,</p>	Policy should not seek to go beyond Building Regulation requirements. The requirement in Part 1 should be proportionate and not require an equivalent amount of renewable energy be generated on-site as the predicted yearly use.	Yes	No

									with the necessary legislation introduced in 2024, ahead of implementation in 2025. The changes to the Building Regulations will provide significant improvements. It is considered unsound and unjustified to place further requirements upon residential development. Part 1 of the policy seeks to require an equivalent amount of renewable energy be generated on-site as the predicted yearly use. Once again this goes beyond national policy. The PPG is clear that whilst the Planning and Energy Act 2008 allows development plan policies to impose a proportion of energy used in development to be from renewable sources in the locality of the development, it requires this proportion to be reasonable and does not require it to be on-site. The proposed policy complies on neither account.			
11936789	S11	Y			No		No		The policy indicates that prior to 2025 there will be no requirement (unless mandated by government) to use any specific lower embodied carbon materials provided the applicant has at least demonstrated consideration of the options and opportunities available. Whilst it is considered appropriate that there will be no requirement to use such materials it is unclear why developers should be required to provide additional studies at additional cost with no benefit to either the proposal or decision-making process. From 1st January 2025 it is suggested that developments will need to demonstrate how the building materials used have considered embodied carbon and that additional guidance will be provided prior to 1 January 2025. Neither the NPPF nor the PPG advocates such a policy. This is noted within paragraphs 2.2 and 2.4 of the June 2021 background paper 'Policy S10 Embodied Carbon Evidence Report'. The evidence paper seeks to justify the introduction of this policy because "it represents a real opportunity..." (paragraph 3.1). Whilst this may be the case no further justification is provided. Furthermore, it is notable this issue was not included in the Issues and Options consultation neither is it considered in the June 2021 'Whole Plan Viability Assessment'.	Due to the lack of justification and evidence upon the viability implications it is recommended that the policy be deleted.	Yes	No
11936853	S12	Y				No			The policy is generally sound but to ensure it is effective amendments are considered necessary. The policy requires all developments to meet the Optional Technical Standard of 110 litres per day per person for water efficiency. This accords with Policy LP14 of the extant Local Plan due to the location of the plan area within an area of serious water stress. Whilst the over-arching aim of the policy is not disputed no exceptions are identified.	To ensure that the policy is sufficiently flexible it is recommended that the policy wording be amended to read: "...Optional Technical Housing Standard of 110 litres per day per person for water efficiency as described by Building Regulation G2, where practical and viable. Proposals..."	Yes	No
11936949	S22	Y			No	No	No		The need for affordable housing is not disputed and indeed within our comments upon the housing requirement we advocate a higher housing requirement to assist in the delivery of affordable housing. The critical issue is, therefore, the need to ensure that affordable housing contributions retain development viability. In this regard the outputs from the June 2021 'Whole Plan Viability Assessment' are noted. Whilst this report identifies that viability is generally maintained at the identified levels there are some exceptions, including brownfield sites. Given these exceptions and the fact that the viability study cannot take account of all site issues it is important that flexibility is built into the policy. This is not currently evident within the policy wording. It is, therefore, recommended that the policy be re-worded to provide in-built flexibility. First Homes	The reference to a lower price cap should either be removed or justified. In addition, any amendments should be reflected within the viability work.	Yes	No

									<p>The policy identifies a maximum value, post 30% discount of £140,000 for First Homes. This is significantly below the national figure of £250,000 (PPG ID: 70-005-20210524). The supporting text to Policy S21 identifies that this reduction is due to the fact that at the national cap the product would not be affordable to between 75% and 85% of all households in Central Lincolnshire (Paragraph 4.1.12 & footnote 10, Local Plan Review). It is unclear why a figure of £140,000 has been chosen. Neither the Local Plan nor the March 2022 'Policy S22 Affordable Housing Evidence Report' provide evidence on the choice of £140,000, other than suggesting the national price cap is unobtainable in Central Lincolnshire. This evidence gap was noted in our response to the previous iteration of the Local Plan and does not appear to have been filled.</p> <p>The PPG is clear that local price caps should not be set 'arbitrarily', and they should only be used if evidence demonstrates a need for intermediate housing at particular price points (PPG ID: 70-005-20210524). This evidence does not appear to have been provided and as such the cap would appear unjustified. Furthermore, the cap appears out of kilter with the assumptions used in the June 2021 'Whole Plan Viability Assessment' which suggests (paragraph 6.4) that the £250,000 price cap has been used in the viability work. It should be noted that the Addendum Report to the Viability Assessment (dated March 2022) appears to utilise figures for first homes more than £140,000.</p>			
11937045	S23	Y							<p>The policy identifies proposals should provide a mix of housing tenures, types and sizes. This is supported.</p> <p>The policy also identifies that the mix should contribute to delivering the needs identified in the Central Lincolnshire Housing Needs Assessment. Whilst this is considered appropriate it must be recognised that any Housing Needs Assessment provides a 'snapshot in time' view of need. This will change both temporally and spatially. It is, therefore, important that the outcomes of this or any latter studies are not applied too rigidly. The current policy wording allows for this.</p>		Yes	No
11937173	NS24	Y			No				<p>Part 3 of the policy requires sites of 100 or more dwellings to deliver at least 5% of all plots as self-build or custom build. Whilst it is recognised the policy includes caveats this is unjustified and will stymy the delivery of coherent planning of a site as a proportion of the site will need to be retained for self / custom-builders. Furthermore, most self-builders seek smaller typically windfall sites.</p> <p>The current evidence (Policy NS24 Custom and Self Build Report, March 2022) only identifies that on average 41 individuals are registered for self-build and custom build each year. This represents just 3% of the proposed annual housing requirement. A 5% requirement, therefore, appears unjustified. Table 16 of the background paper clearly illustrates that such a requirement could deliver 97 such plots, more than double the identified demand.</p>	<p>It is recommended that Part 3 of the preferred approach be deleted and the support for the provision upon such sites be provided through Parts 1 and 2 of the policy.</p>	Yes	No
11937365	S31	Y			No	No			<p>The policy aims to ensure employment floorspace within IEEA remains primarily in B2, B8 and E(g) Use Classes is protected. Proposals resulting in the loss of business uses under B2, B8 and E(g) Use Classes will not be permitted unless specific criteria are met.</p> <p>As discussed within section 2 of our attached detailed response our client's site is included within an IEEA. This represents a continuation of the extant plan policy in this location. The employment area in this location is a small and relatively narrow strip of a much wider site. Within this location the employment area was formerly occupied by Lincoln Castings and all buildings associated with its former use have since been demolished. The formerly developed area is small at just 0.68ha and its loss would be negligible in terms of the wider designation and district-wide supply. In addition, the size of this parcel means it is unlikely to be attractive to most B2 and B8 uses as identified in Policy S31.</p> <p>The March 2020 'Economic Needs Assessment Update' suggests an indicative need</p>	<p>Greater flexibility within the policy to allow for other uses, or, our clients site (as identified in section 2 of the attached document) should be de-allocated.</p>	Yes	Yes

									for 11.6ha of additional employment land over the plan period (2018 to 2040). However, Policy S29 identifies that proposed strategic sites provide a net undeveloped (May 2020) capacity of a further 97.27ha of employment land. Whilst a buffer is required for churn and choice this is over 8 times the indicative requirement. The loss of this small element would therefore neither impact upon the existing Employment site (LN6) nor create any harm to the delivery of economic growth. The site is highly sustainable; comprising previously developed land positioned within the Lincoln Urban Area, served by a range of public transport options including the nearby North Hykeham Railway Station, and the significant number of services, facilities and amenities which the area has to offer. It is considered the site would be suitable for a wider range of uses than those prescribed by Policy S31, including residential. We consider Policy S31 unduly restricts development of the site to B2, B8 and E(g) uses primarily, and greater flexibility should be provided to enable the plan to deal with sites such as our clients. Given the sustainability credentials, fact that the site is vacant, limited contribution to the wider employment area and dearth of alternative employment land we consider this site should either be de-allocated from IEEA or the policy provide a more permissive framework for other uses.			
11937397	S51	Y				No			The policy is generally sound however, to ensure the policy is effective amendments are required. Our client supports the provision of open space. However, the policy refers to very prescriptive requirements within appendix 3. Whilst this should be used as a guide it should be applied flexibly to allow individual site characteristics and existing and proposed open space provision within an area to be considered.	It is recommended that additional flexibility be built into the policy.	Yes	No
11937429	S53	Y				No			The policy is generally sound however, to ensure the policy is effective amendments are required. Our client supports the principle of good design and adheres to both the National Design Guide and Building for a Healthy Life. The criteria contained within the policy are, generally, considered appropriate. It is, however, important that innovation and the need to respond to the requirements of a site are not unduly inhibited by an overly prescriptive approach. In this regard the policy needs to provide flexibility, where appropriate.	Greater flexibility provided in the policy.	Yes	No
11937461	S59	Y							The policy sets out the requirement for new development to deliver green and blue infrastructure. Within our previous comments upon this policy, we noted that the multi-functionality of green and blue infrastructure should be recognised. It is noted that the policy has been amended to incorporate reference to multi-functionality. This is supported. This change is considered important as green and blue infrastructure overlaps with the open space requirements set out within Policy S51. This change is considered consistent with the NPPF.		Yes	No
11937525	S61	Y				No			The policy introduces the requirement for a minimum 10% net gain for biodiversity. Whilst the NPPF requires measurable biodiversity net gains (paragraph 174(d)) it does not specify a percentage for the gain. The mandatory 10% requirement was included within the Environment Bill which received Royal Assent in November 2021. The policy should, however, recognise that the current intention is that there is a 2-year transitional period for implementation. The policy refers to off-site offsetting schemes only being used in exceptional circumstances, this should be deleted. This is because there may be clear benefits of scale to providing off-site mitigation in some instances. The preference for on-site mitigation could be retained to ensure that in most cases this is achieved.	Reference to off-site offsetting only being used in exceptional circumstances should be deleted.	No	No

11937621	S63	Y			No	No			<p>Our client considers the boundaries of the current Green Wedges identified on the Policies Map to be inappropriate, unjustified and ineffective.</p> <p>Our client has a direct interest in the Hykeham Pits Green Wedge. This area comprises two discrete areas on opposite sides of Station Road, separated by employment development. The area in which our client has an interest covers a tract of landscape to the east of Station Road.</p> <p>The main aim and objectives for Green Wedges is to:</p> <ul style="list-style-type: none">• Prevent the physical merging of settlements;• Create continuous links to the open countryside beyond urban areas;• Provide an accessible recreational resource; and• Conserve and enhance local wildlife to create wildlife corridors. <p>The existing employment uses to the north and south combined with the former Lincoln castings development within the western part of our client’s site interrupted and disconnected the continuous Green Wedge link to the open countryside a considerable time ago. The issue around coalescence is considered to no longer apply in this location given the intervening development between the settlement and open countryside.</p> <p>Whilst the site is located adjacent to the public rights of way it is privately owned and thus inaccessible to the public which negates the site’s potential as a recreational resource. Access to the Richmond Lakes can and will be improved through our clients’ proposals. In addition, as discussed in section 2 and appended to this representation a Preliminary Ecological Assessment has been undertaken. Our detailed consideration of the Hykeham Pits Green Wedge is also appended to this response (see appendix 6 of the attached document). This report concludes that the inclusion of our clients’ interests in the Green Wedge designation is neither necessary nor valid in order for the Green Wedge to continue to serve its current purpose. Any function that this tract of Green Wedge currently provides comes from either the area around the Richmond Lakes, or from the public footpaths and former recreation ground within the vicinity of the site, all of which would not be affected by the proposals. Notwithstanding this, within section 2 of this response our client has provided an alternative proposal which softens the proposed development edge facing the Richmond Lakes area with open space. Whilst our client is happy to work with the Council to identify the most appropriate solution for this site it is considered that the amended layout would provide greater enhancement of the Green Wedge.</p>	Based upon our detailed evidence it is recommended that the Hykeham Pits Green Wedge designation be redrawn to exclude our client’s site.	Yes	Yes
11940245	S68	Y							<p>The following provides a summary of our comments upon this section of the plan. Our detailed comments are provided within section 11 of the attached document.</p> <p>The Local Plan Review is heavily dependent upon Sustainable Urban Extensions (SUEs) at Lincoln, Gainsborough and Sleaford. Whilst we do not seek to object to the allocation of the SUEs we consider that the anticipated delivery rate is unjustified and ultimately unsound.</p> <p>The delivery rates of many of the SUEs appear high, in particular the both the Western Growth Corridor and South East Quadrant (188 and 213 dpa respectively) and will require early submission and approval of reserved matters applications to meet these ambitious trajectories. Based upon our client's experience a developer operating from at least 2 outlets could deliver up to 70dpa within Central Lincolnshire. To meet the delivery totals identified above would require up to 6 outlets operating at the same time. This appears unlikely. It is notable that within the supporting text for Policy S3 the plan argues market saturation issues should be taken into account with regards windfalls. Yet it does not appear to apply the same logic to the SUEs.</p>	The heavy reliance of the Local Plan Review on SUEs means that any slippage in timescales, as has occurred since the adoption of the extant Local Plan will place the delivery of the housing requirement in jeopardy. Whilst we do not object to the allocation of these sites and anticipate they will deliver over the plan period the quantum of delivery is considered unrealistic. To rectify this position, it is recommended that	Yes	Yes

									<p>The 'Start to Finish' research by Lichfields indicates that the average build-out rate for sites of 2,000+ dwellings is 160dpa. If this rate is applied to the both the Western Growth Corridor and South East Quadrant, based upon our ambitious start dates these average rates would create a shortfall of 1,222 dwellings compared to the identified supply.</p> <p>In addition it is notable that SUEs have been beset by delay. For example the Lincoln North East Quadrant SUE is scheduled to deliver 1,400 homes in the plan period and has an extant outline permission for 500 dwellings, granted by West Lindsey District Council in December 2015. In preparation for the examination of the extant Central Lincolnshire Local Plan a Joint Delivery Statement was produced in April 2016 (examination ref: E014A). This anticipated that delivery of the remaining 900 dwellings (within the City of Lincoln boundary) would commence in 2021/22. However, to date no application has been received for this site. Delivery is, therefore, likely to be delayed by at least 24 to 36 months. Others such as the South West Quadrant SUE is reliant upon delivery of critical infrastructure. Furthermore, the June 2021 'Whole Plan Viability Assessment' is clear that the infrastructure requirements for the SUEs make their delivery challenging and will require assistance to be unlocked (Paragraph ES7) whilst some sites already benefit from external funding, such as the Western Growth Corridor, this need may slow delivery from the SUEs.</p>	further smaller site allocations which can be delivered at relative speed, such as our client's, are included within the plan.		
11940277	Trajectory	Y		No	No	No			<p>The housing trajectory (table 1 and table 2, chapter 13 of the Local Plan Review) identifies a buffer of 3,522 dwellings over the proposed upper end of the housing requirement (29,150). This represents a buffer of approximately 12% to account for under or none-delivery from the allocations and other sources of supply. Whilst at 'face-value' this appears reasonable we have already highlighted the potential for significant under-delivery from the SUEs. A more realistic delivery rate from such sites would significantly reduce this buffer.</p> <p>The supply also includes 2,314 dwellings from small sites and 931 from windfalls, a combined total of 3,245 dwellings. Whilst the number of small sites with permission is not disputed and delivery from windfalls is considered appropriate, they essentially cover the same types of site (i.e. unallocated sites), all of which were essentially windfalls prior to gaining permission. The delivery of on average 150dpa from this source is considered ambitious, particularly given their uncertain nature.</p>	<p>In order to provide certainty and a reasonable buffer the council is recommended to include additional allocations, such as our clients.</p> <p>Further details of our clients site is included within section 2 and the appendices of the attached document.</p>	No	Yes

Persimmon Homes & Charles Church (South Yorkshire)

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
11935605	Vision	Y					No		<p>The vision and objectives are generally supported but a minor amendment is recommended to ensure it is consistent with the NPPF.</p> <p>Vision The vision provides a positive statement identifying that growth is required across most of the area's settlements but with a clear focus upon the towns of Lincoln, Sleaford and Gainsborough. We do, however, raise issue with several detailed issues throughout this consultation response. One such issue is that of housing growth. The proposed requirement is dealt with within section 4. However, within the spirit of the NPPF it is recommended that the housing requirement be identified as a minimum within the vision.</p>	<p>Vision The proposed change to the vision would therefore read: "Between 2018 and 2040, Central Lincolnshire will grow by at least 29,150 new homes, meeting the housing needs of all our communities".</p>	No	No

									Objectives The objectives are generally considered appropriate.			
--	--	--	--	--	--	--	--	--	--	--	--	--

Persimmon Homes East Midlands

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103133	S3	No	Don't know	Yes	No	No	No	Yes	<p>Policy S3: Housing in the Lincoln Urban Area, Main Towns and Market Towns</p> <p>Persimmon Homes acknowledge and support the removal of the triggers within the policy.</p> <p>There is still ambiguity within the definitions, which therefore means the policy is neither justified nor effective.</p>	<p>‘Retain the core shape’ has been removed from the policy but is still in the definition in the glossary for ‘appropriate location’. The term currently is ambiguous as to a clear appropriateness in location and Persimmon Homes are therefore of the view that this term should be deleted from the policy.</p> <p>The term developed footprint is also ambiguous with differing interpretations from the definition in the absence of a settlement boundary.</p> <p>These ambiguous terms should therefore be removed from the policy.</p>	No	No
1103135	S4; Glossary	No	Don't know	Yes	No	No	No	Yes	<p>Policy S4: Housing Development in or Adjacent to Villages</p> <p>Persimmon Homes’ previous comments on the Regulation 18 consultation still remain, these are detailed below.</p> <p>Ambiguity remains in the definitions that are provided that are neither justified nor effective.</p> <p>All development should be assessed on merit and stating that proposals higher than these triggers are not to be supported on unallocated sites is too restrictive, and could again cause a lack of infrastructure and service contributions though financial or planning obligations.</p> <p>The policy would limit the provision of essentials as defined in para. 20 of the NPPF, as larger developments provide these contributions and enhance the surroundings with a cohesive scheme and larger financial contributions. Para.64 of the NPPF details that provision of affordable housing should not be sought for residential developments that are not major developments, therefore the policy could result in a loss of affordable housing contributions.</p>	<p>‘Larger villages’ requires a higher threshold due to these villages having more access to services. This restriction could encourage unsustainable development lacking provisions of on-site affordable housing, infrastructure and service contributions.</p> <p>‘Retain the core shape’ has been removed from the policy but is still in the definition in the glossary for ‘appropriate location’. The term currently is ambiguous as to a clear appropriateness in location and Persimmon Homes are therefore of the view that this term should be deleted from the policy.</p> <p>The term developed footprint is also ambiguous with differing interpretations from the definition in the absence of a settlement boundary. This should be removed.</p>	No	No
1103137	S6	No	Don't know	Yes	No	No	No	Yes	<p>Policy S6 Design Principles for Efficient Buildings</p> <p>The policy is not appropriate within planning policy and should be within building regulation requirements.</p>	<p>Points 2-5 are not appropriate in planning policy and should be considered in building regulations.</p> <p>Point 1 should be removed as building orientation is included within Policy 20 Resilient and Adaptable Design.</p>	No	No

1103138	S7	No	Don't know	Yes	No	No	No	Yes	<p>Policy S7 Reducing Energy Consumption Persimmon Homes' previous comments still remain.</p> <p>Whilst Persimmon Homes fully appreciate the need to reduce energy consumption, the vehicle for delivering these changes is through Building Regulations.</p> <p>With the changing technology reducing energy consumption needs to come forward as part of the Building Regulations and this is already happening with Part L requiring a 31% carbon reduction summer 2022 and this increasing in 2025 to a decentralised network.</p> <p>The policy introduces a number of requirements above building regulations including those to be introduced in Summer 2022. These requirements will inevitably have financial implications for development which have not been fully taken into account in the Aspinall Verdi 'Whole Plan Viability Assessment', which specifically Chapter 7 sets out the policy inclusions which have been used in the viability testing and this does not include this policy.</p> <p>This policy will inevitably have a negative impact on housing delivery at a time when there is real need for houses both locally and nationally to be delivered. This will further have a knock on impact on house prices and affordability.</p> <p>Part 1 requires that developments generate the same amount of renewable energy on site as they demand over the course of the year. Whilst renewable energy can and is provided for on large housing sites, the technology is not in place to provide for the level of renewable energy required by this policy. For example, there will be insufficient roof space within a housing development for the required number of PV panels to be installed to meet this policy and the concerns and issues associated with wind turbines is well documented. The Council has failed to demonstrate in its evidence base that such a policy is achievable or viable. Persimmon Homes are of the view that this policy should be deleted and such measures controlled through Building Regulations.</p> <p>Part 2 requires that no unit shall have a total energy demand in excess of 60 kWh/m2/yr. Persimmon Homes is not convinced this is achievable and the Council has also failed to provide the evidence to demonstrate this is achievable. Again, such requirements need to come through as part of Building Regulations.</p> <p>Exception Basis Clauses – sets out 3 scenarios where exceptions to this policy would apply, however lack of financial viability is not deemed to be a reason to trigger this exception clause. If such policies are to remain in the plan there need to be some flexibility as currently the technology is not in place to meet the requirements of these policies and is evolving, as such financial costs associated with these conditions is unknown. Furthermore,</p>		No	No
---------	----	----	------------	-----	----	----	----	-----	--	--	----	----

									<p>the Aspinall Verdi 'Whole Plan Viability Assessment' dated 18 June 2021 does not consider the costs likely to be involved in meeting the requirements of this condition. Chapter 7 of this report sets out the policies that have been included within the viability testing and this does not include the costs associated with energy efficiency related conditions. It is essential that these are considered, failure to do so will mean schemes will not come forward as they will not be viable.</p> <p>This exclusion policy further goes onto state what is required if the exclusion if the Exceptional Basis Clause and this will have financial implications which again these figures do not appear to have been considered in the Aspinall Verdi Viability Assessment. Furthermore, criteria point b) sets out that a contribution of £5k - £15k per dwelling is required – what evidence base has been used by the council justify these figures?</p> <p>Clause 2 (accreditation scheme) – sets out that house types need to be accredited to demonstrate to Passivhaus Plus, Premium or Classic. This is policy is not required and is a duplication of NHBC/ Building Regulation requirements where such approvals need to be given for m each individual house type. For this reason this requirement should be deleted from the policy.</p> <p>Clause 3 (viability) states that in zones C and D viability is likely to be an issue in delivering this policy and where it cannot be met the Energy Statement needs to set out the degree to which points 3 and 4 will be complied with to become viable and this in effect means that a viability assessment will need to be submitted with an application. On the basis the Viability Report concludes viability will be an issue in Zones C and D, there should be no requirement in the policy for development in these areas to meet the requirements of points 3 and 4.</p> <p>The policy does not acknowledge inflation and the rise in building costs, this will impact the ability to provide housing at the current levels. The implications of this policy would severely impact the delivery of new houses, and this approach should be taken from a national level with a continually monitored evidence base that considers the evolving technology. There is no evidence that there is a way in which these requirements will be assessed through a planning application and whether council officers have the technical capabilities to make judgement on this policy.</p>			
1103140	S11	No	Don't know	Yes	No	No	No	Yes	<p>Policy S7 Reducing Energy Consumption</p> <p>This policy is a duplication of the building regulations and is not appropriate through planning policy.</p>	Paragraphs 2 and 3 under 'Major Development Proposals' should be removed until further government position is clear at the period beginning 2025. The policy wording is premature.	No	No
1103119	S12	No	Don't know	Yes	No	Yes	Yes	Yes	<p>Policy S12 Water Efficiency and Sustainable Water Management</p> <p>Persimmon Homes' previous comments still remain.</p>	Criteria 1 requires that hard surfacing is permeable, this policy should be extended to include either swales or permeable paving. The use of swales	No	No

										would have the benefit of improving water quality.		
1103120	S20	No	Don't know	Yes	No	No	No	Yes	<p>Policy S20 Resilient and Adaptable Design</p> <p>Persimmon Homes' same comments remain as before with regards to space implications on home working. The space required is subjective based on the type of work someone does, therefore the amount of space required for 'home working' cannot be quantified to an amount of space within the home.</p>	Point 4 should be removed from the policy as the term 'home working' is subjective and should not be used within policy.	No	No
1103121	S21	No	Don't know	Yes	No	No	No	Yes	<p>Policy S21 Flood Risk and Water Resources</p> <p>Persimmon Homes' previous comments still remain. We are in support of the use of SuDS within developments for surface water run-off to ensure development does not increase flood risk. However it is not appropriate to include solutions to the 'wider area' due to the implications of working on third part land outside of the applicant's control.</p> <p>In addition the final paragraph should be dictated by IDB bylaws and is not appropriate within planning policy.</p>	<p>'Wider area' from point (e) should be removed due to the implications of working on third party land outside of an applicant's control.</p> <p>The final paragraph should be deleted from the policy and guided by the IDB bylaws.</p>	No	No
1103122	S22	No	Don't know	Yes	No	No	No	Yes	<p>Policy S22 Affordable Housing</p> <p>The maximum value of £140,000 does not allow for increases in house prices and the flexibility of the type of housing required by the first home buyer. Some buyers may require larger houses based on their circumstances and this cap should not be applied.</p>	For the reasons as stated above, the cap of £140,000 should be removed from the policy.	No	No
1103131	NS24	No	Don't know	Yes	No	No	No	Yes	<p>Policy NS24 Custom and Self-Build Housing</p> <p>The evidence base shows there is a low demand for self-build housing and therefore there should be a reduction in the timeframe of 36 months unsold to reflect this.</p> <p>Overprovision of self-build plots within the site could result in empty plots within a development, having harm to the design and character.</p>	<p>For the reasons as stated above, the timeframe of unsold should be reduced to 12 months.</p> <p>There is an overprovision of self-build within the policy therefore this should be increase to larger sites of 500 dwellings or more so any harm to smaller developments is avoided.</p>	No	No
1103123	S47	No	Don't know	Yes	No	No	No	Yes	Clarification is required for point (c) and whether this equates to making allowance for electric car charging points and would this be on all dwellings or a percentage of the dwellings.		No	No
1103124	S49	No	Don't know	Yes	No	Yes	Yes	Yes	The adopted Neighbourhood Plans should be listed within the policy to ensure clarity when preparing an application.		No	No
1103125	S54	No	Don't know	Yes	No	No	No	Yes	<p>Policy S54 Health and Wellbeing</p> <p>The policy is too limiting and the threshold for a HIA should be increased from 150 to 500 dwellings. With varying land uses throughout Central Lincolnshire, a HIA may not be required in less urban areas of SUEs.</p> <p>There is no evidence to suggest why the threshold is limited to 150 dwellings, and this could affect the viability of dwellings.</p> <p>NHS contributions should be determined through consultations and discussed throughout pre-application.</p>	For the reasons stated above, the threshold for a HIA should be increased from 150 to 500 dwellings.	No	No

1103127	S61	No	Don't know	Yes	No	No	No	Yes	<p>Policy S61 Biodiversity Opportunity and Delivering Measureable Net Gains</p> <p>‘Biodiversity schemes should only be used in exceptional circumstances, where net gain cannot be achieved in the site boundary’</p> <p>The Environment Act states that arrangements may be made where a person who is entitled to carry out the development of any land may purchase a credit from the Secretary of State for the purpose of meeting the biodiversity gain objective.</p> <p>Deterring the offsetting contribution could encourage poor net gain contributions onsite where the management of them cannot be guaranteed over the 30 year timeframe (a few examples being: where the biodiversity is on private land, vegetation trampling and bird disturbance). Credits should be encouraged where it cannot be provided in a sustainable manner on site.</p>	<p>‘Wider environmental net gains’ – this is too subjective and should be removed from the policy.</p> <p>‘Ongoing management funding’ – this needs further clarity as to what is expected.</p> <p>‘30 years after completion’ – should be in line with the Environment Act and therefore removed from policy.</p> <p>‘On-site habitat’ – This should make provisions for off-site gains and therefore removed from the policy.</p> <p>The policy should make provisions for off-site generally, to encourage sustainable methods and investments in areas of high ecological value.</p>	No	No
---------	-----	----	------------	-----	----	----	----	-----	---	--	----	----

Quintor UK LLP

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103322	S82	Yes		No	No	No	No	Yes	<p>We object to the Local Plan. See accompanying report. [full report attached, summary provided here]</p> <p>Land at Burton Waters Local Plan Representations Policy S82 These representations are for a site at Burton Waters shown edged red on plan DE(9)900 (included at the end of this report). The site has a planning consent for a chalet style development of 20 holiday homes. These representations object to the Submission Local Plan which does not allocate the site, and propose an allocation for 20 park homes for the over 55's in Policy S82. This type of development has been proposed because there is a consent for 65 park homes for the over 55's immediately to the east which is under construction. The Park Home site is allocated as site WL/BUR/005A in policy S82. This proposal for 20 park homes is to extend that site.</p> <p>The holiday home consent has been implemented. The grant of planning permission for holiday homes shows that there are no constraints to development that cannot be overcome. The over 55's development would be no different in layout and unit type to the holiday homes so the change in development type would make little material difference to the character of the area. Burton Waters is a sustainable location for development with a range of shops and facilities. In addition, there are bus services close to the site. The site could be developed for over 55's homes in the short term within five years. The Councils evidence shows that there is an increasing population of older people in West Lindsay so more over 55's housing will help address the need for homes for older people.</p> <p>The holiday home site is part of a larger site that was granted consent in 2013 by planning application reference 130050. The 2013 planning application was also for 56 park home units for the over 55's, 100 units of extra care housing and a hotel. A planning appeal in 2015 (reference APP/N2535/W/15/30043) increased the number of park homes to 65.</p>	See accompanying report.	Yes	Yes

									<p>Interest in the holiday homes from a holiday home operator has been very limited. Build costs have increased significantly since the first application was approved in 2013. The holiday homes require significant groundworks which will harm their viability. Developing over 55's park homes would address the viability issues.</p> <p>It is proposed to change the 20 holiday homes to 20 over 55's park home units. It is clear that there is a demand for over 55's homes in the locality. The holiday homes that are proposed on the site are similar in style and design to the park home units and so the change would make little physical difference to the character of the site. The proposal for over 55's park homes will use a site with an extant planning permission; will be more viable than the holiday homes; and will help meet the needs of older people.</p> <p>The Proposal The proposal is for 20 homes for the over 55's. The park homes approved in the 2013 planning application and 2015 appeal were restricted by a planning condition that stated: "The park homes shall only be occupied by those aged 55 and over."</p> <p>20 holiday homes have planning approval and the development has been implemented. The layout is shown on the Planting Details plan 16 1011 QH L003 (at the end of this report). The layout and landscaping would be the same for the park homes.</p> <p>Reason for Developing Park Homes The park homes will be more viable than holiday homes and so present a better prospect for developing the site.</p> <p>The appeal inspector noted in 2015 that: "The Council and the appellant said that the existing condition (No. 13) limiting the occupation of the park home units to those aged 55 and older would remain. The Council said that the park home units were originally granted planning permission in 2013 in order "to meet an increasing need arising for an increasingly older population" despite its Local Plan allocation for leisure uses. This was done so as to "offer a genuine alternative to moving into full time residential care enabling people to exercise choice over their accommodation and maintain their independence by being part of a local community. This is a laudable and worthy aim and I have seen nothing which convinces me that this aim would not apply to the proposed extra 9 units. There is no evidence which suggests to me that that the need for this type of accommodation for the older population has been met."</p> <p>The site could be developed in the short term, within five years, as the over 55's homes would be more viable than holiday homes.</p>			
1103325	S82	Yes		No	No	No	Yes	Yes	<p>We support the principle of the allocation WL/BUR/005. The site will shortly be developed. The landowner has recently agreed terms with a local housebuilder, Rippon Homes, who will develop the site. The decision notice reference 138861 attached to this form demonstrates that the site has an extant consent for C3 housing.</p> <p>We object to policy S81 because it does not include the allocation WL/BUR/005 which is in Burton Waters. Burton Waters is classified as a Medium Village in Policy S1. This allocation is instead included in policy S82. Policy S82 sets out allocations for Small Villages, and so the allocation should instead be in policy S81 which contains the allocations for Medium Villages.</p> <p>[Certificate of Lawful Use attached to submission]</p>	Change the allocation WL/BUR/005 from Policy S82 to S81.	Yes	Yes

Reepham Parish Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100227	General	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Reepham Parish Council provide the following general feedback that: given there are hundreds of documents provided,a plain English guide of where to look for relevant information to a parish should be provided. This would make the process of locating information of interest much easier and would be a welcome customer-centric approach.			No

Rhubarb Theatre

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
11811093	Vision	Y				No			As the climate changes Lincolnshire has been earmarked as the area most likely to suffer from flooding. Why would you choose a county that already fights against this challenge, to build more housing on. The roads are already slow, full of potholes and we have a large amount of agricultural vehicles on them. By housing more people in an area, which is not a sought after designation, we are making our roads more dangerous as people try to overtake in impossible places.	Put a hold on the development and observe the landscape over the next 20 years. If Lincolnshire is unchanged, then maybe consider development then.	No	No

RJ Vickers

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102489	Intro				No		No		The National Planning Policy Framework requires broad locations for development to be located on a key diagram. The Regulation 19 Local Plan does not include a key diagram. A key diagram is a useful tool for providing a visual and spatial expression of the Plans strategic policies and can serve to highlight the key constraints and relationships that impact upon the Plan area.	Prepare and include a key diagram within the Local Plan	Yes	No
1102487	Vision				No		No		The Client is generally supportive of the wider vision and strategy, however there are some areas that should be addressed in order to support the soundness of the Plan. The Client welcomes the opportunity to engage further with the Council, particularly with regards to the allocation of the land at Legsby Road, Market Rasen (WL/MARK/001). The current vision is generally positively prepared, and the Client welcomes the recognition that new homes are needed, and that the requirement for new homes should recognise the need to support economic growth. The vision continues to identify a requirement of 29,150 new homes for the period 2018 to 2040. The Client is supportive the identification of the housing requirement within the vision that reflects the ambitions for economic growth. However, as identified in the Clients representations at regulation 18 stage, there are internal inconsistencies within the Local Plan. The vision presents a single requirement, however Policy S2 presents the housing requirement as a range. In response to Policy S2, Spawforths on behalf of the Client, set out concerns in relation to the use of a range as a requirement. It undermines the effectiveness of the Plan and is not considered a 'sound' approach.		Yes	No

1102494	S1			No		No	No		<p>The Client is supportive of the identification of Market Rasen as a settlement which can accommodate significant growth. However, the Client considers that a clearer strategy for the Market Towns should be provided.</p> <p>The Client welcomes the acknowledgement that Market Rasen should be a focus for significant growth, and welcomes the strategic aim to ‘maintain and enhance’ the role of Market Rasen as a Market Town.</p> <p>However, the Client considers that it is important that the strategy reflects Market Rasen’s location and excellent connectivity to higher order settlements by a range of public transport modes. The House of Lords, Built Environment Committee’s report on Meeting Housing Demand (January 2022), highlights the role of land which close to train stations which provide service to employment centres in meeting housing demand. Stating that rail provides the fastest means of access to larger cities and has the lowest carbon footprint of any mode of travel. It encourages maximising the use of existing rail infrastructure in order to provide a low carbon option for supporting the growth of urban areas and providing new homes.</p> <p>Market Rasen is well served by bus, and importantly benefits from frequent (up to ten services a day) and regular train services operating to Lincoln, Grimsby, Cleethorpes, Leicester and Nottingham, with ongoing services to London, the Midlands, the North and beyond. This provides a genuine choice of transport modes for current and future residents. The journey by train to Lincoln to and from Market Rasen is typically under 20 minutes, making the Market Town eminently commutable from Lincoln. Consistent with the Plans policies on climate change the Plan should seek to prioritise growth in areas that are accessible by a range of public transport, with a focus on locations well served by train. The Services and Facilities Methodology highlights that Market Rasen has an excellent range of services and employment opportunities, with the town centre identified as a tier 2 centre, and thus provides the opportunity to sustainably support the growth of Lincoln and the wider Plan area, as well as meeting the needs of Market Rasen and its immediate hinterlands.</p> <p>Policy S1, along with the vision should provide a positive strategy for the growth of the Plan area in the long term to ensure that the most sustainable options for growth are maximised. The policy should recognise the sustainability of Market Rasen, with its range of services, facilities, and employment opportunities, and its excellent transport connections, via a range of modes. These transport connections provide sustainable access to a greater range of employment, leisure, cultural and retail facilities. In order to ensure that the plan is both effective and positively prepared, it is considered appropriate to differentiate the role of Market Rasen from Caistor having regard to the significant differences in connectivity with Lincoln, including by rail, making Market Rasen better placed to support the wider growth of the Plan Area, and beyond merely ‘maintaining’ its current role.</p> <p>The Plan in its current form is not positively prepared or effective, and is not consistent with national policy. Subject to the inclusion of the suggested changes identified below, the Client’s consider that the Plan is capable of being found sound.</p>	<p>To overcome the soundness matters ‘the client’ proposes the following changes:-</p> <ul style="list-style-type: none"> • Amend the policy to establish a positive framework for the growth of Market Rasen, recognising its connectivity to Lincoln and centres beyond the Plan area, and therefore its potential to have a greater role in supporting the growth of Lincoln and the wider Plan area. • The strategy for the Market Towns, within Policy S1 should differentiate the between the role of Market Rasen and Caistor having regard to the differences in connectivity, reflecting Market Rasens excellent links to Lincoln. 	Yes	No
1102504	S2			No	No		No		<p>[Representation summarised due to length. See attachment for full representation]</p> <p>The Client, considers that the use of a range lacks the clarity needed to ensure that the Plan is effective, and the Plan is unsound in its current form.</p> <p>The vision identifies a strategic aim to deliver 29,150 homes. This is consistent with the</p>	<p>To overcome the soundness matters ‘the client’ proposes the following changes:-</p>	Yes	Yes

								<p>upper end of the range presented in Policy S2, and not the lower end of the range. Policy S2 also establishes the strategic objective to deliver 24,000 jobs within the Plan period. Delivery at the lower end of the range would not be consistent with the strategic aim to delivery 24,000 additional jobs within the Plan period. The policies pertaining to distribution, allocations and the parish requirements established within appendix 1, are consistent with the vision to deliver 29,150 homes and not 23,320 dwellings associated with the bottom of the range based on a local housing need figure of 1,060. The use of a range results in clear inconsistencies across the Plan it policies and appendices. This undermines the effectiveness of the Plan.</p> <p>The use of range indicates that the upper end of the range forms a maximum. This would not be consistent with national policy including the strategic objective to significantly boost the supply of homes.</p> <p>The use of a range when the lower end of the range does not reflect the strategic aims of the Plan is inappropriate and leads to internal inconsistencies within the Plan. The use of the range creates the potential for the level of housing provision to fall out of alignment with the delivery of jobs and employment land. This will serve to lead to unsustainable travel patterns, impact upon affordability, and could result developments coming forward in an unplanned way.</p> <p>Furthermore, the results of the standard method vary. The lower end of the range established in Policy S2 is already lower than the latest outputs from the Standard Method, the minimum starting point for calculating a requirement. On the basis of the latest affordability ratios, which at April 2022 result in a Local Housing Need figure of 1,103. This further demonstrates the implications of the use of a range where the lower end of the range reflects the outputs from the standard method on the effectiveness of the Plan.</p> <p>The Client supports the use of a minimum requirement that reflects the economic growth aspirations and will meet the needs of different groups, including the need for affordable homes. The requirement should be expressed as a single figure to ensure that the Plan is effective.</p> <p>The Client is concerned that the upper end of the range does not reflect the Councils evidence including the evidence set out within HOU001 and ECO001, and the targets for jobs growth established with Policy S2. The Plan as currently worded is not sufficiently justified, it is not internally consistent and therefore not effective.</p> <p>Setting a range for a housing requirement, where the upper requirement does not reflect the level of growth needed in order to support the scale of economic growth being supported, risk unduly constraining economic growth, lacks consistency. The Sustainability Appraisal, has not tested an Option of a housing requirement which would support the delivery of 24,000 jobs. Option 3 refers to the figure of 1,325 which HOU008 indicates will support circa 992 Jobs per annum and not 1090 jobs per annum. The SA should also assess the option to deliver housing growth sufficient to maintain the levels of jobs growth since 2012 (an annual average of 1,849 jobs). The Plan in this regard is inconsistent, ineffective, unjustified, and is not consistent with national policy. There is sufficient evidence to point to the need for a higher minimum housing requirement.</p> <p>The minimum requirement should at least be sufficient to ensure that the level of economic growth/jobs growth supported by Policy S2 can be delivered, and should be</p>	<ul style="list-style-type: none"> • Express the minimum housing requirement as a single figure. • The housing requirement should be increased in order to support the level of economic growth/jobs growth identified in Policy S2, as a minimum, and support the delivery of affordable housing. • Refine the strategy for distribution to ensure that it is effective in directing allocations and windfall development. Provide a clear strategy for distribution to the Market Towns, including Market Rasen, ensuring that the distribution reflects its position within the settlement hierarchy and its sustainability credentials, including the high level of service provision and connectivity by a range of public transport modes to Lincoln and the Humber, with ongoing connections to London, the Midlands and the North. 		
--	--	--	--	--	--	--	--	--	---	--	--

									<p>uplifted to reflect the scale of affordable housing need across the Central Lancashire authorities.</p> <p>Policy S2 also establishes the strategy for distributing development within the Plan area. The explanatory text notes that it is important to locate housing in locations best suited and most attractive to the market and where it can minimise the need to travel by private car. A 'Lincoln Strategy Area' is identified through policy S2, and the Plan indicates that this area reflects travel to work patterns, although this area excludes Market Rasen, which HOU008 identifies as falling within the Lincoln Travel to Work Area.</p> <p>Policy S2 directs 64% of the Plan area's growth to the Lincoln Strategy Area, the policy identifies a strategy (priority order) for delivering homes and employment land within the defined strategy area. This is the following order, urban regeneration, sustainable urban extensions to Lincoln; and growth at settlements which serve and are serviced by Lincoln. This latter point lacks clarity, the Lincoln Strategy Area is stated to reflect travel to work patterns, No further justification is provided in EVR002</p> <p>Policy S2 provides the proposed distribution for the Main Towns of Gainsborough and Sleaford, indicating that each area should accommodate around 12% of the Plan areas growth. These Towns are tier 2 within the settlement hierarchy. 12% of growth is then directed 'Elsewhere'. This category includes the Market Towns of Market Rasen and Caistor. It is not considered that this strategy provides an effective strategy for the Tier 3 Settlements, within which Policy S1 supports significant growth. In order to ensure that the Plan is effective the Client considers that it is appropriate to establish a distribution that is reflective of Policy S1 and hence policy S2 should be further refined to provide a clearer strategy for distribution for the Tier 3 Settlements, in particular Market Rasen.</p> <p>It is not clear from the Sustainability Appraisal (STA004, or STA004.1g), how distribution of development within the 'Elsewhere' category has been tested and whether therefore options for a greater proportion of development within the Elsewhere category, and greater proportion of the overall requirement to Market Rasen has been tested, as this would not necessarily lead to more growth overall within the 'Elsewhere' category (Option 2).</p> <p>It is noted that a significant proportion of the overall requirement (47%) is to be accommodated within the eight sustainable urban extensions. It is vital that there are sufficient deliverable sites within sustainable locations such as Market Rasen which can be brought forward to meet the short term housing needs should the delivery on one or more of the Sustainable Urban Extensions stall.</p> <p>In summary, the strategy for distribution should be further refined, providing a clear strategy for the Lincoln Strategy Area, and justification for its boundaries, and importantly providing a clear, effective and positive strategy for the growth of the Market Towns, which reflects their status within the settlement hierarchy, retail hierarchy, level of services and facilities, and important their connectivity to higher order settlements, by a range of transport modes, including rail.</p> <p>The Plan in its current form is not positively prepared, effective or sufficiently justified and is not consistent with national policy. Subject to the inclusion of the suggested changes identified below, the Client's consider that the Plan is capable of being found sound.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

1102507	S22				No		No		<p>The Client supports the principle of affordable housing provision, however the Client highlights that there is a need to ensure that the level of contributions required by the Plan is not set at a level that will undermine the deliverability of the Plan.</p> <p>The Client is supportive of the need for affordable housing and recognises that the need for affordable housing across the Plan area is particularly acute, and acknowledges the need within West Lindsey. The Client is willing to support the delivery of affordable housing on the site WL/MARK/001.</p> <p>The Client welcomes the Council's recognition of the role of viability within affordable housing delivery within the explanatory text in accordance with paragraph 34 of the 2021 Framework. However the policy should be revised to confirm the level of affordable housing provision that will be sought, but with a clear statement that this is subject to it being demonstrated that this would not have an unacceptable impact on the economic viability of the proposed scheme.</p> <p>As highlighted under the section titled General Comments, when the Plans policy requirements are tested in combination, there are a number of occasions where there is not sufficient headroom to deliver the full requirements of the Plan in Mid Value areas, which includes Market Rasen. The Council should be mindful to set the policy requirement for affordable housing at a level that will not risk undermining the deliverability of the Plan or at a level that will necessitate the need for frequent use of site specific viability assessments. This is contrary to the aims and objectives of the 2021 Framework.</p> <p>The Plan in its current form is not sufficiently justified, and is not consistent with national policy. Subject to the inclusion of the suggested changes identified below, the Client's consider that the Plan is capable of being found sound.</p>	<p>To overcome the soundness matters 'the client' proposes the following changes:-</p> <ul style="list-style-type: none"> • Review the Policy requirements to ensure that the cumulative impact does not risk undermining the delivery of the Plan, due to their impact on site viability. • Amend the policy wording to reflect the role of economic viability. 	Yes	No
1102492	S44								<p>The proposed Local Plan seeks to establish a number of requirements such as carbon reduction (Policy S6), water efficiency (Policy S11). In some cases there is a potential duplication with existing or emerging requirements of building regulations. Where these are intended to go beyond the building requirements or require optional requirements to be met, it is essential that sufficient justification is provided for the introduction of localised standards. We would also note that there is the potential for some of these requirements to build in a need for technology which may soon become obsolete or are incorporated into other regulations (i.e Electric Vehicle Charging will be a requirement within Part S of the Building Regulations from June 2022).</p> <p>In all cases it is critical that the viability assessment thoroughly considers the cumulative impact of all the policy requirements. At regulation 18 stage the 'Whole Plan Viability' assessment indicated that achieving the policy requirements alongside strategic infrastructure requirements across the Plan area could prove challenging. The Council(s) should be mindful not to set policy requirements at a level that will risk undermining the Plan or necessitate the frequent use of site specific viability assessments, as this is contrary to the objectives of the 2021 Framework.</p> <p>It is noted that an Addendum Report [INF003] has been produced on behalf of the Council(s). This updated appraisals in the light of updated Build Costs, Residential Sales Values, and provided explanation of how policy S6 (Carbon Reduction) now Policy S7, was and is reflected within the whole plan viability assessments. It is noted that the policy requirement to meet or exceed the latest future homes standard, and use no fossil fuel energy on site, have been deleted from policy S7. Whilst the Addendum report indicates that typologies in Mid Value areas are assessed to have a surplus of</p>	Amend Policy S44 wording to reflect the role of economic viability.	Yes	No

								<p>between £10,000 to £16,000 per dwelling, depending on density and affordable housing provision 20%/25%. Based on the update report, the delivery of Policy S7 costed at £12,000 per dwelling will challenge the viability of developments in mid viability areas, when considered alongside CIL/S106 and biodiversity net gain, particularly against the backdrop of continuing rising costs including finance and build costs. The Client notes that 'Assessing Viability in Planning under the NPPF 2019 for England' March 2021, Guidance is clear that it should be straightforward to find the assumptions used in testing development typologies that when detailed applications come forward they can be easily compared (paragraph 3.7.6). Paragraph 3.7.7 indicates that the basis for sensitivity testing should be clearly set out.</p> <p>Associated with the above, Policy S44 relates to strategic infrastructure requirements and requires contributions towards the delivery of relevant infrastructure to meet the needs arising from the development. This policy should be amended to ensure that it makes appropriate reference to the role of economic viability.</p>			
1102512	S79				No		No	<p>The Client supports the allocation of Land adjacent to Davenscourt, Legsby Road, Market Rasen (Site Ref: WL/MARK/001). However the Client is concerned that the potential for the additional land, to the south of the identified site located within the existing field boundary's, has not been recognised. The representations at Regulation 18 stage highlighted the potential of this land to facilitate the provision of open space, and support the delivery additional benefits.</p> <p>The Client supports the allocation of WL/MARK/001 and its identification as a proposed housing site. The proposal is an appropriate site to provide for the housing needs for Market Rasen and the wider area in the short term. The allocation of the Site would confirm its potential to help continue the provision of a balanced supply of housing across the Plan area, within sustainable locations. As demonstrated within the attached Advocacy Report there are no constraints that would preclude the development of the Site, and the Site is capable of coming forward in the short term, supporting the delivery of a range and mix of housing, including affordable housing provision. There is a need for a robust housing trajectory across the Plan area including deliverable smaller allocations to balance the significant reliance on the sustainable urban extensions, which given their scale and complexity, will take time to come forward. Site WL/MARK/001 will therefore assist in housing delivery in the short term.</p> <p>The accompanying Advocacy Document highlights that the Site is in a prime location and is suitable for residential development. Development of the site would support the Plan's wider policy objective of developing sites within sustainable locations, whilst providing homes in a choice of locations, in order to meet needs and support delivery.</p> <p>The Advocacy Document and the subsequent section of these representations demonstrates that the Site as proposed is available, suitable and achievable and therefore deliverable in accordance with the 2021 Framework.</p> <p>The Client acknowledges the requirements set out within Policy S78 in relation to flood risk, footway and crossing enhancements, and the need to take account of the low voltage overhead cables. It is acknowledged that these requirements are all standard for residential development, which are capable of being addressed. In order to demonstrate that development on the site is achievable the Client has commissioned a range of technical evidence, including ecology, highways and access, floodrisk and drainage, and ground conditions. The technical evidence is summarised within the Advocacy Document. This concludes that there are no known constraints that would preclude the development of the Site and confirms that a</p>	<p>To overcome the soundness matters 'the client' proposes the following changes:-</p> <ul style="list-style-type: none"> • Maintain the proposed allocation WL/MARK/001. • Extend the allocation to the south, within the limits of the existing field boundary to support the delivery of open space, the achievement of biodiversity net gain, and support connectivity to the wider public right of way network. Revise and update the Sustainability Appraisal, with particular regard to 2.2, 4.4 and 13.1. 	Yes	No

								<p>suitable scheme can be delivered on Site.</p> <p>An Illustrative Masterplan has been prepared to demonstrate that a suitable scheme can be delivered within the boundary of the allocation within the context of the identified requirements and known constraints, refer to figure 1 below and the appended Advocacy. However, whilst the Client supports the allocation of the Site, and a suitable development can be achieved within the identified boundaries of the Site, the Client has previously made representations that identified that additional land is available to the south of the allocation, within the extent of the existing field boundary. The inclusion of this additional land within the allocation will support the provision of open space and provides the potential deliver significant benefits in terms of biodiversity net gain above and beyond the requirements set out within Policy S61. It will also support access to the wider PROW network to the south of the Site. The Client considers that the inclusion of the additional land will support the effective development of site, whilst delivering significant benefits. It is not proposed to deliver residential buildings on the additional land.</p> <p>The Client would welcome the opportunity for further engagement with the Council, in order to agree the scale of the allocation, and necessary amendments to the requirements, and the scope of any further assessments of the Site.</p> <p>The Client considers that the Sustainability Appraisal should be revised and updated, the assessment does not fully reflect the outcomes anticipated for the Site, having regard to the technical evidence. For example, the availability of the additional land to the south results in an allocation that will secure new open space provision and may have a significant positive effect. Consistent with STA001.1e this would result in a predicted performance of ++. Objective 4.1 relates to conserving and enhancing biodiversity, the Preliminary Ecological Appraisal indicates that the inclusion of the additional land will result in a net gain significantly above requirements. This should be reflecting within the assessment of the Sites performance against this objective. In relation to objective 13.1 the site is currently assessed (--), the SA criteria, within STA004.1e, indicates that this is the score ascribed to sites that are not within walking distance of public transport links. The Advocacy Report demonstrates that the site sits within reasonable walking distance of the Town Centre, bus stop, and railway station.</p> <p>In addition to the above, as highlighted earlier there is a significant reliance on the delivery of housing on eight sustainable urban extension sites, it is therefore important to ensure that there are sufficient deliverable sites that can come forward within the Plan area to support the delivery of the Plan in the short term. Furthermore, within Market Rasen, inclusive of the two Middle Rasen sites, a significant proportion of the supply is from sites that have been carried forward from the previous Plan, or benefit from planning permission. However, WL/MARK/002 is indicated with in EVR076-82 Appendix F to be constrained by compromised drainage, and does not record an updated position by the Site Promotors in response to regulation 18 consultation. EVR076 also highlights potential for contamination on the site which may impact upon deliverability, again there is no response recorded in EVR076 from the Site Promotors. Accordingly development of such sites may not come forward when anticipated (from 22/23 – HOU008). As demonstrated in the Advocacy Document the Site at WL/MAR/001 is capable of coming forward in the short term, and making significant contribution towards meeting the needs for housing within Market Rasen, as well as the wider needs of Central Lincolnshire.</p> <p>The Client supports the allocation of WL/MARK/001. However, the Client is concerned</p>			
--	--	--	--	--	--	--	--	--	--	--	--

								<p>that the benefits of including the additional land, as identified in the accompanying Advocacy Report, have not been recognised, and reflected within the supporting evidence, including the Sustainability Appraisal. Subject to the inclusion of the suggested changes identified below, the Client's consider that the Plan is capable of being found sound.</p> <p>The proposed housing allocation is available, suitable and achievable and therefore accords with the 2021 Framework. It is a deliverable site that is able to come forward for development in the short term.</p> <p>The Client has commissioned a range of technical evidence including highways and access, ecology, flood risk and drainage, and ground conditions. This is summarised within the accompanying Advocacy Document, appended to these representations. This demonstrates that there are no known constraints that would preclude the development of the Site, and that a suitable scheme can be delivered.</p>			
1102493	Evidence				No		No	<p>The proposed Local Plan seeks to establish a number of requirements such as carbon reduction (Policy S6), water efficiency (Policy S11). In some cases there is a potential duplication with existing or emerging requirements of building regulations. Where these are intended to go beyond the building requirements or require optional requirements to be met, it is essential that sufficient justification is provided for the introduction of localised standards. We would also note that there is the potential for some of these requirements to build in a need for technology which may soon become obsolete or are incorporated into other regulations (i.e Electric Vehicle Charging will be a requirement within Part S of the Building Regulations from June 2022). In all cases it is critical that the viability assessment thoroughly considers the cumulative impact of all the policy requirements. At regulation 18 stage the 'Whole Plan Viability' assessment indicated that achieving the policy requirements alongside strategic infrastructure requirements across the Plan area could prove challenging. The Council(s) should be mindful not to set policy requirements at a level that will risk undermining the Plan or necessitate the frequent use of site specific viability assessments, as this is contrary to the objectives of the 2021 Framework. It is noted that an Addendum Report [INF003] has been produced on behalf of the Council(s). This updated appraisals in the light of updated Build Costs, Residential Sales Values, and provided explanation of how policy S6 (Carbon Reduction) now Policy S7, was and is reflected within the whole plan viability assessments. It is noted that the policy requirement to meet or exceed the latest future homes standard, and use no fossil fuel energy on site, have been deleted from policy S7. Whilst the Addendum report indicates that typologies in Mid Value areas are assessed to have a surplus of between £10,000 to £16,000 per dwelling, depending on density and affordable housing provision 20%/25%. Based on the update report, the delivery of Policy S7 costed at £12,000 per dwelling will challenge the viability of developments in mid viability areas, when considered alongside CIL/S106 and biodiversity net gain, particularly against the backdrop of continuing rising costs including finance and build costs. The Client notes that 'Assessing Viability in Planning under the NPPF 2019 for England' March 2021, Guidance is clear that it should be straightforward to find the assumptions used in testing development typologies that when detailed applications come forward they can be easily compared (paragraph 3.7.6). Paragraph 3.7.7 indicates that the basis for sensitivity testing should be clearly set out. Associated with the above, Policy S44 relates to strategic infrastructure requirements and requires contributions towards the delivery of relevant infrastructure to meet the needs arising from the development. This policy should be amended to ensure that it makes appropriate reference to the role of economic viability.</p>	Review the policy requirements within the Plan to ensure that in combination they do not undermine the deliverability of the Plan.	Yes	No

Robert Nelstrop Farms Ltd & Robert F. Nelstrop

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103111	S76; Map	Yes	Yes	Yes	No	Yes	Yes	Yes	<p>The land that this Representation is subject to is the Land to the south of Heighington Road, Canwick. The site is part of the NK/CAN/003 allocation for the South East Quadrant SUE. Specifically, a 14-acre strip of land between the current NK/CAN/003 boundary and the Eastern Bypass.</p> <p>The landowner considers that the Local Plan is generally positively prepared, justified, effective, consistent with national policy and in compliance with the Duty to Co-Operate.</p> <p>However, the landowner wishes to raise a comment in regard to the 'justification' of Policy S76 (Residential Development on Sustainable Urban Extensions).</p> <p>Positively Prepared Paragraph 35 of the NPPF (2021) provides guidance on the 'soundness' of examining Local Plans. To be 'Positively Prepared', plans are sound if they provide a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.</p> <p>Policy S2 (Growth Levels and Distribution) outlines the housing requirements for Central Lincolnshire and the amount of dwellings to be delivered per year. The policy provides a distribution of dwellings across the Lincoln Strategy Area, Gainsborough, Sleaford and 'Elsewhere'. Within the Lincoln Strategy Area, the plan states that sustainable urban extensions to Lincoln, amongst others, will provide homes.</p> <p>Section 12 of the Proposed Submission Draft states that Sustainable Urban Extensions (SUEs) form an integral part of the local plan strategy, delivering more than half of the housing requirement in the plan period.</p> <p>Policy S69 concerns the Sustainable Urban Extensions around Lincoln and identifies The South East Quadrant SUE (SEQ) (land at Canwick</p>	<p>In light of the response to question 4, we consider changes are required to the allocation boundary of NK/CAN/003 and ultimately the size of the allocation of the SUE which is stated within Policies 69 and 76.</p> <p>The land identified as the 'gap' was under a 'Licence for Temporary Occupation' whilst LCC constructed the Eastern Bypass. The land was then returned to the landowner and there are no hedges or permanent features that separate the land from the rest of the bypass. It is considered that there is no reason for this land to be left out of the SUE area.</p> <p>The current Central Lincolnshire Local Plan 2017 allocates the 'gap' as a designated 'Approved route of the Bypass'. The designation, under Policy LP36 (Access and Movement within the Lincoln Area) is shown by the maroon-coloured allocation on the Policy Map (Figure 2).</p> <p>The policy states that 'In order to enable deliver of both the Lincoln Eastern Bypass and the Lincoln Southern Bypass, the two routes are identified on the Policies Map and safeguarded for such purposes. Any development proposal on or near either route, which would prejudice the efficient and effective delivery of either of the bypasses or their future dualling will be refused'.</p> <p>Since this policy was written and adopted, the Eastern Bypass has been completed and this section of the Bypass is already dualled on one side. As mentioned above, the land is no longer under the licence of LCC and has been returned back to the landowner. It is considered therefore, that this section of the current Policy LP36 is no longer relevant and is out-of-date in the context of this section of the bypass.</p> <p>With this in mind, it is understood why the boundary of the SUE was originally drawn here, given the safeguarding of the bypass. However, as the bypass no longer requires to be safeguarded as it is already delivered, the landowner considers no reason as to why the remaining land up to the bypass should not be included within the SUE now.</p> <p>Lincoln South East Quadrant Broad Concept Plan and Design Code Policy S69 which details the specific requirements of the SUE refers to the Broad Concept Plan and Design Code SPD (2020) which identifies in principle the disposition of land uses and infrastructure for the SUE. It is therefore</p>	No	Yes

									<p>Heath – NK/CAN/003) as an SUE within the Plan. The policy outlines the locally specific requirements for the SUE.</p> <p>The landowner considers that this process of identification and allocation of SUE to help deliver need is presents a positively prepared plan and policy.</p> <p>Justified Paragraph 35 of the NPPF (2021) provides guidance on the ‘soundness’ of examining Local Plans. To be ‘Justified’, plans are sound if they are an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.</p> <p>As referred to in the ‘Positively Prepared’ section above, the landowner considers that the strategy for identifying and allocating housing sites has been justified. However, the landowner wishes to make comment on the area of the SUE allocation, specifically the eastern boundary. It is noticed that there is a gap between the eastern boundary of the CLLP allocation and the eastern bypass, as shown in Figure 1 (below). This ‘gap’ is approximately 14 acres in area and is included within the Lincoln South East Quadrant Broad Concept Plan and Design Code SPD (2020) as within the masterplan of the SUE.</p> <p>There appears to be an inconsistency between the SUE SPD and the emerging policy. The current Local Plan includes this area as a ‘safeguarded area’ for the construction of the bypass. The construction of bypass has now been completed and the emerging policy map does not include the ‘safeguarded area’. The landowner is of the opinion that the SUE boundary should now be increased to abut the Bypass highway. The reasoning behind this is and change is outlined within Question 5.</p> <p>Effective Paragraph 35 of the NPPF (2021) provides guidance on the ‘soundness’ of examining Local Plans. To be ‘effective’, plans are sound if they are deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p>	<p>considered that the Concept Plan and Design Code is an important Supplementary Planning Document in direct connection with the Local Plan. So much so, that the North Kesteven website states:</p> <p>“All applications submitted following the adoption of the Broad Concept Plan and Design Codes are required to be supported by a report detailing how the proposals respond to, and are in accordance with the planning guidance. As such the document should be read as a whole”.</p> <p>Referring to the Broad Concept Plan and Design Code, the red line Context Plan and the concept plans within the document do not exclude any part of the land within the bypass and specifically doesn’t exclude the strip of land referred to in this representation.</p> <p>Whilst the Broad Concept Plan and Design Code (Figure 3) does not provide exact scaled locations of uses, it is clear that the section of land between the current boundary and the bypass is included within the Concept Plan area and omission of this is considered to be remiss of the Plan when it is clearly part of the SUE masterplan.</p> <p>Consistency The entirety of NK/CAN/003, besides this corner, is allocated up to and abutting either a highway, existing development or a landscape designation. The north-eastern corner is the only piece of omitted land that presents itself as a ‘gap’. It is considered that there is an inconsistency here with the allocation as a whole that this parcel of land is not included within the SUE.</p> <p>Analysis of the other SUE’s and allocations also shows that the allocation boundaries primarily are designated up to and abutting highways without gaps, especially in the case of allocations adjacent to the Bypass. Most notably, at Lincoln Roundabout the south, it is noted that the allocation area of NK/CAN/003 has replaced the previous ‘safeguarded area’ around the roundabout (Figure 4 & 5 below).</p> <p>The omission of the ‘gap’ of approximately 14 acres subject to this representation is considered to not be consistent with the allocations within the plan and the allocation itself.</p> <p>Omission of the land If this land is left outside of the SUE allocation what would be left is a strip of 14 acres of undesignated land between the Eastern Bypass and the SUE allocation. It is assumed following analysis of the Broad Concept Plan and Design Code that the perimeter of the SUE would be somewhat</p>		
--	--	--	--	--	--	--	--	--	---	---	--	--

									<p>The landowner considers that the Plan is effective as the Plan has identified and the Sustainable Urban Extension Topic Paper published in March 2022 as part of the Local Plan Consultation Library provides projected delivery of the SUE.</p> <p>Consistent with National Policy The NPPF promotes the delivery of a sufficient supply of homes to support the Government's objective of significantly boosting the supply of homes. To do this, the NPPF requires sufficient amount and variety of land can come forward where needed to meet the needs of groups with specific housing requirements. Section 5 of the NPPF outlines how policies within Development Plans can help provide deliver houses through strategic policy-making.</p> <p>Paragraph 23 of the NPPF (2021) supports the designations and allocations within Local Plans and Paragraph 28 of the NPPF (2021) states that non-strategic policies should be used by local planning authorities and communities to set out detailed policies for specific areas, neighbourhoods, or types of development, which can include allocating sites.</p> <p>The CLLP Proposed Submission Plan sets out within Policy S69 the allocation of the South Eastern Quadrant SUE with the locally specific delivery requirements.</p> <p>The landowner considers that the Local Plan is consistent with National Policy.</p> <p>In Compliance with the duty to Co-Operate It is considered that the Plan and The Central Lincolnshire Joint Strategic Planning Committee (CLJSPC) is in compliance with the duty to co-operate, however this representations focus regards the continued promotion of NK/CAN/003, rather than the detail of the duty to co-operate.</p>	<p>reminiscent of a defined edge to the allocation which will be appropriately considered by the Local Authority. The omission of this strip of land will leave an unallocated area of agricultural land which would be impractical to farm and would be at risk of becoming an unusable area of open land which would have no benefit to the landowner nor the wider community. It is stressed that this area should be included within the SUE to allow for the Plan, the Local Authority and the ultimate developer(s) the opportunity to utilise this land to its fullest capability. The landowner is not proposing the land to be used for any specific purpose but considers that it should be included within the SUE to prevent an undesirable and separate strip of land being located adjacent to the SUE. It is understood that this area was previously safeguarded, but it is considered that this is no longer needed as the construction of the bypass has concluded.</p> <p>Inclusion of the land is considered to be an overall positive to the SUE allocation and would adhere to the NPPF's guidance of 'making effective use of land'. As stated, omission of this area would not be an effective use of land.</p> <p>Proposed Change Therefore, the landowner is promoting the increase of area to the South East Quadrant SUE to include approx. 14 acres between the current allocation and the Eastern Bypass as highlighted on Figure 1. The landowner encourages the CLLP to amend this boundary and subsequently amend the plan areas within the Plan. The policy which the allocation boundary originated from is now out of date and the landowner stresses that the boundary should be revised to make effective use of the land available to the CLLP and Local Authority. The change would increase the size of the SUE to 469 hectares. The accompanying plan enclosed to this letter identifies the area of the landowner's land which we consider should be allocated.</p> <p>Overall Comments Considering the plan as a whole, the landowner has the following comments:-</p> <ul style="list-style-type: none"> • The Plan and South Eastern Quadrant SUE is broadly supported as a whole; • The landowner continues to support the South Eastern Quadrant SUE; • However, the landowner considers the 14 acres of land between the existing SUE boundary and the Eastern Bypass should also be included within the SUE allocated. As it stands, with the 14 acres being unallocated, there will be an impractical strip of undesignated land between the SUE and the bypass which is not considered to be of any benefit to the SUE or the landowner. 		
--	--	--	--	--	--	--	--	--	--	---	--	--

Ryland Residents Group

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103103	S80	No		No	No	No			As stated in our representations [attached] * we do not accept that the public consultation held in July/August 2021 was conducted in accordance with the spirit of the required process and therefore the outcome of that consultation is unsound. *Ryland Residents Group	Full and detailed consideration of public and community views on the proposed designation of site WL/WELT/008A for future housing development	Yes	Yes

Savills (UK) Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103694	S1	Yes	No	No	No	No	No	Don't know	Draft Policy S1 sets out the distribution of new housing within the emerging Local Plan with the overall objective of delivering sustainable growth across the district. 2.2. In general terms, we consider using an 8-tier system is positive as it enables all types of settlement to be attributed to a specific category, which makes the proposed settlement hierarchy more transparent. 2.3. The settlement hierarchy places Lincoln Urban Area top, followed by the Main Towns of Sleaford and Gainsborough. 2.4. We note that the strategy also recognises the importance of maintaining and enhancing the services and features of the rural area in order to sustain the vibrancy of rural settlements and the quality of life experienced by those living in such areas. 2.5. Growth in villages such as Leasingham and Ruskington will contribute to creating a strong, vibrant and healthy community, improving vitality and increased support for existing local facilities, services and businesses through increased footfall, developer contributions and visitor income. The ability to be able to truly enhance the vitality and viability of villages such as Leasingham and Ruskington should be considered when determining the future growth strategy. 2.6. In the context of the wider District, settlements such as Leasingham and Ruskington represent sustainable locations for growth. 2.7. Leasingham benefits from key facilities including a post office, convenience store and public house. The village also benefits from a bus service. Sleaford centre is also located approx. 2.5km with access to a wider range of shops and services, including a train station. 2.8. Ruskington benefits from a range of facilities including two primary schools, two convenience stores, a hairdresser, a garden centre and a vets. The village also benefits from a train station, running East Midlands service to a wider geographical area including Doncaster, Leicester and Peterborough. 2.9. Therefore, by distributing appropriate levels of well-designed housing development more broadly to appropriate locations of Villages such as Leasingham and Ruskington, it would provide the much needed growth and injection of life into the villages to help support and sustain their services and facilities. 2.10. We would therefore strongly recommend additional growth and housing allocations within both Leasingham and Ruskington. As such, we put forward our client's sites for consideration. We confirm the sites' deliverability and developability at Section 3 of this representation. 2.11. We also note that Tiers 4 to 6, those referred to as Large Villages to Small	2.13. Recommendation 1: Additional housing allocations should be directed towards sustainable villages such as Leasingham and Ruskington to help support and sustain much needed growth. To ensure consistency with the NPPF and in the interests of effective and positive plan making. 2.14. Recommendation 2: CLJPU should regularly review a settlement's position in the hierarchy in the interests of effective and positive plan making.	Yes	No

									<p>Villages, are defined in the context of the number of houses within the settlement. We strongly recommend that a settlement's position in the hierarchy is regularly reviewed, taking into account growth which is delivered throughout the plan period.</p> <p>2.12. It follows that, should the number of dwellings in a settlement define its place in the hierarchy, as the settlement grows, its place within the settlement hierarchy should change accordingly. This approach will encourage growth across the Settlement Hierarchy throughout the entirety of the plan period.</p>			
1103697	S2	Yes	No	No	No	No	No	Don't know	<p>Draft Policy S2 sets out the amount of housing to be developed over the Plan period. Whilst we understand the range CLJPU have expressed in terms of the Local Housing Need Figure (LHN) of 1,060 dpa up to 1,325 dpa to support the expected growth in jobs, we would draw the Council's attention to how this matter has been dealt with at the Doncaster Local Plan EiP in October 2020 where the Inspector rejected the notion of the range as it clouded the plan making process. By setting an upper limit for housing growth, the Council are also limiting the growth potential in the region. This should be seen in the context of the National Government's aim of delivering significant growth across the country and addressing the housing crisis. The national target is a delivery of 300,000 dwellings per year.</p> <p>The NPPF is clear that Local Planning Authorities are to be ambitious, but realistic, in their approach to growth and that the LHN figure should be seen as a minimum (paragraph 60). The Department for Levelling Up, Housing and Communities are explicit that if Councils want a more ambitious local plan for growth then they should incorporate positive growth and housing figures.</p> <p>We therefore support the aspirational target in the Plan of aiming for the higher end of the identified range i.e. 1,325 dwellings per year or 29,150 over the Plan period to 2040. We therefore consider the upper end of the range should be utilised as the minimum target.</p>	Recommendation 3: Ensure that a positive growth strategy is incorporated into the Plan. CLJPU should therefore adopt a minimum housing target utilising the upper limit of 1,325 dwellings per annum in the interests of positive plan making.	Yes	No
1103699	S4	Yes	No	No	No	No	No	Don't know	<p>The NPPF is unequivocal in its support for growth in rural areas and states that 'Planning policies should identify opportunities for villages to grow and thrive' (paragraph 77) and supports the wider growth aspirations of the Local Plan. Growth in villages will also ensure that an appropriate level of affordable housing can be delivered. High house prices in villages, driven by a lack of supply, often results in existing residents having to leave in order to secure more affordable homes elsewhere. The distribution of growth to these areas will contribute an appropriate mix and tenure of homes to meet the local housing needs.</p> <p>It is also important that the emerging Local Plan considers the market requirement in a post-covid world. The pandemic has resulted in a shift in working practices, with more people working from home and a reduction in commuting or travelling for work. In turn, there has been an increase in demand for homes in countryside or village locations. Savills research publication entitled UK Housing Market Update (June 2021) has demonstrated that the pandemic has resulted in a 'race for space' with a demand for homes in more rural locations. Whilst this needs to be balanced with existing housing needs, there is the opportunity through appropriate growth to provide a mix of homes to meet the varying needs and demand at a micro and macro scale.</p> <p>It is clear that there is a market for housing growth within villages, particularly those villages with key services as well as strong links into Gainsborough and other Main Towns such as Sleaford. Examples of such villages would be Leasingham and Ruskington.</p> <p>Our client therefore supports the view that growth should take place in the small,</p>	Recommendation 4: In order to promote growth in rural locations, the proposed percentages of growth for each settlement should be considered on a rolling basis, which is reset with the new plan period. To ensure consistency with the NPPF and in the interests of effective and positive plan making. Additional non-allocated growth should not be limited to sites of 5/10 dwellings in small-medium/large villages respectively.	Yes	No

									<p>medium and large villages to help enhance or maintain the vitality of rural communities. The approach of using a percentage growth level for villages is supported in principle. However, in order to promote growth in these rural locations, the proposed percentages should be considered on a rolling basis, which is reset with the new plan period.</p> <p>Paragraph 16(b) of the NPPF requires plan makers to 'plan positively, in a way that is aspirational but deliverable'. It is our view therefore that the Council should reset the percentages with this emerging Local Plan to ensure that local market conditions are taken into account and homes can be delivered in locations where they are most needed. This approach would also align with Paragraph 77 of the NPPF which requires planning policies and decisions to be responsive to local circumstance and developments which reflect local needs in rural locations.</p> <p>We recognise that growth in villages must be carefully managed to ensure that the setting and character of a village remains unharmed. We agree with a baseline 10% growth baseline for villages in principle albeit we would also support an increased threshold of 15% where appropriate, particularly if the sustainability of villages can be achieved, this also relates so village clusters. Again, we reiterate that this figure should be considered on a rolling basis to encourage sustainable growth.</p> <p>We support the continued recognition of Ruskington as a Large Village and Leasingham as a Medium Village. We note however, that the scale of development permitted outside of an allocation will typically be limited up to 10 dwellings in large and medium village, reducing to 5 dwellings in small villages. However, we would encourage the CLJPU to allow a level of flexibility within this policy to ensure that additional growth can take place subject to compliance with the usual development management considerations and other policy requirements. This is in line with the view that flexibility should be included in the overall housing numbers as the planned number of dwellings should only be a minimum.</p>			
1103701	S22	Yes	No	No	No	No	No	Don't know	<p>It is noted that an assessment of the Whole Plan Viability has been undertaken to support the revised level of affordable housing within the emerging Local Plan. Taking this forward, both Leasingham and Ruskington are regarded as a Value Zone B which results in a 20% contribution sought for affordable dwellings. This is in line with the current adopted Plan which seeks 20%.</p> <p>In respect of the tenure split of affordable housing we support the wording of the policy which states that “the exact tenure mix should be identified through discussions with the local authority and informed by the latest Government guidance and up-to date local Housing Need Assessment (HNA)”.</p> <p>We note the inclusion of the new requirement for First Homes, with the starting point based on the delivery of 25% which will be priced at least 30% below full market value.</p>	Encourage CLJPU to allow a level of flexibility within Policy S22 in respect of affordable housing percentages and specific tenure splits. In the interests of positive plan making.	Yes	No
1103703	S80	Yes	No	No	No	No	No	Don't know	<p>The following comments are based on the village of Ruskington.</p> <p>Draft Policy S80 lists three draft allocated sites within Ruskington. We note that one of the sites (ref: NK/RUSK/005a) is currently under construction and another site (ref: NK/RUSK/018) is an existing allocation which benefits from planning permission. The third site, ref: NK/RUSK/007, is an existing allocation within the currently adopted Central Lincolnshire Local Plan. As such, all three of the draft allocated sites within Ruskington are existing commitments to delivering homes within the village. In respect of new housing allocations within the emerging Local Plan, we are therefore disappointed to note that CLJPU have relied on existing sites rather than using the emerging Local Plan to facilitate new developments to help the vitality of Ruskington village up to 2040.</p> <p>In light of the above, we are of the opinion that additional new sites within Ruskington should be allocated to not only the meet local housing needs but also</p>	Encourage CLJPU to allocate additional new sites within Larger Villages, such as Ruskington, to not only the meet local housing needs but importantly to assist in sustaining the settlement’s vitality and support existing services moving forward. To ensure consistency with the NPPF and in the	Yes	Yes

									<p>importantly to assist in sustaining the settlements vitality and support existing services moving forward.</p> <p>As such, we put forward our client's sites for consideration. We confirm the sites' deliverability and developability at Section 3 of this representation</p> <p>We note that that only two of the site's our client has previously put forward are included within the Sustainability Appraisal (Document STA004f), in respect of land at Priory Road, Ruskington (ref: NK/RUSK/002) and land to the west of Lincoln Road, Ruskington (ref: NK/RUSK/015). We cannot find any reference to Land to the east of Sleaford Road, Ruskington and therefore one can only assume that this site has not been considered as an alternative site for residential development. CLJPU are therefore not in accordance with the requirements of the NPPF and a point of legal procedure, in ensuring all reasonable alternatives are assessed.</p>	<p>interests of effective and positive plan making.</p> <p>Encourage CLJPU to allocate Land to the West of Lincoln Road, Ruskington, and Land to the East of Sleaford Road, Ruskington, for residential development.</p>		
1103704	S81	Yes	No	No	No	No	No	Don't know	<p>The following comments are based on the village of Leasingham.</p> <p>Draft allocation ref: NK/LEAS/006, land to the north of Moor Lane, Leasingham is supported.</p> <p>As detailed within our previous representations, the site itself forms a natural extension to the settlement of Leasingham, allowing for a contribution to the critical mass of residents to help support and sustain the existing facilities and economy of the village of Leasingham. As noted, part of the site already benefits from outline planning consent for up to 9 residential dwellings (ref: 19/0136/OUT) with Reserved Matters now submitted (ref: 21/1908/RESM) which is currently under consideration.</p> <p>It is also worth referring to the most up to date growth levels within Medium and small villages (in line with current adopted policy LP4). We note that within the most recent LP4 Monitoring Report (dated 25th April 2022), based on the 15% growth level for Leasingham, there are still 69 units of remaining growth with a further 25 dwellings outstanding but with planning permission. This latest Report clearly demonstrates that insufficient new residential development has come to fruition in Leasingham, in the context of Policy LP4. It is also important to note that the remaining growth of 69 dwellings should not be seen as a ceiling to development and that new additional housing which reflects the village should be delivered within Leasingham to sustain the settlements vitality and support existing services.</p> <p>In light of our comments in respect of Draft Policy S1 (The Spatial Strategy and Settlement Hierarchy), Draft Policy S2 (Growth Levels and Distribution) and Draft Policy S4: Housing Development in or Adjacent to Villages, it is important to allocate additional sites within the village of Leasingham. This would not only meet local housing needs but importantly would assist in sustaining the settlement's vitality and support existing services moving forward.</p> <p>As such we put forward our client's site at Land South of Moor Lane, Leasingham, for consideration. We confirm the site is deliverable and developable at Section 3 of this representation. It must be noted that if the site to the North of Moor Lane, Leasingham is considered suitable for residential development (as per the draft allocation), the site located to the South of Moor Lane, Leasingham should also be considered suitable for residential development.</p>	<p>Encourage CLJPU to allocate additional new sites within medium villages such as Leasingham, to not only the meet local housing needs but importantly to assist in sustaining the settlement's vitality and support existing services moving forward. To ensure consistency with the NPPF and in the interests of effective and positive plan making. Encourage CLJPU to allocate Land to the South of Moor Lane, Leasingham for residential development.</p>	Yes	Yes
1103705	SA	Yes	No	No	No	No	No	Don't know	<p>There appear to be inconsistencies within the site selection methodology and process in respect of residential allocations. There are some sites which have not been draft allocated (NK/RUSK/015) which actually score better than some sites which have been draft allocated (NK/BRAN/007 or NK/RUSK/007 for example). This</p>	<p>Encourage CLJPU to review the Site Selection Methodology and approach to ensure the</p>	Yes	No

									<p>should be reviewed as a matter of urgency.</p> <p>There must also be a level of pragmatism applied to the site selection and review process. For example, where sites falls within a minerals safeguarded area, however there is no real prospect of the sites coming forward as a quarry or being worked for such minerals due to their proximity to nearby residential properties etc, they should not be marked down on this basis.</p>	scoring of sites within the Sustainability Appraisal Report is consistent and pragmatic.		
--	--	--	--	--	--	--	--	--	---	--	--	--

Scampton Heritage Group

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1088942	Vision; Objectives	Yes	Yes	Yes	Yes	Yes	Yes	Yes	While the overall document is very weel conceived and executed, I am disappointed that there is no reference to the 'Levelling-Up' agenda and the need to maximise revenue and capital receipts to the region at the expense of the Treasury or other sub-regions.		No	No

Scothern Parish Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100340	S81								<p>Scothern Parish Council would like to make the following comments in relation to the current consultation in respect of the Central Lincolnshire Local Plan.</p> <p>As has been advised in earlier responses, Scothern is a small village (although categorised as “medium” in the current local plan) with very few services - no shops, medical services, library hubs or regular bus service, etc. The lack of amenities in Scothern results in residents travelling by car to the nearby villages to access amenities; there are no bus services, footpaths or cycle paths available. Local education facilities are stretched and are “landlocked” preventing further expansion.</p> <p>The existing local plan identified growth of 10% over the plan period, however 78 properties have been erected giving a growth of ≥20%. Should both the large sites (41 and 53 properties) detailed in the Plan which is now under review be allowed to proceed the percentage increase would be 47% from the base of 365 properties published in the current Central Lincolnshire Local Plan.</p> <p>These two sites are outside of the built form of the village and expands into the open countryside which is against the existing Scothern Neighbourhood Development Plan (Policy S1) and the Review of the Plan which is now nearing consultation stage.</p> <p>The larger of the two sites has a single access road onto a road that carries in excess 2500 vehicles (including HGVs) in one day, this figure has been obtained from a recently installed speed indicator device.</p>			No
1103062	S81								<p>Scothern Parish Council would like to make the following comments in relation to the current consultation in respect of the Central Lincolnshire Local Plan.</p> <p>As has been advised in earlier responses, Scothern is a small village (although categorised as “medium” in the current local plan) with very few services - no shops, medical services, library hubs or regular bus service, etc. The lack of amenities in Scothern results in residents travelling by car to the nearby villages to access amenities; there are no bus services, footpaths or cycle paths available. Local education facilities are stretched and are “landlocked” preventing further expansion.</p> <p>The existing local plan identified growth of 10% over the plan period, however 78 properties</p>			No

									<p>have been erected giving a growth of ≥20%. Should both the large sites (41 and 53 properties) detailed in the Plan which is now under review be allowed to proceed the percentage increase would be 47% from the base of 365 properties published in the current Central Lincolnshire Local Plan.</p> <p>These two sites are outside of the built form of the village and expands into the open countryside which is against the existing Scothern Neighbourhood Development Plan (Policy S1) and the Review of the Plan which is now nearing consultation stage.</p> <p>The larger of the two sites has a single access road onto a road that carries in excess 2500 vehicles (including HGVs) in one day, this figure has been obtained from a recently installed speed indicator device.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

Severn Trent Water Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103663	S12								Severn Trent are supportive of the approach to required development to meet the tighter optional water efficiency target, and the need for external hard surfacing to be made permeable, and for rainwater harvesting to be incorporated into developments, whilst North Lincolnshire is outside of our area of water provision, but there are benefits to the sewerage system through the reduction of water usage within both residential and non-residential properties.		No	No
1103664	S21	No	Don't know	Yes	Yes	Yes	No	Yes	<p>As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments on the impacts of future developments and to provide advice regarding policy wording on other relevant areas such as water efficiency, Sustainable Drainage Systems (SuDS), biodiversity, and blue green infrastructure. Where more detail is provided on site allocations, we will provide specific comments on the suitability of the site with respect to the water and sewerage network. In the instances where there may be a concern over the capacity of the network, we may look to undertake modelling to better understand the potential risk. For most developments there is unlikely to be an issue connecting. However, where an issue is identified, we will look to discuss in further detail with the Local Planning Authority. Where there is sufficient confidence that a development will go ahead, we will look to complete any necessary improvements to provide additional capacity.</p> <p>Severn Trent cannot support elements of Policy S21 in its current form.</p> <p>Policy S21 places the onus on developers to ensure additional flows from their development do not impact on performance of the existing public sewer network. Whilst developers have responsibilities to ensure surface water in managed sustainably, where they need to exercise their right to connect to the public sewerage system the responsibility for ensuring sewer capacity rests with the sewerage company. Therefore setting out a policy which requires a developer to</p>		No	Yes

									<p>demonstrate that another organisation is must do certain activities is not appropriate.</p> <p>Policy 21 correctly sets out the drainage hierarchy, with connection to a public sewer being less desirable and connection to a combined sewer being a last resort. We are fully supportive of ensuring surface water on new development is sustainable but as acknowledged in the Policy there are likely to be instances where surface water connections to the combined or surface water system are necessary where it can be demonstrated that there are no feasible alternatives. This contradicts with another bullet point in the Policy which states that no surface water connections are made to the foul system. In such cases where a connect to a public sewer is needed, should capacity upgrades be required then the responsibility to accommodate such flows rests with the sewerage company, not the developer.</p> <p>Under Section 94 of the Water Industry Act 1991, this clearly sets out that the sewerage company's responsibility to maintain 'effectual drainage' and to provide capacity for new development to maintain 'effectual drainage'. Hence a planning policy that requires a developer to demonstrate that a water company will fulfil this duty is not appropriate as the duty to provide 'effectual drainage' within the public sewerage network rests with the sewerage company.</p> <p>We would however encourage developers to contact Severn Trent early in the design and planning process to enable the impacts of development to be assessed any required upgrades to be considered, designed and planned for, to enable Severn Trent to meet its S94 duties.</p> <p>In its current wording, the policy requires the developer to demonstrate that a water company is going to fulfil its duty to maintain 'effectual drainage' and whilst elements of the Policy are welcomed to ensure surface water is managed sustainably, we do not feel it is appropriate to place a duty on a developer for something which is another organisations responsibility.</p>			
1103665	S37								Severn Trent would highlight that this policy represents a great opportunity to promote the principles of Retro-fitting SuDS, and surface water separation.		No	No
1103666	S51								Severn Trent understand the need for new open spaces and Sports and Leisure facilities, be we would highlight that these locations could be suitable for the incorporation of Multifunctional use such as SuDS. It is important that multifunctional benefits such as SuDS and biodiversity are considered within the design of these new areas.		No	No
1103667	S53								Whilst it is covered in other polices, we feel that SuDS, Drainage Hierarchy and water efficiency are key design considerations that it is also worth detailing them within this policy is likely to help ensure that developers pick this up within the early design process.		No	No
1103668	S59								Severn Trent are supportive of the principles outlined within Policy S59, particularly the incorporation of blue infrastructure through green corridors making space for water and enhancing biodiversity and amenity.		No	No

1103669	S63								Severn Trent are supportive of the approach to consider multifunctional spaces within green wedges such that SuDS can be incorporated where possible or other multifunctional benefits.		No	No
1103671	S65								Severn Trent understand the need for Local Green Space and the need for it to be protected, however local green spaces can provide suitable locations for schemes such as flood alleviation to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space in the form of biodiversity or amenity improvements.	<p>We would therefore recommend that the following point is added to Policy S65 to support the delivery of flood alleviation projects where required within green spaces.</p> <p>Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.</p>	No	No
1103672	S66								Severn Trent are supportive of the need to protect Trees, Woodland and Hedgerows, however we would also recommend that watercourses are protected, to ensure that the natural drainage processes can be maintained and prevent the increase of flood risk. Watercourses also provide access to water for wildlife and habitats. Some example wording is provided below to assist with implementation of the recommendation.	<p>No development shall prevent the continuation of existing natural or manmade drainage features, where watercourses or dry ditches are present within a development site, these should be retained and where possible enhanced.</p> <p>Access to drainage features for maintenance should be retained and ownership of land clearly defined as part of the overall site maintenance plan.</p> <p>Prior to the alteration of any alignment an assessment will be required to ensure that all connections into the watercourse are retained and that exceedance flows are not then directed away from the watercourse channel towards properties.</p> <p>The removal of watercourses and ditches from development sites, presents a risk for future growth and development in such that links to the natural water cycle can be removed resulting in a potential increase of on site and off site flood risk. The removal of these features would result in an increased need to connect surface water to the sewerage network, as identified above this is against the drainage hierarchy outline in the Planning Practice Guidance</p>	No	No
1103673	S70								It is vital with large strategic developments that they incorporate SUDS, and discharge surface water to the most sustainable outfall, to ensure that the sewerage system is not overwhelmed by the addition of surface water flows.		No	No

1103674	NS73								As a regeneration, there are a number of buildings with combined sewers, it is important that where possible surface water is separated and managed through SuDS, before being discharged to a sustainable outfall.		No	No
---------	------	--	--	--	--	--	--	--	---	--	----	----

South Hykeham Parish Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103397	S2	Yes	Don't know	Yes	Yes	Yes	Yes	Don't know	<p>Council welcomes the proposed reduction in the number of new dwellings specified but has concerns that the ambition to achieve these levels overlooks the importance of the necessary infrastructure to support new development and feels that greater emphasis needs to be made in ensuring that the necessary environmental, economic and social infrastructure is in place. Council would like to be assured that affordable housing should be of affordable price but not reduced quality or location and should be kept affordable on re-sale.</p> <p>Council feels that too much emphasis is being placed on increased levels in the number of dwellings but with woefully inadequate services, facilities and infrastructure to support this expansion in housing levels.</p> <p>There needs to be a much slower rate of development in order to ensure that the support infrastructure is in place before the properties are built.</p> <p>An example of the challenges faced by my Council under the lost of Proposed new allocations - sites with planning permission NK/AUB/001A Land south of Thorpe Lane, South Hykeham 5.20 144.</p> <p>The aforementioned site of 144 dwellings is on a site which does not have the infrastructure, services or facilities to cope with such an increase in the number of properties, residents and traffic that such a development would bring onto a very busy road with no crossing point for pedestrians or safe access or egress for vehicles. There is no local GP surgery and the local primary school is already oversubscribed. Whilst Council recognises that there is some expansion required to accommodate a growing population there has to be proper regulation and a will to ensure the necessary infrastructure is there to support this development.</p>		No	No
1103401	S14	Yes	Don't know	Yes	Yes	Yes	Yes	Don't know	<p>Council acknowledges the need to achieve net carbon zero targets and to that end recognizes that there has to be increased focus in the will to address environmental concerns and to place more emphasis on green energy.</p> <p>The idea that the installation of wind turbines having been changed to general presumption in favour rather than against is unacceptable. The proposal for the large scale developments of larger wind turbines will have a detrimental impact upon the open countryside and the visual and sensory impact upon a much wider area the residents of which would not necessarily have any say on something that would have such far reaching impact upon many more than those in the immediate vicinity.</p> <p>Green energy whilst supported as the need for an increase in renewable energy is essential but commercial scale wind turbine farms are not the complete answer. More emphasis needs to be put on alternative solutions such as solar and anaerobic digestion solutions to energy production.</p>		No	No

Sport England

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102212	S50								The Central Lincolnshire Policy S50 Community Facilities Evidence Report (March 2022) makes reference to the concerns already raised by Sport England at the Regulation 18 Consultation			No

								<p>Stage and summarises them as: “The evidence behind the policy is lacking/weak, particularly in relation to leisure facilities.”</p> <p>Sport England is generally supportive of the wording of Policy S50, however, continue to reiterate that whilst we have provided comments on the Facilities Planning Model (FPM) reports produced for the three authorities, modelling has not been undertaken to understand the impact of growth on these facilities as required by Paragraph 98 in the NPPF.</p>			
1102215	S51							<p>The Central Lincolnshire Policy S51 Evidence Report (March 2022) includes reference (at paragraph 2.9) to Sport England’s strategy “Towards an Active Nation 2016-2021”. This strategy has now been replaced with Sport England’s strategy “Uniting the Movement: A 10-Year Vision to Transform Lives and Communities through Sport and Physical Activity.”</p> <p>At paragraph 3.13 of the Evidence Report it is recognised that the evidence documents produced to inform Policy S51 provide an audit of the current facilities and do not provide a full assessment of the needs for sports facilities that follows a robust methodology to identify specific needs and quantitative or qualitative deficits or surpluses of sports and recreational facilities and opportunities for new provision which NPPF paragraph 98 requires. They do not include qualitative surveys and so are not a replacement for a detailed Playing Pitch Strategy.</p> <p>As stated in paragraph 3.13, Sport England has agreed for a full Playing Pitch Strategy to be progressed by each Council, working alongside Sport England, in advance of the next review of this Local Plan in order that its findings can fully inform the next plan. Therefore, Sport England has no objections to the proposed wording of Policy S51.</p>			No
1102219	S51							<p>Evidence Base</p> <p>There is a need for all of the appendix items for the Sports Facility Assessments, which includes the Master Lists, to be publicly shared and form part of the published evidence base for the Central Lincolnshire Local Plan (currently they do not appear in the Central Lincolnshire Local Plan Consultation Library published on the web-site).</p>			No
1102217	S65							<p>Whilst Sport England generally supports this Policy, along with Policy S64, all of the sites included in the master lists for Lincoln City, WLDC and NKDC should be included and protected under Policy S65. The wording of the Policy should not just be restricted to protecting school playing fields in use. Policy S65 should protect all playing fields in accordance with the wording in the NPPF at paragraph 99 whereby:</p> <p>“existing open space, sports and recreational buildings and land, including playing fields, should not be built on.”</p> <p>It should be noted that the definition of a playing field in the 2015 Order and the glossary to the NPPF does not differentiate between different types of ownership, e.g. public, private or educational ownership and so all playing fields have this same level of protection.</p> <p>The exception criteria in paragraph 99 to the presumption against building on existing open space, sports and recreational buildings and land should be included in Policy S65 being:</p> <p>a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or,</p> <p>b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</p> <p>c) The development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.</p>			No

St Modwen Developments

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103635	S31								<p>This representation is submitted in relation to two sites which St. Modwen Development Ltd have ownership of, that are allocated within the local plan as an 'Important Established Employment Area' under Policy S31; Great Northern Terrace (ref. E9) and Waterside South (ref. E14). The sites are currently occupied by various businesses which are recognised as providing important, highly technical industrial employment in the City of Lincoln, such as Siemens.</p> <p>As the landowner, St. Modwen Development Ltd (SMD Ltd) are committed to seeking to maintain the presence of these businesses on the sites. While SMD Ltd are hopeful to agree the on-going presence of the current occupiers, it is however possible for current occupiers to decide to relocate when their lease agreements with SMD Ltd conclude in the coming years. Alternatively, further occupancy at the site may only be agreed for a period which does not align with the full Plan period to 2040.</p> <p>Should current occupiers of the site relocate once leases conclude, the use of the sites is limited to employment generating uses within B2, B8 and E(g) Use Classes. Other E Class uses would be acceptable, subject to passing the sequential test prescribed by Policy S35, and employment generating uses outside of these use classes would also be acceptable where the use is ancillary to the existing uses on site.</p> <p>Should Siemens, for example, vacate the site upon the end of their lease, this leaves a significant amount of vacant industrial floorspace, waiting for a suitable occupier within the limited prescribed uses. Until that occupier is fulfilled, there would be a large vacant site located less than 100 metres from the city centre. As such, in its current form, Policy S31 is unreasonably restrictive and fails to account for the substantial sustainability credentials of the sites; Great Northern Terrace (ref. E9) and Waterside South (ref. E14). Accounting for the sustainability of the sites, it is considered that if the sites were to be vacated, they should be immediately available for a wide range of uses including residential and main town centre uses.</p> <p>While there are a range of uses prescribed under Class E which does offer the site a degree of flexibility, the Local Plan does not define 'employment generating uses', therefore it is unclear what level of employment is required to be generated to enable other E Class uses and ancillary uses outside of B2, B8 and E Classes to be supported. For example, would a small retail store (Class E(a)) be accepted subject to passing the sequential test if it generates at least an employee – this is unclear within the Local Plan.</p> <p>The sites are highly sustainable; comprising previously developed land positioned on the edge of the city centre boundary, served by a range of public transport options including Lincoln Railway Station located less than 0.5 miles away, and the significant number of services, facilities and amenities which Lincoln City Centre has to offer. It is considered the sites would be suitable for a wider range of uses than those prescribed by Policy S31, including residential, and main town centre uses defined by the Framework as:</p>	<p>On the basis that Policy S31 unreasonably restricts development at the sites notwithstanding their sustainability credentials which should allow them to be suitable for a wide range of uses, it does not enable the delivery of sustainable development in accordance with the NPPF or reflect its presumption in favour of sustainable development. As such, Policy S31 is not consistent with national policy and is not sound.</p> <p>We consider that it is more appropriate the sites are allocated as 'Lincoln Regeneration and Opportunity Areas' under Policy NS72; defined as locations near to Lincoln City Centre which contribute significantly to the overall offer of the city or where there are substantial opportunities for regeneration. This allocation would, in the event the sites become available for development within the Plan period, ensure the redevelopment and regeneration of the sites which are suitable for a range of mixed uses including residential, business, leisure and retail, providing greater flexibility than the limited uses permitted by Policy S31.</p> <p>Alternatively, we consider it appropriate for the Council to consider a site-specific policy and allocation, alongside a supplementary</p>		No

									<p>“Main town centre uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)”.</p> <p>We consider that despite the substantial sustainability credentials of the sites, Policy S31 restricts development of the site to B2, B8 and E(g) uses primarily, and limits other uses where certain criteria is met. Policy S31 needs to provide greater flexibility for the sites in the event current occupiers relocate from the sites during the Plan period to ensure the future use of the site, including redevelopment, is sustainable and consistent with the presumption in favour of sustainable development as contained with the Framework, NPPF. In its current form, we object to Policy S31 on this basis.</p> <p>At paragraph 35, the Framework confirms Plans are ‘sound’ if they are:</p> <p>a) “Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;</p> <p>b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;</p> <p>c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and</p> <p>d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant”.</p>	planning document which seeks to guide redevelopment of the site, in the interests of promoting sustainable development in the event current site occupiers relocate during the Plan period.		
--	--	--	--	--	--	--	--	--	--	--	--	--

Stirlin Developments Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103609	S1	Yes		Yes					<p>1. These representations are prepared by Globe Consultants Limited on behalf of Stirlin Developments Limited. These representations have been prepared to support the general narrative of emerging Policy S1: The Spatial Strategy and Settlement Hierarchy and Policy S80: Housing Sites in Large Villages) of the Central Lincolnshire Local Plan Proposed Submission Draft (March 2022) ‘Proposed Submission Draft CLLP’ (Regulation 19 Consultation) with specific regard to the settlement of Branston.</p> <p>2. There is support for the recognition that Branston, as a defined Large Village offering a range of local services and facilities and also enjoying close proximity to the City of Lincoln with good transport connections, is a sensible location to receive additional housing growth.</p> <p>3. As a large settlement close to the City of Lincoln and the Lincoln Urban Area, now benefitting from much improved connection via the recently opened Lincoln Eastern Bypass, Branston will continue to play an important role in delivering additional managed growth within the allocations shown and, through future calls for sites, additional sensible development in further revisions to the Local Plan.</p> <p>4. These will need to be considered at the appropriate time and stage to make sure that growth can be accommodated in a manner that is proportionate to the ability of the settlement to accommodate the additional population. It must also be accommodated in a manner that</p>	Not applicable in this instance.	Yes	No

									safeguards and enhances the character and appearance of the village within its rural setting. Acknowledging the hub of the village along High Street, the sensitive built and landscape environment at Branston Hall, future opportunities would be most easily and beneficially delivered south of the village east of Mere Road where growth has already been encouraged.			
1103611	S1	Yes		Yes					<p>1. These representations are prepared by Globe Consultants Limited on behalf of Stirlin Developments Limited. These representations have been prepared to support the general narrative of emerging Policy S1: The Spatial Strategy and Settlement Hierarchy and Policy S80: Housing Sites in Large Villages) of the Central Lincolnshire Local Plan Proposed Submission Draft (March 2022) 'Proposed Submission Draft CLLP' (Regulation 19 Consultation) with specific regard to the settlement of Nettleham.</p> <p>2. There is support for the recognition that Nettleham, as a defined Large Village offering a range of local services and facilities and also enjoying close proximity to the City of Lincoln with good transport connections, is a sensible location to receive additional housing growth.</p> <p>3. As a large settlement close to the City of Lincoln and the Lincoln Urban Area, Nettleham will continue to play an important role in delivering additional managed growth within the allocations shown and, through future calls for sites, additional sensible development in further revisions to the Local Plan.</p> <p>4. These will need to be considered at the appropriate time and stage to make sure that growth can be accommodated in a manner that is proportionate to the ability of the settlement to accommodate the additional population. It must also be accommodated in a manner that safeguards and enhances the character and appearance of the village within its rural setting.</p> <p>5. Careful planning will offer significant opportunities for landscape and ecological benefits delivering significant biodiversity net gain.</p>	Not applicable in this instance.	Yes	No
1103615	S1	Yes		Yes					<p>1. These representations are prepared by Globe Consultants Limited on behalf of Stirlin Developments Limited. These representations have been prepared to support the general narrative of emerging Policy S1: The Spatial Strategy and Settlement Hierarchy and Policy S80: Housing Sites in Large Villages) of the Central Lincolnshire Local Plan Proposed Submission Draft (March 2022) 'Proposed Submission Draft CLLP' (Regulation 19 Consultation) with specific regard to the settlement of of Saxilby.</p> <p>2. There is support for the recognition that Saxilby, as a defined Large Village offering a range of local services and facilities and also enjoying close proximity to the City of Lincoln with good transport connections, is a sensible location to receive additional housing growth.</p> <p>3. As a large settlement close to the City of Lincoln and the Lincoln Urban Area, which benefits from easy access along the A57 directly into the City and, via A46 Lincoln Bypass, to many of the City's major employment sites, Saxilby provides a convenient location for further housing growth. As Saxilby is one of the few settlements close to the City with a train station providing direct and quick train transport into the heart of Lincoln it offers many advantages over other locations and will continue to play an important role in delivering additional managed growth. Such growth is occurring within the allocations shown north of the village but, through future calls for sites, additional sensible development in further revisions to the Local Plan should focus on opportunities closer to the Station and avoid further expansion into the countryside northwards. Opportunity does exist eastwards with sensibly scaled landholdings which sit within Flood Zone 1.</p> <p>4. Such opportunities will need to be considered at the appropriate time and stage to make sure that growth can be accommodated in a manner that is proportionate to the ability of the settlement to accommodate the additional population. It must also be accommodated in a manner that safeguards and enhances the character and appearance of the village within its rural setting. The proximity of the village to the Fosdyke Navigation means that parts of the village are in areas of high flood risk but, through careful site selection, there is scope to identify development land which is not constrained by flood risk but is well located close to the village centre and transport connections.</p> <p>5. Careful planning will offer significant opportunities for landscape and ecological benefits delivering significant biodiversity net gain.</p>	Not applicable in this instance.	Yes	No

1103610	S80	Yes		Yes					<p>1. These representations are prepared by Globe Consultants Limited on behalf of Stirlin Developments Limited. These representations have been prepared to support the general narrative of emerging Policy S1: The Spatial Strategy and Settlement Hierarchy and Policy S80: Housing Sites in Large Villages) of the Central Lincolnshire Local Plan Proposed Submission Draft (March 2022) 'Proposed Submission Draft CLLP' (Regulation 19 Consultation) with specific regard to the settlement of Branston.</p> <p>2. There is support for the recognition that Branston, as a defined Large Village offering a range of local services and facilities and also enjoying close proximity to the City of Lincoln with good transport connections, is a sensible location to receive additional housing growth.</p> <p>3. As a large settlement close to the City of Lincoln and the Lincoln Urban Area, now benefitting from much improved connection via the recently opened Lincoln Eastern Bypass, Branston will continue to play an important role in delivering additional managed growth within the allocations shown and, through future calls for sites, additional sensible development in further revisions to the Local Plan.</p> <p>4. These will need to be considered at the appropriate time and stage to make sure that growth can be accommodated in a manner that is proportionate to the ability of the settlement to accommodate the additional population. It must also be accommodated in a manner that safeguards and enhances the character and appearance of the village within its rural setting. Acknowledging the hub of the village along High Street, the sensitive built and landscape environment at Branston Hall, future opportunities would be most easily and beneficially delivered south of the village east of Mere Road where growth has already been encouraged.</p>	Not applicable in this instance.	Yes	No
1103612	S80	Yes		Yes					<p>1. These representations are prepared by Globe Consultants Limited on behalf of Stirlin Developments Limited. These representations have been prepared to support the general narrative of emerging Policy S1: The Spatial Strategy and Settlement Hierarchy and Policy S80: Housing Sites in Large Villages) of the Central Lincolnshire Local Plan Proposed Submission Draft (March 2022) 'Proposed Submission Draft CLLP' (Regulation 19 Consultation) with specific regard to the settlement of Nettleham. 2. There is support for the recognition that Nettleham, as a defined Large Village offering a range of local services and facilities and also enjoying close proximity to the City of Lincoln with good transport connections, is a sensible location to receive additional housing growth. 3. As a large settlement close to the City of Lincoln and the Lincoln Urban Area, Nettleham will continue to play an important role in delivering additional managed growth within the allocations shown and, through future calls for sites, additional sensible development in further revisions to the Local Plan. 4. These will need to be considered at the appropriate time and stage to make sure that growth can be accommodated in a manner that is proportionate to the ability of the settlement to accommodate the additional population. It must also be accommodated in a manner that safeguards and enhances the character and appearance of the village within its rural setting. 5. Careful planning will offer significant opportunities for landscape and ecological benefits delivering significant biodiversity net gain.</p>	Not applicable in this instance.	Yes	No
1103616	S80	Yes		Yes					<p>1. These representations are prepared by Globe Consultants Limited on behalf of Stirlin Developments Limited. These representations have been prepared to support the general narrative of emerging Policy S1: The Spatial Strategy and Settlement Hierarchy and Policy S80: Housing Sites in Large Villages) of the Central Lincolnshire Local Plan Proposed Submission Draft (March 2022) 'Proposed Submission Draft CLLP' (Regulation 19 Consultation) with specific regard to the settlement of of Saxilby. 2. There is support for the recognition that Saxilby, as a defined Large Village offering a range of local services and facilities and also enjoying close proximity to the City of Lincoln with good transport connections, is a sensible location to receive additional housing growth. 3. As a large settlement close to the City of Lincoln and the Lincoln Urban Area, which benefits from easy access along the A57 directly into the City and, via A46 Lincoln Bypass, to many of the City's major employment sites, Saxilby provides a convenient location for further housing growth. As Saxilby is one of the few settlements close to the City with a train station providing direct and quick train transport into the heart of Lincoln it offers many advantages over other locations and will continue to play an important</p>	Not applicable in this instance.	Yes	No

									<p>role in delivering additional managed growth. Such growth is occurring within the allocations shown north of the village but, through future calls for sites, additional sensible development in further revisions to the Local Plan should focus on opportunities closer to the Station and avoid further expansion into the countryside northwards. Opportunity does exist eastwards with sensibly scaled landholdings which sit within Flood Zone 1. 4. Such opportunities will need to be considered at the appropriate time and stage to make sure that growth can be accommodated in a manner that is proportionate to the ability of the settlement to accommodate the additional population. It must also be accommodated in a manner that safeguards and enhances the character and appearance of the village within its rural setting. The proximity of the village to the Fosdyke Navigation means that parts of the village are in areas of high flood risk but, through careful site selection, there is scope to identify development land which is not constrained by flood risk but is well located close to the village centre and transport connections. 5. Careful planning will offer significant opportunities for landscape and ecological benefits delivering significant biodiversity net gain.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

Strawson Holdings Limited

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
11935221	S1	Y							<p>Please see attached a PDF copy of representations prepared by Boyer on behalf of Strawson Holdings Ltd.</p> <p>Policy S1 seeks to concentrate growth in the main urban areas of Lincoln, Gainsborough and Sleaford, with a significant and proportionate growth in the market towns of Caistor and Market Rasen. This is where the remaining growth will be delivered to support the function of other sustainable settlements, particularly where these are well connected by public transport and where the main centres can be accessed by active travel means.</p> <p>The spatial strategy also sets out a settlement hierarchy which includes large, medium and small villages, hamlets and the countryside. Limited growth in these settlements is supported through allocations in the emerging plan.</p> <p>The principle of Policy S1 is generally supported as it provides certainty and a sustainable approach to focusing growth in the main urban and market areas as the most accessible and sustainable areas for housing. The policy also supports a proportionate amount of growth in the rural areas to help address housing needs, however these would be limited and delivered to a small number of allocated sites with a large provision of windfall. This approach presents a risk that could potentially restrict the growth of settlements outside of the main urban areas and market towns as there are suitable and sustainable sites in settlements specifically large and medium villages that have not been allocated. As such additional allocations should be considered beyond those currently proposed to address current and future housing needs in the rural areas.</p> <p>The proposed settlement hierarchy set out in Policy S1 is a continuation of the adopted hierarchy set out in Policy LP2. The Settlement Hierarchy Methodology Report (2020) notes this Tier hierarchy reflects a range of settlements across Central Lincolnshire based on their existing number of dwellings. Whilst this approach was considered sound through examination of the Adopted Local Plan, it is important to note that this approach soon becomes out of date as some settlements will deliver housing development much faster than others particularly those that are more accessible and commercially desirable.</p> <p>As stated in previous representations, it is important the emerging plan does not solely rely on the existing number of dwellings to determine the Tier of settlement. Fundamentally, this should be determined by attributes such as proximity to local services and facilities and</p>		Yes	Yes

									towns to ensure it meets the current and future needs of local people in a sustainable manner.			
1103780	S2								<p>Proposed Policy S2 sets out the annual housing requirement for Central Lincolnshire that is required over the plan period 2018 -2040. The annual requirement falls in a range of 1060-1325 dwellings. 23,230 new dwellings are the proposed baseline requirement, which is also used in the 5YHLS, however the emerging plan aims to facilitate the top end of the range totalling to 29,150 dwellings through allocated sites.</p> <p>The lower end of the annual requirement presents the minimum requirement prescribed by the Government’s standard methodology with the higher end of the range representing the figure needed to support the expected growth in jobs. The higher end of the requirement represents the most updated Housing Needs Assessment (2020) and therefore should be adopted as the only requirement for the emerging plan and 5 YHLS.</p> <p>Policy S2 sets out the quantum and distribution of residential development for Central Lincolnshire, with 64% of the total housing requirement to be provided from the Lincoln Strategy Area, 12% from Gainsborough, 12% from Sleaford and 12% from ‘Elsewhere’. This approach is generally supported as it provides certainty to where and how much growth is expected across Central Lincolnshire over the plan period. Whilst a proportionate amount of growth is expected within ‘Elsewhere’ and the market towns, a significant proportion of growth is expected to come forward from the Lincoln Strategy Area. As set out below:</p> <p>Lincoln Strategy Area 64% (18.656 dwellings) of the total housing requirement is expected to come forward over the plan period from the following strategy, which includes in a descending order of priority:</p> <ul style="list-style-type: none"> i. urban regeneration ii. sustainable extensions to Lincoln; and iii. growth at settlements which serve, and are serviced by, Lincoln. <p>The emerging Local Plan’s Housing Trajectory forecasts that the required proportion of housing provision will be achieved where more than 64% will be provided and a total of 21,113 homes will be delivered by 2040. This proportion is informed by the following reported completions and commitments as at 31st March 2021, which indicates a large proportion of housing is completed and committed already.</p> <p>Completions from 2018 - 2021 - 2,850 dwellings Small sites with permission - 634 Allocations and other large sites with permission - 7,357 Allocations without permission - 9,331 Growth assumptions from windfall sites - 931</p> <p>Total number of dwellings expected 2018-2040 21,113</p> <p>It is important to note, Witham St Hughs although a Large Village is identified in the Lincoln Strategy Area as such in policy terms this is significantly more sustainable and a much larger contributor to the Council’s housing supply than other large villages outside of the Lincoln Strategy Area.</p> <p>Since 2018, past housing provision indicates more dwellings have been provided in Witham St Hughs and more dwellings permitted than other Large Villages including Skellingthorpe, and Cherry Willingham, which are both Large Villages strategically located, closer to Lincoln and supported by a range of services and facilities.</p> <p>A total of 1,318 new dwellings will continue to be provided in Witham St Hughs over the emerging plan period (53 completed and 1265 with permission). However, given the attributes attached to Witham St Hughs as a suitable and sustainable location for future development, more homes could be accommodated during the later stages of the Local Plan, if not the next plan period in order to support the growth of Witham St Hughs.</p> <p>As no additional sites have been allocated in the emerging plan, we would advocate for</p>			No

									further sites to be allocated now for later in this plan period and beyond so that Witham St Hughs can continue to support its role and function as a Large Village.			
1103783	S4								<p>This policy relates to windfall sites and supports limited development of up to 10 or more dwellings in large, medium and small villages. Development of this scale would only be supported through allocated sites in the emerging Local Plan, in the Neighbourhood Plan or on unallocated sites in appropriate locations within the developed footprint of the village. The policy considers growth of this scale would be proportionate to and support the role and function of these villages.</p> <p>Whilst the principle of the policy is supported for enabling a proportionate amount of development to come forward in large, medium and small villages of Central Lincolnshire, the policy limits the amount of development that could be achieved on a larger and more suitable and sustainable sites.</p> <p>Windfall provision is a valuable supply when contributing towards the overall housing requirement especially in the absence of potential allocated sites not coming forward. However, given that these provide 1-9 dwellings, the benefits of these small-scale developments in socio economic and environmental terms can be limited. The benefits of allocating additional and larger sites within large, medium and small villages over uncertainty of windfall delivery specifically would be much more significant.</p> <p>Provision of medium to large-scale housing sites in large villages would facilitate higher levels of S106 contributions for local services, affordable housing and a more comprehensive mix of house types. Larger sites can also offer on-site provision of open space, local play and have more flexibility to provide ecological and biodiversity enhancements than smaller windfall sites. Larger sites also offer a wider variety of local jobs while still offering opportunities for small and medium sized developers.</p> <p>Developments at this larger scale can also support the growth, vitality and viability of large villages. Witham St Hughs is a perfect example of this, where previous residential development including education, community, retail and nursery expansion, provided by Strawson's has supported the role and function of Witham St Hughs as a large village.</p> <p>The requirements of proposed Policy S4 limits the growth of development in large, medium and small villages to small scale development. This would not be proportionate to villages that are much more suitable and sustainable in more accessible settlements and capable of facilitating larger scale of growth. Whilst small scale development would support the role and function of medium and small villages, the benefits from small sites permitted in large villages would be very limited.</p>			No
1103785	S80								<p>Policy S80 provides a list of allocated sites primarily for residential development within Large Village's. This policy supports the role, function and vitality of Large Villages across Central Lincolnshire such as Witham St Hughs.</p> <p>Policy S80 includes the allocation of land to the north of Witham St Hughs, which has planning permission (15/1347/OUT) for Phase III development of up to 1,100 dwellings and 150 care/retirement units as well as supporting infrastructure.</p> <p>2.24 Further to the proposed settlement hierarchy categorised by existing dwellings as set out in Policy S1, large villages are identified as 750 dwellings or more. Medium Villages are 250 – 749 dwellings and small villages are 50-249 dwellings.</p> <p>This settlement hierarchy approach goes hand in hand with Site Allocations Settlement Analysis (2021), which looks at the sustainability attributes of a settlement to inform specific site allocations. The SASA provides a deeper understanding of the villages and suitability of development in villages as a whole. The methodology includes the number of dwellings as at 2018, number of completed dwellings, provision of primary and secondary schools and local services and facilities.</p> <p>The SASA (2021) which forms part of the emerging plan's evidence base describes Witham St Hughs as a large village with a range of services and facilities that are complimented by those in nearby Bassingham. The village has excellent access onto the A46 providing road links to Lincoln and Newark on Trent.</p>	The allocation of land north of Moor Lane and land east of Camp Road would see the residential development of approximately 1000 new homes and support the role of in Witham St Hughs as a Large village, while assisting in developing a strong local economy. Other		Yes

								<p>Witham St Hughs – A well-established Settlement</p> <p>Witham St Hughs is identified as a Large Village in the emerging Local Plan. In 2018, Witham St Hughs comprised of 1,354 dwellings. The emerging Local Plan shows between 2018-2021 53 dwellings were built in Witham St Hughs, with 1,265 dwellings with planning permission and 0 dwellings allocated totalling 1,318 dwellings as a requirement from the emerging Local Plan.</p> <p>Witham St Hughs occupies the former RAF Swinderby base located on the western side of the Village. This officially closed in 1993 before being sold off in 1996. The site now comprises of Camp Road Industrial Estate identified in the emerging Local Plan as (Policy S31: Important Established Employment Areas) and a Strategic Employment Sites in the adopted and emerging Local Plan. Through a number of phased developments (1-3) the site has since expanded to what has now become St Modwen Park, Lincoln.</p> <p>A recent planning permission (20/1523/FUL) for a further 12ha of employment land on the SES will meet the strategic employment ambitions of Witham St Hughs and beyond, given its close proximity to the local and strategic highway network. Development of the former RAF base will see the phased development of the site (phases 4-7) and overtime will provide a number of permanent and temporary jobs for the area.</p> <p>In recent years, Witham St Hughs has undergone a significant amount of housing development. Strawson Holdings Limited have been the landowner and developer for all previous phases of Witham St Hughs since planning permission was originally granted in 2000 for 1000 dwellings. Since then, the village has grown substantially with Strawson’s retaining involvement through further growth and the retention of land within and surrounding the local centre to ensure the provision of local services and facilities grows to keep a pace with the population.</p> <p>As part of the latest Phase III planning permission for 1250 dwellings, Strawson’s have committed to provide land and financial contributions to deliver a 1.5 form expansion to the existing primary school as well as an extension to the existing village hall and further open space for public playing fields. Prior to the planning approval of this site, Strawson’s were committed to see the development of the village as such the promotion of this site featured in all iterations of the North Kesteven and Central Lincolnshire SHLAA’s referenced as CL110. In 2017, Strawson’s also secured planning permission for two single storey retail units and the extension of a children’s day nursery. In 2018 planning permission was also secured for an extension to the Co-op food store.</p> <p>Witham St Hughs has undergone a sustainable level of housing and economic growth as shown above, and with recent permissions to provide future housing and employment growth, these developments will help to ensure the local needs of the community are being met. With further development in the pipeline, the service, facilities, accessibility and employment opportunities would support further housing growth within the Large Village and furthermore maintain the role and function of the Large Village.</p> <p>Land north of Moor Lane and east of Camp Road, Witham St Hughs</p> <p>The above site immediately adjoins the existing built-up area of Witham St Hughs and would form a logical southern extension to the village that squares the built form off up to Moor Lane. The land is bound to the north by existing residential dwellings, to the east by open countryside, to the south by Moor Lane and to the west by Camp Road.</p> <p>Witham St Hughs is located 9 miles south west of Lincoln, 9 miles northeast of Newark on Trent and 5 miles east of Collingham.</p> <p>The allocation of the above site would see the phased development of approximately 1000 dwellings. It is envisaged that phase 1 as shown on the attached Location Plan would provide 250 dwellings and phase 2 would provide a further 750 dwellings towards the later stages of the emerging Local Plan and the period beyond. Phase one would be served from an access to Camp Road and phase two would have a second access to Moor Lane. Pedestrian connectivity to the existing settlement would be possible via the trail adjacent to Oak Tree</p>	benefits include the provision of a high-quality residential development, securing developer contributions associated with the proposed development to improve local services and facilities and achieving an inclusive community.		
--	--	--	--	--	--	--	--	--	--	--	--

								<p>Drive and Green Lane that bounds a significant length of the boundary of this proposal. Parcels of the site have featured in the Residential Allocations Evidence Report (2016) as references CL4697, CL4700, CL4698 and CL4699. These sites were assessed individually for their suitability to provide up to 489 dwellings. These sites were rejected for allocation to the Local Plan in 2016 due to their proximity to health care services, train station, primary and secondary school.</p> <p>The evidence report also identified these sites being well contained, with no major constraints and for being well related to the built-up area of Witham St Hughs. With respect to the proximity to health service and schools, the report also acknowledges these can be expanded through the growth of the village. Access to the nearby train station can also be improved in line with the growth of the village, because financial contributions as a result of further housing growth could contribute to road /junction improvements and increased public transport services.</p> <p>The recently permitted site - land north of Witham St Hughs (Phase 3) for 1250 dwellings also featured in this report (CL1100). This site was identified as preferred allocation and despite constraints to proximity to heritage asset and potential medium -high risk of surface water flooding, given the size of the site, its suitability to provide growth in the village while delivering additional services and facilities sustainably was identified.</p> <p>The Sustainability Appraisal Report (2022) Appendix 5.2 North Kesteven, reports land north of Moor Lane is considered a reasonable alternative to the emerging Local Plan (NK/WSH/003 / 003A). This site is scored positively for housing, healthy lifestyles, air pollution, climate changes, access to services and facilities, employment and encourage and support local economy.</p> <p>The SA further notes, the site is located within; 800m of an existing designated employment area (Camp Road Industrial Estate), 250m of a bus stop, 400m of the Village Centre and 500m of a primary school. Furthermore, development of this site would provide a range of affordable and market housing to meet current housing and the future needs of local people.</p> <p>Appendix 7 to the SA (2022), which looks at the reasons for selecting preferred policies and site allocations notes, as Witham St Hughs is undergoing large scale development to the north of the village, the infrastructure of the village would unlikely be able to support the proposed scale of development as it is constrained by Highways capacity, surface water flooding and infrastructure.</p> <p>Through the 'Lincoln Strategy Area Growth Study', which forms part of the consultation evidence base, it was established that Witham St Hughs is located within the strategy area and is relatively self-contained with good access to services within the village and sustainable transport links to Lincoln. Furthermore, given Strawson's retain residual land within the local centre, they can facilitate the extension of the school, community buildings and shops, or further improvements to serve the growing community.</p> <p>In relation to Highways capacity and infrastructure, there is potential for improvements to road and roundabout junctions, local bus services and local infrastructure, which can be secured through financial contributions from allocated sites within Witham St Hughs to the emerging Local Plan. There are also opportunities to address any surface water flooding on site given the scale of the proposal. The ongoing promotion of the site will include a detailed assessment of the site's suitability in relation to accessibility, transport, infrastructure and flood risk.</p> <p>Chapter 5 of the National Planning Policy Framework (2021) details the Government's objectives to significantly boost the supply of homes. Paragraph 60 states in order to significantly boost the supply of homes and without necessary delay, it's important that there is a sufficient amount and variety of land with permission that can come forward where needed to address the needs of groups with specific housing requirements.</p>			
--	--	--	--	--	--	--	--	---	--	--	--

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
11946357	S1	Y		No	No		No		<p>COMMENT: Section 2 Spatial Strategy - Policy S1: The Spatial Strategy and Settlement Hierarchy</p> <p>Policy S2: Growth Levels and Distribution identifies a housing need of between 1,060 - 1,325 dwellings per year during the plan period of 2018-2040, and it is noted that the Local Plan's strategic aim is to facilitate the delivery of the top end of the range when calculating the Five Year Housing Land Supply, a figure of 29,150 dwellings over the plan period. Whilst the Plan's aim of the higher end of the range is considered favourably, the distribution of this figure over the plan period is not sound.</p> <p>It is noted that 12% (3,498) of the total homes are set to be distributed 'Elsewhere' category, which includes the villages of Dunholme and Welton. Policy S1: The Spatial Strategy and Settlement Hierarchy identifies both Dunholme and Welton as 'Large Villages', defined by the presence of key services and facilities, and will receive limited growth to support their role and function.</p> <p>Welton and Dunholme are situated exceptionally close to one another, inextricably linked by virtue of housing developments joining both villages, and over a sustained period of development, the two villages have been allowed to coalesce. Although, these are considered independent 'large villages' for the purposes of Policy S1 and thus their assessment in the Appendix 3.3: Sustainability Appraisal of Preferred Housing Site Allocations and Reasonable Alternatives Considered, they are considered as two separate settlements.</p> <p>When considering the tests of soundness stipulated in Paragraph 35 of the National Planning Policy Framework, test c) Effective, becomes particularly relevant. The two settlements broadly share the same limited infrastructure, sharing a constrained network of roads and a single secondary school and doctors' surgery. This leads questions over the effectiveness of the deliverability of the residential allocations that surround these two villages. It is also considered that the two villages being taken as separate entities is not justified for the purposes of Policy S1 and thus the evidence considered within the Sustainability Appraisal, contravening again the tests of soundness. Any further development at one of the two village directly impacts on the other and therefore they should be considered together when looking at both the Spatial Strategy and Settlement Hierarchy, and therefore the site allocations listed in Policy S80: Housing Sites in Large Villages, and the information assessed within the Sustainability Assessment.</p> <p>The effectiveness in the application of Policy S1 is questionable, and thus fails the tests of soundness. The Sustainability Appraisal, off which this policy is based, itself states that the new development enacted by Policy S1 should have positive effects on efficient use of existing transport infrastructure, and also notes that some allocations will require additional transport infrastructure. It is also noted that Policies S47, S48 and S53 of the Local Plan seek to reduce the need to travel by car, however, it is crucial to consider that residents of Welton and Dunholme already struggle with the transport infrastructure that is in place, and I am deeply concerned.</p>		No	No
11946485	S47	Y		No	No	No			<p>COMMENT: Section 8 Transport and Infrastructure – Policy S47: Accessibility and Transport</p> <p>Policy S47 requires development proposals to contribute towards an efficient and save transport network, embodying the principles of sustainable travel and development. There are concerns over how the development of the outer larger villages (as identified in Policy S1 of this Plan) will contribute positively to a transport network that is already at full capacity. If the</p>		No	No

								<p>rationale for growing Welton as a dormitory satellite for Lincoln, how do all those extra people get to Lincoln, and what is there that is truly in place to ensure this happens in a sustainable manner that is in line with National Planning Policy? Public transport is unreliable and expensive, and the last buses each way run at 18:20 and 18:44, hardly conducive to supporting employment, leisure and evening economy aspirations. The roads from Welton to the A15 and A46 are already poor quality local roads, hardly suited to the extra volumes of traffic that all these developments will generate. There are already dangerous queues on the A15 northbound waiting to turn right onto Heath Lane. There are no pedestrian or cycle facilities connecting the village to the main routes into Lincoln. So the transport implications are more traffic, more congestion, more pollution.</p> <p>The recently commissioned Eastern By-pass has simply re-located the traffic bottleneck from the south east side of Lincoln City to the north sections of the A46/A15 junction with the B1182 and further east to the A15/ A158 Bunkers hill roundabout . It has now become routine to experience significant traffic jams not only at peak commuter times but throughout the whole working day. The additional traffic provided by the families from the existing 563 approved or under construction in Welton & Dunholme will simply be further exacerbated by yet another 521 . ie in total over 1000 more families and employees commuting into this new traffic bottleneck.</p> <p>This Policy is not fully justified and is therefore unsound as it does not fully consider the state of the road network at present and the severe highway impacts that the proposed allocations of WL/WELT/001A , 0008A and 007 sites will have on this network.</p>			
11946389	S67	N		No	No	No	No	<p>COMMENT: Section 11 Natural Environment - Policy S67: Best and Most Versatile Agricultural Land</p> <p>Policy S67: Best and Most Versatile Agricultural Land seeks to protect the best and most versatile agricultural land to ensure sustainability in food production and to support the agricultural economy, which is of great importance in Lincolnshire. When looking at the Agricultural Land Classification Map East Midlands Region (ALC005), it can be seen that the settlements of Welton and Dunholme are mostly surrounded by Class 3 (Good to Moderate) and some Class 2 (Very Good) agricultural land. It is believed that the allocation of sites WL/WELT/001A and WL/WELT/008A and 007 is not justified for this Plan and therefore fails the test of soundness, when considering their location on productive agricultural land.</p> <p>The vast majority of this Local Plan Review and informative evidence base was undertaken before the onset of the recent war in Ukraine, which has resulted in global grain and cooking oil shortages, future insecurities along with unprecedented price increases. As such, their allocation is unjustified and unsound in light of the recent change in food sustainability and is therefore in direct contradiction of Policy S67 criterion 'b'. There is no doubt Britain will have to move back to a greater dependency for self sufficiency for such products. Understandably these events have occurred after the initial development of the Central Lincolnshire Local Plan Review, but must now become one of the highest priorities for the Central Government and hence our city and regional councils too. It would be irresponsible and unjustified to even consider new housing development on such agricultural land given there are many more viable brownfield developments sites available within sustainable locations and within commuter distance of CLLP area. As such, it is proposed that the information provided in Appendix 3.3: Sustainability Appraisal of Preferred Housing Site Allocations and Reasonable Alternatives Considered, is now out of date and thus not justified or consistent with national policy, and therefore fails the tests outlined in Paragraph 35 of the National Planning Policy Framework.</p>		No	No
11946453	S75	Y		No	No	No	No	<p>COMMENT: Section 12 SUEs, Regeneration Areas and Opportunity Areas – Policy S75: RAF Scampton</p> <p>Policy S75 identifies RAF Scampton as an opportunity area, and outlines that a development masterplan will need to be prepared prior to the submission of any planning application, with</p>		No	No

								criteria that the masterplan must adhere to. It is thought that this Policy is neither justified or effective, and fails to present the large brownfield site that is RAF Scampton as the unique opportunity it is. The Policy fails to quantify the ability of the site to meet housing need and thus is not sound. It is not justified to consider expanding established settlements, the infrastructure of which already strained, beyond their natural / existing boundaries and thus onto greenfield land when there are so many infill sites and under-utilised premises available in the CLLP area. The air base is existing community with an excellent road links and other infrastructure (2 x direct junctions onto the A15 trunk road). This Policy is not compliant with the tests of Paragraph 35 of the National Planning Policy Framework as it does not deal with this strategic matter head on, rather acting to defer its potential to the next plan period. Instead, development is directed to greenfield land, which itself goes against the provisions of the NPPF, which seeks to make most efficient use of brownfield and previously developed land.			
11946421	S80	N		No	No	No	No	<p>COMMENT: Section 13 Site Allocations – Policy S80: Housing Sites in Large Villages</p> <p>Policy S2: Growth Levels and Distribution identifies a housing need of between 1,060 - 1,325 dwellings per year during the plan period of 2018-2040, and it is noted that the Local Plan's strategic aim is to facilitate the delivery of the top end of the range when calculating the Five Year Housing Land Supply, a figure of 29,150 dwellings over the plan period. Whilst the Plan's aim of the higher end of the range is considered favourably, the distribution of this figure over the plan period is not sound.</p> <p>It is noted that 12% (3,498) of the total homes are set to be distributed 'Elsewhere' category, which includes the villages of Dunholme and Welton. Policy S1: The Spatial Strategy and Settlement Hierarchy identifies both Dunholme and Welton as 'Large Villages', defined by the presence of key services and facilities, and will receive limited growth to support their role and function.</p> <p>Welton and Dunholme have increased in population massively over recent years, and there are already approved plans for hundreds more houses (an estimate from details provided on pages 187-189 reveal some 563 new dwellings built already, in construction or approved, with a further 521 proposed within the Central Lincolnshire Local Plan Submission Version). It is note that this is disproportionate to the allocations in other parts of the CLLP area, where existing infrastructure and amenities are far better. For example, Welton already has a population larger than Market Rasen, a town with vastly superior facilities (e.g. railway station, high street shops, market, bank, leisure centre, police and fire stations, etc.) – Welton and Dunholme have none of these.</p> <p>Indeed, the allocation of both villages as two separate 'larger' settlements, a status of which informs their sustainability credentials and therefore their suitability for this large housing growth is questioned. When considering the tests of soundness stipulated in Paragraph 35 of the National Planning Policy Framework, test c) Effective, becomes particularly relevant. The two settlements broadly share the same limited infrastructure, sharing a constrained network of roads and a single secondary school and doctors' surgery. This leads questions over the effectiveness of the deliverability of the residential allocations that surround these two villages. It is also considered that the two villages being taken as separate entities is not justified for the purposes of Policy S1 and thus the evidence considered within the Sustainability Appraisal, contravening again the tests of soundness outlined in Paragraph 35 of the National Planning Policy Framework. Any further development at one of the two village directly impacts on the other and therefore they should be considered together when looking at both the Spatial Strategy and Settlement Hierarchy, and therefore the site allocations listed in Policy S80: Housing Sites in Large Villages, and the information assessed within the Sustainability Assessment.</p>		No	No

Studio-G Associates LLP

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103644	Intro	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>It does not acknowledge how clusters of small rural settlements work together to support each other by providing their own essential services and thereby forming sustainable communities. It would better read:</p> <p>‘Functionally, the rural villages often operate as clusters that support each other, sharing essential services amongst each other and thereby forming a sustainable community in its own right and further shares the more comprehensive services provided in larger villages’.</p> <p>It is essential that this large population (acknowledged at more than half of Lincolnshire’s population), residing in small settlements all over the county is provided with the support needed to sustain its future.</p>	<p>There is concern that a simplistic approach to sustainable development by the concentration of new development in the towns and larger villages has resulted in the neglect of the smaller, rural settlements and the populations that live in them, despite the acknowledgement that it accounts to more than half of Lincolnshire’s population. Lack of development in such communities inevitably results in fewer young families moving to or having the ability to stay in those areas and the severe under occupation of the existing properties by couples, or even singles, whose children have grown up and moved away. The inevitable result of this is the loss of the small businesses, such as shops and pubs, and infrastructure such as schools and community facilities that rely on those populations for their existence and are essential their vibrance and sustainability. Without such facilities in the community, their population will inevitably need to travel further to access their needs and the current deterioration of public transport services will inevitably lead to an increase in journeys using personal transport and add to the decline of those communities.</p> <p>It is noted that in Appendix 3 of the Sustainability Appraisal Report that Option 5 of the Spatial Growth Options refers to a balanced combination of options 1-3: and find a balanced approach for distribution of growth. Within the Lincoln Strategy Area there would be a focus on the Lincoln Urban Area and the retention of the Sustainable Urban Extensions. Beyond this there would also be growth focused around the area in smaller settlements, particularly focused on those along transport corridors and in settlements with a good range of facilities and services available either within the village, or nearby. This would see settlements in the hierarchy down to small villages being considered for some allocations.</p> <p>If the plan is serious about this, it needs to ensure that ‘Sequential Tests’ are approached on a local basis rather than district wide, so that settlements such as ‘Newton on Trent’ that can provide safe development acceptable to the EA and are compliant with this approach (Adjacent to A57 & A1133 trunk roads) are not excluded.</p>	Yes	No
1103657	S1								<p>The principle of ‘consideration of the specific context of each settlement in terms of the ability to accommodate growth and its connectivity with the main urban areas’ is understood and accepted. However, it is important that scale of growth is not considered solely on the basis of the current size of settlement. There are villages that are capable of greater growth than that currently</p>	<p>It is noted that in Appendix 3 of the Sustainability Appraisal Report that Option 5 of the Spatial Growth Options refers to a balanced combination of options 1-3: and find a balanced approach for distribution of growth. Within the Lincoln Strategy Area there would be a focus on the Lincoln Urban Area and the retention of the Sustainable Urban Extensions. Beyond this there would also be growth focused around the area in smaller settlements, particularly focused on those along transport corridors and in settlements with a good range of facilities and services available either within the village, or nearby. This would see settlements in</p>	Yes	No

									<p>allocated and are well connected. Newton on Trent for example is capable of significantly greater growth than its allocated 5 properties and is located adjacent the A57 & A1133 trunk roads, giving excellent connectivity to Lincoln, Gainsborough, Newark and beyond. And from Saxilby (a short bus ride away), by rail to Sheffield. The A57 in particular also brings tourism into the area from the western counties and connects into the A1 leading north and south.</p>	<p>the hierarchy down to small villages being considered for some allocations.</p> <p>If the plan is serious about this, it needs to ensure that ‘Sequential Tests’ are approached on a local basis rather than district wide, so that settlements such as ‘Newton on Trent’ that can provide safe development acceptable to the EA and are compliant with this approach (Adjacent to A57 & A1133 trunk roads) are not excluded.</p>		
1103654	S1; S21	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>It does not acknowledge the phasing out of petrol and Diesel vehicles over the life of the plan. If there was a requirement for all new dwellings developed beyond the main urban centres to be built to Passivhaus, or similar defined standards, have external charge points (not just wired for future capability) and a significant, quantified element of renewable energy, it would mitigate any short-term period whilst fossil fuels were still being used.</p> <p>In addition to the above, the advent of hybrid and more agile working practices and people’s attraction to a less urban life has significantly reduced the need for daily travel to work!</p>	<p>The comment referring to ‘reducing the need to deliver new facilities’ is an erroneous point! Where existing facilities exist in rural areas (such as schools), they are an essential part of the community and if growth in such communities is stifled, they will be no longer viable and close, resulting in a degeneration of those communities, the need for such facilities to be delivered elsewhere and for pupils to be bussed, taxied or driven by personal transport to those locations.</p> <p>It is noted that in Appendix 3 of the Sustainability Appraisal Report that Option 5 of the Spatial Growth Options refers to a balanced combination of options 1-3: and find a balanced approach for distribution of growth. Within the Lincoln Strategy Area there would be a focus on the Lincoln Urban Area and the retention of the Sustainable Urban Extensions. Beyond this there would also be growth focused around the area in smaller settlements, particularly focused on those along transport corridors and in settlements with a good range of facilities and services available either within the village, or nearby. This would see settlements in the hierarchy down to small villages being considered for some allocations.</p> <p>If the plan is serious about this, it needs to ensure that ‘Sequential Tests’ are approached on a local basis rather than district wide, so that settlements such as ‘Newton on Trent’ that can provide safe development acceptable to the EA and are compliant with this approach (Adjacent to A57 & A1133 trunk roads) are not excluded.</p>	Yes	No
1103655	S4	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	<p>I am concerned that a simplistic approach to sustainable development by the concentration of new development in the towns and larger villages has resulted in the neglect of smaller, rural settlements and their populations (more than half of Lincolnshire’s population). Lack of development in such communities inevitably results in fewer young families moving to or staying in those areas and the severe under occupation of the existing properties by parents, whose children have grown up and moved away. This results in the loss of the small</p>	<p>Whilst acknowledging that the sense for the majority of development being focused on Urban Centres, I feel that the Plan should also acknowledge the different types of businesses, and ways of working that are appropriate to rural areas. The necessity for people’s connection to the countryside and the natural environment, the consequential benefit to their health and wellbeing and their part played in helping create a rural environment that can be enjoyed by those that live in the urban areas.</p> <p>It is noted that in Appendix 3 of the Sustainability Appraisal Report that Option 5 of the Spatial Growth Options refers to a balanced combination of options 1-3: and find a balanced approach for distribution of growth. Within the Lincoln Strategy Area there</p>	Yes	No

									businesses, such as shops and pubs, and infrastructure such as schools and community facilities that rely on those populations for their existence and are essential their vibrance and sustainability. Without such facilities, their population will inevitably need to travel further to access them, and the decline in public transport services will lead to an increase in use of personal transport.	would be a focus on the Lincoln Urban Area and the retention of the Sustainable Urban Extensions. Beyond this there would also be growth focused around the area in smaller settlements, particularly focused on those along transport corridors and in settlements with a good range of facilities and services available either within the village, or nearby. This would see settlements in the hierarchy down to small villages being considered for some allocations. If the plan is serious about this, it needs to ensure that 'Sequential Tests' are approached on a local basis rather than district wide, so that settlements such as 'Newton on Trent' that can provide safe development acceptable to the EA and are compliant with this approach (Adjacent to A57 & A1133 trunk roads) are not excluded.		
1103659	S21	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	The need for a sequential risk-based approach to development is understood and accepted, it is essential that all development is undertaken in a way that provides safe working and living accommodation for its occupiers and that such development does not increase risk to others elsewhere. However, where by good design developments are able to demonstrate that they are intrinsically safe, do not increase risk to others, and are compliant with all Flood safety measures required by the Environment Agency, such developments should be supported. particularly when they demonstrate benefits to the community and the environment.	It is noted that in Appendix 3 of the Sustainability Appraisal Report that Option 5 of the Spatial Growth Options refers to a balanced combination of options 1-3: and find a balanced approach for distribution of growth. Within the Lincoln Strategy Area there would be a focus on the Lincoln Urban Area and the retention of the Sustainable Urban Extensions. Beyond this there would also be growth focused around the area in smaller settlements, particularly focused on those along transport corridors and in settlements with a good range of facilities and services available either within the village, or nearby. This would see settlements in the hierarchy down to small villages being considered for some allocations. If the plan is serious about this, it needs to ensure that 'Sequential Tests' are approached on a local basis rather than district wide, so that settlements such as 'Newton on Trent' that can provide safe development acceptable to the EA and are compliant with this approach (Adjacent to A57 & A1133 trunk roads) are not excluded.	Yes	No

Sturton by Stow Parish Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1088334	S14	Don't know	Don't know	Yes	No	No	No	No	The potential harm element of renewable energy regarding wind turbines omits glint as a problem. Flicker is only the shadow cast on the ground and as such is a nonsense to include. Glint refers to the perpetual motion of the blades where the sun or sunlight is constantly causing perpetual glinting either off the blades or through the blades by the light being behind. This can cause epileptic fits and exacerbate migraine type problems.	Add in glint as a possible visual problem to the list on potential harms.	No	No
11829109	S14	Y							Not all potential harm is being considered.	Add in glint as a potential harm which can cause epileptic fits and bring on visual disturbances such as when migraine starts.	No	No
11829205	S81	Y			No				WL/STUR/006a has not been assessed correctly in the Residential Allocations Report 2022 - page 266	Remove WL/STUR/006a	No	No

									<p>Sturton by Stow had a growth target of 15% which equates to 97 dwellings. There have been permissions granted for the total allocation already but 48 of these either have not started construction (and are on a rolling re-application) or have not yet been finished. Further additional growth seems excessive for the environment and overstretched infrastructure.</p> <p>There will be loss of employment as this land is under a current tenancy agreement. This is productive grade 3 land.</p> <p>There is no access as shown on the assessment map off Saxilby Road (this is a garden).</p> <p>The access shown off Tillbridge Road is to serve the current development of 6 dwellings and is a private road. The site map is not up to date as it does not show the permission for the current dwellings under construction.</p> <p>Part of this allocation is subject to surface water flooding, substantial at times.</p> <p>There is no note of the environmental problems occurring from the highways depot which near the site. The gritting depot is situated nearby and as such there are noise and light pollution issues when the operations are necessary.</p>			
11829237	S81	Y		No					<p>WL/STUR/004a</p> <p>There are still 48 dwellings out of 97 permissions to be constructed. This is nearly 50% of the total of forecast growth until 2036.</p> <p>This site has planning for 5 dwellings and these are under construction, some finished. This land is also still shown as being in a minerals safeguarding area which is not compatible since planning has already been given. The Residential Allocation report 2022 page 260 also states that Sturton by Stow Parish Council object to this land being included. That is incorrect - there was a general observation that planning had already been passed for part of this parcel of land.</p> <p>Sturton by Stow PC agree this parcel should not be allocated</p>	Remove the minerals safeguarding listing and remove comment that Sturton by Stow PC object to this allocation of land.	No	No

Swinderby Parish Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1104066	General								<p>1. NKDC's commitment to delivering the Local Plan.</p> <p>Swinderby Parish Council welcomes many of the statements in the new Central Lincolnshire Local Plan. For example, concerns that have been expressed to councillors from residents in the past could now have the potential to be addressed by policies covering:</p> <p>Reducing energy consumption Walking and cycling infrastructure Community facilities Protecting biodiversity and geodiversity Trees, woodland and hedges Historic environment Local green spaces</p>			No

								<p>Affordable houses Strategic infra-structure requirements.</p> <p>Unfortunately, our experiences, until recently, shows that there is limited ability or commitment from NKDC to any target over and above the key one of delivering as many dwellings as possible over a relatively short period of time. As a Parish Council our experiences include.</p> <ol style="list-style-type: none"> 1. Poor infrastructure including the lack of ability to remove excess foul water without the use of tankers. 2. The reluctance, although there has been a change recently, to issue TPOs. Although we are still waiting for a replacement tree for a TPO that was felled at least 4 years ago. 3. The removal of mature trees within the village and the building of dwellings that have resulted now in the wrong trees being in the wrong place. 4. Our request for a pavement to be widened for safety reasons and to encourage safe walking within the village being ignored. 5. Our request for a cycle track to the station being ignored. 6. A lack of response to our suggestions/comments on the development of Swinderby Quarry into a nature reserve. 7. Inappropriate lighting on buildings that has contributed to a decline in local bat pollution reducing. <p>We understand that some of the above are the responsibility of LCC or local landowners and involve a degree of cooperation. But if these key policies are to be delivered then NKDC must raise to the challenge both with a cultural change and a restructuring otherwise another Local Plan in many ways becomes meaningless.</p> <p>The decline in UK species has been well documented and the latest survey shows we are in the top four countries world wide in the rate of decline of species. It is challenge and understood by NKDC and yet there is a failure to successfully address this issue.</p> <p>1.1.1. The abundance and distribution of the UK's species has declined rapidly since the 1970's²⁵. There is now an urgent need to reverse the net loss of biodiversity, as this trend is not just a significant problem for wildlife. It has serious implications for the physical environment (air, soil, water) the ability of the natural environment to provide natural resources (such as food and construction materials), our ability to respond to the climate emergency and for our physical and mental health and well-being. Indeed, Lincolnshire Environmental Records Centre data highlights that over 900 species of wildlife previously recorded in Lincolnshire have not been recorded since 1960. This potentially indicates significant losses. (Central Lincolnshire Plan)</p>			
1104068	S4							<p>2. Development within villages S4.</p> <p>There are concerns that the cap on development withing villages has been lifted. This is coupled with the fact that Swinderby is now included in the Lincoln Strategy Area. We understand that there will be extra pressure to build between Newark and Lincoln and this may result in over development of this area because it is the easier option but not necessary the correct option. We request that this policy is reviewed with safeguards in place to ensure proportionate development for our village.</p> <p>Small Villages Small villages are defined as those with between 50 and 249 dwellings at 1 April 2018. Well connected or well served small villages may receive some limited growth, primarily through allocations in this plan in order to achieve a balance between ensuring the vitality of the village and the rural character. Beyond site allocations made in this plan or any applicable</p>			No

									<p>neighbourhood plan, development will be limited to that which accords with Policy S4: Housing Development in or Adjacent to Villages or other policies relating to non-residential development in this plan as relevant (Central Lincolnshire Local Plan).</p> <p>From the above we are defined as a small village but in 5 years' time we will have expanded from 240 houses to approximately 400. We would wish for all our residents, to keep our rural character, our historic buildings and heritage, increase our green environment, have an acceptable infra-structure and a commitment to localism as far as feasible. These are all value judgements and can easily be lost in the complexities of planning.</p> <p>Swinderby Parish Council having committed time to this consultation would wish to receive a response and made aware of any actions undertaken by NKDC as an outcome of the wider consultation.</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

Tarmac Trading Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103857	S76; S77; S78; S79; S80; S81; S82; General	No					No		<p>The 'tests of soundness' for which Local Plans area examined by an Inspector are set out within the NPPF at paragraph 182. In order for an authorities Local Plan to be found 'sound' it must prove to be: Positively Prepared, Justified, Effective and Consistent with National Policy.</p> <p>We submit that the Local Plan Submission Draft does not meet its responsibility to safeguard minerals and mineral infrastructure from unnecessary sterilisation as required by the NPPF, and resultingly therefore not 'consistent with national policy' and could not be found 'sound' at examination in its current form.</p> <p>This representation seeks to further detail the responsibility set upon the Central Lincolnshire Authorities regarding minerals resource and associated infrastructure; aid the authorities by providing reference to the relevant policies within the Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies (June 2016) and Site Locations (December 2017) documents; and, provide structured recommendations as to where minerals policies could be included within the plan and the planning policy Proposals Map.</p> <p>The following two sections – 'National Policy regarding Mineral Safeguarding' and 'Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies (June 2016) (CSDMP) & Site Locations (December 2017)' provide context on the national and county policy position as detailed in the previous consultation comments.</p> <p>National Policy regarding Mineral Safeguarding Planning policies (including at the local level) should safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas and safeguard existing, planned and</p>	<p>'Tier two' Local Plans should cross reference with the adopted Minerals and Waste Local Plan to outline the relationship of mineral planning and mineral safeguarding within two tier authority areas. Within the NPPF and PPG it is suggested that the relationship between the two sets of plans should be more than just referenced, as NPPF paragraph 210c states planning policies should: "safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas⁷⁰; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked)". Footnote 70 indicates that this particularly applies in two tier areas.</p> <p>Figure 1 of the Minerals and Waste Local Plan Core Strategy and Development Management Policies document provides the Minerals Safeguarding Areas for the entirety of the Lincolnshire Authority Area. We propose that this figure, along with all the site safeguarded within Figure 2 and 3 of the CSDMP, and the 'Areas of</p>	No	No

									<p>potential sites for: the bulk transport, handling and processing of minerals; the manufacture of concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material in accordance with the NPPF (July 2021) paragraph 210 (part c and e). As detailed below, this responsibility is not limited to the Mineral Planning Authorities. Paragraph 187 of the NPPF contains the ‘agent of change’ principle which ensure businesses should not have unreasonable restrictions / conditions placed on them as a result of development permitted after they were established. It is the responsibility of the prospective applicant to adequately mitigate impacts prior to development as stated in NPPF paragraph 187. This is particularly pertinent in two tier Authorities where mineral related development/infrastructure applications may be determined by a Local Planning Authority as opposed to the Mineral Planning Authority. Paragraph: 005 (Reference ID: 27-005-20140306) of the Planning Practice Guidance (Minerals) identifies that, ‘whilst district councils are not mineral planning authorities, they have an important role in safeguarding minerals in 3 ways:</p> <ul style="list-style-type: none"> • having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans. District councils should show Mineral Safeguarding Areas on their policy maps; • in those areas where a mineral planning authority has defined a Minerals Consultation Area, consulting the mineral planning authority and taking account of the local minerals plan before determining a planning application on any proposal for non-minerals development within it; and • when determining planning applications, doing so in accordance with development policy on minerals safeguarding, and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction.’ <p>Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies (June 2016) (CSDMP) & Site Locations (December 2017)</p> <p>The adopted CSDMP safeguards and allocates known mineral resource, mineral development and infrastructure sites through a series of policies and associated figures. These are as follows:</p> <ul style="list-style-type: none"> • M2 – Providing for an Adequate Supply of Sand and Gravel • M11 – Safeguarding of Minerals Resources • M12 – Safeguarding of Existing Mineral Sites and Associated Mineral Infrastructure <p>And within the Site Locations document:</p> <ul style="list-style-type: none"> • SL1 – Mineral Site Allocations • SL2 – Safeguarding Minerals Allocations <p>Submission Plan Mineral Policy Position</p> <p>We are aware that the Submission Draft Plan does refer to the Minerals and Waste Plan at points throughout. However these are policy specific and do not comprehensively meet the requirements of the NPPF and Planning Practice Guidance (PPG). Currently</p>	<p>Search’ in Figure 5 should be included on the Policy map.</p> <p>Whilst it is understood that the online interactive policies map allows the user to select the policies of the Minerals Development Plan to see the relationship between the Minerals Development Plan and the Central Lincolnshire Local Plan, reference to minerals related policy within the Central Lincolnshire Local Plan (and therefore within the Central Lincolnshire Local Plan interactive map) would provide the user/prospective developers with a clearer picture of a sites policy position and their subsequent requirements.</p> <p>Further to this Policy M11 of the CSDMP requires applications on non-minerals development in a minerals safeguarding area to be accompanied by a Mineral Assessment.</p> <p>Within the Site Locations document, Policy SL1 plans for a “steady and adequate supply of sand and gravel” in accordance with Policy M2 of the Core Strategy and makes reference to Whisby Quarry in protecting its future use. This is then further supported by policy SL2 which safeguards all allocated sites within Policy SL1.</p> <p>We submit that the emerging Central Lincolnshire Local Plan should, when considering policies and potential land for allocations / designations ensure that quarries and mineral infrastructure sites are safeguarded and not needlessly sterilised from non mineral development that would prejudice the ongoing / future operations of the existing / future mineral site, as advocated within the adopted Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies (June 2016) (CSDMP) policies M11 & M12. Also, Policy SL2 of the Minerals and Waste Local Plan Site Locations (December 2017) document.</p>		
--	--	--	--	--	--	--	--	--	--	---	--	--

								<p>minerals are referenced as follows within the Submission Draft:</p> <ul style="list-style-type: none"> • Policy S1 Spatial Strategy and Settlement Hierarchy – Development restricted in the countryside unless allowed by other policies, including those within the Minerals and Waste Local Development Documents; • Policy S10 Circular Economy – Supportive of a circular economy and will complement any policies set out in the Minerals and Waste Development Plan; • Policy S14 Renewable Energy – Proposals for renewable energy will be tested in compliance to any policies within the Minerals and Waste Local Development Plan; • Policy S68 Sustainable Urban Extensions – There are three Sustainable Urban Extensions included within the Policy, and as part of any forthcoming proposals it must be demonstrated that they will not cause any unnecessary sterilisation of minerals; and, • Policy S77-82 Housing Allocations – The housing allocations within these policies individually address minerals concerns where relevant with each allocation. <p>Whilst the above policies show there has been consideration of minerals in the preparation of the emerging Local Plan, this still falls short of the requirements set upon Local Authorities at a national level. More explicit reference to minerals should be included within the local plan policy; the following section suggests policy to be included within the development plan.</p>	<p>It is suggested that to encompass the points raised above reference to the requirement for a ‘Minerals Assessment’ would be sufficient to cover the requirements of the Local Authority and the Plan should direct the user/prospective developer to the requirements of Policy M11 and M12 if they fall within a Mineral Safeguarding Area.</p> <p>As stated previously, Tarmac are keen to engage with the preparation of the Central Lincolnshire Local Plan and ensure that it is prepared in a manner consistent with National Policy and affords an appropriate degree of protection to existing and future mineral operations.</p>		
1103859	S77; Map	No					No	<p>The ‘tests of soundness’ for which Local Plans are examined by an Inspector are set out within the NPPF at paragraph 182. In order for an authority's Local Plan to be found ‘sound’ it must prove to be: Positively Prepared, Justified, Effective and Consistent with National Policy. We submit that the Local Plan Submission Draft does not meet its responsibility to safeguard minerals and mineral infrastructure from unnecessary sterilisation as required by the NPPF, and resultingly therefore not ‘consistent with national policy’ and could not be found ‘sound’ at examination in its current form. This representation seeks to further detail the responsibility set upon the Central Lincolnshire Authorities regarding minerals resource and associated infrastructure; aid the authorities by providing reference to the relevant policies within the Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies (June 2016) and Site Locations (December 2017) documents; and, provide structured recommendations as to where minerals policies could be included within the plan and the planning policy Proposals Map. The following two sections – ‘National Policy regarding Mineral Safeguarding’ and ‘Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies (June 2016) (CSDMP) & Site Locations (December 2017)’ provide context on the national and county policy position as detailed in the previous consultation comments. National Policy regarding Mineral Safeguarding Planning policies (including at the local level) should safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas and safeguard existing, planned and potential sites for: the bulk transport, handling and processing of minerals; the manufacture of</p>	<p>‘Tier two’ Local Plans should cross reference with the adopted Minerals and Waste Local Plan to outline the relationship of mineral planning and mineral safeguarding within two tier authority areas. Within the NPPF and PPG it is suggested that the relationship between the two sets of plans should be more than just referenced, as NPPF paragraph 210c states planning policies should: “safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas⁷⁰; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked)”. Footnote 70 indicates that this particularly applies in two tier areas. Figure 1 of the Minerals and Waste Local Plan Core Strategy and Development Management Policies document provides the Minerals Safeguarding Areas for the entirety of the Lincolnshire Authority Area. We</p>	No	No

									<p>concrete and concrete products; and the handling, processing and distribution of substitute, recycled and secondary aggregate material in accordance with the NPPF (July 2021) paragraph 210 (part c and e). As detailed below, this responsibility is not limited to the Mineral Planning Authorities. Paragraph 187 of the NPPF contains the ‘agent of change’ principle which ensure businesses should not have unreasonable restrictions / conditions placed on them as a result of development permitted after they were established. It is the responsibility of the prospective applicant to adequately mitigate impacts prior to development as stated in NPPF paragraph 187. This is particularly pertinent in two tier Authorities where mineral related development/infrastructure applications may be determined by a Local Planning Authority as opposed to the Mineral Planning Authority. Paragraph: 005 (Reference ID: 27-005-20140306) of the Planning Practice Guidance (Minerals) identifies that, ‘whilst district councils are not mineral planning authorities, they have an important role in safeguarding minerals in 3 ways: • having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans. District councils should show Mineral Safeguarding Areas on their policy maps; • in those areas where a mineral planning authority has defined a Minerals Consultation Area, consulting the mineral planning authority and taking account of the local minerals plan before determining a planning application on any proposal for non-minerals development within it; and • when determining planning applications, doing so in accordance with development policy on minerals safeguarding, and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction.’ Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies (June 2016) (CSDMP) & Site Locations (December 2017) The adopted CSDMP safeguards and allocates known mineral resource, mineral development and infrastructure sites through a series of policies and associated figures. These are as follows: • M2 – Providing for an Adequate Supply of Sand and Gravel • M11 – Safeguarding of Minerals Resources • M12 – Safeguarding of Existing Mineral Sites and Associated Mineral Infrastructure And within the Site Locations document: • SL1 – Mineral Site Allocations • SL2 – Safeguarding Minerals Allocations Submission Plan Mineral Policy Position We are aware that the Submission Draft Plan does refer to the Minerals and Waste Plan at points throughout. However these are policy specific and do not comprehensively meet the requirements of the NPPF and Planning Practice Guidance (PPG). Currently minerals are referenced as follows within the Submission Draft: • Policy S1 Spatial Strategy and Settlement Hierarchy – Development restricted in the countryside unless allowed by other policies, including those within the Minerals and Waste Local Development Documents; • Policy S10 Circular Economy – Supportive of a circular economy and will complement any policies set out in the Minerals and Waste Development Plan; • Policy S14 Renewable Energy – Proposals for renewable energy will be tested in compliance to any policies within the Minerals and Waste Local Development Plan; • Policy S68 Sustainable Urban Extensions – There are three Sustainable Urban</p>	<p>propose that this figure, along with all the site safeguarded within Figure 2 and 3 of the CSDMP, and the ‘Areas of Search’ in Figure 5 should be included on the Policy map. Whilst it is understood that the online interactive policies map allows the user to select the policies of the Minerals Development Plan to see the relationship between the Minerals Development Plan and the Central Lincolnshire Local Plan, reference to minerals related policy within the Central Lincolnshire Local Plan (and therefore within the Central Lincolnshire Local Plan interactive map) would provide the user/prospective developers with a clearer picture of a sites policy position and their subsequent requirements. Further to this Policy M11 of the CSDMP requires applications on non-minerals development in a minerals safeguarding area to be accompanied by a Mineral Assessment. Within the Site Locations document, Policy SL1 plans for a “steady and adequate supply of sand and gravel” in accordance with Policy M2 of the Core Strategy and makes reference to Whisby Quarry in protecting its future use. This is then further supported by policy SL2 which safeguards all allocated sites within Policy SL1. We submit that the emerging Central Lincolnshire Local Plan should, when considering policies and potential land for allocations / designations ensure that quarries and mineral infrastructure sites are safeguarded and not needlessly sterilised from non mineral development that would prejudice the ongoing / future operations of the existing / future mineral site, as advocated within the adopted Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies (June 2016) (CSDMP) policies M11 & M12. Also, Policy SL2 of the Minerals and Waste Local Plan Site Locations (December 2017) document. It is suggested that to encompass the points raised above</p>		
--	--	--	--	--	--	--	--	--	--	---	--	--

									Extensions included within the Policy, and as part of any forthcoming proposals it must be demonstrated that they will not cause any unnecessary sterilisation of minerals; and, • Policy S77-82 Housing Allocations – The housing allocations within these policies individually address minerals concerns where relevant with each allocation. Whilst the above policies show there has been consideration of minerals in the preparation of the emerging Local Plan, this still falls short of the requirements set upon Local Authorities at a national level. More explicit reference to minerals should be included within the local plan policy; the following section suggests policy to be included within the development plan.	reference to the requirement for a ‘Minerals Assessment’ would be sufficient to cover the requirements of the Local Authority and the Plan should direct the user/prospective developer to the requirements of Policy M11 and M12 if they fall within a Mineral Safeguarding Area. As stated previously, Tarmac are keen to engage with the preparation of the Central Lincolnshire Local Plan and ensure that it is prepared in a manner consistent with National Policy and affords an appropriate degree of protection to existing and future mineral operations.		
--	--	--	--	--	--	--	--	--	---	--	--	--

Taylor Lindsey Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103678	S65; Map	No			No				<p>[See attachment for Figures mentioned in the representation]</p> <p>1. These representations are prepared by Globe Consultants Limited on behalf of the landowner, Taylor Lindsey Limited, and formally object to emerging Policy S65: Important Open Space of the Central Lincolnshire Local Plan Proposed Submission Draft (March 2022) ‘Proposed Submission Draft CLLP’ (Regulation 19 Consultation). Specifically, these representations object to the designation of a parcel of land to the east of Lee Road, Lincoln and to the west of Public Footpath Linc/7/1 (‘the Site’) as an area identified as an Important Open Space on the Policies Map (45 - Lincoln Urban Area and neighbouring villages). An extract from the Policies Map is reproduced below at Figure 1 and this is the focus of these representations.</p> <p>2. Representations were also made by Globe Consultants Limited on behalf of Taylor Lindsey Limited at the Regulation 18 stage. These representations were submitted to the Central Lincolnshire Joint Strategic Planning Committee (‘CLJSPC’) on 16 August 2021 and formally objected to emerging Policy S64: Important Open Space of the Consultation Draft Central Lincolnshire Local Plan (June 2021). A copy of these representations are included at Appendix 2.</p> <p>3. Following the publication of the Proposed Submission Draft CLLP, the CLJSPC were alerted to error on the Policies Map (45 – Lincoln Urban Area and neighbouring villages), specifically in relation to the Site’s designation as Important Open Space. An email from James Rigby (Planning & Development Director, Globe Consultants Limited) was sent to the CLJSPC on 22 April 2022 (08:13) and a reply received from Kate Eales (Planning Policy Officer, Central Lincolnshire Local Plan Team) on 22 April 2022 (10:58). A copy of this email exchange is provided at Appendix 1. Ms Eales set out the following in her email: “Dear Mr Rigby,</p> <p>Thank you for your email in respect of the Important Open Space designation at Lee Road in Lincoln.</p> <p>The designation at Lee Road is, as per the Important Open Space Methodology and Review paper, proposed for removal and I can confirm that its appearance is an error. We would suggest that you do indeed raise this in your response to the</p>	1. Based on the content of these representations it is considered that the Proposed Submission Draft CLLP is not considered to be sound. Specifically, the inclusion of the Site on the latest version of the Policies Map (45 – Lincoln Urban Area and neighbouring villages) as IOS is contrary to the evidence base, specifically the Important Open Spaces Methodology and Review document (March 2022). Whilst is appreciated that this has been acknowledged as an error, the Proposed Submission Draft CLLP cannot be seen as Justified until it is modified and the Site’s designation as IOS is removed from the Policies Map.	Yes	Yes

								<p>local plan consultation. Following the close of the consultation, we will be producing a response to the issues raised during the consultation which will be provided to the inspector alongside all the other documentation. By you submitting a response identifying this error, we will then be able to confirm that we agree with this issue raised and hopefully the inspector will then consider the modification.</p> <p>Kind Regards Kate”</p> <p>4. As part of the Regulation 19 consultation and the updated evidence base, the CLJSPC have published a further update to the Important Open Spaces Methodology and Review document (‘IOS Review’) (March 2022). Specific reference to the Site is included within the IOS Review document and key paragraphs from that document are reproduced below (with emphasis added):</p> <p>6.1 The Regulation 18 Consultation Draft of the Local Plan was published for consultation between 30 June and 24 August 2021. During this eight week consultation comments were received on the plan, the policies within the plan, and supporting information and evidence.</p> <p>6.2 A number of comments were received during the consultation that related to specific Important Open Spaces, or potential locations for new ones. The locations submitted are as follows:</p> <ul style="list-style-type: none"> • Locations identified for removal ▪ Swaton, Parsons Drove ▪ Lincoln, Lee Road, ▪ Skellingthorpe, High Street/ Ferry Lane ▪ Keelby, Caddle Beck <p>7.6 Following the review of locations suggested for removal, including the information submitted, one has had its boundary amended, one has been removed and one has been retained as Important Open Space.</p> <p>...</p> <ul style="list-style-type: none"> • Lincoln, Lee Road: Whilst the historic use of this location would have met the criteria for designation as Important Open Space, it is no longer in use as such. This location is surrounded on 3 sides by residential rear gardens with a mix of mature screening, and separated from a school field on the fourth side by secure fencing. With the exception of some of the rear gardens and school field, there are no views into or out of the location. With the exception of the gated entrance, there are no views from the highway of the location either directly, or indirectly across the existing residential gardens, to the degree that it is in effect hidden. This location has been removed from the Important Open Space designation due to its complete lack of visibility and lack of ‘presence’ in the general locality; <p>5. The Site’s removal from the Important Open Space designation is also confirmed at Appendix C (Previously Designated Sites That Do Not Meet Important Open Space Criteria) of the IOS Review document – this is reproduced below (at Figure 2) for ease of reference.</p> <p>6. Notwithstanding the above, the Site remains identified as an Important Open Space (‘IOS’) on the latest version of the Policies Map (45 – Lincoln Urban Area and neighbouring villages) of the Proposed Submission Draft CLLP.</p> <p>7. Accordingly, these representations formally object to Policy S65: Important Open Space and the Policies Map (45 - Lincoln Urban Area and neighbouring villages) of the Proposed Submission Draft CLLP.</p>			
--	--	--	--	--	--	--	--	---	--	--	--

Temple Bruer Airfield

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1089328	S14	Yes	Yes	Yes	Yes	No	No	Yes	The National Planning Policy Framework has, since 2018 positively supported General Aviation Aerodromes. Paragraph 106(f) recognises the importance of GA aerodromes. Paragraph 187 relating to the Agent of Change has been explicitly extended to apply to airfields by PPG Paragraph: 012 Reference ID: 30-012-20190722, Revision date: 22 07 2019. Sport England recognises a wide range of Air Sports and sports venues (airfields) are therefore protected by paragraph 84 of the NPPF and paragraph 98 emphasises the importance of access to opportunities for sport and its benefits for the health and well being of communities. These provisions reinforce the provisions of paragraph 106 (f). Cumulatively, these provisions give greater weight to the safeguarding of existing GA sites. Policy S14 is welcomed in principle. We note that Map 2 has been amended and that this now recognises the presence of Temple Bruer Airfield. The purple area 'potentially suitable for medium to large wind turbines' has been modified to allow for a 5km exclusion zone around Temple Bruer. However, paragraph 3.3.12, in the last bullet point lists a number of specific aerodromes but Temple Bruer is excluded. As the list is preceded by 'namely' it would be more effective and logical for all relevant sites to be identified. The term 'effective' is relevant, as this would alert potential developers to the presence of Temple Bruer airfield and the need for its operations to be safeguarded from inappropriate development. The logic of this is to avoid the unnecessary investment of time and money in developing, for example, a wind farm scheme and then for the airfield operator potentially needing to object.	The Plan would be clearer and more transparent if Temple Bruer is added to the list in paragraph 3.3.12.	No	No

The Benjamin Gamble Will Trust

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101359	S1	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	The Benjamin Gamble Will Trust - Site Allocation - NK/WAD/015 – Land East of Grantham Road, Waddington Our clients' interests are located around the large village of Waddington. Our clients in principle support the Draft Local Plan as submitted and consider that the allocation of their site (NK/WAD/015) accords with the policies outlined within the Draft Local Plan and represents a natural extension of the village to the south-east of Grantham Road with good access to all the local facilities within the village. The allocation offers up a balancing of development on both sides of the Grantham Road (A607). However, it is noted that land which is situated at Green Farm to the west of Grantham Road (NK/WAD/013) is excluded from the overall allocation for the village and it is our view that this should be included as it would not in our opinion adversely affect the "green wedge" which it has been allocated within.	n/a	No	No
1101360	S4; S80	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	The Benjamin Gamble Will Trust - Site Allocation - NK/WAD/015 – Land East of Grantham Road, Waddington Our clients' interests are located around the large village of Waddington. Our clients in principle support the Draft Local Plan as submitted and consider that the allocation of their site (NK/WAD/015) accords with the policies outlined within the Draft Local Plan and	n/a	No	No

									represents a natural extension of the village to the south-east of Grantham Road with good access to all the local facilities within the village. The allocation offers up a balancing of development on both sides of the Grantham Road (A607). However, it is noted that land which is situated at Green Farm to the west of Grantham Road (NK/WAD/013) is excluded from the overall allocation for the village and it is our view that this should be included as it would not in our opinion adversely affect the “green wedge” which it has been allocated within.			
1101362	S80	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	Don't know	The Benjamin Gamble Will Trust - Site Allocation - NK/WAD/015 – Land East of Grantham Road, Waddington Our clients’ interests are located around the large village of Waddington. Our clients in principle support the Draft Local Plan as submitted and consider that the allocation of their site (NK/WAD/015) accords with the policies outlined within the Draft Local Plan and represents a natural extension of the village to the south-east of Grantham Road with good access to all the local facilities within the village. The allocation offers up a balancing of development on both sides of the Grantham Road (A607). However, it is noted that land which is situated at Green Farm to the west of Grantham Road (NK/WAD/013) is excluded from the overall allocation for the village and it is our view that this should be included as it would not in our opinion adversely affect the “green wedge” which it has been allocated within.	n/a	No	No

The Mottram Family Trust

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103064	S77	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>Our client owns part of the land proposed to be allocated as NK/WAD/004a under policy S77 of the Submission Draft Local Plan.</p> <p>The land is part of an area identified as a “Broad Location for Future Growth” under Policy LP54 of the Adopted Local Plan. Bringing forward growth in this location is, therefore, reasonable and appropriate, potentially as the first part of a wider development brought forward through a future review of the Local Plan. In the context of this site, the allocation of a significant site in a sustainable location indicates the plan is Positively Prepared, Justified and Effective.</p> <p>We note Lincolnshire County Council voted on 4 May 2022 to appoint a contractor to bring forward the delivery of the North Hykeham Relief Road. The road will deliver improvements to traffic circulation in the area, supporting development and providing a context for new development between Station Road and Brant Road.</p> <p>Our client looks forward to discussions with the Local Planning Authority and the other landowners to explore the most appropriate way to bring forward development of the proposed allocation.</p>		Yes	No

The Original Fiskerton Neighbourhood Plan Group

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100458	S1	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>The Group Fully Support the Proposed Policy S1, Spatial Strategy and Settlement Hierarchy. The changes made can be seen to have been fully informed by evidence based arguments and documentation.</p> <p>We note and support the changes made and the inclusion of the proposed site in Fiskerton North of Ferry Road.</p> <p>We are pleased to note that this Policy and site allocation for Fiskerton is supported by the Landowners of the site. The Church Commissioners.</p>		No	No

1100461	S2	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Policy S2 is fully supported by The Original NPG for Fiskerton. The Group Fully Support the Proposed Policy S2, Growth Levels and distribution. this policy as the most suitable and fair way to distribute growth over the CLLP area and specifically with reference to Fiskerton Village. Which needs to grow in population size, sufficiently to keep and improve current facilities and infrastructure. And attract younger families into the village.		No	No
1100464	S4	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Policy S4 is fully supported by The Original NPG for Fiskerton. The Group Fully Support the Proposed Policy S4, Housing Development in or Adjacent to Villages. this policy and content is supported in full. Specifically with reference to Fiskerton Village and the school and services. Development should also reflect the need for affordable as well as market value housing.		No	No
1100465	S48	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Policy S48 is fully supported by The Original NPG for Fiskerton. The Group Fully Support the Proposed Policy S48, Walking and Cycling Infrastructure. This policy is most important to Fiskerton Village along with the adjacent villages of Reepham and Cherry Willingham. All three villages need safe interconnections via cycleways and footpaths to allow safe travel between communities without the need for motor vehicles. These will allow Children to go to and from Schools safely and will encourage all residents to improve their health and wellbeing.		No	No
1100492	S57	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Policy S57 is fully supported by The Original NPG for Fiskerton. The Group Fully Support the Proposed Policy S57, The Historic Environment. This policy is of great importance and supported fully. All our rural history and Archaeology must be protected for future generations. Planning conditions are a very easy and effective way to achieve this.		No	No
1100496	S64	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Policy S64 is fully supported by The Original NPG for Fiskerton. The Group Fully Support the Proposed Policy S64, Local Green Space. The policy of rolling on 2017 CLLP protected Green spaces is fully supported and enforcing the protection of any suitable areas is to be supported. With particular reference to Fiskerton Village.		No	No
1100501	S65	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Policy S65 is fully supported by The Original NPG for Fiskerton. The Group Fully Support the Proposed Policy S56, Important Open Space. This policy is of great importance and supported fully. Fiskerton Has few open spaces within the village, and all should be preserved for future generations to continue to enjoy the rural feel of the village. New developments should consider the design and ensure the rural environment of the village is preserved.		No	No
1100515	S81	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Policy S81 is fully supported by The Original NPG for Fiskerton. The Group Fully Support the Proposed Policy S81, Housing Sites in Medium Villages. The Group fully support the site as allocated for Fiskerton WL/Fisk/001A. Work has been carried out by a group of residents during the period 2014 to 2019 to produce a NDP in which Fiskerton would necessarily develop to remain sustainable and relevant for the next generation and provide the needed infrastructure to support this. This site when assessed and proved to be the most sustainable in planning terms for development over the next 20 years. The group carried out many consultation with local residents over that period and gained majority support on a number of consultation events and agreed with the landowners, who made the site available for inclusion in the finished NDP 2019. The landowners also agreed, along with the LPA, to offsite planning gain in the form of the existing Paddock area, as a community use open space. (Village Green) The new incoming PC raised objection to the inclusion of this site, as it bounded on a number of their personal dwellings. The PC which included two District Councilors withdrew the already deposited plan from the Reg 16 consultation with WLDC in 2019. Since that time the NDP has not progressed with the current PC, other than to hold a consultation in mid 2020.		No	No

									<p>In that consultation the current site was included for consultation along with other sites in the village which had all previously failed the site assessment as not suitable for the numbers needed or failed the tests for inclusion in the NDP or the CLLP in force at that time.</p> <p>The site North of Ferry Road which covered an area of appx 10Ha including open spaces, in its original proposal for the Fiskerton NDP, was for the purpose of the Parish Councils 2020 consultation, split into two sites.</p> <p>This action was obviously intended to split the total vote for the Site North of Ferry Road in favour of their preferred site. However, taking the result of the PC's 2020 consultation, the total votes cast for the two halves of the North Ferry Road site (WL/Fisk/001A) still gained the most votes and therefore, again came out as the most acceptable to the residents.</p> <p>This group fully support the allocation WL/Fisk/001A for the future development in Fiskerton as the most suitable, inclusive and suitable site in planning terms, and in accordance with the latest Parish Council 2020 consultation results also, with local residents. We note that the Landowners are still, also in agreement with the selection of this site and they confirm that it would be made available within the first five years of the CLLP and Fiskerton NDP.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

Theatres Trust

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
11940341	S50	Y							We welcome that this policy now sets out that it can be applied to cultural facilities in line with our advice at the previous stage of consultation.		No	No

Thonock and Somerby Estate

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102775	S1	Yes	Don't know	No	Don't know	Don't know	Don't know	Yes	Draft Policy S1 sets out the distribution of new housing within the emerging Local Plan with the overall objective of delivering sustainable growth across the district. The settlement hierarchy places Lincoln Urban Area top, followed by the Main Towns of Sleaford and Gainsborough. The Estate notes that the strategy also recognises the importance of maintaining and enhancing the services and features of the rural area in order to sustain the vibrancy of rural settlements and the quality of life experienced by those living in such areas. This is fully supported.		Yes	No
1102776	S2; S4	Yes	Don't know	No	Don't know	Don't know	Don't know	Yes	<p>Draft Policy S2 sets out the amount of housing to be developed over the Plan period. Whilst we understand the range CLJPU have expressed in terms of the Local Housing Need figure of 1,060 dpa up to 1,325 dpa to support the expected growth in jobs we would draw the Council's attention to how this matter has been dealt with at the Doncaster Local Plan EiP in October 2020 where the Inspector rejected the notion of the range as it clouded the plan making process. This should be seen in the context of the National Government's aim of delivering significant growth across the country and addressing the housing crisis.</p> <p>To detail the NPPF is clear that Local Planning Authorities are to be ambitious, but realistic in their approach to growth and that the LHN figure should be seen as a minimum (paragraph 60). MHCLG are explicit that if Councils want a more ambitious local plan for growth then they should incorporate positive growth</p>	<p>Ensure that a positive growth strategy is incorporated into the Plan. CLJPU should therefore adopt a housing target utilising the upper limit of 1,325 dwellings per annum in the interests of positive plan making.</p> <p>Ensure flexibility should be retained to increase the growth distributed to Gainsborough should</p>	Yes	No

									<p>and housing figures.</p> <p>We therefore support the aspirational target in the Plan of aiming for the higher end of the identified range i.e. 1,325 dwellings per year or 29,150 over the Plan period to 2040. We therefore consider the upper end of the range should be utilised as the target.</p> <p>In terms of distribution, The Estate supports the continued identification of Gainsborough as a Main Town second only to Lincoln Urban Area. We support the proposed distribution of growth and in particular the 12% of overall growth which is proposed to be directed to Gainsborough. However, given the reductions in the housing requirement for the Central Lincolnshire area, this creates a reduction of c. 1,000 homes in Gainsborough compared to the current adopted Local Plan. The Estate therefore requires that sufficient flexibility should be retained to increase this figure should circumstances dictate. The Estate welcomes the continued reference to the strategy of urban regeneration and sustainable urban extensions.</p> <p>In recent years, the Estate has committed significant resources to progressing the Southern, Northern and Eastern Sustainable Urban Extensions (SUEs). The Southern SUE already benefits from outline planning permission for 2,500 dwellings with Reserved Matters approved for Phase 1 which Keepmoat are delivering.</p> <p>The Northern Neighbourhood now also benefits from outline planning permission for an initial 750 dwellings with Phase 1a marketed earlier in 2021 with Persimmon the chosen housebuilder. A Reserved Matters application is due to be submitted imminently. The market exercises confirm that there is market appetite within Gainsborough and for these large sites.</p> <p>The Estate supports the view that some growth should take place in villages lower down the settlement hierarchy to help enhance or maintain the vitality of rural communities. This is required by the NPPF and supports the wider growth aspirations of the Local Plan.</p> <p>The Estate supports the principle that large, medium and small villages will all be permitted to grow. We note that the Draft Local Plan has allocated sites to both large and medium villages, a positive change from the current Local Plan.</p> <p>We support the continued recognition of Blyton as a Medium Village and Corringham as a Small Village.</p> <p>The Estate notes however the scale of development permitted will typically be up to 10 dwellings in large and medium village, reducing to 5 dwellings in small villages. However, we would encourage the CLJPU to allow a level of flexibility within this policy to ensure that additional growth can take place subject to compliance with other policy requirements. This is in line with the view that flexibility should be included in the overall housing numbers as the planned number of dwellings should only be a minimum.</p>	<p>circumstances dictate. In the interests of effective and positive plan making.</p> <p>Encourage CLJPU to allow a level of flexibility within Policy S2 and corresponding Policy S4 (Housing Development in villages) to ensure that additional growth in villages can take place subject to compliance with other policy requirements. In the interests of positive plan making and in line with national policy.</p>		
1102779	S22	Yes	Don't know	No	Don't know	Don't know	Don't know	Yes	<p>The Estate notes that an assessment of the Whole Plan Viability has been undertaken to support the revised level of affordable housing within the emerging Local Plan. Taking this forward, Gainsborough is regarded as a Value Zone D which results in 10% sought for affordable dwellings. This is in contrast</p>	<p>Encourage CLJPU to allow a level of flexibility within Policy S22 in respect of affordable housing</p>	Yes	No

									<p>to the current adopted Plan which seeks 20% within Gainsborough and also includes a specific percentage for SUE's (at 15%).</p> <p>In respect of the tenure split of affordable housing we support the wording of the policy which states that "the exact tenure mix should be identified through discussions with the local authority and informed by the latest Government guidance and up-to date local Housing Need Assessment (HNA)".</p> <p>We note the inclusion of the new requirement for First Homes, with the starting point based on the delivery of 25% which will be priced at least 30% below full market value.</p>	percentages and specific tenure splits. In the interests of positive plan making.		
1102786	S68	Yes	Don't know	No	Don't know	Don't know	Don't know	Yes	<p>Draft Policy S68 (previously S67), is the overarching policy for all urban extensions with subsequent policies providing specific requirements for each SUE.</p> <p>SUEs form an integral part of the local plan strategy, delivering more than half of the housing requirement in the Plan period. The eight SUE's located around Lincoln, Gainsborough and Sleaford were allocated as part of the 2017 Local Plan and the Estate fully supports the continued delivery of development through these SUEs.</p> <p>As detailed within the pre-text to the policy, "substantial efforts from the Central Lincolnshire Districts and site promotor and developers has gone into making progress with these SUEs". In the case of both the Gainsborough Northern and Southern SUEs, progress has ensured that the first phases are under way or due to submit Reserved Matters shortly. This is following significant effort from the Estate to ensure the SUE's are progressing in line with Local Plan timescales.</p> <p>The Estate therefore fully supports the principle of delivering development through SUEs. It is important to highlight that the revised NPPF (2021) clarifies that councils who wish to plan for new settlements and major urban extensions will need to look over a longer time frame, of at least 30 years instead of 15 years, to take into account the likely timescale for delivery. It is therefore important that the delivery of the SUE's within the Central Lincolnshire Local Plan are taken in context of 30 years instead of 15.</p>	Encourage CLJPU to allow a level of flexibility within Policy S22 in respect of affordable housing percentages and specific tenure splits. In the interests of positive plan making.	Yes	No
1102788	S70	Yes	Don't know	No	Don't know	Don't know	Don't know	Yes	<p>Gainsborough Southern Neighbourhood (SUE) – Warren Wood The Estate supports provision of the Gainsborough Southern SUE as outlined within Policy S70 (previously S69).</p> <p>This area of land benefits from outline planning permission (Ref. No. 125020) for 2,500 houses, employment land, a neighbourhood centre, primary schools, green infrastructure and sustainable transport measures. This permission was approved in July 2011.</p> <p>In March 2019 a Section 73 application (Ref. No. 138921) was submitted to amend and/ or remove conditions pursuant to the original outline consent and accompanying Section 106 Agreement. The planning application (planning ref: 138921) varied conditions 1, 2, 3, 6, 11, 17, 19, 20, 21, 26, and 27, and removed conditions 4, 5, 7, 8, 9, 10, 12, 13, 18, 23, and 25.</p> <p>The first phase was bought by Keepmoat. A Reserved Matters application (Ref.</p>	<p>Gainsborough Southern Neighbourhood (SUE) – Warren Wood Support the c. 1,500 dwellings expected within the Plan period to 2040 with the caveat that this figure should not be viewed as a ceiling for delivery.</p> <p>Gainsborough Eastern Neighbourhood SUE CLJPU should include a specific policy on broad locations, similar to that of Policy LP54 in the 2017 Local</p>	Yes	No

									<p>No. 140081) was granted 6th February 2020 for the development of 454 dwellings. Keepmoat started on site in 2021, with the development referred to as 'Warren Wood View' on their website with the market dictating quick sales. Given the confidence in the market, Keepmoat have now sold a parcel of land to Danum Homes to increase delivery rates on site. This initial phase also includes the delivery of the key infrastructure to 'open up' the wider site.</p> <p>At the beginning of 2022 Phase 2 was marketed with strong market interest. More detailed discussions have since taken place with a select few of the housebuilders with the preferred housebuilder to be decided shortly.</p> <p>The current outline consent for the Southern SUE lapses in July 2023, The Estate are in the process of preparing a new outline planning application for the latter phases of the Southern SUE to ensure the delivery of the entire SUE moving forward.</p> <p>The Estate therefore remains committed to the delivery of the SUE and are particularly keen to achieve a legacy in this part of Gainsborough. The Estate are keen to progress the next stages of the SUE with work on going to get another housebuilder for the Phase II land.</p> <p>The Estate are therefore committed to meeting the timescales for delivery as detailed within the adopted Local Plan, which equates to c. 1,500 dwellings to come forward to 2040. We note that the submission draft Local Plan confirms that the anticipated numbers for the Southern Neighbourhood are 1,500 with the supported caveat that the figure should not be viewed as a ceiling for delivery. This will provide the necessary reassurance that a higher number of dwellings will be allowed to come forward should the site be in a position to deliver them.</p> <p>Gainsborough Northern Neighbourhood SUE The Estate supports the continued allocation of the Northern SUE which is allocated for approximately 2,500 dwellings. The SUE is split into two distinct phases with Phase 1 comprising 50.4 hectares and benefits from outline planning permission for 750 units (planning ref: 136937) and the wider land. Outline planning approval was granted on 15th September 2020.</p> <p>Phase 1 is split further into two distinct development parcels. These are known as Phase 1A for approximately 130 units and Phase 1B for 620 units. Phase 1A is well related to Gainsborough and can come forward with very little forward funding and the infrastructure requirements are light.</p> <p>Phase 1A was marketed in early 2021 with significant house builder interest. The Estate is now in contract with Persimmon Homes with the submission of a Reserved Matters application to follow imminently.</p> <p>Delivery of 750 dwellings on the Northern SUE is anticipated within the emerging Local Plan period to 2040.</p> <p>The Estate also remain committed to the delivery of the remaining circa. 1,750 dwellings which are anticipated to come forward on the Northern Neighbourhood SUE site beyond the Local Plan period, i.e. post 2040.</p>	Plan to ensure the longer term view of the Eastern SUE and to accommodate additional employment growth as and when required. In the interests of justified and positive plan making.		
--	--	--	--	--	--	--	--	--	--	--	--	--

									<p>Gainsborough Eastern Neighbourhood SUE</p> <p>The Estate support the identification of the Eastern SUE as a 'broad location' for future growth post 2040.</p> <p>The Estate note however that our suggestion from our previous representations has not been included and as such there is still no specific policy relating to Broad Locations for Future Growth. This is in contrast to the current Local Plan which covers Broad Locations within Policy LP54. While we recognise that the Eastern SUE is for future growth, in light of the new NPPF1, which states that major urban extensions will need to look over a longer time frame, of at least 30 years instead of 15 years, it is more important than ever to take a longer term view on large scale developments such as the Eastern SUE. Should circumstances dictate this could be a location that comes forward earlier and so should be properly considered within its own policy, similar to that of Policy LP54.</p> <p>The Estate's strategy with the Eastern SUE is to seek to assist the CLJPU with delivering employment growth. Despite being a major land owner, the Estate no longer has any allocated employment land and therefore assisting with the delivery of employment space and jobs becomes more difficult. All of the Estate land at Somerby Park, which was allocated for employment uses in the 2017 Local Plan (Site Reference E4), has been sold for employment purposes to third parties.</p> <p>Demand for additional employment growth in this location is anticipated to be strong moving forward, particularly given the proposed level of housing growth in the Gainsborough location. The Eastern SUE offers the opportunity to move quickly should a significant developer / occupier market requirement come forward.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

Thurlby Parish Meeting

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1102330	S2	Don't know	Don't know	Yes	Don't know	Don't know	Don't know	Yes	<p>As a hamlet located near to and between a large village (Witham St. Hugh's) and a medium village (Bassingham) we are concerned that their housing growth, as set out in the Plan, will result in increased traffic passing through Thurlby.</p> <p>The only road is narrow, rural and without pavements, making it dangerous for pedestrians, mothers with prams and cyclists. We therefore request greater emphasis in the Plan for the provision of cycle paths and safe pedestrian use (maybe as a combined routing).</p> <p>Attendance at Schools and Doctors' Surgeries will also increase traffic as the Plan is not clear about extra provision to go with the proposed new housing.</p> <p>We suggest that the above stress point will be found in many other locations covered by the Plan.</p>		No	No
1102331	S4	Don't know	Don't know	Yes	Don't know	Don't know	Don't know	Yes	<p>As a hamlet located near to and between a large village (Witham St. Hugh's) and a medium village (Bassingham) we are concerned that their housing growth, as set out in the Plan, will result in increased traffic passing through Thurlby. The only road is narrow, rural and without pavements, making it dangerous for pedestrians, mothers with prams and cyclists. We therefore request greater emphasis in the Plan for the provision of cycle paths and safe</p>		No	No

									pedestrian use (maybe as a combined routing). Attendance at Schools and Doctors' Surgeries will also increase traffic as the Plan is not clear about extra provision to go with the proposed new housing. We suggest that the above stress point will be found in many other locations covered by the Plan.			
--	--	--	--	--	--	--	--	--	---	--	--	--

Tinsley (Branston) Farms Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103680	S1; S4; App 1	No	Don't know	No	No	Don't know	No	Don't know	<p>Policy S1 states that growth will be allowed in large villages (such as Branston) to an “appropriate” level via sites allocated in the draft Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be.</p> <p>Appendix 1 of the draft plan provides a list of housing targets, which can be used to guide Neighbourhood Plans (as required by paragraph 65 of the NPPF). This figure, however, is derived from adding dwellings, completed since the start date of the plan, sites with extant planning permission and sites allocated in the Local Plan. This approach does not result in a target for growth to be met by a Neighbourhood Plan. Nor does it provide a context for considering windfall developments.</p> <p>There is no evidence to suggest the growth targets have taken into consideration evidence of local housing need or the population for the area, as required by paragraph 67 of the NPPF, which requires targets to be set based on an assessment of demand and the role of the settlement.</p> <p>There is, therefore, no justification for setting growth targets for individual settlements. It is left for the reader to conclude that the “appropriate” level is that which is already built, permitted or allocated, rather than an assessment of any “need” for growth to support the settlement, nor any capacity of the settlement to support growth.</p> <p>This approach may well be pragmatic, but it does not provide any justification for why specific sites are allocated. What role do the settlements play? How will growth assist in meeting that role? Could other smaller or larger sites be allocated just as readily to better meet the needs of the settlement? Paragraph 66 of the NPPF requires strategic policy making authorities to set targets to provide a minimum target to be met by a Neighbourhood Planning process.</p> <p>Setting targets based on existing commitments (past development, current permissions and local plan allocations) is not providing guidance for the Neighbourhood Plan process, contrary to Paragraph 66 of the NPPF.</p> <p>Policy S4 sets criteria for windfall sites in large villages, including a cap of 10 dwellings (because allocations are over 10 dwellings) and sites must be within the developed footprint of the settlement. Neither of these reasons are justified. It is not unreasonable to expect windfall sites within the same village to accommodate more than 10 dwellings. An arbitrary cap can lead to an inefficient use of land.</p> <p>Restricting development to the developed footprint may lead to ‘town cramming’</p>	<p>The derivation of settlement targets for different settlements should be based on an assessment of demand and the role of the individual settlements. This target should then be used to inform the choice of allocations. If no further target is identified to be met through a Neighbourhood Plan process this position should be clarified, and guidance provided for any potential Neighbourhood Planning Group.</p> <p>The process of allocations in large villages, as identified in policy S1, should be informed by the growth target. The draft plan appears to set the target based on past consents, previous development and allocations already identified.</p> <p>The process for selecting sites to be allocated in Large Villages (under Policy 80) should be revisited to take into consideration the needs and capacity of each settlement.</p> <p>The criteria for windfall sites set out in Policy S4 should be amended to remove the arbitrary cap</p>	Yes	No

									<p>by directing development into a settlement, or may, alternatively, prejudice developments, all or part of which may need to be outside the footprint - this could include a new access, drainage attenuation, open space, landscaping and not just new dwellings or commercial properties.</p> <p>The approach to setting growth targets for individual settlements, and henceforth the justification for the allocation of sites within or adjacent to these settlements is not justified. Without a clear growth target for a settlement such as Branston, it is not clear why sites Bran/004 or Bran/007 were chosen to be allocated rather than, for instance, our client's land at Thacker's Lane (BRAN/001), East of Mere Road (BRAN/002), Lincoln Road (BRAN/003), North of Kirks Yard (BRAN/004), Hall Lane (BRAN/005) and North of Lincoln Road (BRAN/011). Although BRAN/004 is next to BRA/012, which is being built out, there is no evidence that there has been any interest in delivering development since consideration of an EIA Screening request in 2014. There is, therefore, some potential doubt about the deliverability of the site.</p> <p>The plan has failed to demonstrate how it is positively prepared, as settlement targets are restricted to the capacity of previous development, current consents and allocated sites. The growth targets for each settlement have not been justified. The Plan is not consistent with national policy because it fails to set a target for growth to be met through the Neighbourhood Plan process. The targets that are set are not based on an assessment of local demand and the role of individual settlements.</p> <p>The choice of allocations is not justified in policy S80, nor are the restrictions imposed on windfall developments in large villages in policy S4.</p>	on the capacity of windfall sites and restriction on development outside the settlement footprint.		
1103681	S4	No	Don't know	No	No	Don't know	No	Don't know	<p>Policy S1 states that growth will be allowed in large villages (such as Branston) to an "appropriate" level via sites allocated in the draft Local Plan. No effort has been made within the plan, however, to define what an "appropriate" level may be.</p> <p>Appendix 1 of the draft plan provides a list of housing targets, which can be used to guide Neighbourhood Plans (as required by paragraph 65 of the NPPF). This figure, however, is derived from adding dwellings, completed since the start date of the plan, sites with extant planning permission and sites allocated in the Local Plan. This approach does not result in a target for growth to be met by a Neighbourhood Plan. Nor does it provide a context for considering windfall developments.</p> <p>There is no evidence to suggest the growth targets have taken into consideration evidence of local housing need or the population for the area, as required by paragraph 67 of the NPPF, which requires targets to be set based on an assessment of demand and the role of the settlement.</p> <p>There is, therefore, no justification for setting growth targets for individual settlements. It is left for the reader to conclude that the "appropriate" level is that which is already built, permitted or allocated, rather than an assessment of any "need" for growth to support the settlement, nor any capacity of the settlement to support growth.</p> <p>This approach may well be pragmatic, but it does not provide any justification for why specific sites are allocated. What role do the settlements play? How will</p>	<p>The derivation of settlement targets for different settlements should be based on an assessment of demand and the role of the individual settlements. This target should then be used to inform the choice of allocations. If no further target is identified to be met through a Neighbourhood Plan process this position should be clarified, and guidance provided for any potential Neighbourhood Planning Group.</p> <p>The process of allocations in large villages, as identified in policy S1, should be informed by the growth target. The draft plan appears to set the target based on past</p>	Yes	No

									<p>growth assist in meeting that role? Could other smaller or larger sites be allocated just as readily to better meet the needs of the settlement? Paragraph 66 of the NPPF requires strategic policy making authorities to set targets to provide a minimum target to be met by a Neighbourhood Planning process.</p> <p>Setting targets based on existing commitments (past development, current permissions and local plan allocations) is not providing guidance for the Neighbourhood Plan process, contrary to Paragraph 66 of the NPPF.</p> <p>Policy S4 sets criteria for windfall sites in large villages, including a cap of 10 dwellings (because allocations are over 10 dwellings) and sites must be within the developed footprint of the settlement. Neither of these reasons are justified. It is not unreasonable to expect windfall sites within the same village to accommodate more than 10 dwellings. An arbitrary cap can lead to an inefficient use of land.</p> <p>Restricting development to the developed footprint may lead to ‘town cramming’ by directing development into a settlement, or may, alternatively, prejudice developments, all or part of which may need to be outside the footprint - this could include a new access, drainage attenuation, open space, landscaping and not just new dwellings or commercial properties.</p> <p>The approach to setting growth targets for individual settlements, and henceforth the justification for the allocation of sites within or adjacent to these settlements is not justified. Without a clear growth target for a settlement such as Branston, it is not clear why sites Bran/004 or Bran/007 were chosen to be allocated rather than, for instance, our client’s land at Thacker’s Lane (BRAN/001), East of Mere Road (BRAN/002), Lincoln Road (BRAN/003), North of Kirks Yard (BRAN/004), Hall Lane (BRAN/005) and North of Lincoln Road (BRAN/011). Although BRAN/004 is next to BRA/012, which is being built out, there is no evidence that there has been any interest in delivering development since consideration of an EIA Screening request in 2014. There is, therefore, some potential doubt about the deliverability of the site.</p> <p>The plan has failed to demonstrate how it is positively prepared, as settlement targets are restricted to the capacity of previous development, current consents and allocated sites. The growth targets for each settlement have not been justified. The Plan is not consistent with national policy because it fails to set a target for growth to be met through the Neighbourhood Plan process. The targets that are set are not based on an assessment of local demand and the role of individual settlements.</p> <p>The choice of allocations is not justified in policy S80, nor are the restrictions imposed on windfall developments in large villages in policy S4.</p>	<p>consents, previous development and allocations already identified.</p> <p>The process for selecting sites to be allocated in Large Villages (under Policy 80) should be revisited to take into consideration the needs and capacity of each settlement.</p> <p>The criteria for windfall sites set out in Policy S4 should be amended to remove the arbitrary cap on the capacity of windfall sites and restriction on development outside the settlement footprint.</p>		
1103877	S28; S29; S30; S31; S32; S33; S34	No	Don't know	No	No	No	No	Don't know	<p>The economy section does not reflect the demand for economic demand in the Plan Area. The Economic Needs Assessment (ENA) prepared to support the Local Plan confirms that the number of jobs created in the area always exceeds the number predicted by the two respected prediction models (Experian and Oxford Economics) Although the ENA increases the job creation targets to reflect past trends, rather than rely on the projections, no attempt has been made to explore the reasons for this rapid jobs growth. Is it informed by the concentration of defence jobs (both in the armed services and related civilian roles) or the impact of investment in Agri food? Alternatively, are new jobs investment by major</p>	<p>The economic strategy for the draft Local Plan should be revisited to ensure that the policies and proposals support the economic investment focused in the area, including the growth of the University of Lincoln, investment in defence,</p>	Yes	No

									<p>engineering companies such as Siemens, responding in part to investment in renewable energy generation? Or is the growth of the University of Lincoln the driver to job creation? Or is it based on jobs to support the growing population and the increase in Households – perhaps described in the past as the butcher, the baker, the candlestick maker, but today’s equivalent being the telecoms engineer, the gas fitter, the car mechanic, the childcare professional or the dogwalker as well?</p> <p>Without knowing what is driving the creation of new jobs, how is it possible to plan for delivering those new jobs?</p> <p>This approach is inconsistent with national policy, specifically paragraph 8 of the NPPF, which requires plans to provide sufficient land of the right type in the right place and at the right time to support growth, innovation and improved productivity.</p> <p>Many of the jobs created in recent years may not necessarily fit within the standard use classes of B1, B2 and B8 (Now B2, B8 and E(g)) although Chapter 5 of the Local Plan, and the supporting analysis and policies, appears to be based on the limited use classes order. Many employment areas, whether identified in the local plan or not, accommodate other uses (soft play zones, car mechanics, IT services, parcel couriers, etc.). When small units for rent are provided, either by the public or private sector, they generally have tenants by the time they are open and run at high occupation rates, whether the business serves a national or local market.</p> <p>The policy concentrates on “strategic” economic development sectors identified the industrial strategy, with growth focused on strategic allocations located in the main settlements. This does not appear to reflect more localized issues affecting the economy of Central Lincolnshire, such as the growth of the University of Lincoln, defence or the growth in small businesses created to meet the daily needs of the local community (whether this is professional services, education or care) Nor does it address the demands of agri-food, with past investment in locations such as “Branston”, resulting in job creation spread across the whole area, including in rural areas. The draft Local Plan, however, focuses on large allocations in the main settlements, despite the evidence of significant job creation in other locations in addition to the strategic development sites. This approach is taken despite evidence in the ENA that jobs growth has been delivered across the rural area and are not focused purely in the main settlements.</p> <p>The approach in the plan is inconsistent with national policy in the NPPF, paragraph 82 of which requires planning policies to “positively and proactively” encourage sustainable economic growth and to set criteria and identify strategic sites for local and inward investment to meet needs anticipated over the plan period.</p> <p>The plan does not positively respond to the evidenced demand, either in terms of type of job or geographic location of new allocations.</p> <p>In addition to the main elements of economic growth outlined above the plan is inconsistent with paragraph 79 of the NPPF which requires planning policies to identify opportunities for villages to grow and thrive, especially where this will</p>	<p>growth of agri-food and renewable energy generation, together with the more dispersed demand for smaller businesses that meet the daily needs of the wider population, whether based in main towns or smaller settlements.</p> <p>The draft Local Plan should be amended to identify key existing employment sites. The draft plan identifies significantly fewer existing sites than the adopted plan.</p>		
--	--	--	--	--	--	--	--	--	---	--	--	--

									<p>support local services. Concentrating economic growth in large towns will undermine investment in the range of smaller communities and settlements across the more rural areas.</p> <p>The failure to address specific needs of various economic sectors, including agri-food engineering (including maintaining renewable energy installations), defence, Higher education and small businesses means the draft Local Plan is unjustified and does not make appropriate provision to support the demand for new jobs in appropriate locations.</p> <p>Our client promoted the “Kirks Yard” development of small rental business units for development adjacent to the “Branston” agri-food plant on Mere Road, Branston. The “Branston” plant is a longstanding development that continues to benefit from investment to respond to changing circumstances. It is symbolic of other developments of this type across the Central Lincolnshire area. Although the business units are a recent development, they have been hugely popular meeting a growing demand for units of this nature across Central Lincolnshire (other sites, such as Churchill Business Park, Bracebridge Heath, and Sleaford Railway Station, both provided and managed for North Kesteven District Council, also demonstrate the need for such units). The “Branston” plant is a well-established employment area.</p> <p>The surrounding land is occupied by a solar farm installed in late 2021. Areas like this should be identified in the plan and a positive approach taken to their future. Although investment in “Branston” would be reluctantly supported by policy S34, development to support the maintenance of renewable energy installations and smaller businesses is lacking. Support for the type of facility provided by Branston and Kirks Yard should be positively promoted in the Local Plan to support the growth of the local economy.</p>			
1103682	S80	No	Don't know	No	No	Don't know	No	Don't know	<p>Policy S1 states that growth will be allowed in large villages (such as Branston) to an “appropriate” level via sites allocated in the draft Local Plan. No effort has been made within the plan, however, to define what an “appropriate” level may be. Appendix 1 of the draft plan provides a list of housing targets, which can be used to guide Neighbourhood Plans (as required by paragraph 65 of the NPPF). This figure, however, is derived from adding dwellings, completed since the start date of the plan, sites with extant planning permission and sites allocated in the Local Plan. This approach does not result in a target for growth to be met by a Neighbourhood Plan. Nor does it provide a context for considering windfall developments. There is no evidence to suggest the growth targets have taken into consideration evidence of local housing need or the population for the area, as required by paragraph 67 of the NPPF, which requires targets to be set based on an assessment of demand and the role of the settlement. There is, therefore, no justification for setting growth targets for individual settlements. It is left for the reader to conclude that the “appropriate” level is that which is already built, permitted or allocated, rather than an assessment of any “need” for growth to support the settlement, nor any capacity of the settlement to support growth. This approach may well be pragmatic, but it does not provide any justification for why specific sites are allocated. What role do the settlements play? How will growth assist in meeting that role? Could other smaller or larger sites be allocated just as readily to better meet the needs of the settlement? Paragraph 66 of the NPPF requires strategic policy making authorities to set targets to provide a minimum target to be met by a Neighbourhood Planning process. Setting targets based on existing commitments (past development, current</p>	<p>The derivation of settlement targets for different settlements should be based on an assessment of demand and the role of the individual settlements. This target should then be used to inform the choice of allocations. If no further target is identified to be met through a Neighbourhood Plan process this position should be clarified, and guidance provided for any potential Neighbourhood Planning Group. The process of allocations in large villages, as identified in policy S1, should be informed by the growth target. The draft plan appears to set the target</p>	Yes	No

									<p>permissions and local plan allocations) is not providing guidance for the Neighbourhood Plan process, contrary to Paragraph 66 of the NPPF. Policy S4 sets criteria for windfall sites in large villages, including a cap of 10 dwellings (because allocations are over 10 dwellings) and sites must be within the developed footprint of the settlement. Neither of these reasons are justified. It is not unreasonable to expect windfall sites within the same village to accommodate more than 10 dwellings. An arbitrary cap can lead to an inefficient use of land. Restricting development to the developed footprint may lead to 'town cramming' by directing development into a settlement, or may, alternatively, prejudice developments, all or part of which may need to be outside the footprint - this could include a new access, drainage attenuation, open space, landscaping and not just new dwellings or commercial properties. The approach to setting growth targets for individual settlements, and henceforth the justification for the allocation of sites within or adjacent to these settlements is not justified. Without a clear growth target for a settlement such as Branston, it is not clear why sites Bran/004 or Bran/007 were chosen to be allocated rather than, for instance, our client's land at Thacker's Lane (BRAN/001), East of Mere Road (BRAN/002), Lincoln Road (BRAN/003), North of Kirks Yard (BRAN/004), Hall Lane (BRAN/005) and North of Lincoln Road (BRAN/011). Although BRAN/004 is next to BRA/012, which is being built out, there is no evidence that there has been any interest in delivering development since consideration of an EIA Screening request in 2014. There is, therefore, some potential doubt about the deliverability of the site. The plan has failed to demonstrate how it is positively prepared, as settlement targets are restricted to the capacity of previous development, current consents and allocated sites. The growth targets for each settlement have not been justified. The Plan is not consistent with national policy because it fails to set a target for growth to be met through the Neighbourhood Plan process. The targets that are set are not based on an assessment of local demand and the role of individual settlements. The choice of allocations is not justified in policy S80, nor are the restrictions imposed on windfall developments in large villages in policy S4.</p>	<p>based on past consents, previous development and allocations already identified. The process for selecting sites to be allocated in Large Villages (under Policy 80) should be revisited to take into consideration the needs and capacity of each settlement. The criteria for windfall sites set out in Policy S4 should be amended to remove the arbitrary cap on the capacity of windfall sites and restriction on development outside the settlement footprint.</p>		
--	--	--	--	--	--	--	--	--	--	---	--	--

Tom Barton Farms Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103079	S2	Yes	Yes	No	No	No	No	Yes	<p>The preamble to Policy S2 (paragraph 2.2.5) explains that 1,325 dwellings per year are needed to support the expected growth in jobs in Central Lincolnshire and that an important part of the Local Plan is delivering economic growth within the region to ensure it is competitive and supports the ambitions of the Greater Lincolnshire Local Enterprise Partnership.</p> <p>The National Planning Practice Guidance (Paragraph: 009 Reference ID: 2a-009-20190220) says that the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area and that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. These include where there are growth strategies for the area that are likely to be deliverable. The Economic Needs Assessment (ENA) (2020) identifies strong growth in recent years,</p>	<p>The Local Plan housing requirement is not positively prepared, justified, effective and consistent with national policy in meeting identified economic development and affordable housing needs. In order to make the plan sound:</p> <ul style="list-style-type: none"> • The figure of 1,325 should form the minimum planned housing requirement in order to meet identified economic development needs • Consideration should be given to an uplift to meet affordable housing needs • Consideration should be given to a 20% buffer in the overall housing supply against the requirement 	Yes	No

								<p>outstripping anticipated growth, and projects forward a growth of approximately 992 jobs per year. In order to provide enough working age population to support the projected level of job growth, 1,325 dwellings per annum would need to be delivered. The Local Plan housing trajectory demonstrates that this figure is achievable, since it has been exceeded over the first three years of the plan period. This is significant evidence to support this housing figure.</p> <p>However, Policy S2 proposes that the Local Plan will use a housing range as its housing requirement, with the national standard method figure (1,060) at the bottom end of the range and the figure needed to match economic growth ambitions (1,325) as the top of the range. The bottom end figure would be the ‘housing requirement’ and housing would be planned to meet the top end of the range. We disagree with the use of a range, with only the bottom end of the range only being used as the ‘official’ housing requirement. The figure of 1,325 should be used as the housing requirement as it is the level of planned growth that is required, taking into account the projected level of job growth. If this housing requirement is not achieved then homes will not be provided to match jobs and this would lead to unsustainable outcomes. The National Planning Practice Guidance does not support the approach taken in Policy S2. It does not set out that important economic factors can be taken into account in determining the housing need, for the local authority to then undershoot the established need with a lower housing requirement.</p> <p>We also disagree with the use of a range for the calculation of the 5-year housing land supply. The Local Plan attempts to justify this at paragraph 2.2.6 as in accordance with the Planning Practice Guidance (PPG). However, the PPG says at Paragraph: 001 Reference ID: 68-001-20190722 that ‘the 5 year housing land supply is a calculation of whether there is a deliverable supply of homes to meet the planned housing requirement [my emphasis] (or, in some circumstances, local housing need) over the next 5 years’. It goes on to say that housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5-year housing land supply figure. Only in other circumstances, i.e. when the planned housing requirement is not up-to-date, will the 5 year housing land supply be measured against the area’s local housing need calculated using the standard method. This does not justify the local authority plan-making on the basis of only securing a deliverable supply of housing against the standard method figure. The 5-year housing requirement is there to ensure that Local Plans maintain a deliverable supply of housing land to meet the housing requirement, where this is up-to-date. Furthermore, when the ‘top end’ figure of 1,325 has been exceeded over the first 3 years of the plan period, it does not make sense to provide circumstances to under-achieve it.</p>	<ul style="list-style-type: none"> • The reference to measuring 5-year supply against the standard method figure should be removed 		
--	--	--	--	--	--	--	--	---	---	--	--

									<p>In relation to Spatial Issue 1: Housing Need and Ambition for Growth, paragraph 2.4 of the Growth Options Paper STA011.1 recognises that there is an affordable housing need of 592 dwellings per year to 2040. However, it does not provide adequate consideration as to whether the housing requirement should be increased to help to meet this need. This need equates to nearly 44% of the 1,325 dwellings identified as being needed to support expected job growth, but given that affordable housing policies only require between 10-25% of housing development to be affordable housing, a substantial proportion of these needs will go unmet unless affordable housing is delivered in other ways.</p> <p>Paragraph 7.85 of the HOU001 Housing Needs Assessment Central Lincolnshire April 2020 says that ‘it is for the Councils to consider whether an increased housing requirement could help to increase the delivery of affordable housing that is evidently needed in Central Lincolnshire. This judgement should also take into account any specific objectives set by the Councils through their housing strategies to play a more proactive role in directly enabling the provision of social housing as part of fully affordable housing schemes. Evidently this will need to also take into account the extent to which such objectives are reliant upon funding being available to deliver these homes’. Although HOU001 provided a clear mandate for this further consideration, the consideration given to this important matter has been very limited. Paragraph 2.4 of STA011.1 says that delivering this level of affordable housing would clearly be challenging under any likely scenarios, but it is not only delivered through planning obligations. Direct development by districts, or housing associations also occurs which help to deliver homes to meet the needs of those whose needs are not met by the market. This is not underpinned or justified by reference to any housing strategies and it does not take into account the extent to which such objectives are reliant on funding to deliver the homes needed. Therefore, there is a resulting deficit in meeting affordable housing needs which needs to be given further consideration. Clearly uplifting the housing requirement and making further housing allocations would directly contribute towards meeting affordable housing needs.</p> <p>Paragraph 13.1.9 of the Local Plan confirms that, overall, there is a planned surplus of 2,665 dwellings against the higher end of the housing requirement range. This is a surplus of 9%. We would argue that this is not a sufficient buffer to take account of deliverability issues within the plan period. A buffer of between 10-20% is normally seen as appropriate in plan-making. The circumstances in Central Lincolnshire are such that a buffer at the higher end of this range should be sought. The Local Plan covers a 20-year time period, where much can change and occur in relation to site delivery. Furthermore, the plan relies heavily on the delivery of a number of large SUEs right through to the end of the plan period. Delivery issues on such sites often result in housing numbers ‘slipping off the end’ of the housing trajectory and then the buffer would quickly diminish.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

1103078	S4	Yes	Yes	No	No	No	No	Yes	<p>Current Local Plan Policies LP2 and LP4 set out the approach to growth in Medium Villages, making provision for 10-15% growth to the villages. Sites must:</p> <ul style="list-style-type: none"> • retain the core shape and form of the settlement; • not significantly harm the settlement's character and appearance; and • not significantly harm the character and appearance of the surrounding countryside or the rural setting of the settlement. <p>Policy LP2 also makes provision for additional growth where there is demonstration of clear local community support. This means that, should housing needs be identified by a community, then there is a proactive policy to ensure that they can be met on suitable sites.</p> <p>The Local Plan Review Policy S4 does not set out a percentage growth allocation for the Medium Villages. Effectively it would remove the allocated growth from many villages which had not yet secured planning permissions during the adopted plan period.</p> <p>Policy S4 says that proposals for up to 5 dwellings will only be supported where they comply with the above bullet points and addition are within the 'developed footprint' of the village. The developed footprint is defined as the continuous built form of the settlement and excludes:</p> <ul style="list-style-type: none"> • individual buildings or groups of dispersed buildings which are clearly detached from the continuous built up area of the settlement; • gardens, paddocks and other undeveloped land within the curtilage of buildings on the edge of the settlement where land relates more to the surrounding countryside than to the built up area of the settlement; • agricultural buildings and associated land on the edge of the settlement; and • outdoor sports and recreation facilities and other formal open spaces on the edge of the settlement. <p>Therefore, where the current Local Plan has allowed some growth to the edge of villages where this has not encroached harmfully on the countryside and has been in keeping with the pattern of surrounding development, this new policy is much stricter and only envisages 'infill' development. In reality such infill opportunities will be very limited. Coupled with the lack of new housing allocations (as referred to in our representations to Policy S81) this presents a scenario where the natural growth of Medium Villages is heavily restricted and this is likely to mean that rural housing needs will go unmet and local services will decline in many villages.</p> <p>The EVR004 Policy Evidence Report for Policy S4 provides limited explanation of this key decision to restrict further growth and curtail the growth allocated in the existing Local Plan. Paragraph 7.3 of EVR004 considers the option (3) of continuing with the application of a percentage growth allowance, as in the current</p>	<p>The Local Plan is not positively prepared and effective in meeting rural development needs, it does not reflect paragraph 79 of the National Planning Policy Framework and the policy is not justified by the evidence base. Policy 4 should be amended to continue the approach taken in Policies LP2 and LP4 of the adopted Local Plan, so as to ensure that housing needs in Medium Villages are met and those villages do not suffer a decline in their local facilities and services due to a declining population.</p>	Yes	No
---------	----	-----	-----	----	----	----	----	-----	---	---	-----	----

									Local Plan. However it dismisses this option by saying that a number of settlements have already reached the growth allowance with some proposals now needing to apply a community consultation process. Surely this demonstrates a successful policy, delivering growth where needed and ensuring the vitality and vibrancy of communities?			
1103080	S81	Yes	Yes	No	No	No	No	Yes	<p>Medium Villages are defined in Policy S1 as well-connected or well-served villages and it is said that they may receive some limited growth through allocations in the plan in order to achieve a balance between ensuring the vitality of the village and protecting the rural character. Paragraph 2.4.1 of the Local Plan says that it is important to maintain and enhance the services and features of the rural area in order to sustain the vibrancy of rural settlements and the quality of life experienced by those living in such areas. It is therefore important that the Local Plan makes provision for the growth to medium villages in order to sustain the local services and village life in Medium Villages.</p> <p>Upon first glance the Local Plan makes a large number of housing allocations. However, on closer examination many of these sites are existing allocations being carried forward, or they already have planning permission or are under construction. Document HOU007 confirms that, of the 32,672 dwellings planned for in total over the plan period, only 2,321 are new allocations which don't already have planning permission. The Local Plan therefore makes very limited provision for new growth, instead relying very heavily on committed sites including planning permissions and carried forward allocations. This is a risky strategy because such sites, particularly those that have been allocated or have had planning permission for a long time without coming forward for development, may have problems with their deliverability. No review has been made in the Local Plan evidence base of the deliverability of these sites and why they have not come forward thus far.</p> <p>Furthermore, a plan which makes such limited provision for new allocations is not proactive in pursuing growth and ensuring it takes place where needed, particularly over such a long plan period. Out of 36 Medium Villages only 11 have received new housing allocations. This means that many villages would have to wait another 20 years to see any growth. Over such a long period there is significant potential for decline in local services and facilities and real impacts on village vitality and viability. There is no specific assessment of rural housing needs in the Local Plan evidence base and the approach taken is likely to mean that rural housing needs will go unmet in many villages.</p> <p>The Sustainability Appraisal and Housing & Economic Land Availability Assessment do not separate out the new allocations for assessment and therefore do not explain why choices have been made to allocate sites at only a handful of Medium Villages, or why such sites have been chosen for new allocations instead of other potential sites at the Medium Villages.</p>	<p>The Local Plan says that it is important to maintain and enhance the services and features of the rural area in order to sustain the vibrancy of rural settlements and the quality of life experienced by those living in such areas. However, it falls far short of meeting these objectives for Medium Villages and in particular recognising the role of such villages near to the Main Towns, such as Lea. Therefore, the Local Plan is not positively prepared and effective in meeting rural development needs, it does not reflect paragraph 79 of the National Planning Policy Framework and the policy is not justified by the evidence base. Policy 81 should be amended to include further site allocations at Medium Villages, including at Lea.</p>	Yes	No

									<p>In order that the vitality and viability of Medium Villages is sustained over the plan period, new housing allocations should be made, or Neighbourhood Plans should be mandated to make provision for housing allocations, unless it is robustly demonstrated that the villages have sufficient committed growth to meet their needs over the plan period.</p> <p>Policy S81 allocates site WL/LEA/003 for the development of 60 dwellings at Lea, however this site is already allocated in the Lea Neighbourhood Plan, has received reserved matters approval and development has commenced. This site will likely have been developed in the next couple of years, leaving Lea without further significant development until at least 2040. This is a significant failure of the Local Plan, because Lea is a sustainable village located close to Gainsborough. Furthermore, the village in itself is experiencing issues from a lack of housing growth in recent years. Significant employers in haulage, food and farming have difficulty in attracting and retaining a workforce locally, with an ageing population in the village and limited opportunities for young families to move into the village into affordable homes. Housing growth would support and enhance the vitality of the village in terms of access to employment and sustaining local services.</p> <p>Paragraph 7.4 of the STA011.1 Growth Options Paper highlights villages near to the Main Towns as having an important role in supporting these centres and recognises the ability of residents in such villages to access the facilities and services of the Main Towns. This is a key part of the chosen Local Plan strategy, as justified in the Growth Options Paper, and yet Table 1 of the Local Plan falls short of the allocating sites at Gainsborough (and in settlements in proximity and well-connected to Gainsborough) by 395 dwellings (a further 71 dwellings short compared to at Regulation 18 consultation stage, when this point was made by Tom Barton Farms Ltd). Furthermore, there does not appear to have been any specific consideration in the site selection process of sites which would be well connected to the Main Towns, such as at Lea.</p> <p>The STA008 Site Locations Settlement Analysis identifies Lea as having good access to the services and facilities in neighbouring Gainsborough. It has been described in representations to the Sustainability Appraisal how site WL/LEA/002 at Lea is highly sustainable and should be allocated for housing and mixed use development. Allocation of this site would support the chosen strategy to deliver housing in Gainsborough's well-connected nearby villages and it would also contribute to meeting development needs in these areas as identified in paragraph 5.3 of STA011.1.</p>			
1103086	S81; SA	Yes	Yes	Don't know	No	Don't know	Don't know	Don't know	<p>These representations will explain that the Local Plan is not justified by the SA as key evidence regarding site WL/LEA/002 has been ignored and, were the site to be properly and fairly assessed as a reasonable alternative, then the SA would justify that the site is selected as an allocation.</p>	<p>8.2 Noise Pollution</p> <p>WL/LEA/002 has scored poorly in relation to WL/LEA/003 under this objective because it is said that the site is immediately adjacent to the A156.</p>	Yes	Yes

								<p>EVR076-082 Residential Allocations Evidence Report 2021</p> <p>The assessment of site WL/LEA/002 in the Residential Allocations Evidence Report 2021 is very basic and does not appear to have taken into account site-specific information and assessment that has been undertaken for the site and was submitted to the Central Lincolnshire Local Plan Team in December 2020. Furthermore, despite this having been raised in representations at Regulation 18 stage, the report has not been updated. The result is that the site has been rejected whereas it should have been allocated for housing and mixed-use development. The assessment of the site has failed to take into account the very significant advantage in that the site is not just proposed for housing development, but also for a specialist sheltered housing / age restricted complex, a local convenience store and local community facilities. This would provide important facilities for the village and should be given significant weight in the site selection process.</p> <p>For ease of reference, the site-specific supporting information that was submitted at Regulation 18 stage is submitted again with these representations. The 'Baronet's Walk' Vision Document confirms that the site is proposed for 137 dwellings, whereas the site has been assessed in EVR076-082 for 214 dwellings. This assumption of a higher-density or more extensive development is likely to have adversely influenced conclusions in the assessment of the site.</p> <p>The site-specific information for this site will be referred to in the representations below and representations shall be set out under headings extracted from the assessment of the site in EVR076-082.</p> <p>THE SITE IS A LARGE AREA EXTENDING INTO THE OPEN COUNTRYSIDE, IMPACTING UPON THE CHARACTER OF THE SETTLEMENT. THE SITE IS WITHIN THE AREA OF GREAT LANDSCAPE VALUE (AGLV).</p> <p>This is a very cursory assessment of the site. A detailed landscape and visual appraisal has been undertaken in the appended 'Baronet's Walk' Vision Document and it is carefully explained in that document how the masterplanning of the site has responded to landscape considerations and would result in development which would respect the assets of the land, the prevailing landscape character and sensitive receptors. In addition, the high-quality development would promote a landscape framework reinforcing existing character traits, whilst improving the ecological value of the site and surrounds. A much finer grain of assessment is necessary, taking into account the site-specific landscape and visual appraisal and masterplanning, which demonstrates that the development would not extend harmfully into the open countryside, nor would it impact adversely on the character of the settlement. This assessment would find that the development would adhere to the objectives of the Area of Great Landscape Value and adopted Local Plan Policy LP17, responding positively to</p>	<p>However, this takes no account of the submitted masterplan for the site, which places woodland planting and commercial uses in the areas of the site closest to the A156. The proposed housing would be separated from the A156 by existing houses and these intervening land uses. This masterplan should be taken into account in the SA and as a consequence the scoring should be adjusted so that the scores for WL/LEA/002 and WL/LEA/003 are equal.</p> <p>12. Climate Change & Adaption to Flood Risk</p> <p>WL/LEA/002 has scored poorly in relation to WL/LEA/003 under this objective because the site is located partly within Flood Zones 2 and 3. However, in view of our representations highlighting that the flooding constraints to site WL/LEA/002 are entirely mitigable to allow a development of 137 dwellings with a sustainable drainage strategy and a cut/fill earthworks strategy to manage flood water in the site's Green Infrastructure, the scoring for the site should be revisited. Furthermore, the SA Framework for Sites & Assumptions Applied indicates that sites that are mainly within Flood Zone 1 (which the site is, with only about 30% affected by Flood Zones 2 and 3) should receive a minor positive score. Therefore the site should score equally with WL/LEA/003.</p> <p>13.1 Access to Services & Facilities</p> <p>WL/LEA/002 has scored favourably in relation to WL/LEA/003 under this objective because it is recognised that the site is within 100m of a bus stop, whereas WL/LEA/003 is 450 metres from a bus stop, which is beyond the 400m walking distance criteria in the SA Framework for Sites & Assumptions Applied. However, the score for WL/LEA/002 should be higher still. The SA has not taken account the proposal to provide important new facilities for the village in the form of a local convenience store and community facilities, as</p>		
--	--	--	--	--	--	--	--	--	---	--	--

								<p>the landscape and townscape character, whilst preserving key views and vistas.</p> <p>THE ACCESS ROUTE CONTAINS A LOCAL WILDLIFE SITE (LWS).</p> <p>The site contains a farm track connecting to a minor arm of Gainsborough Road. This is what is described as the 'access route'. However, the proposed access to the site is not taken along this route, it is taken directly from the main Gainsborough Road. The farm track would be used as a pedestrian access and, if necessary, occasionally for emergency services. The LWS designation covers this track, but it is the tightly-grazed bank alongside the track that is of considerable interest, mainly because the sparse sward includes subterranean clover, which is a rare plant species. A vegetation survey has been undertaken in the appropriate survey season to assess the LWS for the presence of subterranean clover and this has identified a 38 metre stretch of bank containing subterranean clover, plus a single plant to the west, outside the LWS. This survey has informed a detailed mitigation strategy for the development which has been taken into account in the masterplanning process, reducing the site capacity from 150 to 137 dwellings. Liaison with the project ecologist during the masterplanning process has determined an avoidance and mitigation strategy, as described in the appended Preliminary Ecological Appraisal and Subterranean Clover Survey – Addendum (August 2021). The ongoing management arrangements for the LWS and enhancements through creation of additional habitat creation would result in a net gain to biodiversity and therefore the LWS designation on a small part of the site should not be considered an overriding constraint to development.</p> <p>THE SITE IS BOUNDED AT THE WEST BY FLOOD ZONES 2 & 3 AND WATERCOURSES TO THE EAST HAVE BEEN 'LOST'. HISTORY OF SURFACE WATER FLOODING TO THE EAST, INCLUDING OF PROPERTY AND OF UNDER CAPACITY OF FOUL SEWERS.</p> <p>Various flood risk sources including the River Trent, minor watercourses, pluvial flooding, sewers, highways and groundwater have all been considered in the appended Flood Risk Assessment for the site and the overall flood risk is considered to be very low. The potential 100 year + climate change flood level was determined to be 6.95m and it was recommended that floor levels of buildings should be clear of the flood level and any swales and infiltration areas should be located in areas above this level. Access, parking and play areas should be raised to this level. A cut/fill earthworks strategy was recommended to balance the flood plain volume lost by raising land levels and to channel flood waters so that they would not affect developed areas of the site. The surface water drainage for the proposed development would be managed through a sustainable drainage system incorporating swales, infiltration drainage and permeable paving.</p> <p>The site masterplan has taken account of this flood risk and</p>	<p>confirmed in the Vision Document for the site. These facilities would be located adjacent to the village core, so that they are highly accessible for the whole village as well as the new development. This is a significant sustainability advantage that should be taken account of. The SA Framework for Sites & Assumptions Applied says that sites that are expected to provide new services and facilities as part of a mixed use development are likely to have significant positive effects. Therefore site WL/LEA/002 should be re-assessed and should achieve a significant positive score under this objective.</p> <p>13.2 Sustainable Travel Modes</p> <p>WL/LEA/002 has scored favourably in relation to WL/LEA/003 under this objective because it is recognised that the site is within 100m of a bus stop, whereas WL/LEA/003 is 450 metres from a bus stop, which is beyond the 400m walking distance criteria in the SA Framework for Sites & Assumptions Applied. WL/LEA/002 would have scored even higher had it been within 800 metres of the railway station as well. The site is 1.7km from the railway station, but previous national guidance suggested that cyclists are typically prepared to cycle up to 5km (3.1 miles) for non-leisure journeys, such as those to school or work. As such Gainsborough Lea Road Railway Station is well within a distance which would encourage integrated commuting by bike and train and thus would reduce use of the car. This should be factored into a finer grain of sustainability assessment of the site and on this basis the site should achieve a minor positive score.</p> <p>14.2 Education, Training and Learning</p> <p>WL/LEA/002 has scored poorly in relation to WL/LEA/003 under this objective because it is located 500 metres from the local primary school, whereas WL/LEA/002 is located 200 metres from it. The criterion in the SA Framework for Sites & Assumptions Applied is 400</p>		
--	--	--	--	--	--	--	--	--	--	--	--

									<p>drainage strategy and would result in a policy-compliant development which would not increase risk of flooding on the site or elsewhere and would in fact introduce positive management to the surface water regime. It is perfectly possible through site engineering to address issues of sewer capacity and this should not be considered an overriding constraint to development.</p> <p>THIS SITE HAS PREVIOUSLY BEEN SUBJECT TO A GEOPHYSICAL SURVEY AND A SMALL AMOUNT OF TRIAL TRENCHING. WE HAVE THEREFORE PREVIOUSLY RECOMMENDED THAT THE AREAS OF POTENTIAL ARCHAEOLOGICAL INTEREST IDENTIFIED ARE FULLY EVALUATED BY A MORE COMPLETE PROGRAMME OF TRIAL TRENCHING PRIOR TO DETERMINATION.</p> <p>Further archaeological trial trenching would be undertaken prior to determination of a planning application. This is a normal planning consideration in decision making and the same comment has been made in respect of very many sites. This should not be considered an overriding constraint to development.</p> <p>HOU006 Site Allocations Sequential Test June 2022</p> <p>The sequential test identifies that site WL/LEA/002 is partially within flood zone 2 and 3. In view of our representations above, highlighting that the flooding constraints to site WL/LEA/002 are entirely mitigable to allow a development of 137 dwellings with a sustainable drainage strategy and a cut/fill earthworks strategy to manage flood water in the site's Green Infrastructure, the site has the potential to be considered for allocation despite partial flooding constraints. The comments in HOU006 should be amended to reflect this.</p> <p>STA004.1hiii SA Report for the Central Lincolnshire Local Plan Proposed Submission Draft (March 2022) Appendix 5.3: SA of Preferred Housing Site Allocations and Reasonable Alternatives Considered</p> <p>Site WL/LEA/002 has been considered as a reasonable alternative for allocation at Lea, but ultimately site WL/LEA/003 has been chosen for allocation. At Regulation 18 consultation stage the Interim SA STA004g set out an appraisal of sites WL/LEA/002 and WL/LEA/003. However, in the final SA the appraisal for chosen site allocation WL/LEA/003 is absent. It is assumed this is in error so these representations will refer to the appraisals for the sites in the Interim SA STA004g. The appraisal for site WL/LEA/002 has not been updated in the final SA STA004.1j and so the representations below are still relevant.</p> <p>The choice to allocate site WL/LEA/003 over site WL/LEA/002 is not borne out in the SA. Site WL/LEA/002 should receive higher scores in the SA under a number of objectives. Comments will be made below in respect of the two sites under headings taken from the SA objectives.</p>	<p>metres, so the site is not so far beyond this criterion that it is likely to discourage walking to school. Indeed, the Guidelines for Providing for Journeys on Foot (IHT, 2000) guide that 500 metres is a desirable walking distance. Furthermore, site WL/LEA/002 is much more conveniently located for the bus stops that would be used for accessing secondary schools. On balance, therefore, the site should be upgraded to a minor positive score under this objective.</p> <p>STA004.1j SA Report for the Central Lincolnshire Local Plan Proposed Submission Draft (March 2022) Appendix 7: Reasons for Selecting Preferred Policies and Site Allocations</p> <p>STA004.1j sets out the Council's reasoning for not selecting WL/LEA/002 as an allocation. It says that the site is a large area extending into the open countryside, impacting upon the character of the settlement, that the site is within the Area of Great Landscape Value, that the western edge of the site is within Flood Zone 3 and that the access route contains a Local Wildlife Site. It says that the SA identified major negative effects in relation to biodiversity, landscape and minerals resource. As discussed above, landscape and biodiversity effects along with noise and flood risk effects are entirely mitigable and the development would not result in major negative effects. With regard to minerals resource, while the site is within a Sand and Gravel Minerals Safeguarding Area, this is the same for over 30 other sites in the SA for West Lindsey, including many sites that have been selected for allocation. Therefore it is not an overriding constraint to the site's allocation.</p> <p>In view of the above examination of the SA evidence, it is clear that the site has not been adequately or fairly assessed on the basis of submitted information and, were this to be rectified, this 'reasonable alternative' should be chosen for allocation.</p>		
--	--	--	--	--	--	--	--	--	---	--	--	--

									<p>4.1 Conserve & Enhance Biodiversity & Geodiversity</p> <p>WL/LEA/002 has scored poorly in relation to WL/LEA/003 under this objective, apparently because the site contains a Local Wildlife Site (LWS) and is within 500m of other wildlife designations. However, this does not take account of the mitigation and enhancement that is proposed for the site, as described in earlier in these representations. The SA also identifies that site WL/LEA/002 predominantly falls within a Biodiversity Opportunity Mapping (BOM) area, where there is an opportunity for management of the ecological network. Sensitive development of the site with a biodiversity enhancement and management plan would positively facilitate such management, to the benefit of ecological networks. This should be taken into account in the SA of the site.</p> <p>Conversely, site WL/LEA/003 does not fall within a BOM area and does not present such opportunities. It is therefore considered that, on balance, the scores for the two sites should be equal, if not WL/LEA/002 better.</p> <p>[Continued below in q5]</p>	<p>Enclosures:</p> <ul style="list-style-type: none"> • Flood Risk Assessment, TDi, April 2016 • Masterplan 375-UW-SK-001 dated 11 Aug 2021 • 'Baronet's Walk' Vision Document • Preliminary Ecological Appraisal, including Confidential Badger Information and Subterranean Clover Survey, Delta Simons, June 2021 • Preliminary Ecological Appraisal and Subterranean Clover Survey – Addendum, August 2021 <p>The SA evidence should be updated to take into account submitted information with regard to site WL/LEA/002. This would justify the site being chosen for allocation for mixed use development including housing development, a specialist sheltered housing / age restricted complex, a local convenience store and local community facilities.</p>		
--	--	--	--	--	--	--	--	--	---	---	--	--

TS Land (Sturton) Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1099129	S1; S2; S81; SA	Yes	No	Yes	No	No	No	Yes	<p>Policy S1: The Spatial Strategy and Settlement Hierarchy</p> <p>Whilst the overarching thrust of the Spatial Strategy is not objected to, the assessment of Sturton by Stow as a medium sized village is considered unsound. For the reasons set out in the Regulation 18 representations (re-attached and not repeated within this letter), Sturton by Stow and Stow act as single settlement with single sense of place. Combined they are of a size which meets the threshold for a Large Village to where more growth should be directed.</p> <p>There is, for example, a single Neighbourhood Plan produced for the settlement (soon to be at Referendum). The artificial separation of the two for the purpose of this Plan has led to an inappropriate allocation of Sturton by Stow and Stow, into the wrong settlement category which is considered unsound as it does not reflect the reality of their functional relationship on the ground or the level of service provision/sustainability they share. In order for the plan to be properly justified and effective, Sturton by Stow and Stow should be identified together within the Large Village category of the hierarchy.</p> <p>Policy S2: Growth Levels and Distribution</p> <p>Policy S2 is considered to be unsound as drafted, in that the strategy proposed is neither justified nor effective. In order to rectify this, it is proposed that either the percentage of development proposed July 2021 Page 7 for the LSA be reduced, or that the LSA boundary be extended to incorporate highly sustainable settlements, within the 'Elsewhere bracket' to be within the Lincoln TTWA, so that they may better contribute to the sustainable support and growth of Lincoln as the area's principal settlement, and economic and social centre.</p>	<p>Policy S1 is considered unsound, in its treatment of Sturton by Stow within the Village hierarchy, it should be considered in conjunction with the adjacent village of Stow with which it shares facilities and a unified sense of place (as evidenced by the joint Neighbourhood Plan), and as such be defined as a Larger Village, capable of absorbing additional growth, close to the City of Lincoln.</p> <p>The LSA boundary should correctly include Sturton by Stow and Stow, within its boundary, given their excellent functional and sustainable access</p>	Yes	Yes

								<p>Specific representations were made in the Regulation 18 submission, relating to the incompatibility of the distribution strategy against the Plan's own Vision, the irrational nature of the drawn boundary line for the Lincoln Strategic Area (LSA) generally, and specifically the irrational exclusion of Sturton and Sturton by Stow from the LSA boundary, when other settlements, nearly twice the distance from Lincoln, are included.</p> <p>The Site WL/STUR/006</p> <p>Objection is raised to the inconsistent basis of the treatment of the Site. It reveals the underlying evidence base to be irrational, and therefore unsound as it relates to the treatment and assessment of this site. The site itself is without any material constraint and would not breach any of the emerging Neighbourhood Plan critical issues. i.e., it does not lie in a strategic gap, it is not impacted by any Heritage assets (Listed Building/Conservation Area etc), it does not form part of a recognised 'Protected View' within the village and does not form part of proposed Local Green Space. The site is not subject to river flooding. A small section to the southern boundary identifies as having limited flood risk from surface flows but this can very easily be designed for. There is no known ecological constraint on the site as confirmed by the call for sites submission. Indeed, within the Council's SA of the Plan (SA Appendix 5.3, pages 763/768), this wider site (006) scores more positively against the SA objectives than the allocated part of the site (006A), scoring more positively for Housing and Healthy Lifestyles.</p> <p>Without a genuine attempt to assess the 'reasonable alternatives' promoted for development, the Plan can not be found sound, as there is at the heart of the Sustainability Assessment a flaw in its approach, which then pervades the preferred development options.</p> <p>NPPF para 32 states;</p> <p>Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered). (my emphasis)</p> <p>If the sustainability assessment is flawed in its consideration of the reasonable assessments which may reduce adverse impacts of development, as part of a plan's overarching settlement hierarchy, then it is difficult to see how the plan itself can be considered to have been properly informed throughout.</p> <p>With regard to this Local Plan's assessment of the Site, there are a number of irrational inconsistencies in its treatment, which have resulted in its not having been considered appropriate for development.</p> <p>Had the site been properly assessed and considered then it is fair to conclude that it would as a minimum, have been stood against other sites which have been allocated and a fair comparison could have been made as to which were the most appropriate for development on a genuinely comparable basis. However, having incorrectly dismissed the Site as suitable for development, that part of the assessment process has been denied, and it is not possible to conclude that the Plan has been appropriately informed by a robust sustainability appraisal.</p> <p>With regard to the Site's assessment, the following is noted;</p> <p>a) The sole reason provided in the Council's assessment of the site for its non-allocation at Regulation 18 stage was that it would represent an 'intrusion into the</p>	<p>relationship with Lincoln.</p> <p>With regard to CLLPR Policy 81 Housing Sites in Medium Villages, whilst there is support for the allocation of land under reference WL/STUR/006a, it is considered that the allocation does not propose development at an appropriate density.</p> <p>The justification for not allocating site WL/STUR/006 is considered unsound as it is unsupported by the evidence base, which is irrational in its assessment. The site both can and should play a role, wholly consistent with the historic growth pattern of the Village, in delivering housing into this highly sustainable Village, with high accessibility to the Lincoln Strategic Area.</p>		
--	--	--	--	--	--	--	--	---	--	--	--

									<p>countryside' with the smaller allocation better 'retaining the shape and character of the settlement' (Residential Allocation Evidence Report 2021, pages 260/262). However, this is neither consistent with the findings of the SA which identifies no such landscape harm arising and assesses the site at the same level as the smaller allocated portion, nor does it have regard to the historic growth pattern of the village, which allocation of the wider site would support (see also Reg 18 submission analysis paras 2.17 -2.21).</p> <p>b) The reason given at Appendix 7 of the March 2022 Sustainability Assessment for the rejection of the Site for allocation is; 'The site is a large extension into the countryside. The SA identified major negative effects in relation to noise pollution and access to employment.'</p> <p>c) Comparison with the allocated part of the site (WL/STUR/006A), identifies that the SA's assessment of both sites is absolutely identical with regard to landscape, noise, and access to employment impacts. Indeed, the only noise source in the vicinity, is the nearby A Road which runs through the heart of the village, and around which the village and its housing has developed. It is difficult to understand how noise could in any way be a defining or constraining factor. The SA identifies the both the allocated part of the site, and the whole Site, in identical terms for both landscape and employment access.</p> <p>Given the way in which, overall, the SA actually identifies the whole of the Site WL/STUR/006 which is not allocated more favourably than the smaller parcel of WL/STUR/006A which is allocated, then the Plans SA of the wider parcel, and the conclusion that it should be rejected is considered to be obviously flawed, and unsound due to the clear and obvious inconsistency in analysis</p>			
--	--	--	--	--	--	--	--	--	--	--	--	--

Turley Farms Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1100759	S1; S4; S80	Yes	Yes	Yes	No	No	Yes	Yes	<p>Please see accompanying documents, including:-</p> <ul style="list-style-type: none"> • Reg19 CLLP Consultation Response - Welton relating to site WL/WELT/008A, supporting the inclusion of this site as an allocation for housing. 	<p>Site WL/WELT/008A should not be phased back. Please see accompanying documents, including:-</p> <ul style="list-style-type: none"> • Reg19 CLLP Consultation Response – Welton. • Reg19 CLLP Consultation Response – Welton - Site Location Plan. • Reg19 CLLP Consultation Response – Welton - Indicative Site Development Plan. 	Yes	Yes

United Kingdom Onshore Oil and Gas

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103802	Intro; Context; Strategic Priorities; Vision; Objectives								<p>We submit that the Local Plan Proposed Submission Draft requires amendment in order to balance the aspirations for carbon net neutrality with the strategic role that the area plays in supplying market demand. We submit that a greater balance needs to be struck between the Local Plan's role in supporting sustainable economic growth whilst safeguarding and conserving the natural environment. The plan should refer to the important role that Central Lincolnshire has with regards to both renewable and non-renewable energy and acknowledge the importance of having a mix of energy sources within Central Lincolnshire.</p>			No

1103804	S1								<p>Policy S1 states that development in ‘countryside’ is restricted unless it is demonstrably essential to the effective operation of:</p> <ul style="list-style-type: none"> • agriculture, horticulture, forestry, outdoor recreation, transport or utility services; • the delivery of infrastructure; • renewable energy generation; and • “minerals or waste development in accordance with separate Minerals and Waste Local Development Documents.” <p>We note that there have been no changes to the wording for Policy S1 since the Local Plan Consultation Draft. With regard to the first bullet point above, we would like to reiterate that development that is essential to the effective operation of the existing onshore oil and gas minerals industry should be specifically listed as an exception to the general restriction on development in the countryside.</p> <p>Furthermore, we wish to re-emphasise that Policy M9 of the Lincolnshire Core Strategy and Development Management Policies document (CS&DMP) (adopted June 2016) should be included under the wording of Policy S1, as per the final bullet point. Policy M9 ‘Energy Minerals’ of the adopted CS&DMP states that planning permission will be granted for the exploration, appraisal and/or production of conventional and unconventional hydrocarbons provided that proposals accord with all relevant development management policies set out in the adopted Plan.</p>			No
1103814	Climate change						No		<p>Further to the above comments relating to specific Draft Policies within the Local Plan Submission Draft, the introduction and preamble within Section 3 of the Local Plan Consultation Draft contains discussion to provide context to the Draft Policies that we wish to comment on. In particular, paragraph 3.1.3 of the document states that “this Local Plan would be unlawfully produced if it did not meaningfully contribute to reducing emissions, help mitigate against climate change and help society adapt to a changing climate”.</p> <p>We welcome the removal of the wording ‘radical’ from the Local Plan Consultation Draft and whilst proactive steps towards carbon net zero are welcomed, they should not result in conflict between the Local Plan and the national policy with which it should be prepared in accordance.</p>			No
1103815	Climate change								<p>Paragraph 3.1.5 outlines the ‘CO2 budget’ for Central Lincolnshire in the context of its “fair share” as a proportion of the world’s total CO2 budget as calculated by the Tyndall Centre. We would again wish to support the transition to a lower carbon future but would stress that with regard to Central Lincolnshire’s “fair share” of CO2 emissions, it is inevitable that certain areas may emit comparatively more CO2 as fossil fuels / hydrocarbons can only be exploited where they are naturally located. We want to reiterate the minerals can only be worked where they are found and Central Lincolnshire benefits from such resources.</p>			No
1103816	Climate change						No		<p>Finally, paragraph 3.1.6 states that only development that is “fit for a zero-carbon future” is welcome in Central Lincolnshire. It is not made clear what constitutes development fit for a zero-carbon future, however the wording alludes to any development necessitating carbon as unwelcome.</p> <p>We wish to note the comments made by the Inspector on Egdon Resources’ appeal for the Wressle development regarding national energy policy 1 : ‘National energy policy, most succinctly set out in NPS EN-1 and the Framework, is aimed at reducing demand by end users, and in that way reducing both demand and consumption. It is no part of national policy to attempt to reduce emissions by restricting the production of hydrocarbons in the UK, as was implied or stated by some objectors. Nor was such an approach suggested by the Committee on Climate Change when dealing with the net</p>			No

									zero 2050 position – and there is no policy which provides that a net zero carbon economy in 2050 would be hydrocarbon-free.’			
1103805	S6						No		The current wording of Policies S6, S7 and S8 are comparable to a blanket ban on the use of fossil fuels in all new built development where the Exceptional Basis Clauses cannot be adhered to. We do not consider that the wording of Policies S6, S7 and/or S8 are deliverable or consistent with Central Government’s agenda of promoting low-emission alternatives to the use of fossil fuels for heating new homes by 2025.			No
1103806	S7						No		The current wording of Policies S6, S7 and S8 are comparable to a blanket ban on the use of fossil fuels in all new built development where the Exceptional Basis Clauses cannot be adhered to. We do not consider that the wording of Policies S6, S7 and/or S8 are deliverable or consistent with Central Government’s agenda of promoting low-emission alternatives to the use of fossil fuels for heating new homes by 2025.			No
1103809	S8						No		The current wording of Policies S6, S7 and S8 are comparable to a blanket ban on the use of fossil fuels in all new built development where the Exceptional Basis Clauses cannot be adhered to. We do not consider that the wording of Policies S6, S7 and/or S8 are deliverable or consistent with Central Government’s agenda of promoting low-emission alternatives to the use of fossil fuels for heating new homes by 2025.			No
1103810	S11						No		Policy S11 is too broad a policy and is not in accordance with national planning policy. There is no presumption against demolition in either the NPPF or planning practice guidance. Demolition of buildings is also permitted development under Parts 10 and 17 of the General Permitted Development Order 2015. For the Plan to be sound we recommend that Policy S11 is deleted.			No
1103812	S19						No	No	<p>Policy S19 states that “any proposal for fossil fuel based exploration, extraction, production or energy generation for the determination by City of Lincoln, North Kesteven District Council or West Lindsey District Council will normally be refused on the basis that any remaining fossil fuels should remain under the ground as part of the area’s commitment to a net zero-carbon society and economy.”</p> <p>We acknowledge that wording has been changed since the Local Plan Consultation Draft to emphasise refusal will only be on the basis of applications being determined by local authorities and majority of applications are the County Council responsibility however the policy itself is still contrary to national policy.</p> <p>Within the policy justification text Paragraph 3.5.7 and 3.5.8 states that the ‘current Lincolnshire Minerals and Waste Local Plan, adopted in 2016, includes a policy which supports the ‘exploration, appraisal and/or production of conventional and unconventional hydrocarbon (Policy M9).’ However, the text further states at Paragraph 3.5.9 that ‘Central Lincolnshire Joint Strategic Planning Committee has taken the view that both the legislative and policy context has evolved considerably since then...extraction and burning of fossil fuels is no commensurate with delivering a net zero carbon Central Lincolnshire’</p> <p>Firstly, the justification for the policy is the view that ‘legislative and policy context has evolved’, however the NPPF was recently adopted in July 2021 and the approach to fossil fuel development was considered sound. Policy S1 of this emerging plan also supports ‘mineral and waste development within the countryside’ which hasn’t specified specific type of mineral and waste development and therefore this would also include fossil fuel exploration and extraction under guidance contained in the NPPF.</p> <p>Secondly Paragraph 3.5.7 – 3.5.9 are overall contrary to national and energy policy. Paragraph 210 of the NPPF states that planning policies should provide for the extraction of mineral resources of local and national importance which includes oil and gas and Paragraph 215 states that ‘(mineral) planning authorities should plan for on-shore oil and</p>	<p>We would reiterate that this policy approach is not consistent with national planning policy and guidance to effectively impose a blanket ban on new fossil fuel exploration, extraction, production, or energy generation. To do so would directly conflict with adopted policies established by the local MPA, Lincolnshire County Council. For these reasons Policy S19 and supporting paragraphs 3.5.7, 3.5.8 and 3.5.9 should be deleted.</p> <p>We submit that in light of the above, the Plan cannot be considered ‘sound’</p>		No

								<p>gas development, including “plan positively for, the three phases of development (exploration, appraisal and production)’. Furthermore, Government energy policy recognises that the UK is not currently in a position to rely solely on renewable energy sources and therefore fossil fuels will continue to have a role in the UK energy system.</p> <p>Policy S19 is therefore contrary to national policy and is not beneficial to the emerging Local Plan. Within the justification text, Policy S19 emphasises that the District Authority’s will predominantly not deal with mineral applications, and this will be handled by the County Council, yet a policy has been produced which states the District Authority will blanket refuse all fossil fuel and gas applications. Considering the NPPF and County Council support fossil fuel development and District Authorities involvement in the decision process of applications will be as statutory consultees, this policy can be seen as a failure of duty to cooperate.</p>	as it has not been prepared in a manner consistent with NPPF (2021).		
1103829	S76; S77; S78; S79; S80; S81; S82						No	<p>Mineral Safeguarding In addition to the points made above, we wish to reiterate the importance of mineral safeguarding at a District Level and the requirement for District Councils to consider policies set out within the relevant Minerals Local Plan. We submit that the emerging Central Lincolnshire Local Plan should, when considering policies and potential land for allocations / designations ensure that due regard is had to the need to safeguard mineral resources, mineral infrastructure sites, and all locations whereby new non-minerals development could harm the exploration, extraction, and production of hydrocarbons. The ability to meet hydrocarbon demand can only be met where the hydrocarbons naturally occur. It is therefore important to ensure that these resources are safeguarded and not needlessly sterilised by non-mineral development or any development that would prejudice existing or future operations In our view, the Plan still at present conflicts with NPPF (July 2021) Paragraph 210 (parts c and e) and Minerals PPG. The NPPF (July 2021) is clear at paragraph 210 (parts c and e) that planning policies should: • adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development (part c); and • define Mineral Safeguarding Areas and Mineral Consultation Areas to safeguard, inter alia, “existing, planned and potential sites for the bulk transport, handling and processing of mineral” (part e). This responsibility is not limited to Mineral Planning Authorities. Paragraph: 005 (Reference ID: 27-005-20140306) of the Planning Practice Guidance (Minerals) identifies that, ‘whilst district councils are not mineral planning authorities, they have an important role in safeguarding minerals in three ways: • having regard to the local minerals plan when identifying suitable areas for non- mineral development in their local plans. District councils should show Mineral Safeguarding Areas on their policy maps; • in those areas where a mineral planning authority has defined a Minerals Consultation Area, consulting the mineral planning authority and taking account of the local minerals plan before determining a planning application on any proposal for non- minerals development within it; and • when determining planning applications, doing so in accordance with development policy on minerals safeguarding, and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction.’ The inspector’s decision in the Wressle appeal 2 also stated, ‘In line with the NPPG on Minerals I am entitled to assume that other regulatory regimes will operate effectively and that it is not necessary for me to carry out my own assessment because I can rely on the assessment of the other regulatory bodies. There is no evidence that other regimes are incapable of operating effectively and adequately regulating the development. As a minimum a ‘tier two’ Local Plan should cross reference with the adopted Minerals and Waste Local Plan (in this case the adopted Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies (June 2016) and Site Locations (December 2017) documents) to outline the relationship of mineral planning and mineral safeguarding within two tier authority areas. These concerns were raised during the Local Plan Consultation Draft</p>			No

								stage and have not been rectified within the Proposed Submission Draft Plan. The NPPF and PPG also suggest that minerals should be more than just referenced in ‘tier two’ plans; NPPF paragraph 210c states planning policies should: “safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas ⁷⁰ ; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked)”. Footnote 70 indicates that this particularly applies in two tier areas. We are aware that the Local Plan Proposed Submission Draft does make reference to the Lincolnshire Minerals and Waste Plan development plan documents throughout, although more explicit reference to the Minerals and Waste policies should be made within the Local Plan Proposed Submission Draft with specific regard to Policy S1. Minerals Safeguarding Areas as shown on Figure 1 of the Minerals and Waste Local Plan Core Strategy and Development Management Policies document) should be shown on the emerging Proposals Map to provide visible clarification regarding the locations within Central Lincolnshire that are at risk of either direct sterilisation by future non-minerals development, or sterilisation by proximity. Furthermore, Policy M11 of the MWLPCSDMP requires applications on non-minerals development in a minerals safeguarding area to be accompanied by a Mineral Assessment. Reference to this should be made within the Local Plan Submission Draft to ensure that developers and applicants are aware of this requirement.			
1103828	Map						No	<p>Mineral Safeguarding</p> <p>In addition to the points made above, we wish to reiterate the importance of mineral safeguarding at a District Level and the requirement for District Councils to consider policies set out within the relevant Minerals Local Plan.</p> <p>We submit that the emerging Central Lincolnshire Local Plan should, when considering policies and potential land for allocations / designations ensure that due regard is had to the need to safeguard mineral resources, mineral infrastructure sites, and all locations whereby new non-minerals development could harm the exploration, extraction, and production of hydrocarbons.</p> <p>The ability to meet hydrocarbon demand can only be met where the hydrocarbons naturally occur. It is therefore important to ensure that these resources are safeguarded and not needlessly sterilised by non-mineral development or any development that would prejudice existing or future operations</p> <p>In our view, the Plan still at present conflicts with NPPF (July 2021) Paragraph 210 (parts c and e) and Minerals PPG.</p> <p>The NPPF (July 2021) is clear at paragraph 210 (parts c and e) that planning policies should:</p> <ul style="list-style-type: none"> • adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development (part c); and • define Mineral Safeguarding Areas and Mineral Consultation Areas to safeguard, inter alia, “existing, planned and potential sites for the bulk transport, handling and processing of mineral” (part e). <p>This responsibility is not limited to Mineral Planning Authorities. Paragraph: 005 (Reference ID: 27-005-20140306) of the Planning Practice Guidance (Minerals) identifies that, ‘whilst district councils are not mineral planning authorities, they have an important</p>			No

									<p>role in safeguarding minerals in three ways:</p> <ul style="list-style-type: none"> • having regard to the local minerals plan when identifying suitable areas for non-mineral development in their local plans. District councils should show Mineral Safeguarding Areas on their policy maps; • in those areas where a mineral planning authority has defined a Minerals Consultation Area, consulting the mineral planning authority and taking account of the local minerals plan before determining a planning application on any proposal for non-minerals development within it; and • when determining planning applications, doing so in accordance with development policy on minerals safeguarding, and taking account of the views of the mineral planning authority on the risk of preventing minerals extraction.' <p>The inspector's decision in the Wressle appeal 2 also stated, 'In line with the NPPG on Minerals I am entitled to assume that other regulatory regimes will operate effectively and that it is not necessary for me to carry out my own assessment because I can rely on the assessment of the other regulatory bodies. There is no evidence that other regimes are incapable of operating effectively and adequately regulating the development.</p> <p>As a minimum a 'tier two' Local Plan should cross reference with the adopted Minerals and Waste Local Plan (in this case the adopted Lincolnshire Minerals and Waste Local Plan Core Strategy and Development Management Policies (June 2016) and Site Locations (December 2017) documents) to outline the relationship of mineral planning and mineral safeguarding within two tier authority areas. These concerns were raised during the Local Plan Consultation Draft stage and have not been rectified within the Proposed Submission Draft Plan.</p> <p>The NPPF and PPG also suggest that minerals should be more than just referenced in 'tier two' plans; NPPF paragraph 210c states planning policies should: "safeguard mineral resources by defining Mineral Safeguarding Areas and Mineral Consultation Areas⁷⁰; and adopt appropriate policies so that known locations of specific minerals resources of local and national importance are not sterilised by non-mineral development where this should be avoided (whilst not creating a presumption that the resources defined will be worked)". Footnote 70 indicates that this particularly applies in two tier areas.</p> <p>We are aware that the Local Plan Proposed Submission Draft does make reference to the Lincolnshire Minerals and Waste Plan development plan documents throughout, although more explicit reference to the Minerals and Waste policies should be made within the Local Plan Proposed Submission Draft with specific regard to Policy S1. Minerals Safeguarding Areas as shown on Figure 1 of the Minerals and Waste Local Plan Core Strategy and Development Management Policies document) should be shown on the emerging Proposals Map to provide visible clarification regarding the locations within Central Lincolnshire that are at risk of either direct sterilisation by future non-minerals development, or sterilisation by proximity.</p> <p>Furthermore, Policy M11 of the MWLPCSDMP requires applications on non-minerals development in a minerals safeguarding area to be accompanied by a Mineral Assessment. Reference to this should be made within the Local Plan Submission Draft to ensure that developers and applicants are aware of this requirement.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--

Venari Fuel Ltd

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				

1104112	S63	No	No	No	No	No	No	Don't know	<p>at the A15/A46 intersection in the northern part of Lincoln (site plan attached), and approached the local authority in April 2020 relative to a petrol filling station and truck park proposal to meet a current deficiency in the area. Venari Fuel is a key stakeholder in the plan-making process, and representations were submitted earlier in the process on behalf of Venari Fuel in August 2021 (attached for reference).</p> <p>Representations</p> <p>The previous representations focused on Green Wedge policy, given that the emerging local plan proposes to place the site within such a designation. Although the name of the policy has changed (from S62 to S63), the wording of the policy is otherwise identical. In this context, my client reiterates the points made in the previous representations, in particular:</p> <p>Given the suitability of the site for a petrol filling station and HGV service area, as reviewed in the August 2021 representations, the site should be removed from the Green Wedge. The site in itself is a small piece of land in comparison to the wider designation and therefore will not prejudice the functions and aims of the Green Wedge with reference to Policy S63, for the reasons set out below:</p> <ul style="list-style-type: none"> • The removal of the site from the Green Wedge would not undermine the policy aim to prevent the physical merging of settlements and preserve their separate identity, local character, and historic character as it does not sit adjacent on the north, east or west sides to any major built-up areas of development, only Lincoln to the south, and therefore merging will not occur and the separate identity, local and historic character of existing settlements would therefore be preserved. • In terms of the policy aim to create a multi-functional 'green lung' to offer communities a direct and continuous link to the open countryside beyond the urban area, the removal of the site from the Green Wedge would not be detrimental to this aim and function, again, due to the site's small size in relation to the wider designation. • As for fulfilling the provision of an accessible recreational resource, with both formal and informal opportunities, close to where people live, where public access is maximised without compromising the integrity of the Green Wedge, removing the site from the Green Wedge would not be material as the site is of a small scale, as discussed above, and therefore, the Green Wedge as a whole would still fulfil its purpose in these terms. • Finally, in terms of the policy aim to conserve and enhance local wildlife and protect links between wildlife sites to support wildlife corridors, local wildlife and wildlife corridors would be protected irrespective of the site's designation and removal of the site would have no material impact on this function due to its size. <p>In any event, it is considered that the development proposals are consistent with Policy S63. The facilities would be provided effectively through the location of the site on the strategic road network, and location of the site along the strategic road network confirms that the site cannot go anywhere</p>	<p>Change sought to the Local Plan (Question 5, with reference to the authority's representation forms)</p> <p>As confirmed above, the change sought by the representations to the Local Plan is the removal of the Land at A15/A46 Intersection from the Green Wedge within the final plan, in the interests of providing a service area to meet a need that can only be accommodated on this site, and which will provide an important function in serving road safety by supporting the busy strategic road network</p> <p>Soundness of the local plan (Question 4, with reference to the authority's representation forms)</p> <p>In the absence of the change sought, the Local Plan is unsound on the grounds that it is not:</p> <ul style="list-style-type: none"> • Positively prepared (not least as it fails to positively plan to meet the need for a roadside service area on this part of the road network); • Justified (as the lack of making allowance for the need for a roadside service area in this location has not been addressed by the evidence base); • Effective (as the plan ignores the provision of a use that is needed in the area), and • Consistent with national policy (as it is contrary to paragraphs 82b), and in particular paragraph 106e) which confirms that planning policies should provide for large scale transport facilities, which footnote 44 confirms includes roadside services, that need to be located in the area). 	Yes	Yes
---------	-----	----	----	----	----	----	----	------------	---	---	-----	---------------------

									<p>else in the surrounding area. Further, the major benefit of the proposal will be to improve highway safety and efficiency. The service area facilities and road layout would therefore provide an important function in serving road safety by providing a service area for the busy strategic road network.</p> <p>As confirmed above there will be no impact on the functions and policy aims of the Green Wedge, and in any event, the scale of the proposal suggests that any impact on Green Wedge can only be very modest, and must be outweighed by the benefits identified in terms of highway safety.</p> <p>However, given the local authority's feedback in response to the aforementioned pre-application request, if for whatever reason removal of the site from the Green Wedge is not pursued by the local authority, it is essential that clear allowance is made within the Local Plan Green Wedge Policy S63 for development such as that sought by our client. In particular, it is considered that the policy should make specific reference to potential development that is suitable, in principle, in the Green Wedge. This should be inclusive of transport and highway infrastructure (such as roadside facilities), as detailed above.</p>	The right is reserved to add to, and elaborate further on the above matters, as necessary, during the course of the Examination process.		
--	--	--	--	--	--	--	--	--	--	--	--	--

Vistry Homes Limited

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103689	S1	Don't know	Don't know	No	No	No	No	Don't know	<p>The proposed settlement hierarchy within Policy S1 (The Spatial Strategy and Settlement Hierarchy) has eight separate tiers, with The Lincoln Urban Area is at the top. Gainsborough and Sleaford are 'Main Towns' at the second tier, and Caistor and Market Rasen are 'Market Towns' at the third tier. Below the Market Towns, settlements are organised into tiers based solely on their size (number of dwellings). The 'Large Villages' tier includes villages with a minimum 750 dwellings, but there is no maximum figure.</p> <p>3. The Large Villages tier includes a significant variation in the size of settlements, in which the largest settlements (including Branston) are in excess of 2,000 dwellings and comparable to (or in some cases larger than) the Market Towns of Caistor and Market Rasen in the tier above. The settlement hierarchy should be amended to ensure those more sustainable villages have the appropriate status within the Plan.</p>	Given the difference between settlements within the 'Large Village' category, this tier should be split, so that the larger settlements in excess of 2,000 dwellings join Market Rasen and Caistor in a new tier, 'Market Towns and Key Centres'. Under this approach, those settlements with fewer than 2,000 dwellings would remain as 'Large Villages'.	Yes	No
1103690	S2	Don't know	Don't know	No	No	No	No	Don't know	<p>5. The policy is not sound for two principal reasons.</p> <p>6. Firstly, in relation to its use of a range, and secondly the actual housing requirement figure included in the Plan.</p> <p>7. Policy S2 expresses housing requirement as a range of between 1,060 and 1,325 dwellings per year. Setting out the requirement as a range does not provide the necessary clarity as to what the Plan is intending to deliver. It is also not the intention of national policy, whereby the NPPF (paragraph 66) is worded in the singular, stating "Strategic policy-making authorities should establish housing requirement figure for their whole area" (our emphasis).</p> <p>8. The PPG (paragraph 027 reference ID 68-027) suggests that</p>	<p>15. For the Submission Local Plan to be made sound, a single housing requirement figure should be used.</p> <p>16. Further, the figure should be higher than the upper level of the range that PolicyS2 currently quotes. Otherwise, the Plan will not meet the level of market and affordable housing need identified. Adopting a higher figure for the housing requirement would support</p>	Yes	No

									<p>expressing housing requirement as a range can be done only exceptionally. The paragraph relates to the calculation of five year housing land supply, and refers to circumstances “Where strategic policy-makers have successfully argued through plan-making and examination.” for this approach. The Submission Local Plan does not make the case as to why a range is appropriate in this case, only that it is possible adopt a range.</p> <p>9. If the Plan includes a requirement to deliver a specific number of dwellings that is deemed necessary in order to achieve sustainable development, the Plan should be monitored and assessed against that requirement in terms of whether the Council can demonstrate a five year housing land supply. To do otherwise could result in housing needs or economic needs not being met during the Plan period, and frustrate the delivery of sustainable development.</p> <p>10. Secondly, in terms of the housing requirement, the Policy includes a range of 1,060-1,325 dwellings per annum. The lower end of the range is based on the 2020 Local Housing Need Figure applying the Standard Method. This calculation is now two years out of date, and the most recent 2022 figure is 1,102 dwellings per annum.</p> <p>11. In any event, the Plan evidence (HOU001 Housing Needs Assessment) acknowledges that their analysis suggests a higher figure than standard method is necessary. HOU001 concludes a figure of 1,325 dwelling per annum is representative of the higher housing need. However, that figure itself is not considered sound based on the following evidence.</p> <p>12. The NPPG indicates that if previous housing delivery has exceeded the minimum LHN, consideration should be given as to whether the level of delivery is indicative of a greater housing need (ID 2a-010-20201216). The Government’s Housing Delivery Test confirms completions of 1,586 dwellings in 2018/19, 1,807 dwellings in 2019/20 and 1,532 dwellings in 2020/21. Housing delivery has therefore been consistently and significantly above 1,325 dwellings per annum (circa 20 to 30%) which suggests a higher figure is required.</p> <p>13. Further, in terms of housing affordability, the evidence from HOU001 demonstrates a need for 592 affordable homes per annum. This is some 45% of the overall requirement of 1,325 dwellings per annum. As the proportion of affordable homes sought on sites of 10 or more dwellings will be between 10 and 25%, there is a clear shortfall between need and what will be delivered by the Plan.</p> <p>14. These two factors alone point towards the need for a higher housing requirement.</p>	the Government’s objective of significantly boosting the supply of homes (NPPF, paragraph 60). The extent to which the housing requirement should be increased should have regard to the availability of suitable sites that confirm with the Strategy.		
1103692	S76	Don't know	Don't know	No	No	No	No	Don't know	<p>27. Policy S76 (Residential Development from Sustainable Urban Extensions) illustrates there is an over reliance on SUEs, which will deliver 13,900 dwellings over the plan period (nearly half of the overall housing requirement to 2040). Of the eight SUEs, five will continue to deliver after the plan period ends. The housing trajectories for some of these sites are considered unrealistic, and there is not sufficient evidence to support the rates of delivery envisaged. For instance, delivery rates of 225 dwellings per annum (South East Quadrant) are not supported by any evidence to</p>	<p>29. The Council should allocate additional smaller sites in sustainable locations to protect against the risk of slower than expected delivery rates on the SUEs, and diversify the housing land portfolio already identified.</p> <p>30. This could be as allocations or as reserve sites. A reserve site would provide the Plan with additional</p>	Yes	Yes

									<p>demonstrate this is achievable.</p> <p>28. In the absence of sufficient evidence to demonstrate the SUEs will deliver their allocation within the plan period, there is no certainty the level of housing completions in Policy S76 will be achieved and that as a consequence the housing requirement will be met.</p>	<p>flexibility and resilience where delivery issues are experienced at any SUE.</p> <p>31. The Vistry land at Moor Lane, Branston should be allocated for development to help meet the housing needs of the area in a sustainable location, either as an allocation or a reserve site.</p> <p>32. The site is available immediately for residential use. The Vision Document accompanying these representations includes a Concept Masterplan that shows how a development of around 165 homes could be integrated with the existing village and achieve a high quality development.</p> <p>33. The Moor Lane site is the most appropriate location for development at Branston:</p> <ul style="list-style-type: none"> · It represents a logical extension away from the designated conservation area to the west, which restricts development at the southern village boundary. The site would not affect any of the key views the Neighbourhood Plan identifies as being worthy of protection. · There are no technical constraints preventing development. The site is wholly within Flood Zone 1 (lowest probably of flooding). Surface water can be effectively managed through the design of the layout and the use of sustainable drainage. There are no listed buildings present at or near the site. There are no public rights of way crossing the site. The trees present at the site are not affected by any tree preservation orders. · There are no landscape or ecology designations. The site would extend the settlement to the east by a small degree, which would relate well to the existing built edge, owing to the indented settlement pattern. · The site would represent a ‘rounding off’ of the settlement and not result in ribbon development, which is a risk with some other growth options. · Vehicular, pedestrian and cycle access can be taken from Moor Lane via a new simple priority ‘T’ junction, with an 		
--	--	--	--	--	--	--	--	--	--	---	--	--

										<p>additional pedestrian and cycle access point linking to Shardloes.</p> <ul style="list-style-type: none"> · There are opportunities to tie in with existing footpaths in the vicinity. The site would have good access to community facilities and services, including the recreation ground on Moor Lane and shops nearby. <p>34. The Site Assessment supporting the Local Plan allocations did not identify any significant issues regarding the site (reference NK/BRAN/008) that would affect delivery. The principal issue was its location at the edge of the settlement (in common with the sites allocated) and that other sites were “preferable”.</p>		
1103691	S80	Don't know	Don't know	No	No	No	No	Don't know	<p>17. Policy S2 confirms that around 64% of the homes and employment land needed will take place in the Lincoln Strategy Area (LSA). The LSA is based on travel to work patterns and is separate to the Lincoln Urban Area. The remainder of growth is split equally between Gainsborough (around 12%), Sleaford (around 12%), and ‘Elsewhere’ (around 12%).</p> <p>18. In identifying the LSA, the Councils recognise that the settlements within the LSA (including Branston) have a particular relationship with the Lincoln based on existing movements and supported by infrastructure including public transport provision.</p> <p>19. However, the distribution of growth to Branston does not reflect its particular status as a Large Village within the LSA, and a sustainable location in its own right (as recognised in The Central Lincolnshire Site Allocations Settlement Analysis). It has two village centres at Beech Road and Station Road, and a range of community facilities, including primary and secondary schools, a library, health care facilities, and a well-equipped recreational area.</p> <p>20. The village is planned to receive a very limited amount of development in comparison to its size, with only one new allocation of 35 dwellings and reliance on an existing allocation of 109 dwellings. Therefore, only 144 dwellings are planned to come forward from 2021 to 2040 (with all completions expected by 2028/29). This equates to only 0.5% of the higher housing requirement to 2040, and only 4% of the allocation to ‘elsewhere’ (based on the higher figure in the housing requirement ‘range’).</p> <p>21. The level of growth planned to be accommodated in Branston does not reflect its status, proximity to Lincoln, and level of facilities. Further, it will not meet local needs arising from the village. Branston should be accommodating more growth over the Plan period either in addition or instead of less sustainable settlements.</p>	<p>22. The distribution of growth should be amended so that more growth is directed to the Large Villages within the Lincoln Strategy Area. In particular, additional development should be directed to Branston in Policy S80 to reflect its status proximity to Lincoln, and existing facilities.</p> <p>23. Land at Moor Lane, Branston should be allocated for development in Policy S80 to help meet the housing needs of the area in a sustainable location, either as an allocation or a reserve site.</p> <p>24. The site is available immediately for residential use. The Vision Document accompanying these representations includes a Concept Masterplan that shows how a development of around 165 homes could be integrated with the existing village and achieve a high quality development.</p> <p>25. The Moor Lane site is the most appropriate location for development at Branston</p> <ul style="list-style-type: none"> · It represents a logical extension away from the designated conservation area to the west, which restricts development at the southern village boundary. The site would not affect any of the key views the Neighbourhood Plan identifies as being worthy of protection. · There are no technical constraints preventing development. The site is wholly within Flood Zone 1 (lowest 	Yes	Yes

										<p>probably of flooding). Surface water can be effectively managed through the design of the layout and the use of sustainable drainage. There are no listed buildings present at or near the site. There are no public rights of way crossing the site. The trees present at the site are not affected by any tree preservation orders.</p> <ul style="list-style-type: none"> · There are no landscape or ecology designations. The site would extend the settlement to the east by a small degree, which would relate well to the existing built edge, owing to the indented settlement pattern. · The site would represent a ‘rounding off’ of the settlement and not result in ribbon development, which is a risk with some other growth options. · Vehicular, pedestrian and cycle access can be taken from Moor Lane via a new simple priority ‘T’ junction, with an additional pedestrian and cycle access point linking to Shardloes. · There are opportunities to tie in with existing footpaths in the vicinity. The site would have good access to community facilities and services, including the recreation ground on Moor Lane and shops nearby. <p>The Site Assessment supporting the Local Plan allocations did not identify any significant issues regarding the site (reference NK/BRAN/008) that would affect delivery. The principal issue was its location at the edge of the settlement (in common with the sites allocated) and that other sites were “preferable”.</p>		
--	--	--	--	--	--	--	--	--	--	---	--	--

Welbourn Parish Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103461	S2	Yes	Don't know	Yes	Yes	Yes		No	Welbourn Parish Council consider the lower figure of 1060 dwellings to be more appropriate and sustainable than the 1325 proposed. In addition Welbourn PC wish to see the cap of 10% maximum growth over the life of the plan to be reapplied.	This lower number is necessary in order to attempt to provide community services and infrastructure to meet the needs of these additional households. Infrastructure changes such as improved drainage and sewage capacity needs to be addressed as well as school and medical services capacity to be increased. Roads and access matters are also needed to be improved.	No	No

Welton-by-Lincoln Parish Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1101779	S80								<p>Welton-by-Lincoln Parish Council is concerned over the continued potential development within the village as we believe that continued growth on the scale proposed in the Draft Central Lincolnshire Local Plan, (CLLP), is not sustainable.</p> <p>The concept of sustainability mandates that new development in open countryside should be regarded as a last resort, after all potential alternatives have been exhausted and then only if the case is compelling. As far as land supply is concerned there are potential development opportunities on a large brownfield site at RAF Scampton (policy S75) only three miles away, which have yet to be fully evaluated.</p> <p>Welton-by-Lincoln Parish Council believes that Welton is being allocated a disproportionate share of housing growth and that the additional homes would further increase pressures on local services in Welton and Dunholme, which are struggling to meet demands arising from recent housing expansion and previously permitted developments not yet completed. In particular, health care and education are hard to expand, and funding is chronically constrained.</p> <p>We understand that whilst there is some spare capacity in local primary schools there is no headroom at secondary or sixth-form levels to absorb the additional demand that would be generated.</p> <p>At a recent meeting of the Parish Council, the Practice Manager from the Welton Family Health Centre stated that although they had extended the space available for patients and practitioners, they were unable to recruit sufficient qualified doctors and nursing staff to fill their consulting rooms. They stated that they could not realistically cope with growth in the local population from existing and previously consented housing developments and although the practice list remains open, they had asked for it to be closed to new patients.</p> <p>Accessibility constraints include vehicle access and parking. The Welton Co-op car park is frequently full, with vehicles queueing to enter causing congestion at the Cliff Road/Lincoln Road/Ryland Road junction. A similar situation takes place on the opposite side around the Village Green and outside the Black Bull public house. The doctor's surgery has only eight public parking spaces. There is no physical scope to expand these facilities. We have previously tried, but failed to secure additional parking provision.</p> <p>We believe that the draft CLLP does not present a convincing case for yet more housing development in Welton, a location which is being disproportionately targeted for housing growth.</p> <p>For the period up to 2040 (nearly twenty years into the future), the base planning assumption sets a target of 18,656 new homes in the Group 1 Lincoln Strategy Area. The current draft plan expands this by nearly 2,500 – to a total of 21,113. The justification for this increase is unclear and Welton is again disproportionately targeted to achieve nearly 20% of this surplus, amounting to a further 458 homes. Taking this into account the overall growth for Welton would exceed 870 houses; a 48% increase from 2018.</p>			No

West Lindsey District Council

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				

1101876	General	Yes	Yes	Yes	Yes	Yes	Yes	Yes	West Lindsey District Council supports the overall Policy Approach taken in the Proposed Submission Draft of the Central Lincolnshire Local Plan. It is considered that the approach of the Central Lincolnshire Local Plan reflects the overall vision and objectives of West Lindsey, there is clear synergy between the plan and the corporate plan themes of 'our Place' and 'Our People' as detailed within the corporate plan and other key policies and strategies. The Central Lincolnshire Local Plan strikes a positive balance between enabling growth and economic prosperity, whilst recognising the special characteristics of the district and the need to respond to both urban and rural communities, as well as providing protection for those unique and valuable features both in terms of landscape and heritage.		Yes	No
1101789	Intro; Context; Strategic Priorities; Vision; Objectives	Yes	Yes	Yes	Yes	Yes	Yes	Yes	This chapter supports the delivery of West Lindsey District Council's strategic aims and broader vision for the district identified in the Council's Corporate Plan (2019 – 2023); providing a statutory spatial planning framework to promote sustainable growth, prosperity and economic development as well as enabling the delivery of housing to meet identified need.		Yes	No
1101794	S1; S2; S5	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>The approach to the spatial strategy reflects that of the adopted Central Lincolnshire Local Plan which has proven clear, effective and justified previously, by enabling growth in appropriate locations across the District and maintaining a 5year land supply. The policies within this chapter also on balance afford the appropriate protections to those areas within the district where unplanned housing growth would impact negatively on certain communities, and place additional strain on infrastructure.</p> <p>Both Policies S1 and S2 provide an effective and positive approach to, and appropriate framework for, meeting identified housing need across the District and more widely across Central Lincolnshire. The distribution of growth has remained unchanged from the current Local Plan and this is supported by West Lindsey as it has been found to operate well in terms of delivering housing in appropriate and sustainable locations. As such the site allocations detailed within policies S76 to S82 are considered justified and deliverable. The sustainable urban extensions detailed in Policy S76 located in West Lindsey all have the benefit of outline permission and are either seeking reserve matters approval or already delivering housing and associated infrastructure.</p> <p>It is recognised and supported by the Council that the Local Plan now allocates housing sites of 10 or more. This is considered a positive change to the Plan as smaller housing sites better reflect the rural nature of the District and provide an opportunity for smaller communities to grow proportionately in a planned way. Equally, the policy continues to provide appropriate flexibility to allow appropriate, small scale and sustainable development outside of the allocations, whilst providing appropriate safeguards and a clear assessment criterion for developers, communities and planning officers to assess the appropriateness of applications.</p> <p>Being a predominately rural authority, the Council supports the inclusion of Policy S5 within the Local Plan. The approach of the Local Plan to direct development away from the Countryside is considered important and justified. Agriculture plays a significant role in the District both in terms of the economy and food security. Therefore, the inclusion of a policy which promotes the protection of the countryside, whilst allowing diversification as needed is appropriate and justified.</p>		Yes	No
1101806	S6; S7; S8; S14; S19	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The introduction of the Climate Change Chapters as part of the Central Lincolnshire Local Plan review is wholly supported by West Lindsey District Council. The policies within this chapter accord with West Lindsey District Council's own Climate Change, Environment and Sustainability Strategy adopted in summer 2021 and will support the aspirations of the District achieving net zero carbon by 2050. It is considered that the		Yes	No

									<p>adoption of the draft Central Lincolnshire Local Plan with the inclusion of all of the policies within Chapter 3 of the Local Plan will deliver positive outcomes for the communities across West Lindsey and seek to safeguard the district for future generations.</p> <p>S6, S7, S8 It is considered that S6, S7 and S8 provides an effective and positive policy framework to assess the efficiency of buildings as part of new development proposals across Central Lincolnshire. It is strongly asserted within the Council that any new development in the District strives for excellence in terms of energy efficiency, sustainability and where possible achieves carbon net zero. The Council welcomes the requirement that all development must provide Energy Statements to confirm that both the design principles and energy consumption requirement have been met is the correct approach. Equally, whilst it is accepted that there may be circumstances where all requirements can't be met, the fact that this is dealt with by exception is the correct approach. The inclusion of the value zones acknowledging the function of the different housing markets across the District is also an appropriate approach, it essentially presents the current Building Regulation standards as the very minimum that should be achieved, encouraging all areas to achieve more, whilst acknowledging viability challenges in some areas. The purpose of this policy approach is reducing the number of homes that will require future retrofit initiatives and overall support the reduction in the Countries demand for energy. In this fact West Lindsey District Council supports this policy direction.</p> <p>S14 In relation to meeting the needs of the Country's energy demands, the Council recognises the need for renewable energy and supports the extensive evidence and rationale on which Policy S14 has been based upon. It is considered that the policy is justified and strikes the correct balance in its approach, providing a positive framework against which specific renewable energy applications may be assessed. Moreover, the policy recognises the National position on Wind Turbines specifically and accords with it through the utilisation of a two-stage assessment approach. The Council recognises there is an on-going need to review the approach to energy generation and considers that Policy S14 provides a positive framework in which to do this.</p> <p>S19 It is acknowledged by West Lindsey District Council that Lincolnshire County Council is the Minerals Authority for Lincolnshire and as such are responsible for making decisions on applications in this regard. However, in the broader context of what the Central Lincolnshire Local Plan is trying to achieve and indeed what West Lindsey District Councils' own Climate Change, Environment and Sustainability Strategy, it is considered appropriate that Policy S19 is included within the Local Plan which specifically resists the extraction of fossil fuels within the Districts Local Planning Authority Areas.</p>			
1101823	S22	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>The approach taken in Policy S22 is supported, providing a positive policy framework to enable the delivery of housing both in rural and urban areas that meets identified need and is reflective of the housing markets across the district. It is acknowledged that the policy in relation to First Homes exception sites is provided within the NPPF and whilst it is disappointing that national policy has sought to impose such development on rural communities, it is acknowledged that Policy S22 seeks to provide clarity on the areas of the application which may be assessed under the adopted Local Plan and ensure Affordable Housing is delivered in the right place and meeting identified needs.</p> <p>There is however some wording that needs to be updated in the affordable housing policy supporting text 4.1.5 in relation to the Rural Designation. West Lindsey District</p>		Yes	No

									Council were successful in securing rural designation for the villages applied for.			
									Please see the link to the Statutory Instrument: https://www.legislation.gov.uk/ukxi/2021/1222/contents/made			
1101826	S39	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The inclusion of a policy which deals exclusively with development in Market Rasen and Caistor town centres is wholly supported, having been positively prepared and justified. The context provided in the supporting text recognising the important role in which these towns play in West Lindsey, supporting rural communities as well as highlighting some of the challenges they now face is very important. As such, the policy itself provides a positive framework in which to assess future development proposals to ensure both towns are in the best position to thrive throughout the plan period and beyond.		Yes	No
1101830	S40	Yes	Yes	Yes	Yes	Yes	Yes	Yes	This policy is considered of great importance, specifically to rural communities. The last two years have demonstrated clearly the need for local facilities and amenities. This policy is effective and clearly promotes future development of such facilities and seeks to, where possible, ensure the protection of existing village centres, recognising the import role they play in terms of the creation of sustainable places, being the heart of the community and also providing invaluable facilities for all in the community including vulnerable members of society. It is acknowledged that the recent update to the Use Class Order has the potential to put some existing facilities at risk of conversion without planning permission and it is acknowledged that this policy seeks where possible to mitigate against this.		Yes	No
1101831	S52; Map	Yes	Yes	Yes	Yes	No	Yes	Yes	This policy refers to the Riseholme Campus being shown on the policies map; however, the area is not showing up on the submitted policies map. Without being mapped this policy is not effective. Please add the area based on the area mapped in the Adopted Central Lincolnshire Local Plan 2017.	Please add Riseholme Campus to the policies map. The area should be the same as the area mapped in the Adopted Central Lincolnshire Local Plan 2017.	Yes	No
1101807	S53; S54								Policies related to driving up build quality and standards, and specifically recognising the impact of the built environment and housing quality on both the broader environment and health and wellbeing is supported by West Lindsey District Council. The objectives of the policies, specifically S53 and S54 are considered justified and effective and align with West Lindsey District Council's own corporate aims and objectives.		Yes	No
1101810	S59; S60; S61; S62; S63; S64; S65; S66; S67	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Being a predominately rural district and having the benefit of an Area of Outstanding Natural Beauty the policies contained within this chapter are considered very important and are fully supported. The policies within this chapter have been positively prepared and are considered justified and effective both in terms of protecting existing green and blue infrastructure and promoting the creation of more across the District. The inclusion of policies specifically relating to Biodiversity and Geodiversity are also supported and the approach very much aligns with the vision and objectives of the Council's recently adopted Climate Change, Sustainability and Environment Strategy.		Yes	No
1101816	NS73	Yes	Yes	Yes	Yes	Yes	Yes	Yes	The Council welcomes the inclusion of this Non-strategic policy which highlights this area as a priority area for improvement and regeneration. The criteria in which applications would be assessed are fully supported and accord with both West Lindsey's broader approach to the regeneration of Gainsborough and those detailed within the Gainsborough Neighbourhood Plan. It is considered that this policy supports and promotes the aspirations of the District Council and wider community for the town.		Yes	No
1101869	S75	Yes	Yes	Yes	Yes	Yes	Yes	Yes	It is considered that the update to this Local Plan policy, following the Regulation 18 consultation, means that the policy is robust, justified and effective drawing out both the key issues and opportunities for the site. The policy emphasises the historic importance of the site and affords positive protection to the heritage as future uses are		Yes	No

									<p>explored. The Council fully supports the requirement of a masterplan prior to development to further safeguard the base and ensure that future development proposals are sustainable, viable and appropriate and relate positively to the existing community.</p> <p>The Council also supports the inclusion of the assessment and understanding of the airspace R313 in the context of future development, it's protection through Statutory Instrument being a unique and important feature of the site.</p>			
1101870	S80; SA	Yes	Yes	Yes	No	No	Yes	Yes	<p>Site allocation WL/WELT/008A phasing in the supporting text is incorrect. The text states the site to be phased back after WL/WELT/001 and WL/WELT/007. However, this should be phased back from WL/WELT/003 which is the adjacent site with an existing permission, vehicle access between these sites should be provided to ensure good connectivity.</p> <p>Furthermore, following consultation with Lincolnshire County Council Highways Department the categorisation is incorrect, it is deemed R (red) category and should in fact be A (amber) category. It is acknowledged that an access is required from Eastfield Lane but to achieve this it does require road widening and the culverting of ditches which is reliant on agreement with 3rd party land owners and as such may not be a deliverable access point.</p> <p>Also, in relation to site WL/WELT/008A it has been brought to the attention of the Council by residents that the reasons for selecting this site and rejecting site WL/WELT/008 are inconsistent. The sites are essentially the same site, however site WL/WELT/008A boundary to the North has been adjusted slightly. It therefore doesn't make sense that the justification for the sites selection or otherwise are completely different within the Sustainability Appraisal documentation.</p>	<p>The supporting text within the site allocations section of policy S80 relating to WL/WELT/008A needs to be updated to reflect the appropriate site the proposed allocation should be phased back from.</p> <p>The site access information relating to the access from Eastfield Lane should be rated correctly but also refer to the need to seek 3rd party agreement for road widening and the culverting of ditches.</p> <p>The Sustainability Appraisal documentation should be reviewed to ensure a consistent narrative and assessment.</p>	Yes	No
1101883	App 2	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>Appendix 2: Car Parking Standards</p> <p>The inclusion of car parking standards within the Central Lincolnshire Local Plan is supported and a welcome addition. As a rural district it is acknowledged that privately owned vehicles remain a significant part of life and the appropriate provision for parking is important and should be appropriately factored into the design and layout of new housing developments to support principles of place making.</p>		Yes	No
1101891	Evidence	Yes	Yes	Yes	Yes	Yes	Yes	Yes	<p>Viability</p> <p>The evidence base used to support the development of the Local Plan Policies is correct and reflective of the operation of the current housing markets in West Lindsey. It is considered the approach taken to value zones and affordable housing contributions is appropriate and strikes a balance between enabling delivery of housing and supporting growth, whilst also protecting the interests of the communities in West Lindsey by securing contributions to the necessary infrastructure, including affordable housing. The value zones are supported by effective and justified evidence developed alongside the Local Plan and very clearly align with established housing markets and actual delivery across the District. It is considered that this approach will ensure large numbers of new</p>		Yes	No

									houses developed will meet the highest energy efficiency standard and will thereby reduce the number of houses that will require retro-fitting in the future.			
--	--	--	--	--	--	--	--	--	---	--	--	--

Western Power Distribution

Rep ID	Comment on	Q2: Legal Compliance		Q3: Tests of Soundness					Q4: Please give details.	Q5: What change(s) do you consider are necessary	Q6: Take part in the EiP?	Additional files
		Local Plan	SA	Positively Prepared	Justified	Effective	Consistent with national policy	Complies with Duty to Co-Operate				
1103115	S68					No			<p>WPD owns and is responsible for electrical distribution apparatus within the area subject to this Local Plan and is the licensed network operator with statutory duties and powers including compulsory purchase powers.</p> <p>In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of WPD's infrastructure to enable WPD to supply electricity in the most efficient and cost effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons.</p> <p>Where diversion and/or undergrounding of overhead lines is deemed necessary to enable the development of a proposed allocation, lower voltage lines (up to 33kV) can normally be undergrounded or diverted without significant concern. However, where land allocations affect 132kV lines, the LPA are advised to engage with WPD at the earliest opportunity in the plan-making process to confirm:</p> <p>a) whether the lines can be accommodated within the development site; or</p> <p>b) the viability and feasibility of diverting and/or undergrounding overhead lines.</p> <p>This includes, where relevant, ensuring the agreement of third party landowners to the provision of new infrastructure on their land and subsequent agreement between the LPA and WPD to appropriate wording within the allocation policy.</p> <p>In allocating land affected by high voltage power lines, the LPA should take into account the additional costs involved in their diversion and/or undergrounding and the potential impact on timescales for delivery of the development. WPD cannot be held accountable for the absence of a planned solution for a proposed diversion route or undergrounding of an overhead power line or any subsequent reduction in the allocation site's development capacity, where the LPA and/or developer/landowner has not agreed proposals with WPD prior to the adoption of the Local Plan.</p> <p>In light of the above, WPD does not object to the allocation of land upon which its infrastructure is present, subject to the following steps being taken by the LPA in preparing the Local Plan:</p> <ol style="list-style-type: none"> 1. Priority should be given to retention of overhead lines wherever possible, with design principles included within the allocation policy to safeguard the retained lines and incorporate them sensitively into the development, whilst achieving high standards of design and an efficient use of land. 2. Early engagement with WPD to establish whether WPD's infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible; 3. Where diversion/undergrounding is required, ongoing dialogue with WPD to agree a potential route prior to adoption of the Local Plan, as outlined above. 4. For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), WPD recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines, with the agreement of WPD. 		No	No

								WPD supports the provisions of Policy S68, in particular the requirement for urban extension to be planned and implemented in a coordinated way, through an agreed broad concept plan which must be agreed between the developer and local planning authority prior to determination of any outline planning application. However, the form and content of the broad concept plan is undefined by Policy S68. Clear policy requirements for the broad concept plan should be set out within Policy S68 including a requirement for the plan to safeguard WPD's infrastructure, unless prior agreement has been reached with WPD to divert or underground the lines.			
1103117	S69					No		<p>WPD owns and is responsible for electrical distribution apparatus within the area subject to this Local Plan and is the licensed network operator with statutory duties and powers including compulsory purchase powers.</p> <p>In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of WPD's infrastructure to enable WPD to supply electricity in the most efficient and cost effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons.</p> <p>Where diversion and/or undergrounding of overhead lines is deemed necessary to enable the development of a proposed allocation, lower voltage lines (up to 33kV) can normally be undergrounded or diverted without significant concern. However, where land allocations affect 132kV lines, the LPA are advised to engage with WPD at the earliest opportunity in the plan-making process to confirm:</p> <p>a) whether the lines can be accommodated within the development site; or</p> <p>b) the viability and feasibility of diverting and/or undergrounding overhead lines.</p> <p>This includes, where relevant, ensuring the agreement of third party landowners to the provision of new infrastructure on their land and subsequent agreement between the LPA and WPD to appropriate wording within the allocation policy. In allocating land affected by high voltage power lines, the LPA should take into account the additional costs involved in their diversion and/or undergrounding and the potential impact on timescales for delivery of the development. WPD cannot be held accountable for the absence of a planned solution for a proposed diversion route or undergrounding of an overhead power line or any subsequent reduction in the allocation site's development capacity, where the LPA and/or developer/landowner has not agreed proposals with</p> <p>WPD prior to the adoption of the Local Plan.</p> <p>In light of the above, WPD does not object to the allocation of land upon which its infrastructure is present, subject to the following steps being taken by the LPA in preparing the Local Plan:</p> <p>1. Priority should be given to retention of overhead lines wherever possible, with design principles included within the allocation policy to safeguard the retained lines and incorporate them sensitively into the development, whilst achieving high standards of design and an efficient use of land.</p> <p>2. Early engagement with WPD to establish whether WPD's infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible;</p> <p>3. Where diversion/undergrounding is required, ongoing dialogue with WPD to agree a potential route prior to adoption of the Local Plan, as outlined above.</p> <p>4. For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), WPD recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines, with the agreement of WPD.</p>		No	No

									<p>WPD raises no objection in principle to the strategic allocations proposed through Policy S69. However, it is noted that the following allocations affect land which supports high voltage, 132kV overhead power lines:</p> <ul style="list-style-type: none"> • NK/CAN/003 • COL/ABB/001; and • NK/NHYK/001. <p>Land allocated under NK/CAN/003 is traversed by a 132kV overhead line which crosses through the centre of the northern part of the site. The line is supported by 4 pylons through the site. Sites COL/ABB/001 and NK/NHYK/001 are also affected by 132kV overhead lines, although the lines are relatively close to or on the boundary of the allocation.</p> <p>Despite the presence of 132kV lines on these sites, no reference is made in Policy S69 to the overhead lines or to establish design principles for their retention and assimilation into the future development proposals. In the absence of any correspondence from the LPA, WPD is not aware of any proposals to seek to divert or underground the overhead lines and therefore assumes that the proposed site capacities are based on the retention of the overhead lines in situ.</p> <p>To ensure the overhead lines are safeguarded and sensitively accommodated within any future development masterplans, WPD requests that additional wording is added to Policy S69 in respect of each of the sites listed above, to confirm that the overhead lines should be retained and incorporated in situ into future concept plans and masterplans.</p> <p>In the absence of the amendments sought to Policy S68 and S69, WPD considers the policies to be ineffective and therefore unsound.</p> <p>WPD welcomes the opportunity to engage with the LPA and discuss proposals for the sustainable urban extensions in more detail, to agree appropriate wording to safeguard its infrastructure and resolve WPD's objections.</p>			
--	--	--	--	--	--	--	--	--	---	--	--	--