

# Central Lincolnshire

## Representations on the Recommended Modifications Consultation

March 2023



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## Introduction

Following the hearing sessions of the examination of the Central Lincolnshire Local Plan a six-week consultation was held on the recommended Main Modifications between Friday 13 January 2023 and Friday 24 February 2023.

This document sets out all the responses received during this consultation on the Main Modifications and also includes responses received in relation to the accompanying additional 'Minor' Modifications, the Map Modifications, and other more general responses.

For information about what these different types of modifications are, please see the consultation documents which can be found at <https://www.n-kesteven.gov.uk/central-lincolnshire/local-plan-review-examination/examination-documents/> with the following references:

- [Recommended Main Modifications](#)
- [Additional 'Minor' Modifications](#)
- [Recommended Policies Map Modifications](#)

This document is also accompanied by a summary of the comments submitted along with a Committee response to these comments.

## Main Modifications

Modification Number	Respondent Name	Response
MM1	Gladman Developments Ltd	Gladman welcome the Inspectors' suggested main modification to remove the inclusion of a range with regards to the housing requirement for Central Lincolnshire. Gladman support the inclusion of the additional text outlining the aspirational growth figure of 1,325 dwellings per annum in order to ensure that the provision of new homes balances with the target job growth and we would urge the partnership to strive to deliver this quantum of development in order to ensure the area can reach its full economic potential. We agree that removing the range will provide greater certainty and remove confusion with regards to the housing requirement to be used for the purposes of five-year land supply and housing delivery test calculations.
MM1	Vistry Group (Richard Cooke, Marrons Planning)	<p>We agree with the suggested Main Modification that the housing requirement be set out as a single figure, rather than as a range, in order to provide clarity around the requirement.</p> <p>A single housing requirement figure provides a clear basis for calculating the five year housing land supply position and monitoring future housing delivery.</p>
MM1	Home Builders Federation (HBF)	The HBF continues to consider that the housing requirement should reflect the higher housing figure of 1,325dpa which will help to provide balance between the homes provided and jobs created as stated in the Policy. There still appears to be limited benefit to the Councils reflecting the minimum LHN as their housing requirement when they know this will be insufficient to meet their actual need as identified by their own evidence. The HBF continues to recommend that the Council seeks to only include one housing figure within their Policy and that this reflects the 1,325dpa.
MM1	Robert Doughty	<p>We note the change to state that the Housing Requirement in the Local Plan will be 1,102 dwellings per year to meet Housing Need, yet a higher target of 1,325 annum is being offered up as an additional target to help meet the economic vision and strategy of the plan. The first main paragraph describes the figure of 1,325 dwellings as required to meet the job creation target.</p> <p>It is not clear what justification is being provided to set two different targets. Why is a level of growth to meet the desired job creation not a target? Are the partner local authorities not committed to delivering economic growth? If the Councils are committed, can you please confirm how two different targets are justified.</p>

		<p>We also note the first paragraph of the policy uses the term “dwellings per year”, but the second paragraph refers to “per annum”. For clarity and consistency the same wording should be used.</p> <p>Sections a, b, c and d of the Modification now refer to the amount of development to be apportioned to Lincoln, Gainsborough, Sleaford and Elsewhere as “xx% of the supply”, instead of “the total homes and employment land needed”. This change in term creates some confusion. Is the development “needed”, or is it a “supply” within which the need can be met? This lack of clarity may result in the “requirement” identified in the first paragraph (or “need” in the old wording of paragraphs a to d) not being delivered, because the “requirement” for each area needs to be quantified by an applicant, rather than being established in the Local Plan.</p> <p>We appreciate there should be no differentiation between the “requirement”/“supply” and the “supply”, as the supply adds up to 100% of the requirements. There is, however, an ongoing issue in the operation of Policy LP4 of the adopted Local Plan, where the individual Local Planning Authorities treat the total level of growth for each Medium Village as a theoretical “headroom” for growth, rather than a policy requirement, despite the Housing Trajectory Local Plan and the five year land supply reports all factoring in delivery of the total growth figures for each settlement as part of the housing supply.</p>
MM1	National Highways	<p>National Highways understands that the Central Lincolnshire Local Plan Review was submitted to the Secretary of State in July 2022 for an independent examination following the last consultation which ran from March – May 2022. Through this examination a number of proposed changes to the Local Plan were identified.</p> <p>In relation to this consultation, we have now reviewed the Recommended Main Modifications, Proposed Minor Modifications and the Policies Map Modifications.</p> <p>From our review we have noted some changes to Policy S2: Growth Levels and Distribution within the Main Modifications document. The inspectorate recommends that the housing target is changed to 1,102 dwellings per year rather than a range of housing between 1,060-1,325 dwellings per year for the plan period (2018-2040). It is not clear how the 1,102 dwellings figure was achieved, however we note it is a slightly lower value than the range average previously set out.</p> <p>We note that this modification offers no material change to our previous response. This is because the overall scale and location of the development remains the same as previously assessed as part of the development of the transport evidence base for the Central Lincolnshire Local Plan.</p>
MM1	Beal Developments Ltd (Gareth Pritchard, Barton Willmore)	<p>Whilst Beal believe that the yearly housing figure associated with the standard method plus economic growth would be a more robust approach as the five-year land supply position, the amended wording proposed is more clear from a decision-makers perspective.</p>

		It may be appropriate to insert wording that if housing delivery slips behind job growth, that the plan is reviewed accordingly.
MM3	Gladman Developments Ltd	Gladman support the suggested main modification to include additional text in Policy S3 which provides for sustainable sites outside of, but immediately adjacent to, the developed footprint of settlements to be considered on their individual merits and sets out a list of criteria against which they will be assessed. The permissive policy is positively written and provides decision makers, local communities and developers alike greater clarity as to what development will be deemed appropriate in policy terms surrounding the Lincoln Urban Area, Main Towns and Market Towns. Gladman agree that the policy worded this way, when applied properly by decision makers, will help to further bolster the supply of homes surrounding the most sustainable settlements across Central Lincolnshire.
MM3	Historic England	Reference to heritage assets within the second bullet point is welcomed.
MM3	Robert Doughty	<p>The proposed modification includes the wording “to further Bolster supply” before describing the circumstances where development could potentially come forward outside the developed footprints of the three main settlements.</p> <p>This term “to further Bolster supply” is unclear. Bolster tends to mean “support or strengthen”: are proposals abutting a settlement considered to be part of the “supply” to meet the “requirement” or are they additional supply which will need to be justified by the applicant?</p> <p>Is there an acceptance that some sites outside, but adjacent to, the developed footprint will be required, or is this a facility to provide additional housing over and beyond the requirements set out in Policy LP2?</p> <p>We request this issue is clarified in the final wording of the plan.</p>
MM3	Environment Agency	We support the additional text proposed in Policy S3 which improves clarity on what would be considered appropriate for proposals adjacent to the developed footprint. Point 3 ‘be suitably serviced with infrastructure’ will help support ambitions to become net zero by supporting proposals which can be connected to existing infrastructure networks, aligning with Policy S11: Embodied Carbon. We also welcome Point 5 which emphasises that to integrate successfully with the adjoining community, proposals should have regard to design, layout, and accessibility of the scheme. This provides the opportunity to make positive contributions and connections to the natural environment.
MM3	Anglian Water	Support the inclusion of bullet 3 – ‘suitably serviced with infrastructure’ as this enables the Council to apply the sustainability hierarchy and so make best use of the embedded (capital) carbon in existing infrastructure or for development to connect and expand existing local infrastructure which is likely to have carbon economies of scale.
MM4	Home Builders Federation (HBF)	The HBF continues to consider that this policy including the proposed modifications is not sound. The HBF wants to see improvements in energy efficiency, but this needs to be within a consistent

		<p>national framework not through each area having its own approach to technical standards that places a burden not just on house builders but also on the local authorities themselves who are ill equipped to support developers and even monitor the policies they implement. Energy efficiency improvements delivered through national standards enables the effective delivery and monitoring of building standards for energy efficiency in a way the proposed approach by the Council cannot.</p> <p>The HBF continues to consider that there is no justification for restricting the locations and land type for where viability should be taken into account. There may be circumstances on any site in any location where the delivery of this policy is unviable. Without viability considerations being extended across Central Lincolnshire the policy lacks the necessary flexibility to be deliverable.</p>
MM4	Egdon Resources UK Limited (Paul Foster, AECOM)	We welcome the proposed modification which replaces “principles should be used” to “expectations should be considered”.
MM6	IGas Energy Plc (Heatons Planning)	<p>With regard to Policy S8 the proposed modifications involve altering the policy requirements to be achieved on a site-wide basis. The constraint to non-residential buildings with a total energy demand in excess of 90 kWh/m2/yr is unchanged.</p> <p>It is noted that the Joint Committee’s formal response to all Regulation 19 representations stated that Policy S8 “is not expected to be applied to all uses of land and activities such as minerals and waste extraction” (p. 27). If this is the expectation of the policy, it must be clearly and unambiguously stated in the policy or as a minimum the sub text wording in accordance with Paragraph 16(d) of the National Planning Policy Framework. This would make the policy effective as it is evident how a decision maker should react to policy, particularly where the Development Plan as a whole is relevant in two tier Authority areas. Currently, Policy S8 makes no reference to minerals and waste development but refers to all non-residential development. It is worth highlighting that mineral and waste development are often large operations, requiring multiple buildings of varying sizes and energy requirements. Therefore, the adoption of a District level policy which refers to all non-residential buildings must clearly state how it will be applied to mineral and waste proposals.</p> <p>It is noted that Policy S8 includes two ‘Exceptional Basis Clauses’ which would allow certain developments to not meet the full policy requirements of Policy S8, stating that:</p> <p><i>“Where, on an exceptional basis, points 1-2 cannot be met for technical (e.g. overshadowing) or other policy reasons (e.g. heritage) or other technical reason linked to the unique purpose of the building (e.g. a building that is, by the nature of its operation, an abnormally high user of energy), 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.”</i></p>

		<p>The proposed main modifications do not alter the above text. Whilst we support the purpose of the exceptions, to ensure Policy S8 is clearly written and unambiguous, it is considered a direct reference to minerals and waste development is required, stating that such development is an exception to Policy S8. Mineral and waste developments can be highly intensive in energy use by their very nature. Such developments would be assessed on their merits by the mineral and waste planning authority.</p> <p>If a full exemption by direct reference to minerals and waste development in the sub text is not considered appropriate, it is considered Policy S8 should be modified to read:</p> <p><i>“Where, on an exceptional basis, points 1-2 cannot be met for technical (e.g. overshadowing) or other policy reasons (e.g. heritage) or other technical reason linked to the unique purpose of the building <b>or development</b> (e.g. a building <b>or development</b> that is, by the nature of its operation, an abnormally high user of energy), 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.</i></p> <p><b><i>The requirement for Energy Statements does not extend to applications to be determined by the mineral and waste planning authority.”</i></b></p>
MM7	Egdon Resources UK Limited (Paul Foster, AECOM)	<p>The Proposed Main Modification adds a new paragraph to the Plan which defines the term “very low carbon” power sources. It justifies this refusal to allow “low carbon” sources of energy in Central Lincolnshire on the “wider climate related ambitions of the Plan.” However, there is no clear reference in either the Submitted Local Plan, nor the Main Modifications as to what these ambitions are or how they justify a significant departure from national policy. The final sentence of the paragraph should therefore be deleted.</p>
MM7	Anglian Water	<p>Support the inclusion of ‘low carbon’ term in relation to heat networks as Anglian Water has utilised waste heat from treatment processes to heat tomato greenhouses and is actively considering related renewables utilising bio resources.</p>
MM8	Egdon Resources UK Limited (Paul Foster, AECOM)	<p>Policy S9 (Decentralised Energy Networks and Combined Heat and Power) stated that any proposal for a new or extended combined heat and power network will only be supported if the power source of such a network is non-fossil fuel based.</p> <p>The recommended Main Modification as it relates to Policy S9 is to replace “non-fossil fuel based” with “renewable or very low carbon based.”</p> <p>Whilst this is a positive step forward, it still does not accord with the current version of the National Planning Policy Framework (NPPF) which defines decentralised energy as “local low carbon and local renewable sources of energy”. Very low carbon-based fuel would almost certainly exclude</p>



		<p>hydrogen fuel derived from natural gas which is supported by Government. The Energy Bill which is currently progressing through the House of Lords supports hydrogen production from low-carbon sources. A draft revised NPPF is currently out for consultation until March 2023 with proposed amendments to the current NPPF. There is no proposed change in the definition of decentralised energy from “low” to “very low”.</p> <p>Therefore, Egdon considers that the proposed modification does not make the policy sound because the policy would not be consistent with current national policy. The Local Plan should enable the delivery of sustainable development in accordance with the NPPF. Further, we do not consider that there are clear and convincing reasons to depart from national policy.</p>
MM8	Anglian Water	Support the inclusion of ‘low carbon’ term in relation to heat networks as Anglian Water has utilised waste heat from treatment processes to heat tomato greenhouses and is actively considering related renewables utilising bio resources.
MM10	Historic England	Reference to settings is welcomed.
MM11	Historic England	<p>new paragraphs 3.3.15 and 3.3.16 after 3.3.14</p> <p>Whilst the new paragraphs are welcomed, they have not been agreed with Historic England as the Government’s advisor on the Historic Environment, prior to the Main Modifications consultation. It is considered that the following partial rewording to proposed paragraph 3.3.16 would provide further clarity:-</p> <p><i>The Witham Fen north of the Heckington Eau is a historic landscape particularly sensitive to the introduction of wind turbines, both because it is a shared setting to the numerous scheduled monuments sited around it and because of its importance in key views to Lincoln Castle / Cathedral and Tattershall Castle. This historic landscape has not been mapped as a general constraint to medium-large scale wind turbines, but any wind turbine proposals in this area will be required to address impacts on the significance of this historic landscape in a manner proportionate to its importance and with great weight afforded to conserving the significance of the nationally important assets associated with it.</i></p> <p>In particular, for clarity in relation to Witham Fen, the words “to illustrate the above point” and “potentially” within the first sentence should be removed from that proposed.</p>
MM11	Environment Agency	We support the proposed additional text following paragraph 3.3.14 which recognises the potential for site specific constraints, including flood risk and biodiversity, which are in addition to the ‘principal constraints’.
MM12	Dr Colin Cumming	I find the possible siting of wind turbines between Welbourn and Brant Broughton as suggested in the map of possible sites totally unacceptable. Dycote Lane and Brant Road, the single lane road that runs between the two villages is an area of natural beauty much appreciated by the locals who use it

		for walking, bird watching cycling and jogging. This morning my wife and I had a walk there . The view of the Brant Broughton Church nestling in the trees on the far side of the River Brant is truly b
MM13	Historic England	<p>The addition to criteria (i) “and the historic landscape” is strongly welcomed.</p> <p>The adjustment of the policy to ensure that the requirements of national planning policies are applied equally to proposals for both small and medium-large wind turbines are welcomed.</p>
MM15	Robert Doughty	The proposed change would delete reference to where the policy would apply. Without this reference, the policy has no particular focus and merely repeats national statements, Building Regulations and common sense regarding the provision and siting of Electric Vehicle Charging Points, whether they are subject to a planning application or not. As such, the policy has no focus and should be deleted entirely.
MM16	Lincolnshire County Council (Phil Hughes)	<p>Reason for change: The revised text as currently proposed could be interpreted as implying that Policy M9 is not consistent with national policy. Policy M9 is fully compliant with NPPF para. 215 (2021 pre 2022 consultation version). The relevant policy context has NOT evolved since 2016. Revised NPPF is currently out for consultation (2 March 2023 deadline) and there is no proposed change to government policy. The best way for CLJSPC to influence minerals and waste policy is to engage with LCC in its review of the M&amp;WLP and respond to the latest version of NPPF.</p> <p>Delete paragraphs 3.5.8, 3.5.9 and replace amended 3.5.7 as follows:  3.5.7: “The current Lincolnshire Minerals and Waste Local Plan (M&amp;WLP), adopted in 2016, includes a policy which supports the “exploration, appraisal and/or production of conventional and unconventional hydrocarbons” (Policy M9). The Committee’s view is that the remaining carbon budget, at both a local and a global level, cannot be met if fossil fuels continue to be extracted and consumed. Whilst undoubtedly there will be a period of time where we transition away from fossil fuels, it is imperative that the economy needs to move to low carbon energy. Extraction and burning of fossil fuels is not commensurate with delivering a net zero carbon Central Lincolnshire. Lincolnshire County Council (LCC) is the Minerals and Waste Local Planning Authority and is currently undertaking a review of the M&amp;WLP. The CLJSPC will therefore seek to ensure the Central Lincolnshire aims on delivering climate change are considered through appropriate representations to inform the M&amp;WLP review.</p>
MM16	Egdon Resources UK Limited (Paul Foster, AECOM)	<p>The supporting text is no longer justified for the following reasons:</p> <ol style="list-style-type: none"> <li>1. Main Modification 17 proposes to delete Policy S19 from the Plan. There is therefore no justification for any supporting text.</li> <li>2. The inclusion of the supporting text is not consistent with national policy, notably, the NPPF:</li> </ol>

		<p>a. Paragraph 16(f) of the NPPF states that plans should serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area. The absence of any land use policy whilst including text which states the Joint Committee does not support Policy M9 of the Lincolnshire Minerals and Waste Plan 2016 is confusing and ambiguous for the decision maker.</p> <p>b. Paragraph 188 of the NPPF states that the focus of planning policies and decisions should be on whether proposed development is an acceptable use of land. The Committee's opposition to fossil fuel development is not relevant to decision-making.</p> <p>3. The Central Lincolnshire Joint Planning Committee comprises councillors from Lincolnshire County Council. The Joint Committee's in-principle opposition to any form of fossil fuel exploration, therefore, in paragraph 3.5.9 is at variance and contrary to the adopted development plan, namely Policy M9, which has been prepared by Lincolnshire County Council. As the text stands, therefore, the representatives of LCC on the Joint Committee are opposed to their own Plan. This is confusing for the purposes of clear decision-making.</p> <p>Consequently, both the Main Modifications and the original text in these three paragraphs should also be deleted.</p>
MM17	IGas Energy Plc (Heatons Planning)	<p>With regard to Policy S19 the Inspector has deleted this policy in its entirety. This deletion is strongly supported by IGas. Policy S19 would have been in conflict with the National Planning Policy Framework and the Adopted Lincolnshire Minerals and Waste Local Plan which support the exploration, extraction and production of conventional hydrocarbons in the UK.</p> <p>Paragraph 215 of the NPPF states that mineral planning authorities should plan positively for the exploration, appraisal and production of on-shore oil and gas.</p> <p>A public consultation on a proposed update of the NPPF is open until 2nd March 2023. It is important to highlight that the proposed updates make no changes to Section 17 Facilitating the sustainable use of minerals, including the requirement to plan positively for on-shore oil and gas development in the UK.</p> <p>Policy M9 of the Adopted Lincolnshire Minerals and Waste Local Plan supports 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 Plan.</p> <p>Furthermore, the new Lincolnshire Minerals and Waste Local Plan is currently being prepared, with a formal Issues and Options (Regulation 18) consultation held in summer 2022. The published Draft Plan reflects national considerations and the importance of on-shore oil and gas development,</p>

		<p>including securing energy from a variety of sources. The Draft Plan requested comments on the best approach to plan positively for on-shore oil and gas development, and IGas have contributed positively to this as a significant on-shore oil and gas operator in the County. IGas will continue to contribute to the plan process in future public consultations on the emerging Lincolnshire Minerals and Waste Local Plan.</p> <p>For the above reasons, the deletion of Policy S19 is strongly supported and must be maintained.</p>
MM17	Egdon Resources UK Limited (Paul Foster, AECOM)	Policy S19 (Fossil Fuel Exploration, Extraction, Production or Energy Generation) stated that any proposal for fossil fuel-based exploration, extraction or production will normally be refused. MM17 proposes to delete the policy from the Plan which is welcome.
MM18	Anglian Water	Support caveat that green roofs should be assessed against their whole life cycle carbon analysis.
MM19	Environment Agency	We support the proposed additional wording to criteria 2 a green roof and/or walls to 'assist water management'.
MM19	Beal Developments Ltd (Gareth Pritchard, Barton Willmore)	Beal welcome the amended wording and cap relating to First Homes and linking changes to indexation.
MM20	Home Builders Federation (HBF)	The HBF continues to be concerned by the price cap being applied to the First Homes and considers that ensuring that the homes are priced at least 30% below full market value would be sufficient. The HBF recommends that this policy is amended to remove the price cap.
MM21	Home Builders Federation (HBF)	Whilst the HBF considers that the proposed modification which sees the reduction in the marketing time period and further clarity as to how that time period is to be measured is appropriate if this policy is maintained. The HBF continues to consider that the requirement for 5% of homes on sites of 100 or more dwellings is not sound because it is not positively prepared, effective, nor consistent with national policy, as set out in our previous responses to this policy.
MM23	British Sugar Plc (Wakako Hirose, Rapleys LLP)	British Sugar remains concerned and considers that the absence of a defined employment land designation of both parcels of the site is not justified given the significant role it plays in the agri-food industry and UK's food security. We note the Joint Strategic Planning Committee's (JSPC) position that Policy S33 (non-designated employment sites) is the most appropriate policy for the site, as it would not preclude significant employment sites and would allow growth within them. The site has accommodated the agri-food industrial operations since the early 20th Century and currently accommodates over 22,800sqm of employment floorspace with capacity to deliver more. Evidently, the site's contribution to the Central Lincolnshire economy is substantial. The suite of employment policies makes it clear that outside existing employment areas and allocated sites, economic development will be typically "limited to small-scale proposals". In this context, the site's classification as a non-designated employment site is inconsistent with the significant role the site plays in the economy.

		<p>As we stated in our written and oral representations, we consider that the site should be designated as an Important Established Employment Area (IEEA) or the wording of Policy S33 should be amended to ensure that large scale employment developments would be supported.</p> <p>We therefore <b>object</b> to the Main Modification to <b>Policy S31 (ref: MM23)</b> on the basis of the rigid application of the criteria for IEEA designations which disregard the significance of the former Bardney Syrup Factory site as employment land and the substantial site area and industrial floorspace it already accommodates.</p>
MM28	Cereform Ltd (Wakako Hirose, Rapleys LLP)	We support the proposed Main Modifications to delete 'bad neighbour' for clarity and effectiveness of the policy.
MM31	Environment Agency	<p>We support the proposed additional wording to paragraph 11.2.3 which provides clarity and improves consistency with paragraph 180a) of the National Planning Policy Framework to ensure that biodiversity should be delivered on a site, and otherwise compensation should be a 'last resort'.</p> <p>Similarly, we are pleased to see the additional wording that provides clarity to the approach to 'off-site' measures.</p>
MM31	Natural England	Natural England concurs with modifications MM31 and MM32 which provide greater clarity for the delivery of biodiversity Net Gain (BNG).
MM31	Greater Lincolnshire Nature Partnership	<p>The GLNP feels the recommended modifications relating to its area of expertise are generally positive, but specifically supports the following modifications:</p> <ul style="list-style-type: none"> <li>• MM31 relating to Paragraph 11.2.3</li> <li>• MM32 relating to Policy S61</li> </ul>
MM32	Environment Agency	<p>We support the proposed additional wording to paragraph 11.2.3 which provides clarity and improves consistency with paragraph 180a) of the National Planning Policy Framework to ensure that biodiversity should be delivered on a site, and otherwise compensation should be a 'last resort'.</p> <p>Similarly, we are pleased to see the additional wording that provides clarity to the approach to 'off-site' measures.</p>
MM32	Natural England	Natural England concurs with modifications MM31 and MM32 which provide greater clarity for the delivery of biodiversity Net Gain (BNG).
MM32	Greater Lincolnshire Nature Partnership	<p>The GLNP feels the recommended modifications relating to its area of expertise are generally positive, but specifically supports the following modifications:</p> <ul style="list-style-type: none"> <li>• MM31 relating to Paragraph 11.2.3</li> <li>• MM32 relating to Policy S61</li> </ul>

MM34	Vistry Group (Richard Cooke, Marrons Planning)	<p>This suggested Main Modification proposes an additional sentence be added to the end of Paragraph 12.0.3, which is focussed on the 8 SUEs allocated in the 2017 Local Plan.</p> <p>The additional sentence states,</p> <p><b>“Should it become apparent that an allocated SUE will no longer deliver broadly as envisaged in Policies S68-S71, this may trigger a partial or full Local Plan review.”</b></p> <p>The stated “Reason for Change” for the suggested Main Modification is “This change provides clarity about what the consequences would be of a SUE site not delivering. This will help to provide context and clarity to ensure that the policy is effective in the event that a SUE does not come forward”.</p> <p>There is a difference in intent between the suggested Main Modification text (column 3) and the stated reason (column 4). The suggested Main Modification would apply when a SUE is ‘no longer broadly delivering as expected’, whereas the wording in the Reason for Change refers to a situation in which a SUE ‘does not come forward’. This is not sufficiently clear and should be clarified.</p> <p>Our reading of the suggested Main Modification, in the context of Local Plan Paragraph 12.0.3, is that it is intended to apply where the SUEs do not deliver against the specific requirements of the Policy. This includes the number of dwellings delivered, alongside other requirements set out, such as infrastructure and community services.</p> <p>The wording of the suggested Main Modification is not sufficiently clear as to provide an effective contingency if the SUEs do not deliver as expected. It does not specify how regularly delivery at the SUEs should be reviewed. In addition, the phrases “broadly as envisaged” and “may trigger a partial or full Local Plan review” are open to interpretation and ambiguous. The need to provide clearly written and unambiguous policies is central to NPPF16(d).</p> <p>The draft Local Plan has a significant reliance on the SUEs, which deliver 60% of the overall housing requirement. Any shortfall in delivery at the SUEs will affect the ability to meet the housing requirement. It is therefore important to have a clear mechanism in place to monitor delivery and implement a timely review of the Local Plan, if necessary.</p> <p>Given the significance of the issue, there needs to be a clear set of circumstances, which trigger the need to review the Local Plan and allocate additional deliverable and sustainable sites for development.</p> <p>The benchmarks to assess delivery of the SUEs should include the following.</p>
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		<ul style="list-style-type: none"> <li>• Delivery against the policy criteria: policies S69-S71 include the approximate number of dwellings that each SUE will deliver first in the overall list of requirements.</li> <li>• Performance against the housing trajectory, linked to the above. Table 2 (Housing Trajectory for Central Lincolnshire 2018-2040) of the Local Plan only identifies the source of housing supply (i.e., the contribution made by allocations with and without planning permission, small sites and windfalls). Housing delivery at the SUEs should therefore be monitored against the Housing Trajectory at Appendix 1 of the Central Lincolnshire Housing Delivery Paper (March 2022). This forms part of the Local Plan evidence base and the trajectory should be included as an appendix to the Local Plan to support its monitoring and implementation.</li> </ul> <p>In reviewing SUE delivery against the above criteria the Main Modification should clarify that it would relate to an inability to meet housing needs - e.g. should there be issues with 5-year housing land supply or Housing Delivery Test Results. The Main Modification should also be clear about what the Local Plan review would entail - i.e. being explicit that a review would mean allocating additional housing sites to make up any shortfall in housing land supply. The focus should be on otherwise sustainable and deliverable non-strategic sites, which will be more readily available to address housing needs in the earlier, part of the plan period.</p> <p>The suggested Main Modification is additional to the requirement in Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), that local planning authorities review local plans at least once every five years. With this in mind, the performance of the SUEs should be reviewed annually.</p> <p>The suggested Main Modification text should be updated to read as follows:</p> <p><b><u>“Housing delivery at each SUE will be monitored annually against the Housing Trajectory within the Local Plan. Should it become apparent that an allocated SUE is not delivering against the Housing Trajectory and policy requirements no longer deliver broadly as envisaged in Policies S68-S71 resulting in a shortfall in housing land supply, this may will trigger a partial or full Local Plan review to be commenced within 3 months. The purpose of the Local Plan review shall be to identify additional housing allocations in order to meet planned housing requirements.”</u></b></p> <p>This main modification should also be added to the policy wording in Policy S68: Sustainable Urban Extensions, rather than supporting text, as a key policy mechanism in the new local plan to ensure</p>
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		that objectively assessed needs can be met and deliverable supply of housing sites maintained. This will support the objectives of NPPF60, 68, 74 and 76.
MM35	Church Commissioners for England (Hannah Graham, Deloitte LLP)	The Church Commissioners support the amendments to this policy, which would provide a clearly defined southern boundary for the development.
MM36	Historic England	The text to be added after point k) is welcomed.
MM36	Lincolnshire County Council (Phil Hughes)	Reason for change: It should be clear that a consideration of early phases require a TA of the whole SUE, suggest the additional text in <b>red below</b> : d) A primary access road will connect to Meadow Lane to the northeast through the site to Boundary Lane to the south. No direct access to the North Hykeham Relief Road for motor vehicles will be permitted other than the proposed junction with Boundary Lane to the immediate south of the SUE. <del>As the development progresses it</del> <b><u>Any proposal to deliver early phases of the development in advance of the completion of the North Hykeham Relief Road</u></b> will be informed by a transport assessment, traffic modelling and any associated mitigation <b>which considers the whole SUE and then what is necessary for each Phase. Such proposals will be supported where it is demonstrated that the proposal can be delivered in advance of the North Hykeham Relief Road and will not undermine its delivery."</b>
MM36	Church Commissioners for England (Hannah Graham, Deloitte LLP)	<p>The Church Commissioners have no comments on the changes to the text which relates to SUE site COL/BOU/001 – Western Growth Corridor.</p> <p>The Church Commissioners are supportive of the amendment to bullet point d) relating to SUE site NK/NHYK/001.</p> <p>The modification is consistent with oral comments made on behalf of the Church Commissioners at the hearing session on 22 November 2022 (Matter 6).</p> <p>This seeks to make clear that there is potential to deliver a first phase of development in advance of the completion of the North Hykeham Relief Road.</p>
MM37	Cereform Ltd (Wakako Hirose, Rapleys LLP)	<p>At the hearing session, the Joint Strategic Planning Committee (JSPC) clarified its position that Policy S73 is not intended to preclude any particular development, or restrict ongoing businesses or their desire to expand. This clarification is welcomed, but we retain our concern that the policy does not make explicit enough allowance for growth of the Maltings site, which is key to the future of the area as it is one of, if not the, largest and most established job creators in the area.</p> <p>The proposed modification seeks to provide greater clarity for uses suitable in the Regeneration Area. While it is acknowledged that a range of uses are appropriate in this location but only office, leisure or residential uses are referenced as examples of appropriate uses. We consider that it does</p>



		<p>not go far enough to provide clarity that a wide range of uses are appropriate, as it fails to acknowledge the existing industrial operation. JSPC clarified during the Examination process that the designation of the site as a regeneration area does not intend to restrict ongoing businesses or their desire to expand. The Maltings' operations are industrial and different in nature and characteristics from the examples listed in the Main Modifications which are essentially town centre uses (notwithstanding that the site is not within a defined town centre boundary). As the policy is subject to interpretation, we consider it necessary to reference the existing industrial use. Put simply, given the importance of the Maltings site to the delivery of regeneration in the area, not making mention of it as a land use in the policy (whilst making reference to uses, such as offices, for which there is no evidence of material commercial demand) is unsound.</p> <p>The National Planning Policy Framework (NPPF) states at paragraph 16 that plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.</p> <p>We are also concerned that the proposed Main Modifications now require proposals not to undermine the achievement of the ambitions for the regeneration area relative to criteria a)-g). In this regard, criterion f) is potentially in conflict with proposals associated with expansion of the Maltings business in land use planning terms, as there is no specific location identified for leisure opportunities.</p> <p>In order to provide greater clarity and to ensure the policy is unambiguous about industrial development/use and the expansion of potential riverside leisure opportunities, we consider that the following further amendments (in bold italics) should be made:</p> <p>"Development proposals within the Gainsborough Riverside Regeneration Area, shown on the Policies Map as ROA6, will be supported in principle. <b>This in principle support will apply to a range of uses which are appropriate in this location including <i>industrial</i>, office, leisure or residential uses. Proposals should not undermine the achievement of the ambitions for this regeneration area, as set out in a)-g) below.</b></p> <p>Proposals will be viewed particularly favourably where they:</p> <ul style="list-style-type: none"> <li>a) Protect, enhance or restore the historic identity of the town;</li> <li>b) Strengthen the connection between the river and the town;</li> <li>c) Make the most of the riverside location enhancing;</li> <li>d) Deliver innovative design or design excellence which provides visual interest;</li> <li>e) Contribute positively to the Conservation Area;</li> </ul>
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		f) Expand leisure opportunities <del>related to</del> <b>along</b> the riverside; and/or g) Enhance public spaces and green infrastructure.”
MM38	Historic England	The amendment to criteria c) is welcomed in accordance with the SOCG.
MM40	Historic England	Please see reference to Minor21.
MM40	North Lincolnshire Council	Previously concern has been expressed with the approach taken as part of the development of Policy S75 to 'Safeguard RAF Scampton in the event that the Ministry of Defence withdrawal from the site and to provide a framework to help ensure any redevelopment is sustainable and holistically planned'. Whilst North Lincolnshire Council has been generally supportive of the RAF Scampton base coming forward for development, concern existed over the proposed use of a masterplan as the mechanism to deliver this. It is believed that key issues pertaining to layout, mix and scale of uses, assessment of the impacts on the landscape and infrastructure and proposed mitigation cannot be devolved to a masterplan, unless the masterplan is produced as a Development Plan Document and goes through the same legal process as the Local Plan. As such we are pleased to see that this has been reviewed and amended as part of the Recommended Main Modifications to the Local Plan, and specifically note the change of wording to now reflect this. As such we are supportive of Policy S75, as reflected in the main recommended modifications.
MM40	Anglian Water	Welcome and support the inclusion of the embodied carbon approach for site development to maximise the utility of existing infrastructure assets and so reduce the need for new infrastructure with its attendant new capital (embodied) carbon and climate change impact. The concept was set out in our previous submissions to the Council's and reflects Anglian Water's own net zero approach to infrastructure investment.
MM41	Tarmac Trading Limited (Heatons Planning)	<p>The proposed Main and Minor Modifications have been reviewed and we submit comments below. The Joint Committee's Summary of Main Issues from the Regulation 19 Consultation has also been reviewed.</p> <p>In response to Tarmac's assertion that the Local Plan Submission Draft does not meet its responsibility to safeguard minerals and mineral infrastructure, the Joint Committee responded stating that the Lincolnshire Minerals and Waste Plan sets the mineral safeguarding areas for Central Lincolnshire, and as such safeguarding of minerals does not need repeating in the Central Lincolnshire Local Plan.</p> <p>Planning Practice Guidance clearly states that district councils have an important role in safeguarding minerals and should have regard to the local minerals plan when identifying suitable areas for non-mineral development (Paragraph: 005 Reference ID: 27-005-20140306 Revision date: 06 03 2014).</p>

		<p>Paragraph 16 of the NPPF states that local plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.</p> <p>With regard to the proposed Main Modifications (MM), MM41 is modified to include informatives within Policies S77 – 82 which are intended to bring matters to the attention of applicants and decision takers at the earliest opportunity so they can be properly considered – this includes where sites are within a minerals safeguarding area or area of search.</p> <p>It is emphasised that tier two local planning authorities have an important role in ensuring that mineral resources are considered in all development from the very beginning. As minerals are a finite resource and can only be worked where they are found (NPPF paragraph 209), it is crucial they are not overlooked and the Central Lincolnshire Local Plan must fulfil its role in ensuring applicants understand the minerals planning context as early as possible for their site. Highlighting mineral considerations at an early stage in the planning process is in the interest of all stakeholders, both for the protection of important and viable resources and for the efficiency of the planning system. For this reason, policy informatives must make clear and unambiguous reference to minerals and explicitly refer to policies in the Lincolnshire Minerals and Waste Local Plan.</p> <p>Paragraph 210d. of the NPPF states that planning policies should set out policies to encourage the prior extraction of minerals, where practical and environmentally feasible, if it is necessary for non-mineral development to take place. This should also be clearly referenced in policy text and informatives.</p> <p>It is reiterated that 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 existing / future mineral sites, as advocated within the adopted Lincolnshire Minerals and Waste Local Plan and emerging plan. Not doing so results in inconsistency with national policy, without which the Plan cannot be found ‘sound’ as per NPPF paragraph 35d.</p>
MM41	Church Commissioners for England (Hannah Graham, Deloitte LLP)	The Church Commissioners support the amendments to the supporting text in this paragraph.
MM41	Environment Agency	We welcome the additional wording to paragraph 13.2.7 which provides clarity on the key site-specific requirements. This approach highlights opportunities for early engagement to address the known constraints in the early stages of the planning process. For example, the Environment Agency

		recognise the importance of working with applicants to resolve potential issues at the early stages through their planning advice service.
MM41	Anglian Water	Support inclusion of surface water flood risk as matter to be considered at the earliest opportunity by applicants.
MM45	Robert Nelstrop Farms Ltd (Alistair Anderson, Brown & Co JH Walter)	<p>This statement provides comment on MM45 and Mapmod9.</p> <p>This response, has been completed by Brown &amp; Co JHWalter on behalf of the landowner, Robert Nelstrop Farms Ltd.</p> <p>It provides a response to the Schedule of Post-Submission Recommended Modifications and Recommended Policies Map Modifications. Specifically, this response relates to MM45 (Policy S76) and Mapmod 9 (Site NK/CAN/003 – South East Quadrant boundary amendment to marry up to the Lincoln Eastern Bypass).</p> <p>After reviewing the modification documents, the landowner welcomes the proposed amendment to the boundary and the increase in site area from 463.5ha to 469.9ha.</p> <p>It is understood that the boundary of the South East Quadrant has always been intended to abut the Lincoln Eastern Bypass, however as an area of land had been used for the construction of the bypass, the geographical illustration had previously omitted 6.4 hectares of land. Now that this land does not require to be used for the construction of the bypass, this area can be reincluded within the boundary, as was always the intention of the Central Lincolnshire Local Plan.</p> <p>The recommended modifications applicable to this change are MM45 and Mapmod9. MM45 proposes the increase in site area for NK/CAN/003 and Mapmod9 visually demonstrates the amendment to the boundary, illustrating that the boundary ‘marries’ up with the boundary.</p> <p>These changes are welcomed, and the proposed modifications are fully supported by the landowner.</p>
MM45	Church Commissioners for England (Hannah Graham, Deloitte LLP)	The Church Commissioners support the amendments to this policy.
MM75	Anglian Water	Note and support the additional flexibility of other policy vehicles to masterplan the RAF Scampton site which then enables early engagement with Anglian Water and consequent updates to our investment plans which are developed and approved by regulators on a five-year cycle.
MM47	D. Evans	This modification seeks to amend the requirements for site COL/MIN/005 to remove the requirement to retain the bunds, and subsequently amend the indicative capacity to from 40 to 70.

		<p>Please note – this site is currently subject to a planning application Ref: PL/0096/22 for 75 dwellings, which is currently undetermined by Lincolnshire County Council.</p> <p>Unfortunately, this proposed modification is a backward step for the CLLP in terms of achieving its vision which states “The natural and historic environments, and their assets, will be conserved and enhanced, with new development taking into account the surroundings of the area in which it would be situated. Enhancement of the natural environment and the ecosystem services it provides will create mutual benefits for the nature, people and economy of Central Lincolnshire and help to achieve the vision of this Local Plan”.</p> <p>It has been clear throughout the allocation process and within the submission plan that this site has been earmarked as offering significant potential to deliver on site biodiversity net gain due to the current natural capital within the site boundary (a requirement that cannot be matched by other allocations in the plan). Within document “STA020 Central Lincolnshire Local Plan Summary of Main Issues from Regulation 19 Consultation” (Page 70/71) the CLLP policy team state “This site is understood to offer a good opportunity to deliver biodiversity net gain”.</p> <p>The retention of the bunding to the western edge of the site is integral to this aim because it offers a large wildlife corridor that is already established with mature trees and shrubs.</p> <p>The effective way to deliver on site biodiversity net gain is by working with the site conditions, providing measures to secure and enhance the long-term future of these features. This site is unique insofar that it is a former quarry that has significant ‘buffers’ to all boundaries which comprise of mature trees and shrubs. These mature green corridors which surround the site provide significant habitat opportunities and linkages. Given then length of time the quarry has been disused, the site has been allowed to effectively blend into the landscape allowing naturalisation of the green corridors.</p> <p>As shown in image 1 below, the tree cover around the western bunding is a significant feature in the context of the area. To remove the area shown purple would undoubtedly compromise the ability to retain the mature trees. Further to this, the extent of the bunding and the relationship with the Root Protection Areas of the trees is shown in images 2 &amp; 3. As shown, the bunding lies directly adjacent to the trees and significantly within the root protection areas. Therefore, the removal of the bunding would significantly compromise the ability to retain the mature trees and shrubs.</p> <p>If the trees are removed, then it completely degrades the biodiversity value of the site and would significantly limit the ability the deliver true biodiversity net gain on site.</p>
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		<p>Retaining the bunding to the western edge of the site is the only effective way to secure the longevity of the mature trees and shrubs along the western boundary. The bunding simply cannot be removed if biodiversity net gains are to be delivered on site. Therefore, there should be a policy requirement for the bunding (particularly to the west) to remain in-situ as originally proposed.</p> <p>There is a real opportunity here to deliver a scheme that works with the on-site natural capital. Unfortunately, the proposed modification would significantly compromise this opportunity. Opportunities such as this are not common amongst residential allocations and should not be overlooked by simply allowing increased numbers on the site.</p> <p>It must also be acknowledged that the boundary trees are subject to a new TPO which does not appear to have been acknowledged when proposing these modifications (TPO174 – Cathedral Quarry Tree Preservation Order No.1 2022) (see image 4 below).</p> <p>In relation to the increase in capacity from 40 to 70, the local plan is clear throughout that development proposals should not be constrained by the indicative dwelling numbers. Notwithstanding this, the local plan asserts that in arriving at a total dwelling figure that exceeds the indicative figure, developers should produce the most appropriate design led solution.</p> <p>On the evidence provided with the planning application PL/0096/22, to increase the indicative numbers to 70 would not be based on the most appropriate design led solution.</p> <p>The indicative figure 70 dwellings has likely been informed by the indicative layout provided as part of planning application PL/0096/22. However, the indicative layout provided with application PL/0096/22 is wholly inappropriate and the representations to application PL/0096/22 should be considered in light of these recommended modification.</p> <p>It must be noted that the increase in dwelling numbers designed through PL/0096/22 is based on a scheme/layout that provides absolutely no mention to how biodiversity net gains are to be delivered on site. This was recognised by City of Lincoln Council in their consultation response to planning application PL/0096/22 which stated: “In accordance with LP21 the development should seek to deliver a net gain in biodiversity, it is not clear from the information submitted whether this is the case”. A copy of City of Lincoln Council’s full response is provided at Appendix A.</p> <p>The design of the indicative layout was also provided before the TPO174 was created, and provided no measures (other than stating on an indicative plan) for tree protection.</p>
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		<p>The indicative layout/capacity was also objected to by City of Lincoln Council. Their response to planning application PL/0096/22 stated: "The indicative layout appears overly dense in places, in particular within the southern part of the site where plots are very close together, within no front gardens and parking spaces directly to the front of properties."</p> <p>As such, it is clear that an increase in the indicative capacity (similar to planning application PL/0096/22) is not informed by an appropriate design solution. The increase in dwelling numbers is therefore wholly inappropriate and should not be modified.</p> <p>This site is not similar to other allocations in the plan and the submission version of the plan recognised this, providing acceptable measure to protect the significance of the site. I would urge the Inspector to understand the context of this site and its uniqueness before altering these requirements in line with the modifications document.</p> <p>Overall, it is considered that the main modifications proposed are a regression from the submission version of the plan and will significantly compromise the site and its surroundings. This local plan is supposed to be driving an increase in the standards around environmental sustainability, these modifications would fail to achieve this key theme of the plan.</p> <p>[This representation was accompanied by a number of images. To view the full representation please see Appendix 1.]</p>
MM63	Anglian Water	Similarly support the assessment of drainage and surface water flood risk for the site which will necessarily require the use of SuDS in accordance with the drainage hierarchy.
MM66	Gladman Developments Ltd	In line with the comments raised in our submitted Hearing statement and verbal contribution during the Examination, Gladman support and welcome the amendment of the preferred site access location being changed from 'Heath Lane' to 'Cliff Road' with regards to site WL/WELT/001A. As demonstrated through the submitted access appraisal a safe, deliverable, and suitable vehicular and pedestrian access can be provided from Cliff Road for the full delivery of the 195 dwellings allocated on the site.
MM68	West Lindsey District Council	<p>West Lindsey District Council do not support the removal of the phasing requirement relating to site WL/WELT/008A and consider the phasing of this site should be retained in order to ensure the policy is effective.</p> <p>Further it has been brought to our attention that that the submission from WLDC at regulation 19 stage may have been misunderstood. For the avoidance of any doubt, we wish to clarify this position. The comments made by WLDC to the regulation 19 consultation did not intend to suggest that site WL/WELT/008A should not be phased back behind sites WL/WELT/001 and</p>

		WL/WELT/007. What it was intended to state was that it should also be phased back behind site WL/WELT/003 – i.e. the last site to come forward in the village.
MM68	Ryland Residents Group (Chris Thomas)	<p>Although the Planning Inspectors were not necessarily looking for feedback, from participants in document EX034 Matters Arising from the Examination Hearing Sessions, it's important that a number of clarifications and errors in the document are recognised, as they may have affected the decisions made in MM68.</p> <ol style="list-style-type: none"> <li>1. Point 2 - It is stated the submitted Plan allocates development across 5 sites at Welton.  <i>It should also be noted that the Plan allocates development across a further 3 sites at Dunholme, which share much of the same core infrastructure.</i></li> <li>2. Point 6 - The previously suggested main modification to delete the site are unnecessary.  <i>Whilst we recognise the grounds for removal of MM016 due to the Highways Departments comments, I would like to draw your attention to Day 3 of the hearing. After the committee completed the fact check on the Sustainability Appraisal (SA) I made the following statement "The SA identified major negative effects in relation to access to services and facilities, employment and education (the latter can be replaced with healthcare). It is borderline major negative effects on sustainable travel modes and negative effects on education. It promotes the use of cars. These are core items of sustainability that are all adversely affected. Understandably the site was rejected as site WL/WELT/008 due to these impacts, but then bizarrely accepted as site WL/WELT/008A (008A) when there was only a minor boundary change". I then asked for the site to be removed as it doesn't meet the fundamental criteria for sustainable development. Mr Birkinshaw, who was leading the examination, turned to the Committee and asked them if they'd like to comment. Mr Hylton answered "the site has been recommended for removal in MM016". As a result of Mr Hylton's statement, Mr Birkinshaw was satisfied that this addressed the issues of site 008A being an unsustainable allocation and the hearing continued.</i></li> </ol> <p><i>MM016 has now been revoked and site 008A is again allocated in the plan. It is clear from Mr. Hylton's comments above that the expectation was that this site would be removed from the plan, addressing the issues of the SA, and that MM016 was the mechanism by which it would be removed. However, as MM016 has been revoked, the issue of site 008A not</i></p>



		<p><i>meeting the NPPF guidelines for sustainable development have now not been met. The Planning Inspectors must recommend removal of site 008A.</i></p> <p><i>I request that you look back through the minutes/recordings of the hearing and you will confirm this. I look to the Planning Inspectors to make this correction.</i></p> <p>3. Point 8 - In response to the Regulation 19 consultation, West Lindsey District Council (WLDC) also highlighted that the phasing for site 008A was incorrect.</p> <p><i>You will have seen the document from Rachael Hughes (WLDC), dated 14<sup>th</sup> Feb 2023, clarifying that their position was to phase site 008A behind 001A, 007 and 003 and irrespective of vehicular access.</i></p> <p>4. Point 10 - The example given to provide safeguards, Policy S45 states that planning permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support all the necessary requirements arising from the new developments. <u>(Plural)</u></p> <p><i>On Day 3 of the hearing I pointed out that the funding raised through Policy S45 did not take account of cumulative site effects when looking for S106 money. Mr Hylton confirmed this. Mr Birkinshaw said that he would look into this when Policy S45 was reviewed. It appears that no recommendations have been made to amend Policy S45, so the situation has not been resolved. Thus Policy S45 will only look at each individual new development <u>(Singular)</u> impact on infrastructure. This has also been confirmed by Russell Clarkson (Development Management Team Manager WLDC).An example being Primary School funding. There are more school places required from houses with planning permission and yet to be built than there are school places, yet when a planning application is submitted S106 money will not be requested, as we have recently seen. This same methodology is used across all the consultative bodies, so it is unclear to Decision makers what the impact on infrastructure requirements will be when assessing an individual site without taking into account the impact of other sites that have already been granted planning permission, or are allocated in the Local Plan. The planning application process does not guarantee any safeguards from multiple sites allocations in Welton and Dunholme. This is not sound.</i></p>
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		<p><i>Further to this, it appears that the infrastructure providers, have responded to what resources are required based upon the building trajectory in Appendix 1 Matter 9 hearing statement. Site allocation WL/WELT/008A is omitted from this document, which suggests the amount of housing has not been properly tested having regard to material planning considerations such as highway capacity, the impact on local services or design matters. Evidence of the cumulative impact on Welton and Dunholme should be reviewed to confirm this. As per your point 15 of the document, failure to provide this information should result in Site WL/WELT/008A being removed.</i></p> <p>5. Point 11 - After you're summary you invite the Committee to put forward any alternative suggestions to make the Plan sound.</p> <p><i>Allowing uncontrollable development of up to 8 large sites covering almost 1000 homes is not justifiable, effective or sound. There are a number of options that I could offer and would be more than happy to discuss them with the Planning Inspectors, the Committee and developers.</i></p> <p>It's comforting to see that WLDC, The Joint Committee and the Planning Inspectors all recognise the rationale for phasing in Welton and Dunholme, so to suggest that phasing is taken out of the plan when it's clearly required is remiss. It's disappointing that the Committee is not responding to suggestions that the Planning Inspectors seek, or indeed pointing out the vagaries of document EX034, upon which the Planning Inspectors recommendations for MM68 and phasing have been unsoundly made.</p>
MM68	Freddie Allen	<p>I am writing to show my support for the above mentioned site for housing in Welton. I am a first time buyer and can see the need for more developments in the area. I think the site is in a good position as it fits within the extremities of the existing developments and would be a natural extension to what is already being developed to the west of the site. I am pleased to see the modification made to the CLLP as the requirement to be phased after other developments seemed unreasonable.</p>

MM68	Kit Dickinson	<p>Firstly I agree that the site above should be allocated and allowed to progress. This site is already related to the existing village and borders it immediately.</p> <p>This site is well related to the developed area currently existing– the northern boundary of the site area is an extension going east which ties in with the villages current construction. Given this site is adjacent to the village, future road networks are possible alleviating pressure on main roads and volume of traffic in Welton Village. The site clearly has two access points, one from the development adjoining the allocation, two from Eastfield Lane meaning access isn't an issue.</p> <p>I believe that the phasing should be removed from the site's allocation.</p>
MM69	Beal Developments Ltd (Gareth Pritchard, Barton Willmore)	<p>Beal welcomes the amended text which makes clear that in principle, the development of the safeguarded land from permission 135006 will be supported. Whilst we still believe an indicative unit number consistent with other sites in Policy S80 would be helpful, we believe this updated policy should be sufficient to prevent Policy S4 being engaged in error.</p>
MM80	Church Commissioners for England (Hannah Graham, Deloitte LLP)	<p>The Church Commissioners support the amendments to this policy.</p>
MM83	Sturton By Stow Parish Council	<p>WL/STUR/006 &amp; WL/STUR/006A</p> <p>Please note that the address for the above sites is incorrect in the draft plan. Somehow the address has been corrupted. The correct address to cover both sites is: Land to the rear of GILBERT'S BARN between Tillbridge Road and Saxilby Road. The incorrect address states Gilbert's Farm. There is no longer (if there ever was) a Gilbert's Farm. Please amend all documentation to reflect the correct address.</p> <p>I also note that this land will actually become a windfall site.</p> <p>With regard to the likely timescale for deliverability being not before 8+ years, (WL own housing sites document) as per the Inspectorate comments that land which is deliverable within a 5 year time frame should only be included. This particular parcel could be excluded from the plan.</p>
MM83	Sturton by Stow Parish Council	<p>There is an error with regard to WL/STUR/006a the designation keeps using Gilbert's Farm. There is no farm. It should read GILBERT'S BARN. This is a minor amendment but it should be corrected. All references throughout MM83 need amending.</p>
MM90	Nick Grace, Grace Machin Planning	<p>We write in connection with the Schedule of Post-Submission Recommended Main Modifications (Consultation Version January 2023). We make the following comments in respect of Ref No. MM90, Policy S83, site NK/SWI/006:</p>

		<p>1. The description for the allocation confirms that any detailed proposals for this site need to either be in substantial accordance with the approved scheme (planning application reference: 17/0603/OUT) <b>or supported by further evidence of community support for any substantive variation to that scheme.</b></p> <p>At the time when application 17/0603/OUT was granted by the Council, there was an underlying policy requirement (Policy LP2, paragraph 5: Medium Villages) for evidence of clear local community support. However, that policy requirement is to be removed from the emerging Central Lincolnshire Local Plan. On this basis, the requirement for evidence of community support should be correspondingly removed from the description for this allocation. This is because there will be no legal policy basis underpinning this requirement once the Local Plan is adopted. To retain this requirement would render the Local Plan <u>unsound</u> as it would leave a future applicant unsure of what benchmark would need to be met to show 'evidence of community support' as there is no underlying supporting policy guidance. Furthermore, 'evidence of community support' is not the same as the requirement of Policy LP2 which is 'clear local community support'. Therefore, we would suggest that the requirement to provide further evidence of community support is removed from the description of this allocation.</p> <p>2. The dwelling number has been amended from 140 to 120. The rationale behind this amendment is not supported by the scope of the outline planning permission 17/0603/OUT.</p> <p>The Decision Notice confirms that the proposal is for the <i>"Erection of up to 120 dwellings, up to 1,500 sqm of B1 commercial space, up to 20 units senior living retirement accommodation, communal play/recreational space, community car park and shop"</i>.</p> <p>There appears to be a suggestion that the reduction in the emerging allocation from 140 to 120 dwellings is because of the 20 units for senior living retirement accommodation. However, there is no restriction or stipulation within the Decision Notice, Committee Report, Section 106 Agreement or Planning Statement that the 20 units for senior living retirement accommodation cannot be considered C3 dwellings. In the absence of this, what use class is attributed to the retirement accommodation would be dependant upon the retirement model used. For example, the retirement accommodation could be fully permitted under the scope of the outline planning permission to fall within use class C3 (i.e. a dwelling) if the model were to include a small community of older persons living together as a single household with some degree of support.</p>
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		Therefore, there is no reasoned justification to amend the allocation from 140 to 120 because there is nothing fundamentally restricting the operation of the 20 units for retirement accommodation as C3 use. We would respectfully request that the allocation is re-amended to 140 dwellings.
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## Map Modifications

Modification Number	Respondent Name	Response
MapMod9	Robert Nelstrop Farms Ltd (Alistair Anderson, Brown & Co JH Walter)	<p>This statement provides comment on MM45 and Mapmod9.</p> <p>This response, has been completed by Brown &amp; Co JHWalter on behalf of the landowner, Robert Nelstrop Farms Ltd.</p> <p>It provides a response to the Schedule of Post-Submission Recommended Modifications and Recommended Policies Map Modifications. Specifically, this response relates to MM45 (Policy S76) and Mapmod 9 (Site NK/CAN/003 – South East Quadrant boundary amendment to marry up to the Lincoln Eastern Bypass).</p> <p>After reviewing the modification documents, the landowner welcomes the proposed amendment to the boundary and the increase in site area from 463.5ha to 469.9ha.</p> <p>It is understood that the boundary of the South East Quadrant has always been intended to abut the Lincoln Eastern Bypass, however as an area of land had been used for the construction of the bypass, the geographical illustration had previously omitted 6.4 hectares of land. Now that this land does not require to be used for the construction of the bypass, this area can be reincluded within the boundary, as was always the intention of the Central Lincolnshire Local Plan.</p> <p>The recommended modifications applicable to this change are MM45 and Mapmod9. MM45 proposes the increase in site area for NK/CAN/003 and Mapmod9 visually demonstrates the amendment to the boundary, illustrating that the boundary ‘marries’ up with the boundary.</p> <p>These changes are welcomed, and the proposed modifications are fully supported by the landowner.</p>

## Additional Modifications

Modification Number	Respondent Name	Response
Minor 1	Greater Lincolnshire Nature Partnership	The GLNP feels the recommended modifications relating to its area of expertise are generally positive, but specifically supports the following modifications: • Minor1 relating to Paragraph 1.2.11
Minor2	Environment Agency	We support the proposed amendment to paragraph 1.2.15 which that clarifies that growth ' <b>does not exacerbate pressure on natural resources</b> '.
Minor2	Anglian Water	Welcome and support the inclusion of the text 'are met' as this show leadership in delivering net zero at a local level proactively through planning and development decisions.
Minor 2	Greater Lincolnshire Nature Partnership	The GLNP feels the recommended modifications relating to its area of expertise are generally positive, but specifically supports the following modifications: • Minor2 relating to Paragraph 1.2.15
Minor3	Greater Lincolnshire Nature Partnership	The GLNP feels the recommended modifications relating to its area of expertise are generally positive, but specifically supports the following modifications: • Minor3 relating to the Strategic Priorities
Minor7	Historic England	Minor7 and Minor21 are welcomed.
Minor9	Greater Lincolnshire Nature Partnership	The GLNP feels the recommended modifications relating to its area of expertise are generally positive, but specifically supports the following modifications: • Minor9 relating to Paragraph 3.4.2
Minor12	Environment Agency	We are pleased that paragraph 3.7.2 has been updated to reflect our comments in the Regulation 19 consultation. For clarity, the Environment Agency's suggested wording for consideration is set out below:  <i>'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).)'</i>  Or  <i>'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').'</i>
Minor13	Environment Agency	We welcome the additional wording to paragraph 3.7.14 which reflects our comments to the Regulation 19 consultation and the subsequent joint written statement produced by Anglian Water and

		<p>the Environment Agency in response to the Matters, Issues and Questions. This is important because it provides clarity on the expectations of applicants to demonstrate that adequate infrastructure for foul drainage can be provided in time to serve the development, notably the requirement to evidence engagement with infrastructure providers.</p> <p>Please note, we consider this proposed amendment to be a major modification because it will be critical in ensuring that the development can be supported by appropriate infrastructure, which in turn will help demonstrate that the development is sustainable, safeguarding the natural environment.</p>
Minor13	Anglian Water	Support the inclusion of the text requiring adequate mains foul water treatment. This reflects broader discussions that Anglian Water has had with the Environment Agency and enables appropriate investment planning to meet the needs of growth when that comes forward.
Minor14	Environment Agency	We welcome the amendment to paragraph 11.2.9 which provides the details of the multi- agency Task and Finish Group that are working together on shared principles for Biodiversity Net Gain across Greater Lincolnshire.
Minor21	Historic England	Minor7 and Minor21 are welcomed.

### Other Comments

Reference	Respondent Name	Response
Policy S33	Cereform Ltd (Wakako Hirose, Rapleys LLP)	<p>Employment Site Designation</p> <p>With regard to employment site designation, we maintain our objection that the Maltings falls outside of designations for protection and support for growth as an economic development site and would be subject to onerous requirements under Policy S33. We consider that Policy S33 should be made clear that policies relating to the improvement of existing employment sites should only be addressed against normal development management policies, not the criteria for new employment development or the growth/expansion of existing facilities. We note the JSPC's response at the hearing session that such development would be encouraged in principle, and that in practice, improvements would not be required to address the criteria in Policy S33. To provide clarity, this should be made clear in Policy S33.</p> <p>Conclusion</p> <p>For the soundness of the Plan, we consider that the proposed Main Modifications relative to Policy S73 require further modifications and that Policy S33 should reflect the clarity on the application of the policy provided by the JSPC. We request that our representations are fully taken into account in the examination of the Plan.</p>

Policy S33	British Sugar Plc (Wakako Hirose, Rapleys LLP)	<p>Policy S33 includes unnecessary and potentially onerous criteria for employment proposals not within the designated employment sites. This approach is not fit for purpose for the former Bardney Syrup Factory site and is therefore not consistent with the National Planning Policy Framework (NPPF) which seeks to ensure that planning policies to help create the conditions in which businesses can invest, expand and adapt and places significant weight on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development (paragraph 81).</p> <p>We note the JSPC's response at the hearing session that economic development of the former Bardney Syrup Factory site would be encouraged in principle as an exception to non-designated employment sites intended for small scale development. To provide clarity, this should be made clear in Policy S33 and onerous policy requirements such as criteria a) and e) requiring sequential test and impact assessment on the viability of delivering allocated employment sites are not applied to the development of the former Bardney Syrup Factory site.</p> <p>Conclusion</p> <p>For the soundness of the Plan, we remain concerned with the JSPC's approach to the former Bardney Syrup Factory site. The site should be designated or allocated employment land, or Policy S33 should be amended to ensure that onerous policy requirements are not imposed on development at the site.</p>
n/a	Marine Management Organisation	<p>Thank you for your invitation to participate in the consultation for the Central Lincolnshire Local Plan Review - Recommended Main Modifications.</p> <p>No further comment is required from the MMO regarding the main modifications, as the proposed modifications do not overlap with the East Inshore and Offshore Marine Plans and therefore do not suggest any anticipated impacts on the marine plans.</p> <p>We advise that you consider any relevant policies within the <a href="#">East Marine Plan Documents</a> 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.</p> <p>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.</p> <p>For further information, a copy of the standard response is attached. Please note when considering the MMO as a consultee in the future to send correspondence directly to the consultation mailbox (cc'd in) to ensure the right person will pick it up.</p>



Policy S78	Mowbray Mountain (Clive Wicks Associates)	<p>From my investigation into the Main Modifications document, I seem to be unable to find the evidence required for our site off Town Road and Northfield Road, Quarrington.</p> <p>I apologise if I have missed a report on this parcel of land, but would be grateful if you were able to consider the positive aspects of this land.</p> <p>On the basis that it is possibly not included in your draft proposals I have below included notes regarding the main modifications and reinforced why I believe the above land should be included in the new Local Plan.</p> <p>I note that this aim is for the delivery of 1325 dwellings per annum or 29150 over the Plan Period. I note that Sleaford incorporates 12% of the above supply.</p> <p>The draft plan also refers to the consideration of sites at nearby and well-connected villages. In this case our proposal is within Quarrington village, which is now seen by local residents as part of Sleaford itself.</p> <p>You also note that to further bolster supply at the top three tiers of the settlement hierarchy proposals outside of, but immediately adjacent to the developed footprint, will be considered on their individual merits <u>and will</u>;</p> <ul style="list-style-type: none"> <li>• <i>“Be fully policy compliant, including meeting in full the affordable housing provision set out in Policy S22”.</i> Our proposal has good access, and proposes 8 affordable dwellings on site.</li> <li>• <i>“Result in no significant harm (such as landscape, townscape, heritage assets and other protected characteristics of the area)”.</i> We remove 2 ugly sheds and bring forward a brownfield site for immediate development.</li> <li>• <i>“Be suitably serviced with infrastructure”.</i> The site adjoins a County Highway and has easy access to the local bus route.</li> <li>• <i>“Be subordinate in size and scale to the community they adjoin and will not have the settlement form, character or appearance of the area”.</i> The site is a continuation of recent development in the area and is well hidden from views beyond the site.</li> <li>• <i>“Integrate successfully with the community they adjoin having regard to the mix of uses proposed and the design, layout and accessibility of the scheme”.</i> A sketch layout has been issued which shows the quality character that we aim to achieve.</li> </ul>
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		<ul style="list-style-type: none"> <li>• “Promote active travel patterns including access by walking, cycling and public transport”. Our proposal is within walking and cycling distance of the town centre.</li> </ul> <p>Our proposal is initially for a relatively small scheme of 34 houses, and is immediately developable because of its access to the adopted highway. We are happy to prepare a Passivhaus Classic standard scheme.</p> <p>The site is predominantly brownfield land, unlike many of the sites brought forward and provisionally included in the Draft Local Plan.</p> <p>I would again ask the Inspectors to consider the viability of Sleaford West to come forward within the lifetime of the Local Plan. The proposal there has 6 separate owners who have no intention of selling the land at this point in time, and furthermore, have the impediment of a £6m Section 106 agreement. There is no incentive whatsoever for the owners to bring that substantial housing extension forward.</p> <p>Our proposal is very rare in North Kesteven, since not only is it brownfield but it is immediately available for development.</p> <p>Can I ask that you reconsider the qualities that this land has, are sufficient to take the place of other major developments that are unlikely to come forward for many years to come.</p> <p>[Maps provided with submission. See Appendix 2 to view these]</p>
N/a	South Kyme Parish Council	In respect of the modifications to the CLLP, South Kyme Parish Council have no comment to make on them.
N/a	West Stockwith Parish Council	I have been authorised by West Stockwith Parish Council to state that they have no major comments to make on the above consultation.
N/a	North Lincolnshire Council	<p>As previously expressed, North Lincolnshire Council is generally supportive of the Plan and its approach. In particular the Council remains supportive of the strategy to accommodate the areas full objectively assessed needs and concentrate future growth in the main urban areas of Lincoln, Gainsborough and Sleaford.</p> <p>Additionally, North Lincolnshire Council is supportive of the wider recommended main and minor modifications as established in the two documents.</p>
N/a	Nottinghamshire County Council	Thank you for consulting NCC on the above plan, we have no comments to make.

N/a	Collingham Parish Council	The Parish Council have discussed the proposed modifications and have no comments to make on these
N/a	NHS Lincolnshire Integrated Care Board	Thank you for the opportunity to be part of this consultation, we welcome the plan. Having reviewed the documentation, we have no other comments.
N/a	Mark Page	All the plans for new housing, yet I believe this area to have one of the worst public transport services in the country. I live in Ruskington, with no decent bus service, not even a sat service. No train service on a Sunday. Without good public transport the economy won't improve. You should take a leaf out of Nottinghamshire's public transport services.

APPENDICES

**APPENDIX 1 – Full Response from Daniel Evans**

D.Evans (Local Resident)  
C/O 29 Riseholme Road, Lincoln, LN1 3SN

Objection to MM47 (Policy S77, site COL/MIN/005)

This modification seeks to amend the requirements for site COL/MIN/005 to remove the requirement to retain the bunds, and subsequently amend the indicative capacity to from 40 to 70.

Please note – this site is currently subject to a planning application Ref: PL/0096/22 for 75 dwellings, which is currently undetermined by Lincolnshire County Council.

Unfortunately, this proposed modification is a backward step for the CLLP in terms of achieving its vision which states *“The natural and historic environments, and their assets, will be conserved and enhanced, with new development taking into account the surroundings of the area in which it would be situated. Enhancement of the natural environment and the ecosystem services it provides will create mutual benefits for the nature, people and economy of Central Lincolnshire and help to achieve the vision of this Local Plan”*.

It has been clear throughout the allocation process and within the submission plan that this site has been earmarked as offering significant potential to deliver on site biodiversity net gain due to the current natural capital within the site boundary (a requirement that cannot be matched by other allocations in the plan). Within document *“STA020 Central Lincolnshire Local Plan Summary of Main Issues from Regulation 19 Consultation”* (Page 70/71) the CLLP policy team state *“This site is understood to offer a good opportunity to deliver biodiversity net gain”*.

The retention of the bunding to the western edge of the site is integral to this aim because it offers a large wildlife corridor that is already established with mature trees and shrubs.

The effective way to deliver on site biodiversity net gain is by working with the site conditions, providing measures to secure and enhance the long-term future of these features. This site is unique insofar that it is a former quarry that has significant ‘buffers’ to all boundaries which comprise of mature trees and shrubs. These mature green corridors which surround the site provide significant habitat opportunities and linkages. Given then length of time the quarry has been disused, the site has been allowed to effectively blend into the landscape allowing naturalisation of the green corridors.

As shown in image 1 below, the tree cover around the western bunding is a significant feature in the context of the area. To remove the area shown purple would undoubtedly compromise the ability to retain the mature trees. Further to this, the extent of the bunding and the relationship with the Root Protection Areas of the trees is shown in images 2 & 3. As shown, the bunding lies directly adjacent to the trees and significantly within the root protection areas. Therefore, the removal of the bunding would significantly compromise the ability to retain the mature trees and shrubs.

If the trees are removed, then it completely degrades the biodiversity value of the site and would significantly limit the ability the deliver true biodiversity net gain on site.

Retaining the bunding to the western edge of the site is the only effective way to secure the longevity of the mature trees and shrubs along the western boundary. The bunding simply cannot be removed if biodiversity net gains are to be delivered on site. Therefore, there

should be a policy requirement for the bunding (particularly to the west) to remain in-situ as originally proposed.

There is a real opportunity here to deliver a scheme that works with the on-site natural capital. Unfortunately, the proposed modification would significantly compromise this opportunity. Opportunities such as this are not common amongst residential allocations and should not be overlooked by simply allowing increased numbers on the site.

It must also be acknowledged that the boundary trees are subject to a new TPO which does not appear to have been acknowledged when proposing these modifications (TPO174 – Cathedral Quarry Tree Preservation Order No.1 2022) (see image 4 below).

In relation to the increase in capacity from 40 to 70, the local plan is clear throughout that development proposals should not be constrained by the indicative dwelling numbers. Notwithstanding this, the local plan asserts that in arriving at a total dwelling figure that exceeds the indicative figure, developers should produce the most appropriate design led solution.

On the evidence provided with the planning application PL/0096/22, to increase the indicative numbers to 70 would not be based on the most appropriate design led solution.

The indicative figure 70 dwellings has likely been informed by the indicative layout provided as part of planning application PL/0096/22. However, the indicative layout provided with application PL/0096/22 is wholly inappropriate and the representations to application PL/0096/22 should be considered in light of these recommended modification.

It must be noted that the increase in dwelling numbers designed through PL/0096/22 is based on a scheme/layout that provides absolutely no mention to how biodiversity net gains are to be delivered on site. This was recognised by City of Lincoln Council in their consultation response to planning application PL/0096/22 which stated: *“In accordance with LP21 the development should seek to deliver a net gain in biodiversity, it is not clear from the information submitted whether this is the case”*. A copy of City of Lincoln Council’s full response is provided at Appendix A.

The design of the indicative layout was also provided before the TPO174 was created, and provided no measures (other than stating on an indicative plan) for tree protection.

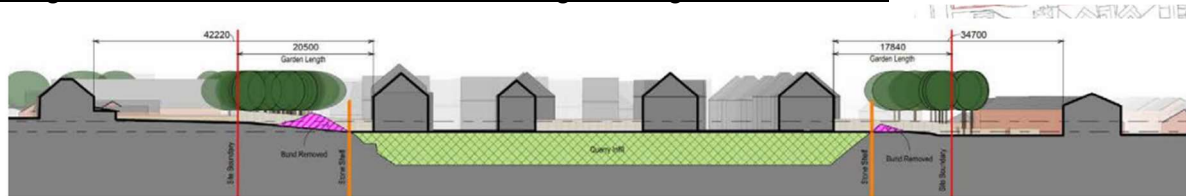
The indicative layout/capacity was also objected to by City of Lincoln Council. Their response to planning application PL/0096/22 stated: *“The indicative layout appears overly dense in places, in particular within the southern part of the site where plots are very close together, within no front gardens and parking spaces directly to the front of properties.”*

As such, it is clear that an increase in the indicative capacity (similar to planning application PL/0096/22) is not informed by an appropriate design solution. The increase in dwelling numbers is therefore wholly inappropriate and should not be modified.

This site is not similar to other allocations in the plan and the submission version of the plan recognised this, providing acceptable measure to protect the significance of the site. I would urge the Inspector to understand the context of this site and its uniqueness before altering these requirements in line with the modifications document.

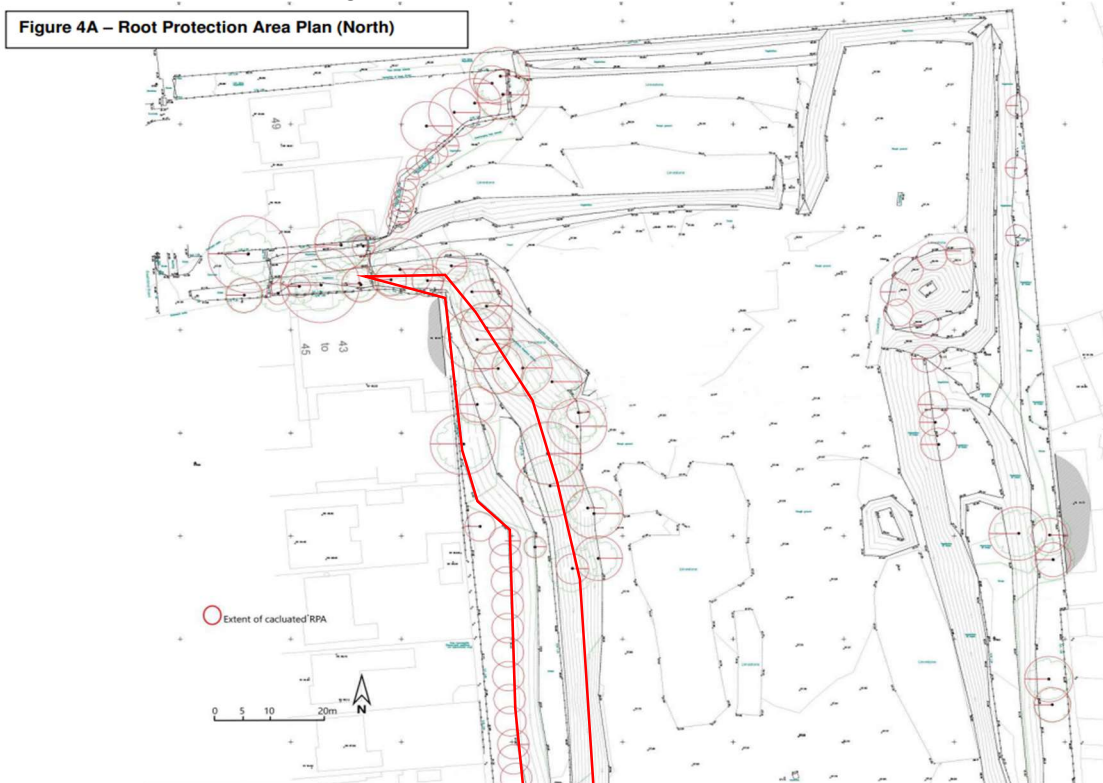
Overall, it is considered that the main modifications proposed are a regression from the submission version of the plan and will significantly compromise the site and its surroundings. This local plan is supposed to be driving an increase in the standards around environmental sustainability, these modifications would fail to achieve this key theme of the plan.

Image 1 – Cross section of the site including bunding and tree cover.



Source: Page 15 of Design and Access Statement submitted with planning application PL/0096/22.

Image 2 – Tree protection plan of northern section of the site showing the root protection areas and extent of bunding outlined in red.



Source: Page 12 of BS5837:2012 Tree Survey submitted with planning application PL/0096/22.

Cont...

Image 3 – Tree protection plan of southern section of the site showing the root protection areas and extent of bunding outlined in red.



Source: Page 13 of BS5837:2012 Tree Survey submitted with planning application PL/0096/22.

Image 4 – Extract from Lincoln.gov.uk mapping site showing the location of TPO174 – Cathedral Quarry Tree Preservation Order No.1 2022.



Source: <https://www.lincoln.gov.uk/planning/trees-shrubs-hedges/2>

Cont...



Appendix A – City of Lincoln Council's response to planning application PL/0096/22.



Lincolnshire County Council

**Directorate of Communities & Environment**

Simon Walters MBA, ACG, MCMI  
City Hall, Beaumont Fee  
Lincoln, LN1 1DF

Telephone: (01522) 881188  
Facsimile: (01522) 567934  
Website: [www.lincoln.gov.uk](http://www.lincoln.gov.uk)

**Julie Mason is dealing with this matter**

Direct Dial: [REDACTED]  
E-mail: [REDACTED]  
Our Ref: 2022/0685/CCC  
Your Ref:  
Date: 22nd September 2022

Dear Sir/Madam,

**Location: Cathedral Quarry Riseholme Road Lincoln Lincolnshire**  
**Proposal: Outline application for residential development of up to 75 dwellings with access and associated infrastructure (Consultation request from Lincolnshire County Council for application reference PL/0096/22)**

Thank you for your recent consultation letter regarding the above application for Outline Planning Permission.

We do not have an in principle objection to the proposal for housing on the site although we do offer the following observations:

The scheme should accord with the Central Lincolnshire Local Plan and National Planning Policy Framework. The land is currently proposed to be allocated within the Central Lincolnshire Local Plan Draft with the indicative capacity being 40 dwellings. Whilst the application is made in outline form with layout reserved for a later application, we would advise that at this stage careful consideration needs to be given to the number of dwellings considered acceptable for the site. The indicative number of dwellings given in the local plan appears to take into account retention and enhancement of biodiversity on the site and a scheme for the retention and maintenance of the bunds around the site. The indicative layout appears overly dense in places, in particular within the southern part of the site where plots are very close together, within no front gardens and parking spaces directly to the front of properties.

In accordance with LP21 the development should seek to deliver a net gain in biodiversity, it is not clear from the information submitted whether this is the case.

On the indicative layout it appears that the remaining bunds and dense belt of trees are within the plots of future properties. It would be prudent to establish who will be responsible for future maintenance in order to avoid ownership and maintenance disputes in the future.

Given the levels on the site it would be advisable to establish existing and proposed land levels and finished floor levels of the proposed dwellings, this will then inform what trees and associated vegetation can be retained and what will be lost to the development.

Requirements via Section 106 agreement

In accordance with Policy LP11, the site should achieve 25% affordable housing.

The NHS should be consulted so they can assess the impact on local services and request a contribution to offset the development impact where necessary. The development should also be policy compliant in respect of the provision of green infrastructure. We would also expect a s106 request from your colleagues in Education.

I trust that this will assist in the determination of the application although if you wish to discuss anything further, please do not hesitate to contact me.

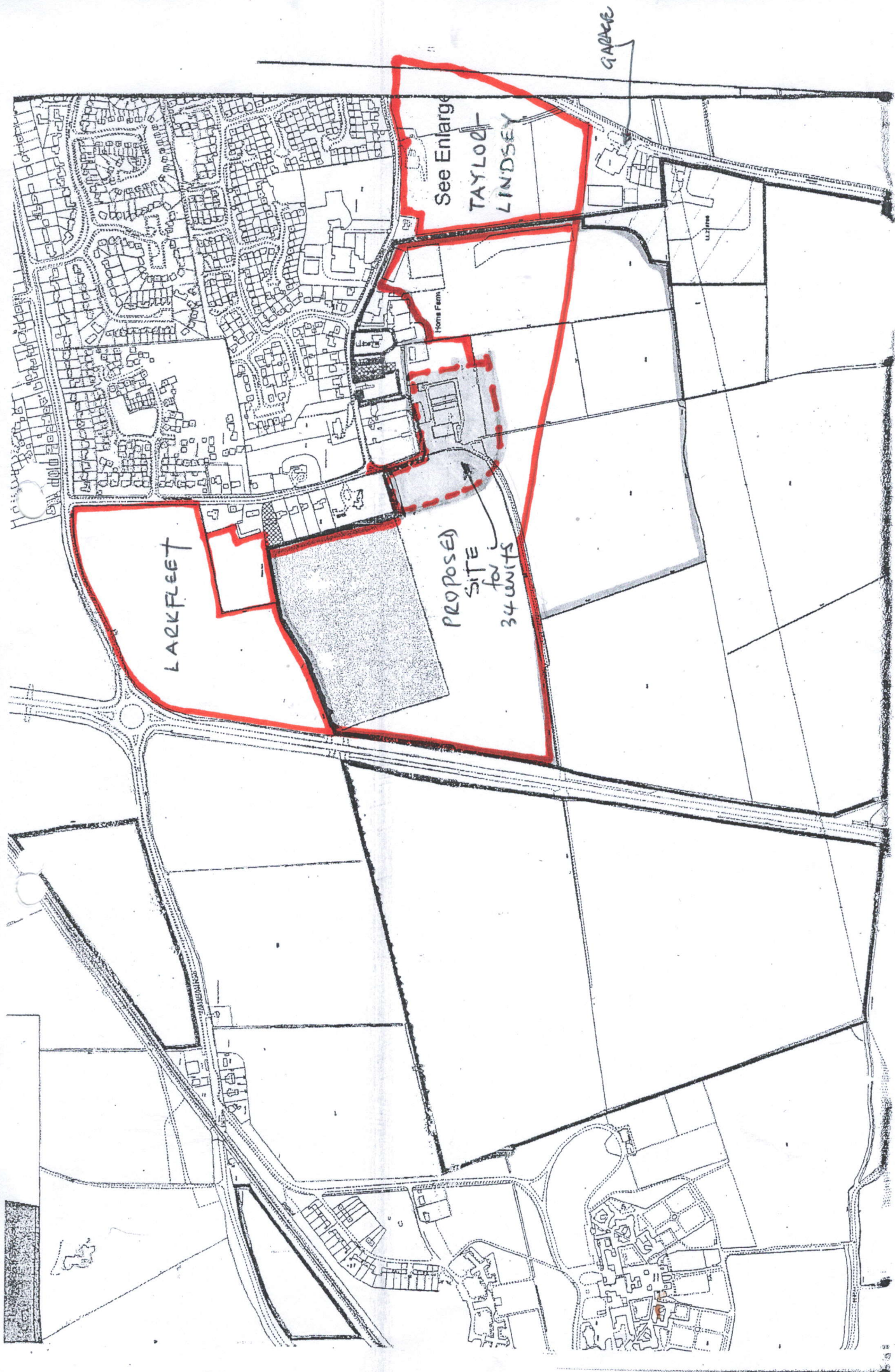
Yours faithfully

Mr K Manning  
Assistant Director - Planning

End.

**APPENDIX 2 – Plans submitted By Clive Wickes Associates on behalf of Mowbray Mountain**



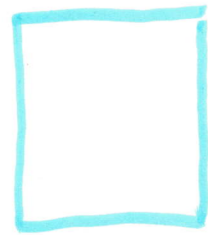
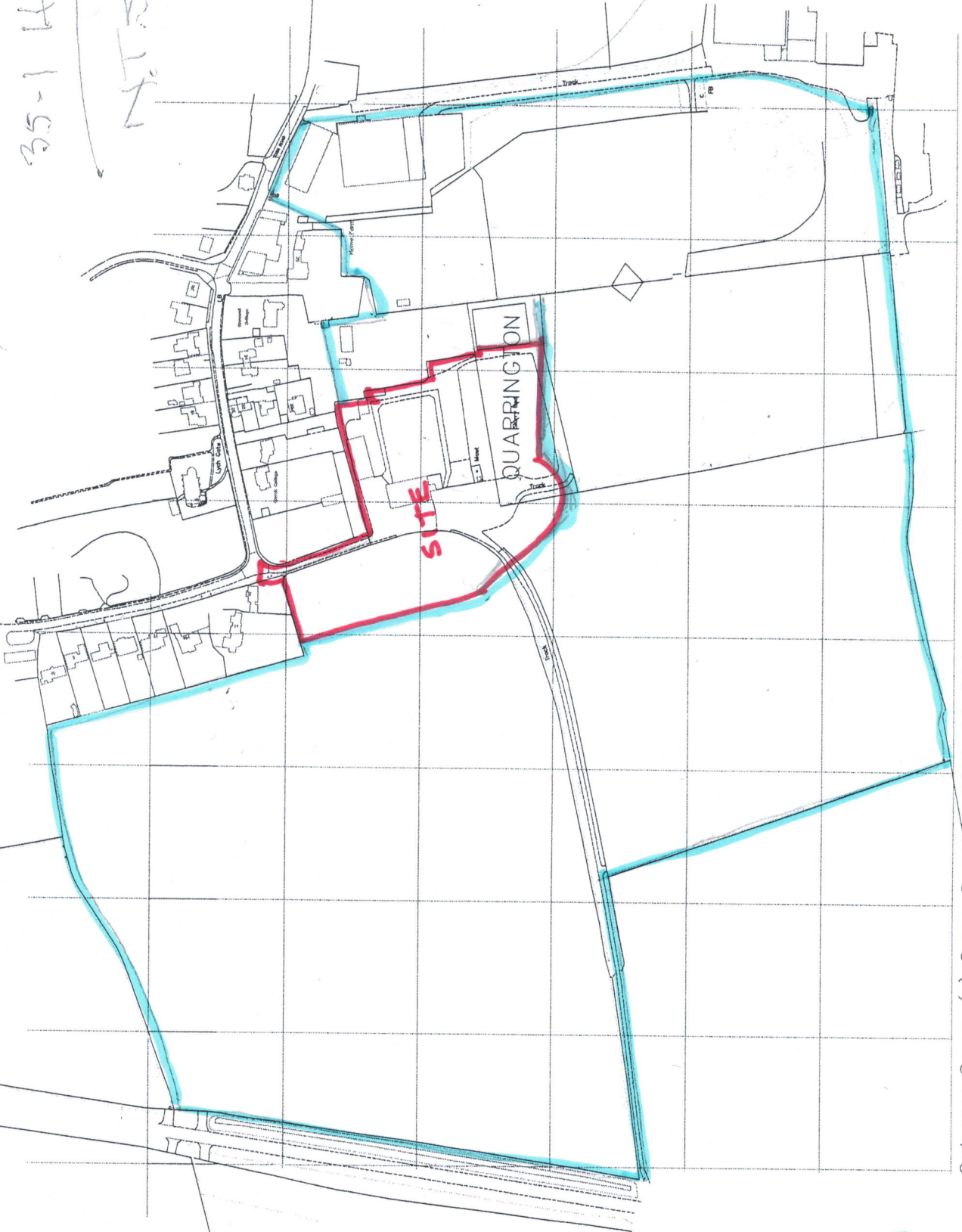




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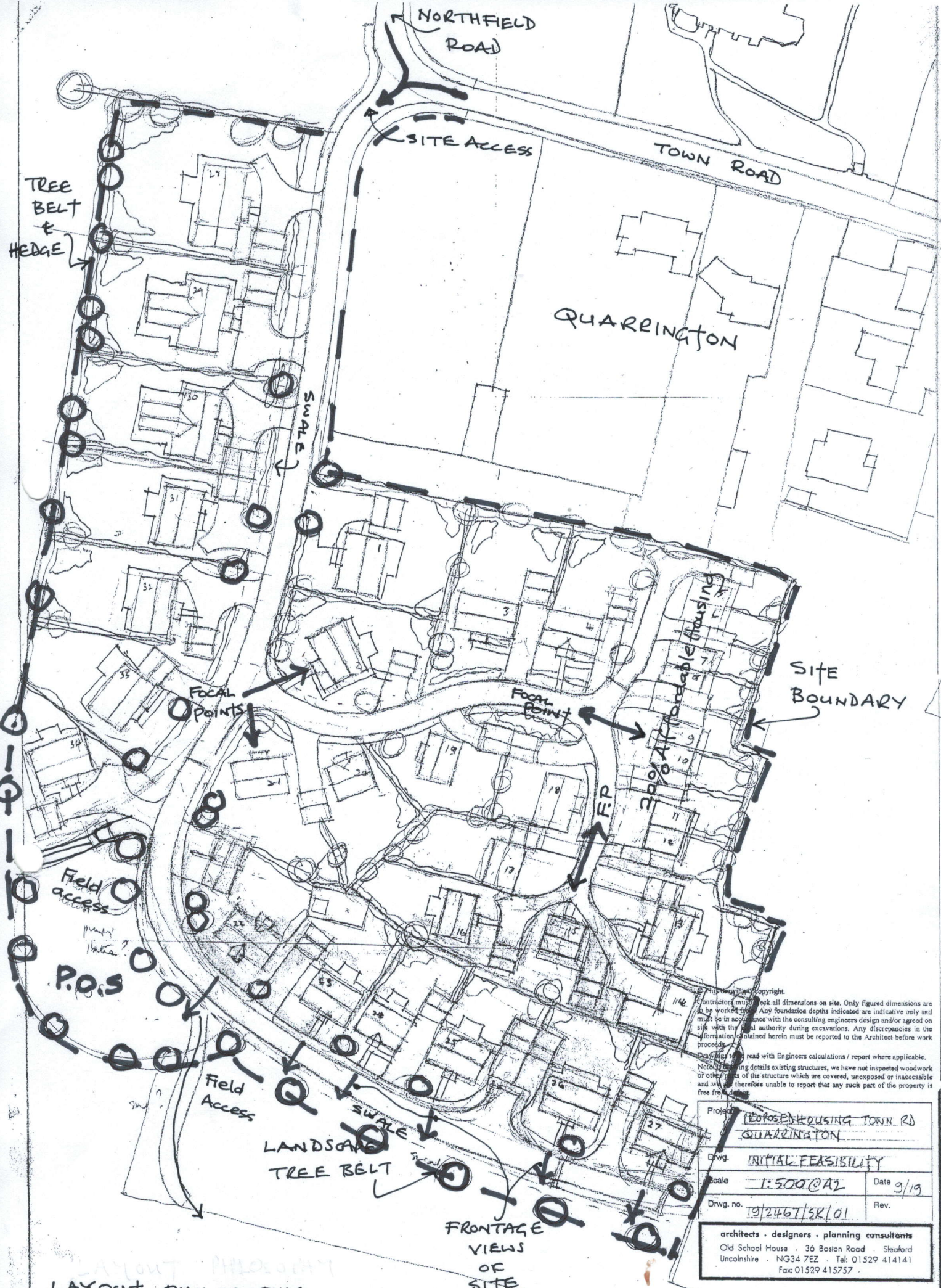
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MTS



LAND IN  
APPLICANT'S  
OWNERSHIP





© This drawing is copyright.  
 Contractors must check all dimensions on site. Only figured dimensions are to be worked from. Any foundation depths indicated are indicative only and must be in accordance with the consulting engineers design and/or agreed on site with the local authority during excavations. Any discrepancies in the information contained herein must be reported to the Architect before work proceeds.  
 Drawings to be read with Engineers calculations / report where applicable.  
 Note: Details of existing structures, we have not inspected woodwork or other parts of the structure which are covered, unexposed or inaccessible and we are therefore unable to report that any such part of the property is free from defects.

Project: ROSEHOUSING TOWN RD QUARRINGTON	
Dwg: INITIAL FEASIBILITY	Date 9/19
Scale 1:500 @ A2	Rev.
Dwg. no. 19/2467/SK/01	
architects • designers • planning consultants Old School House • 36 Boston Road • Steaford Leicestershire • NG34 7EZ • Tel: 01529 414141 Fax: 01529 415757	

LAYOUT PHILOSOPHY

clive wicks associates







Contractors must check all dimensions on site. Only figured dimensions are to be worked to. Any foundation depths indicated are indicative only and must be in accordance with the consulting engineers design and/or agreed on site with the local authority during excavations. Any discrepancies in the information obtained herein must be reported to the Architect before work proceeds.

Notes: To be read with Engineers calculations / report where applicable. Note: Showing details existing structures, we have not inspected woodwork or other parts of the structure which are covered, unexposed or inaccessible and we are therefore unable to report that any such part of the property is free from defect.

Project	PROPOSED HOUSING TOWN RD QUARINGTON		
Dwg.	INITIAL FEASIBILITY		
Scale	1:500 @ A2	Date	9/19
Dwg. no.	19/2467/5K/01	Rev.	

architects • designers • planning consultants  
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 Fax: 01529 415757