

Central Lincolnshire Local Plan Summary of Representations Received to the Recommended Main Modifications Schedule

1 March 2023



Contents

Introduction.....	2
Representations on the Recommended Main Modifications.....	2
Representations on Additional 'Minor' Modifications	23
Representations on Policies Map Modifications	26
Other Representations.....	26

Introduction

The following table summarises the representations that were received in respect of the modifications as consulted upon between Friday 13 January 2023 and Friday 24 February 2023. This summary is provided in order to be helpful to the reader, and aims to capture the key points, but not all points, made. It should not be used as a substitute for the full representations which were received, all of which are available in full on the website.

The fourth column of the table sets out a brief Committee response to the representation made, where it is considered necessary or helpful to do so. For many representations received, the issues raised were either debated at the hearing sessions or are raising issues which are not related to the modifications, and therefore it is not felt necessary or appropriate to provide a further Committee response. Where a representation is made relating to a modification, but the Committee does not support the representation or feel it necessary to comment, then the Committee similarly makes no further comment.

Where the Committee has provided a response, and where this is supporting or recommending a text change, the Committee's view is that such changes are not of such significance to warrant either any additional consultation or any further amendment to the Sustainability Appraisal reports. Instead, they can be matters simply considered and, as they see fit, addressed by the Inspectors in the final set of Main Modifications the Inspectors publish in their Inspector's Report. As a reminder, only the Inspectors have the ability to establish the final set of necessary Main Modifications.

The full set of representations have been sent to the Inspectors examining the Central Lincolnshire Local Plan, and the Inspectors will carefully consider the representations prior to issuing an Inspector's Report. This note has been prepared by the Committee, following the end of the consultation period.

Representations on the Recommended Main Modifications

Matter/ Policy	Representation Summary	Representer Name/ ID	Committee Response
MM1/ Policy S2	<ul style="list-style-type: none">Note the recommendation to change the housing target to 1,102 dpa rather than a range between 1,060 – 1,325 for the plan period. It is not clear how the figure was achieved but note that it is lower than the range average. This offers no material change to the previous response as the overall scale and location of development remains the same as previously assessed. No further comments.	National Highways (Catherine Townend) (41977569)	The Committee has no further comment.

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MM1/ Policy S2	<ul style="list-style-type: none"> The yearly housing figure associated with the standard method plus economic growth is considered to be a more robust approach for the five-year land supply position. The amended wording proposed is clearer from a decision-makers perspective, but it may be appropriate to insert wording that if housing delivery slips behind job growth, that the plan is reviewed accordingly. 	Beal Developments Ltd (Gareth Pritchard) (35417089)	The Committee considers that no further change is necessary.
MM1/ Policy S2	<ul style="list-style-type: none"> Note the change to the housing requirement to meet housing need, yet a higher target is being offered up to help meet the economic vision and strategy. It is not clear what justification is being provided to set two different targets if the partner local authorities are committed to delivering economic growth. 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. Sections a, b, c and d now refer to the amount of development to be apportioned 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. Appreciate there should be no differentiation between the “requirement”/“supply” but there is an ongoing issue with interpretation of the existing policy LP4 by individual LPAs. 	Robert Doughty Consultancy Ltd (Mercedes Golding) (23256033)	<p>This was discussed at length during the examination to justify this position and this is set out in the reason for change in the modifications consultation document.</p> <p>Policy LP4 will no longer be in operation upon adoption of this plan.</p> <p>However, the Committee agrees that it is beneficial to be consistent in terminology and so would have no objection to amending “dwellings per annum” to “dwellings per year”.</p>
MM1/ Policy S2	<ul style="list-style-type: none"> Consider that the housing requirement should reflect the higher housing figure of 1,325 dpa which will help to provide balance between the homes provided and jobs created to meet the need identified by evidence. 	Home Builders Federation (23393537)	The Committee disagrees. This was discussed at length during the examination to justify this position.

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MM1/ Policy S2	<ul style="list-style-type: none"> • Agree that the housing requirement be set out as a single figure, rather than as a range, in order to provide clarity. A single housing requirement figure provides a clear basis for calculating the five year housing land supply position and monitoring future housing delivery. 	Marrons Planning (Richard Cooke) (35413665)	The Committee has no further comment.
MM1/ Policy S2	<ul style="list-style-type: none"> • Welcome the removal of a range with regards to the housing requirement. 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 would urge the partnership to strive to deliver this quantum of development in order to ensure the area can reach its full economic potential. 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. 	Gladman (Richard Naylor) (39672801)	The Committee has no further comment.
MM3/ Policy S3	<ul style="list-style-type: none"> • Support the additional text 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. • 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. 	Environment Agency (Nicola Reyman) (42243585)	The Committee has no further comment.
MM3/ Policy S3	<ul style="list-style-type: none"> • Support the inclusion of bullet 3 as this enables the sustainability hierarchy to be applied and so make best use of the embedded (capital) carbon in existing infrastructure or for development to connect 	Anglian Water Services Ltd	The Committee has no further comment.

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	and expand existing local infrastructure which is likely to have carbon economies of scale.	(Darl Sweetland) (23349633)	
MM3/ Policy S3	<ul style="list-style-type: none"> The term “to further Bolster supply” is unclear and is considered to require clarification. 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? Are some sites outside, but adjacent to, the developed footprint required, or does this provide for additional housing over and beyond the requirements set out in Policy LP2? 	Robert Doughty Consultancy Ltd (Mercedes Golding) (23256033)	Sites not allocated at the edge of the top three tiers of the settlement hierarchy are not needed to meet the housing requirement. This would apply to windfall developments that may arise. The policy, as amended, provides clarity for any such schemes that may come forward. The Committee considers no further change is needed.
MM3/ Policy S3	<ul style="list-style-type: none"> Reference to heritage assets within the second bullet point is welcomed. 	Historic England (Emilie Carr) (23393217)	The Committee has no further comment.
MM3/ Policy S3	<ul style="list-style-type: none"> Support the suggestion 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 to set 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. 	Gladman (Richard Naylor) (39672801)	The Committee has no further comment.
MM4/ Policy S6	<ul style="list-style-type: none"> Welcome the proposed modification which replaces “principles should be used” to “expectations should be considered”. 	AECOM (Paul Foster) (36389761)	The Committee has no further comment.

Matter/ Policy	Representation Summary	Representor Name/ ID	Committee Response
MM5/ Policy S7	<ul style="list-style-type: none"> • Consider that this policy including the proposed modifications is not sound. Improvements in energy efficiency need to be within a consistent national framework not through each area having its own approach to technical standards that places a burden on house builders and the local authorities who are ill equipped to support developers and monitor the policies. • 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. 	Home Builders Federation (23393537)	This was discussed at length in the examination hearing sessions and changes are justified in the modifications consultation document. The Committee considers no further change is needed.
MM6/ Policy S8	<ul style="list-style-type: none"> • It is understood that the policy would not be applied to all land uses such as minerals and waste extraction. This must be clearly and unambiguously stated in the policy or sub text wording. Currently Policy S8 refers to all non-residential development but makes no reference to minerals and waste development. This could be added to the exceptional basis clauses. Alternatively, the policy should read: "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 or development (e.g. a building or development 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. <u>The requirement for Energy Statements does not extend to applications to be determined by the mineral and waste planning authority.</u>" 	Heaton Planning (IGas) (35141825)	This was discussed at length in the examination hearing sessions. It would not be appropriate to list every eventuality where an exception would be justified. The Committee considers no further change is needed.

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MM7 & MM8/ Policy S9 & supporting text	<ul style="list-style-type: none"> 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. 	Anglian Water Services Ltd (Darl Sweetland) (23349633)	The Committee has no further comment.
MM7/ New Paragraph 3.2.19	<ul style="list-style-type: none"> Note the addition of 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. 	AECOM (Paul Foster) (36389761)	This was discussed at length in the examination hearing sessions. The Committee considers no further change is needed.
MM8/ Policy S9	<ul style="list-style-type: none"> Replacing "non-fossil fuel based" with "renewable or very low carbon based" is considered a positive step forward. It still does not accord with the current version of the NPPF which defines decentralised energy as "local low carbon and local renewable sources of energy". Very low carbon-based fuel would almost certainly exclude hydrogen fuel derived from natural gas which is supported by Government. The Energy Bill supports hydrogen production from low-carbon sources. The draft revised NPPF does not propose a change in the definition of decentralised energy from "low" to "very low". It is therefore considered that the proposed modification does not make the policy sound because the policy would not be consistent with current national policy. Do not consider that there are clear and convincing reasons to depart from national policy. 	AECOM (Paul Foster) (36389761)	This was discussed at length in the examination hearing sessions. The Committee considers no further change is needed.
Mm10/ Policy S13	<ul style="list-style-type: none"> Reference to settings is welcomed. 	Historic England (Emilie Carr) (23393217)	The Committee has no further comment.

Matter/ Policy	Representation Summary	Representor Name/ ID	Committee Response
MM11/ Section 3.3 Paragraph 3.3.15 – 3.3.16	<ul style="list-style-type: none"> Support the proposed additional text which recognises the potential for site specific constraints, including flood risk and biodiversity, which are in addition to the ‘principal constraints’. 	Environment Agency (Nicola Reyman) (42243585)	The Committee has no further comment.
MM11/ Section 3.3 Paragraph 3.3.15 – 3.3.16	<ul style="list-style-type: none"> The new paragraphs are welcomed but 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: “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.” 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. 	Historic England (Emilie Carr) (23393217)	The Committee and Historic England discussed this modification following the examination hearing session as directed by the Inspectors, but were unable to come to agreement on the wording. The Committee does not agree with Historic England’s suggested wording on this matter as heritage assets are not the only unmapped constraint. The policy already requires any proposals to undertake the assessment being suggested. The Committee considers that no further changes are needed.
MM13/ Policy S14	<ul style="list-style-type: none"> The addition to criteria (i) “and the historic landscape” is strongly welcomed. 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. 	Historic England (Emilie Carr) (23393217)	The Committee has no further comment.

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MM15/ Policy NS18	<ul style="list-style-type: none"> Without reference to where the policy would apply, it would have no particular focus and 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. 	Robert Doughty Consultancy Ltd (Mercedes Golding) (23256033)	The recommended removal of the first paragraph in Policy NS18 will avoid repetition of national policy. The remaining part of the policy provides clear design guidance for locating charging points and is wholly appropriate to retain. The Committee considers that no further changes are needed.
MM16/ Policy S19 Paragraph 3.5.7 – 3.5.9	<ul style="list-style-type: none"> MM17 proposes deletion of policy S19 and it is considered that there is therefore no justification for any supporting text. Consider it to be contrary to para 16(f) and 188 of the NPPF. It is at variance and contrary to policy M9 of the Minerals and Waste LP. Consider the text should be deleted. 	AECOM (Paul Foster) (36389761)	This matter was discussed at length at the examination hearing sessions, with it being made clear by the Committee that in its view, whilst a policy cannot be retained, the Committee's position is important to be made clear. The Committee considers that no further changes are needed.
MM16/ Policy S19 paragraph 3.5.7 – 3.5.9	<ul style="list-style-type: none"> The revised text could be interpreted as implying that Policy M9 is not consistent with national policy. It is compliant with NPPF para. 215. The relevant policy context has not evolved since 2016, revised NPPF is currently out for consultation and there is no proposed change to government policy. The best way to influence minerals and waste policy is to engage with LCC in its review of the M&WLP and respond to the latest version of NPPF. Consider paragraphs 3.5.8 and 3.5.9 should be deleted and provide amended wording for para 3.5.7. 3.5.7: The current Lincolnshire Minerals and Waste Local Plan (M&WLP), adopted in 2016, includes a policy which supports the 	Lincolnshire County Council (Phil Hughes) (23376481)	The Committee considers that paragraphs 3.5.7-3.5.9, as suggested to be modified in the consultation document, present statements of fact and present the Committee's position clearly. The Committee considers that no further changes are needed.

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	<p>“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&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&WLP review.</p>		
MM17/ Policy S19	<ul style="list-style-type: none"> • Deletion of the policy welcomed. 	AECOM (Paul Foster) (36389761)	The Committee has no further comment.
MM17/ Policy S19	<ul style="list-style-type: none"> • Strongly supported. 	Heaton Planning (IGas) (35141825)	The Committee has no further comment.
MM18/ Policy S20	<ul style="list-style-type: none"> • Support caveat that green roofs should be assessed against their whole life cycle carbon analysis. 	Anglian Water Services Ltd (Darl Sweetland) (23349633)	The Committee has no further comment.
MM19/ Policy S22 Paragraphs 4.1.10 - 12	<ul style="list-style-type: none"> • Welcome amended wording and cap relating to First Homes and linking changes to indexation. 	Beal Developments Ltd (Gareth Pritchard) (35417089)	The Committee has no further comment.

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MM19/ Policy S22 Paragraphs 4.1.10 – 12	<ul style="list-style-type: none"> Support the proposed additional wording to criteria 2 recognising the benefits of installing a green roof and/or walls to 'assist water management'. 	Environment Agency (Nicola Reyman) (42243585)	The Committee has no further comment.
MM20, Policy S22	<ul style="list-style-type: none"> Concerned by the price cap being applied to First Homes and considers that ensuring that the homes are priced at least 30% below full market value would be sufficient. Recommend that the price cap be removed. 	Home Builders Federation (23393537)	The principle of a price cap was discussed at length in the examination hearing sessions and suggested changes to it are justified in the modifications consultation document. The Committee considers no further change is needed.
MM21, Policy NS24	<ul style="list-style-type: none"> Consider that 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. 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 previous responses to this policy. 	Home Builders Federation (23393537)	This was discussed at length in the examination hearing sessions. The Committee has no further comment.
MM23/ Policy S31	<ul style="list-style-type: none"> For the soundness of the Plan the former Bardney Syrup Factory site should be designated or allocated employment land, or the policy should be amended to ensure that onerous policy requirements are not imposed on development at the site. 	Rapeys LLP- British Sugar Plc (Wakako Hirose) (23392833)	The Committee has no further comment.
MM28/ Policy S53	<ul style="list-style-type: none"> Support the proposal to delete 'bad neighbour' for clarity and effectiveness of the policy. 	Rapeys LLP- Cereform Ltd (Wakako Hirose) (23392833)	The Committee has no further comment.

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MM31/ Policy S61 Paragraph 11.2.3	<ul style="list-style-type: none"> • Feel the recommended modifications relating to the GLNP area of expertise to be generally positive, but specifically support MM31. 	GLNP (Luke Bamforth) (23340065)	The Committee has no further comment.
MM31/ Policy S61 Paragraph 11.2.3	<ul style="list-style-type: none"> • Concur with modification MM31 which provides greater clarity for the delivery of biodiversity Net Gain (BNG). 	Natural England (Roslyn Deeming) (23284545)	The Committee has no further comment.
MM31 & MM32/ Policy S61 & Paragraph 11.2.3	<ul style="list-style-type: none"> • Support the proposed additional wording to paragraph 11.2.3 which provides clarity and improves consistency with paragraph 180a) of the NPPF to ensure that biodiversity should be delivered on a site, and otherwise compensation should be a 'last resort'. • Pleased to see the additional wording that provides clarity to the approach to 'off-site' measures. 	Environment Agency (Nicola Reyman) (42243585)	The Committee has no further comment.
MM32/ Policy S61	<ul style="list-style-type: none"> • Feel the recommended modifications relating to the GLNP area of expertise to be generally positive, but specifically support MM32. 	GLNP (Luke Bamforth) (23340065)	The Committee has no further comment.
MM32/ Policy S61	<ul style="list-style-type: none"> • Concur with modification MM32 which provides greater clarity for the delivery of biodiversity Net Gain (BNG). 	Natural England (Roslyn Deeming) (23284545)	The Committee has no further comment.
MM34/ Policies S68 – S71	<ul style="list-style-type: none"> • Consider there to be a difference in intent between the suggested text and the stated reason. The text Main Modification would apply when a SUE is 'no longer broadly delivering as expected', whereas the wording in the reason refers to a situation in which a SUE 'does not come forward'. This is not sufficiently clear and should be clarified. The wording does not specify how regularly delivery at the SUEs should be reviewed and the phrases "broadly as envisaged" and "may trigger a 	Marrons Planning (Richard Cooke) (35413665)	It will be for the Committee to consider whether any non-delivery, or slower than anticipated delivery, would provide the evidence needed to trigger a full or partial review. This will depend on the context

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	<p>partial or full Local Plan review” are open to interpretation and ambiguous. This is important given the reliance on the SUEs to meet the overall housing requirement.</p> <ul style="list-style-type: none"> • Believe 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. Examples of benchmarks to assess delivery of the SUEs provided. Consider the performance of the SUEs should be reviewed annually. • Suggested text should read: <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> And added to the policy wording in Policy S68 rather than supporting text. 		<p>of any delivery issues and whether, for example, alternative windfall sites are meeting any shortfall. The Committee considers no further change is needed.</p>
MM35/ Policy S69 Paragraph 12.1.9	<ul style="list-style-type: none"> • Support the amendments to this policy, which would provide a clearly defined southern boundary for the development. 	Deloitte (Hannah Graham) (37812193)	The Committee has no further comment.
MM36/ Policy S69, site COL/BOU/001 & NK/NHYK/001	<ul style="list-style-type: none"> • No comments on the changes to the text which relate to SUE site COL/BOU/001 – Western Growth Corridor. • Support the amendment to bullet point d) relating to SUE site NK/NHYK/001. This is consistent with oral comments made on behalf of the Church Commissioners, which 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. 	Deloitte (Hannah Graham) (37812193)	The Committee has no further comment.

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MM36/ Policy S69	<ul style="list-style-type: none"> It should be clear that a consideration of early phases require a TA of the whole SUE, suggest the additional text below: 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. <u>As the development progresses it Any proposal to deliver early phases of the development in advance of the completion of the North Hykeham Relief Road will be informed by a transport assessment, traffic modelling and any associated mitigation 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;</u> 	Lincolnshire County Council (Phil Hughes) (23376481)	The wording proposed in Modification MM36 will ensure that any proposals will take account of and not inhibit the delivery of the NHRR which includes the consideration of impacts of this strategic site. The Committee considers no further change is needed.
MM36/ Policy S69	<ul style="list-style-type: none"> The text to be added after point k) is welcomed. 	Historic England (Emilie Carr) (23393217)	The Committee has no further comment.
MM37/ Policy NS73	<ul style="list-style-type: none"> Consider that the policy does not provide explicit enough allowance for the growth of the maltings site. It identifies specific suitable uses for the Regeneration Area but does not acknowledge the existing industrial operation and there is no specific location identified for leisure opportunities. 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, it is considered that the following further amendments should be made: “Development proposals within the Gainsborough Riverside Regeneration Area, shown on the Policies Map as ROA6, will be supported in principle. This in principle support will apply to a range of uses which are appropriate in this location including industrial, office, leisure or residential uses. Proposals should not undermine the 	Rapleys LLP- Cereform Ltd (Wakako Hirose) (23392833)	This matter was discussed at length at the examination hearing sessions. The Committee does not wish to promote wider industrial uses in this edge of town centre location but equally does not want to stifle existing operations. It is proposed that the proposed modification could be reworded as (current proposed modification shown

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	<p>achievement of the ambitions for this regeneration area, as set out in a)-g) below.</p> <p>Proposals will be viewed particularly favourably where they:</p> <ul style="list-style-type: none"> a) Protect, enhance or restore the historic identity of the town; b) Strengthen the connection between the river and the town; c) Make the most of the riverside location enhancing; d) Deliver innovative design or design excellence which provides visual interest; e) Contribute positively to the Conservation Area; f) Expand leisure opportunities related to along the riverside; and/or g) Enhance public spaces and green infrastructure.” 		<p>underlined, new proposed modification shown in bold):</p> <p>“Development proposals within the Gainsborough Riverside Regeneration Area, shown on the Policies Map as ROA6, will be supported in principle. <u>This in principle support will apply to existing uses and a range of uses which are appropriate in this location including office, leisure, or residential uses.</u> <u>Proposals should not undermine the achievement of the ambitions for this regeneration area, as set out in a)-g) below.</u>”</p> <p>The Committee does not agree with the proposed change in part g) of the policy.</p>
<p>Mm38/ Policy NS74</p>	<ul style="list-style-type: none"> • The amendment to criteria c) is welcomed in accordance with the SOCG. 	<p>Historic England (Emilie Carr) (23393217)</p>	<p>The Committee has no further comment.</p>
<p>MM39 & MM40/ Policy 75 Paragraph 12.4.19</p>	<ul style="list-style-type: none"> • Generally supportive of the RAF Scampton base coming forward for development, but concern 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 	<p>N Lincs Council (Michael Hurlley) (38121889)</p>	<p>The Committee has no further comment.</p>

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	as the Local Plan. As such we are pleased to see that this has been reviewed and amended as part of the Recommended Main Mods and specifically note the change of wording to now reflect this.		
MM40/ Policy S75	<ul style="list-style-type: none"> • 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 the previous submissions to the Council's and reflects Anglian Water's own net zero approach to infrastructure investment. • 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. 	Anglian Water Services Ltd (Darl Sweetland) (23349633)	The Committee has no further comment.
MM40/ Policy S75	<ul style="list-style-type: none"> • The amendment is welcomed (see ref to Minor 21). 	Historic England (Emilie Carr) (23393217)	The Committee has no further comment.
MM41/ Policy S77, Paragraph 13.2.7	<ul style="list-style-type: none"> • Support inclusion of surface water flood risk as a matter to be considered at the earliest opportunity by applicants. 	Anglian Water Services Ltd (Darl Sweetland) (23349633)	The Committee has no further comment.
MM41/ Policy S77, Paragraph 13.2.7	<ul style="list-style-type: none"> • Welcome the additional wording 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. 	Environment Agency (Nicola Reyman) (42243585)	The Committee has no further comment.

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MM41/ Policy S77, Paragraph 13.2.7	<ul style="list-style-type: none"> Support the amendments to the supporting text. 	Deloitte (Hannah Graham) (37812193)	The Committee has no further comment.
MM41/ Policy S77, Paragraph 13.2.7	<ul style="list-style-type: none"> Reiterate that the 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 M&WLP. 	Heaton Planning (Tarmac) (34365569)	The Committee has no further comment.
MM45/ Policy 76	<ul style="list-style-type: none"> Support the amendments to the policy. 	Deloitte (Hannah Graham) (37812193)	The Committee has no further comment.
MM45/ Policy 76	<ul style="list-style-type: none"> The landowner welcomes the proposed amendment to the boundary and the increase in site area to include land no longer required for construction of the bypass. 	JHWalter LLP (Alistair Anderson) (34402913)	The Committee has no further comment.
MM47/ Policy S77, site COL/MIN/005	<ul style="list-style-type: none"> The proposed modification is a backwards step for the LP in terms of it's stated natural and historic environments vision. Throughout the process, the site had been identified as offering significant potential to deliver on site biodiversity net gain. 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. This site is unique in 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 	Daniel Evans (44335041)	The Committee agrees that delivery of biodiversity net gain on site and adequate screening is an important objective for its development. However, retention of the bunds and all trees may not be the most appropriate design solution, nor the most effective means to securing biodiversity net gain. It is recognised that this site has a temporary TPO on trees

Matter/ Policy	Representation Summary	Representor Name/ ID	Committee Response
	<p>corridors. Removing the bunding (particularly to the west) would affect the ability to retain the mature trees and shrubs. The boundary trees are now subject to a new TPO which has not been acknowledged. Evidence suggests that the increase in indicative numbers would not be based on the most appropriate design led solution.</p>		<p>at its periphery and is the subject of a condition on the former use of the site as a quarry, which requires remediation and delivery of biodiversity on the site. This is why the requirement has been included in this proposed allocation and the Committee considers that the revised requirements in the proposed modifications allows these important elements to be delivered.</p>
<p>MM63/ Policy S80, site WL/NHAM/018</p>	<ul style="list-style-type: none"> 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. 	<p>Anglian Water Services Ltd (Darl Sweetland) (23349633)</p>	<p>The Committee has no further comment.</p>
<p>MM66/ Policy S80, site WL/WELT/001A</p>	<ul style="list-style-type: none"> 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. 	<p>Gladman (Richard Naylor) (39672801)</p>	<p>The Committee has no further comment.</p>
<p>MM68/ Policy S80, site WL/WELT/008A</p>	<ul style="list-style-type: none"> 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. Consider that the submission at regulation 19 stage may have been misunderstood. For the avoidance of any doubt, we wish to clarify that the comments made at the regulation 19 consultation did not intend to suggest that site 	<p>West Lindsey District Council (Rachael Hughes) (23355809)</p>	<p>The Committee has consistently acknowledged that the scale of growth identified at Welton is significant, and has consistently been concerned of the risk that all allocated sites</p>

Matter/ Policy	Representation Summary	Representor Name/ ID	Committee Response
	<p>WL/WELT/008A should not be phased back behind sites WL/WELT/001 and WL/WELT/007, but that it should also be phased back behind site WL/WELT/003 – i.e. the last site to come forward in the village.</p>		<p>come forward and be built out in a short period of time, early in the plan period. Such early delivery might technically be possible, but might equally cause strain on the existing community to accommodate not only the new residents arriving but the impact of construction taking place in several locations all at the same time. Hence, phasing at least one significant site back may ease some of that strain. On the other hand, the Committee recognises there is no absolute evidence to demonstrate this phasing to be a necessary policy requirement for site 008A (a point made by the Inspectors in EX034), and no new evidence was forthcoming from this representation received from West Lindsey District Council. The Committee therefore acknowledges that, whilst a phasing of the site to later in the plan period has merit, for reasons given above, the justification for such a phasing requirement in the policy for this specific site is somewhat lacking. The question becomes,</p>

Matter/ Policy	Representation Summary	Representor Name/ ID	Committee Response
			therefore, whether that justification is so weak as to make the phasing requirement unsound, particularly when the more generic policy S45 would allow the decision maker the ability to consider infrastructure provision at the point of considering any application. Overall, the Committee does not have 'any alternative solution' to put forward, as was offered by the Inspectors at para 11 of EX034.
MM68/ Policy S80, site WL/WELT/008A	<ul style="list-style-type: none"> • Agree that the site should be allocated. This site is already related to the existing village and borders it immediately, relates well to the existing developed area. Future road networks are possible alleviating pressure on main roads and volume of traffic in Welton Village. The site has two access points, one from the development adjoining the allocation, two from Eastfield Lane meaning access isn't an issue. Believe that the phasing should be removed from the site's allocation. 	Kit Dickinson (44949409)	The Committee has no further comment.
MM68/ Policy S80, site WL/WELT/008A	<ul style="list-style-type: none"> • Support site WL/WELT/008 for housing in Welton. As a first time buyer can see the need for more developments in the area. Consider the site is in a good position, fits with existing developments and would be a natural extension to what is already being developed to the west of the site. Pleased to see the modification made to the CLLP as the requirement to be phased after other developments seemed unreasonable. 	Freddie Allen (44950081)	The Committee has no further comment.

Matter/ Policy	Representation Summary	Representor Name/ ID	Committee Response
MM68/ Policy S80, site WL/WELT/008A	<ul style="list-style-type: none"> Comments made to correct and clarify points made in document EX034 that may have affected the decisions made in MM68. Development at Dunholme is closely linked to Welton and should also be considered. Site 008 was rejected by the SA, but site 008A was not. MM016 recommended removal of the site but has been revoked due to highway comments and 008A reallocated. It had been a reasonable assumption that both would not meet sustainability criteria and site 008A should be removed. Matter was not fully resolved at examination due to proposed modification to remove that site at that time. WLDC have confirmed that sites 001A, 007 and 003 should be phased ahead of 008A. Policy S45 does not take into account cumulative impact and has not been reviewed. Example provided. Infrastructure providers have based their assessment on the building trajectory in Appendix 1, Matter 9 statement for which site 008A is omitted. Allowing uncontrollable development of up to 8 large sites covering almost 1000 homes is not justifiable, effective or sound. Suggesting that phasing is taken out of the plan when it is clearly required is remiss. 	Chris Thomas (37874593)	These matters were discussed at the examination hearing sessions. The Committee has no further comments to make. See also the Committee's response to the representation from West Lindsey District Council above, which, in part, relates to the issue of phasing of sites.
MM69/ Policy S80, WL/WELT/011	<ul style="list-style-type: none"> The amended text is welcomed which makes clear that in principle, the development of the safeguarded land will be supported. An indicative unit number consistent with other sites in Policy S80 would be helpful, but it is believed that this updated policy should be sufficient to prevent Policy S4 being engaged in error. 	Beal Developments Ltd (Gareth Pritchard) (35417089)	The Committee has no further comment.
MM80/ Policy S81, site WL/FISK/001A	<ul style="list-style-type: none"> Support the amendments to this policy. 	Deloitte (Hannah Graham) (37812193)	The Committee has no further comment.

Matter/ Policy	Representation Summary	Representor Name/ ID	Committee Response
MM83/ minor Policy S81, site WL/STUR/006a	<ul style="list-style-type: none"> • WL/STUR/006a reference to Gilbert's Farm should be corrected to Gilbert's Barn. All references throughout MM83 also need amending. 	Sturton by Stow Parish Council (Carol Gilbert) (34373601)	Upon review, the Committee agrees that this address should be updated to read "Land south of Gilbert's Barn Saxilby Road and Tillbridge Lane, Sturton by Stow". However, this further change can be a matter addressed as a minor modification and does not need an Inspectors recommendation.
MM90/ Policy S83	<ul style="list-style-type: none"> • Reference to "supported by further evidence of community support for any substantive variation to that scheme" should be removed as this will no longer be supported by policy requirement. • 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. Therefore request that the allocation is re-amended to 140 dwellings. 	Grace Machin Planning & Property (Nick Grace) (23347073)	The first request by this representation does not relate to a modification consulted upon. Nevertheless, this site was originally approved through a consultation exercise under the provisions of LP4 of the adopted Local Plan. Any substantive change to that proposal should continue to be tested through that route which has proven to be effective in the context. The modification, as consulted upon, to adjust the site capacity to 120 is to more accurately reflect the current approved proposals for the site. Nevertheless, that figure remains indicative, and should a completely new proposal come forward, it would not be

Matter/ Policy	Representation Summary	Representor Name/ ID	Committee Response
			limited to meeting the figure of 120 exactly. The Committee considers that no further change is necessary.

Representations on Additional 'Minor' Modifications

Matter/ Policy	Representation Summary	Representor Name/ ID	Committee Response
Minor 1	<ul style="list-style-type: none"> Feel the recommended modifications relating to the GLNP area of expertise to be generally positive, but specifically support Minor 1. 	GLNP (Luke Bamforth) (23340065)	The Committee has no further comment.
Minor 2	<ul style="list-style-type: none"> Welcome and support the inclusion of the text 'are met' as this shows leadership in delivering net zero at a local level proactively through planning and development decisions. 	Anglian Water Services Ltd (Darl Sweetland) (23349633)	The Committee has no further comment.
Minor 2	<ul style="list-style-type: none"> Support the proposed amendment to paragraph 1.2.15 which that clarifies that growth 'does not exacerbate pressure on natural resources'. 	Environment Agency (Nicola Reyman) (42243585)	The Committee has no further comment.
Minor 2	<ul style="list-style-type: none"> Feel the recommended modifications relating to the GLNP area of expertise to be generally positive, but specifically support Minor 2. 	GLNP (Luke Bamforth) (23340065)	The Committee has no further comment.

Matter/ Policy	Representation Summary	Representor Name/ ID	Committee Response
Minor 3	<ul style="list-style-type: none"> • Feel the recommended modifications relating to the GLNP area of expertise to be generally positive, but specifically support Minor 3. 	GLNP (Luke Bamforth) (23340065)	The Committee has no further comment.
Minor 7	<ul style="list-style-type: none"> • Welcomed. 	Historic England (Emilie Carr) (23393217)	The Committee has no further comment.
Minor 9	<ul style="list-style-type: none"> • Feel the recommended modifications relating to the GLNP area of expertise to be generally positive, but specifically support Minor 9. 	GLNP (Luke Bamforth) (23340065)	The Committee has no further comment.
Minor 12	<ul style="list-style-type: none"> • Pleased that para 3.7.2 has been updated to reflect our comments in the Regulation 19 consultation. (Wording suggested at previous consultation is provided in this response.) 	Environment Agency (Nicola Reyman) (42243585)	The Committee has no further comment.
Minor 13	<ul style="list-style-type: none"> • Support the inclusion of the text requiring adequate mains foul water treatment. This reflects broader discussions that Anglian Water has had with the EA and enables appropriate investment planning to meet the needs of growth when that comes forward. 	Anglian Water Services Ltd (Darl Sweetland) (23349633)	The Committee has no further comment.
Minor 13	<ul style="list-style-type: none"> • 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 the EA 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. • Consider this proposed amendment to be a major modification because it will be critical in ensuring that the development can be supported by 	Environment Agency (Nicola Reyman) (42243585)	The Committee disagrees that this modification is necessary for 'soundness' reasons, and hence is not necessary for it to be promoted up to a main modification. The reasoning for this view is that the Policy itself, S21, is not subject to modification, and criterion (h) of the policy, which relates to

Matter/ Policy	Representation Summary	Representor Name/ ID	Committee Response
	appropriate infrastructure, which in turn will help demonstrate that the development is sustainable, safeguarding the natural environment.		mains foul water, will remain the policy requirement against which planning applications will be determined. Minor 13, which is a change to the supporting text only (not Policy) simply provides additional support and guidance in order for applicants and decision makers to implement Policy S21. That additional support and guidance text, helpful that it is, is not necessary for soundness, hence it can remain a minor modification. The net effect, of course, whether it be a minor or main modification will be the same, provided such a minor modification is included in the final adopted plan (which is the intention of the Committee).
Minor 14	<ul style="list-style-type: none"> • 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. 	Environment Agency (Nicola Reyman) (42243585)	The Committee has no further comment.
Minor 21	<ul style="list-style-type: none"> • Welcomed. 	Historic England (Emilie Carr) (23393217)	The Committee has no further comment.

Representations on Policies Map Modifications

Matter/ Policy	Representation Summary	Representor Name/ ID	Committee Response
General	<ul style="list-style-type: none"> No comments on proposed map modifications. 	Anglian Water Services Ltd (Darl Sweetland) (23349633)	The Committee has no further comment.
Mapmod 9	<ul style="list-style-type: none"> Changes welcomed and fully supported by the landowner. 	JHWalter LLP (Alistair Anderson) (34402913)	The Committee has no further comment.

Other Representations

Matter/ Policy	Representation Summary	Representor Name/ ID	Committee Response
General	<ul style="list-style-type: none"> The Parish Council have no comments to make. 	Collingham Parish Council (Caron Ballantyne) (39349025)	The Committee has no further comment.
General/ Map 2	<ul style="list-style-type: none"> Reference to Map 2 – Consider the land between Welbourn and Brant Broughton to be an unacceptable location for wind turbines. 	Colin Cumming (35120833)	The Committee has no further comment.
General	<ul style="list-style-type: none"> Welcome the plan. No other comments to make. 	NHS Lincs Integrated Care	The Committee has no further comment.

Matter/ Policy	Representation Summary	Representor Name/ ID	Committee Response
		Board (Emily Turk) (38120129)	
General	<ul style="list-style-type: none"> • 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. • Supportive of the wider recommended main and minor modifications as established in the two documents. 	N Lincs Council (Michael Hurtley) (38121889)	The Committee has no further comment.
General	<ul style="list-style-type: none"> • No comments to make. 	Nottinghamshire County Council (Nina Wilson) (38120961)	The Committee has no further comment.
General	<ul style="list-style-type: none"> • New housing planned but with very poor public transport. Without good transport the economy will not improve. 	Mark Page (35082753)	The Committee has no further comment.
General	<ul style="list-style-type: none"> • No comments to make on the proposed modifications. 	South Kyme Parish Council (Dermot Daly) (23345697)	The Committee has no further comment.
General	<ul style="list-style-type: none"> • No major comments to make. 	West Stockwith Parish Council (Mr Dave Harford) (23141025)	The Committee has no further comment.
General/ Rejected Site	<ul style="list-style-type: none"> • Consider site NK/SLEA/013A should be reconsidered as a suitable allocation site and more likely to be deliverable during the lifetime of the plan than Sleaford West. It is a brownfield site and immediately available. Map provided. 	Clive Wicks Associates (Clive Wicks) (35054561)	The Committee has no further comment.

Matter/ Policy	Representation Summary	Representor Name/ ID	Committee Response
General	<ul style="list-style-type: none"> No further comment is required from the MMO. 	Marine Management Organisation (Corinna Dietz) (35204737)	The Committee has no further comment.
Policy S33	<ul style="list-style-type: none"> Consider that the Maltings falls outside of designations for protection and support for growth as an economic development site. Consider that Policy S33 should make clear that 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. 	Rapeys LLP- Cereform Ltd (Wakako Hirose) (23392833)	This matter has been discussed at length at the examination hearing sessions. The Committee has no further comment.