

PRCC.24 14/15

Committee: Prosperous Communities

Date 14 October 2014

Subject: Local Plan Formal Consultation Response

Report by:	Chief Operating Officer; Mark Sturgess
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Purpose / Summary:	The report pulls together comments made by councillors at a number of workshop events in August, September and October to form the formal response by WLDC to the Preliminary Draft of the Central Lincolnshire Local Plan.

RECOMMENDATION(S):

- 1. That Members discuss, amend and agree the formal responses to each policy contained in to the Preliminary Draft of the Central Lincolnshire Local Plan October 2014.
- 2. Should amendments be required, then authority be delegated to the Chief Operating Officer in consultation with the Chair of Prosperous Communities Committee to include the changes and then send to the Central Lincolnshire Local Plan Team as the formal response.

IMPLICATIONS

Legal: None as a result of this report

Financial : FIN/67/15 None as a result of this report

Staffing : None as a result of this report

Equality and Diversity including Human Rights :

The report contains policies to ensure provision for all communities across Central Lincolnshire.

Risk Assessment : The Local Plan process has a full risk assessment.

Climate Related Risks and Opportunities : Policies are contained within the Local Plan aimed at reducing the impact on climate change.

Title and Location of any Background Papers used in the preparation of this report:

http://www.central-lincs.org.uk/

Call in and Urgency:

Is the decision one which Rule 14.7 of the Scrutiny Procedure Rules apply?

i.e. is the report exempt from being called in due to urgency (in consultation with C&I chairman)	Yes		No	X	
Key Decision:					
A matter which affects two or more wards, or has significant financial implications	Yes	X	No		

1 Introduction

The Preliminary Draft Local Plan

- 1.1 The Preliminary Draft Local Plan has been prepared taking account primarily the following:
 - Member steer from the Central Lincolnshire Joint Local Plan Committee, of which West Lindsey is a joint partner, on what is desired for the new Local Plan
 - National Legislation (Acts and Regulations) and Policy (e.g. the National Planning Policy Framework)
 - Recent Inspector decisions on Local Plans nationally
 - Evidence gathered as part of the previous preparation of a draft Core Strategy for Central Lincolnshire
 - Views made by the public and other stakeholders as part of the preparation of the draft Core Strategy
 - New or updated evidence
- 1.2 It should be made clear that this is not a 'full' draft Local Plan. For example, it does not yet include specific allocations for new development. There are also other key policy areas which are yet to be firmed up (such as the precise housing growth target or the proportion of homes which should be 'affordable').
- 1.3 Instead, the Local Plan as presented is one which captures the key issues that we know of already and sets a steer as to how we will tackle the gaps. The intention is then to produce a 'full' draft plan (incorporating suggested sites for development, for example) for July 2015. The plan (and programme) has been consciously prepared in this way as we are specifically seeking comments from the public at this early stage, so that we can prepare the next (and 'full') draft plan with confidence and greater certainty. Members want greater say by the public in helping shape the document, and the risk of producing a 'full' plan without any public involvement beforehand could mean crucial fundamental issues are not addressed early in the process.
- 1.4 In line with Member aspirations, the Local Plan is broadly a pro-growth plan, yet one which seeks not growth for growth's sake, but quality growth, with the right infrastructure, quality design and conservation of what is special about Central Lincolnshire.
- 1.5 The policies as drafted are limited to what is necessary, drafted to meet Central Lincolnshire needs and written in a way which, hopefully, is easy to read and understand (without compromising the need for the plan to be written in a way which is suitable for the formal dealing of planning applications, appeals and the like).
- 1.6 Some headline points to note in the plan are (in order of document):

- A clarification note on the status of this draft plan (which is an important note for decision makers, such as planning committees and planning officers).
- A Vision and set of Objectives that we are trying to achieve.
- Chapter 4, which has a number of key policies, including a Settlement Hierarchy policy (LP2), which categorises all of Central Lincolnshire's settlements above a population of about 50 into a category in the hierarchy, which in turn influences what sort of development will be expected in that settlement. Note, the hierarchy is currently drafted as a 'policy-off' version, which means it is based on facts and figures for each settlement, rather than any policy decision to promote or restrict development in any settlement. The next version of the draft plan in 2015 will be a 'policy-on' version, which means, for policy reasons, some settlements will be promoted up or down the hierarchy, and subsequently be expected to deliver more or less development than would be anticipated via a 'policy-off' hierarchy.
- A Distribution of Growth policy (LP3) which indicates at this stage where growth will be directed, but does not yet establish firm figures as to how much growth.
- Various policies to support the economy (LP4-6 and in Chapter 7 for individual settlements).
- A set of policies around Health and Wellbeing (LP7), Community Facilities (LP8) and meeting housing needs (LP9-10).
- A set of policies relating to infrastructure (LP11-13), which will ensure high quality and necessary infrastructure is provided alongside development.
- Chapter 5, which contains policies on delivering quality development, including protecting what's special (landscape, heritage, natural environment, etc), achieving high quality design and delivering our contribution, where our landscape and other assets permit, to combatting climate change.
- Chapter 6, which helps to give local communities greater ownership of how their community develops (complimenting their separate Neighbourhood Planning powers).
- Chapter 7, which forms the framework for allocating sites in the future draft of the Local Plan. This chapter explains to the reader some principles in terms of what sites we will/will not allocate, and a method for appraising possible sites. In effect, this chapter is also a 'call for sites' from interested parties i.e. if someone thinks a site is suitable for allocation then now is the time to let us know. Members are particularly asked to review this process and

methodology for allocating sites, and be comfortable with its approach.

- Chapter 7 also has a specific section (and associated policies) on Lincoln, Gainsborough, Sleaford and 'Rural Areas'.
- 1.7 A wide range of material has been used to inform the preparation of the plan, all of which will be available on the website during the consultation period.

2 Consultation Timetable

2.1 At the Central Lincolnshire Joint Strategic Partnership in March 2014 a new 'Local Development Scheme' (LDS) was adopted, which in simple terms signalled the legal commencement of the preparation of a new Local Plan for Central Lincolnshire. The LDS confirmed that the intention was to prepare the Local Plan in the following timeframe:

1 st draft Local Plan for consultation (the 'Preliminary Draft Local Plan')	October 2014
2 nd draft Local Plan for consultation (the 'Further Draft Local Plan')	July 2015
Final draft Local Plan for consultation (the 'Proposed Submission Draft Local Plan')	January 2016
Examination of Local Plan 2016	April-September
Adoption of Local Plan	November 2016

3 Comments from WLDC Councillors on each of the policies in the Local Plan

A number of workshops and discussions have been held with members to discuss the response of councillors to the policies contained in the Local Plan draft. Approximately 25 members have been involved in providing these comments.

Workshops have also been happening over the past few months and at each stage comments have been fed back which have been used to shape the Plan we have here.

All the latest comments have been distilled into the table below.

It should be remembered that as this Local Plan will be subject to robust challenge from an independent inspector in a public examination, that any policies that are part of the Local Plan will be subject to intense scrutiny and therefore detailed evidence will be required. This evidence will include local opinion and community involvement as well as facts and figures.

Central Lincolnshire Local Plan – Summary of Policies (Oct 2014 Preliminary Draft). Note: All policies are current at draft stage for public consultation.

	Policy	Summary
	General Principles of Local	
	Plan WLDC Councillor Comments	 Ensure that the Local Plan is for the whole of the Central Lincolnshire area giving as much weight to rural areas as to the urban areas of Lincoln, Gainsborough and Sleaford. Therefore statements included in the Plan should be related to Central Lincolnshire not just Lincoln, Sleaford or Gainsborough. Ensure that Central Lincolnshire Local Plan is not dominated by the needs of Lincoln and that it is balanced across all 3 districts. Mention links to both Robin Hood Airport, Doncaster, Humberside Airport and South Humber Bank. Influence transport policy to include dualling the A15 north of Lincoln to the Forest Pines roundabout, Scunthorpe, A158, the existing bypass around Lincoln and a second bridge/road crossing of the River Trent, Gainsborough.
	LP1: Presumption in Favour of Sustainable Development	A general policy as required to be included by central government to complement the National Planning Policy Framework (NPPF).
A Growing Central Lincolnshire	WLDC Councillor Comments	 Definitely want to ensure that all development is sustainable. Questions as to the real sustainability of the Lincoln Fringe villages as it is perceived that in some villages services are oversubscribed now. Some of the villages in the Lincoln fringe are not sustainable as they have limited services. WLDC priority to make ex-MOD bases more sustainable, Hemswell Cliff and RAF Scampton in particular as they are on a main road with easy access to Lincoln. Some settlements may need extra infrastructure to ensure sustainability eg Bardney and Scotter need more employment land made available to encourage more local job opportunities. New sustainable village near Lincoln at North Greetwell, near Hawthorn Road. (Approx 2,500 dwellings?) When developing plans for sustainable communities ensure that they have significant amounts of green space (at least 5%) and greener aspects - tree-lined avenues, parks, riverside walks, leafy squares. Ensure that road networks are able to cope/wide

LP2: The Spatial Strategy and Settlement Hierarchy WLDC Councillor Comments LP3: Level and Distribution of Growth	 existing road network as well as new provision. Schools and doctors throughout the area are at capacity – infrastructure needed before new homes. Policy determining which towns and villages fall into what category of the settlement hierarchy. Development and investment will be prioritised to those places higher up the hierarchy. Change the emphasis from a Settlement Hierarchy to a Settlement Strategy. Need to retain ability for some of the smaller settlements to grow 'organically' to ensure the survival of services and communities. Need to look at Lincoln fringe villages carefully so the <i>Lincoln Sub-regional Study</i> proposed in September 2014 will be of great importance to determining which settlements grow and by how much. New sustainable village near Lincoln at North Greetwell, near Hawthorn Road. (Approx 2,500 dwellings?) As a result of the above and the strength of feeling from Councillors representing the wards particularly in the Lincoln fringe area please move the villages as listed below: Cherry Willingham to Group 4 Sudbrooke to Group 4 Saxilby to Group 4 Hemswell Cliff to Group 3 RAF Scampton to Group 3 Morton to Group 5 If local communities want it then some settlements, not identified here, should be able to expand by more than the proposed 3 dwellings proposed. More flexibility about numbers. Policy which sets the housing growth targets (currently a range of between 25,000 -47,500). Policy directs the majority of growth to the City of Lincoln (50%), Sleaford (15%) and Gainsborough (15%).
WLDC Councillor Comments	
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Settlement Hierarchy	 and investment will be prioritised to those places higher up the hierarchy. Change the emphasis from a Settlement Hierarchy to a Settlement Strategy. Need to retain ability for some of the smaller settlements to grow 'organically' to ensure the survival of services and communities. Need to look at Lincoln fringe villages carefully so the <i>Lincoln Sub-regional Study</i> proposed in September 2014 will be of great importance to determining which settlements grow and by how much. New sustainable village near Lincoln at North Greetwell, near Hawthorn Road. (Approx 2,500 dwellings?) As a result of the above and the strength of feeling from Councillors representing the wards particularly in the Lincoln fringe area please move the villages as listed below: Cherry Willingham to Group 4 Sudbrooke to Group 4 Saxilby to Group 4 Hemswell Cliff to Group 3 RAF Scampton to Group 3 Morton to Group 5 If local communities want it then some settlements, not identified here, should be able to expand by more than the proposed 3 dwellings proposed. More flexibility about numbers.
	 Schools and doctors throughout the area are at capacity – infrastructure needed before new homes. Policy determining which towns and villages fall into

	facilities (Also has a Noighbourbood Plan nearly
	 facilities. (Also has a Neighbourhood Plan nearly completed.) Greater percentage of growth required for Gainsborough due to growth aspirations which is a priority for WLDC. Depending on numbers this may be more than the 15% allocated at this time which Councillors want to take some pressure off the Lincoln fringe. Greater levels of growth for Hemswell Cliff and RAF Scampton. Level and distribution of growth around Lincoln needs to be looked at in greater detail – <i>Lincoln Sub-regional Study</i> (see comments above). Scenario which Councillors favour at this point in time is the medium growth scenario. Need some growth to allow for natural increase in households, but also need some aspirational growth to encourage employment/jobs creation. Encourage growth in villages that need an increase in houses for sustainability rather than push everything to the Lincoln fringe.
LP4: Delivering Prosperity and Jobs	Policy to promote employment growth, with targets for new jobs and the release of employment land (no targets at this draft stage).
WLDC Councillor Comments	 Broad agreement with this policy. More emphasis on Gainsborough as a centre for employment growth as this is where the greatest employment needs are based in WL. Employment/jobs growth needs to go hand in hand with housing growth. Needs more mention of South Humber bank and employment opportunities there particularly links to Caistor and Market Rasen in the North East of the area. Bardney and Scotter need more employment land made available to encourage more local job opportunities.
LP5: Retail and Town Centres in Central Lincolnshire	Policy sets the retail hierarchy and retail impact assessment threshold.
WLDC Councillor Comments	 Aspirational growth for Gainsborough will help to safeguard and develop retail and leisure sectors in Gainsborough Town Centre. Caistor and Market Rasen currently have larger retail centres than their populations suggest. Need to ensure that these are safeguarded and that retail diversity is maintained/increased. Large scale urban extensions need to link into existing town centres but also provide the right level of sustainable retail opportunities.
LP6: A Sustainable Visitor Economy	Policy to promote the growth of the tourism economy.
WLDC Councillor Comments	 Visitor economy is a priority for WLDC so a policy which promotes and encourages this is important. Make sure there are strong links to rural policies. Must ensure a sustainable visitor economy.

ure	LP7: Health and Wellbeing	Policy requiring developers to take full account of health issues when preparing development proposals including the submission of a Health Impact Assessment, as appropriate.
	WLDC Councillor Comments	 Definition of Major Developments needed here as there is a balance to be made between producing a Health Impact Assessment as part of a sustainable development and it stifling growth in some areas by adding to the cost and reducing the viability of a site too much. Highlight the need for residents to have access to green space and the positive impact it has on mental wellbeing.
of infrastruc	LP8: Meeting Accommodation Need	Policy encouraging a range of accommodation types such as custom build, single storey dwellings and executive homes. Policy also sets out criteria for assessing Gypsy and Traveller and Travelling Showpeople related development.
eds and the provision o	WLDC Councillor Comments	 Very important that there should be a strong evidence base to show need across the different groups. Ensure that a range of provision for older people and single unit homes is taken into account. That provision for all groups but especially Gypsy and Travellers is spread equally across the Central Lincolnshire area to ensure parity. Cater for both ends of the housing market.
ng ne	LP9: Meeting Housing Needs	Policy setting affordable housing requirement and threshold (targets not yet available at this draft stage).
e: meeti	WLDC Councillor Comments	 Needs to meet the need of the community. More comments will be provided when targets are available.
ncolnshire	LP10: Infrastructure to Support Growth	Policy confirming the need for infrastructure to be provided alongside development, as well as an expectation for developers to contribute towards infrastructure provision.
A Caring Central Lin	WLDC Councillor Comments	 Broad agreement with this policy Key issue for most communities and settlements as a number perceive that infrastructure has not been provided for adequately in the past and they are questioning the mechanisms by which requirements are measured. Infrastructure must meet existing need as well as for new developments.
	LP11: Transport	Policy covering strategic as well as site specific transport matters.
	WLDC Councillor Comments	 Broad agreement with this policy. Key issue for most communities and settlements as a number perceive that transport infrastructure has not been provided for adequately in the past and they are questioning the mechanisms by which requirements are measured. Enhance the role of rail links.
	LP12: Managing Water Resources and Flood Risk	Policy sets out the approach and criteria the Central Lincolnshire authorities will use in relation to flood risk
A Caring Central Lincolnshire: meeting needs and the provision of infrastructure	LP9: Meeting Housing Needs WLDC Councillor Comments LP10: Infrastructure to Support Growth WLDC Councillor Comments LP11: Transport WLDC Councillor Comments LP12: Managing Water	 and single unit homes is taken into account. That provision for all groups but especially Gypsy and Travellers is spread equally across the Centra Lincolnshire area to ensure parity. Cater for both ends of the housing market. Policy setting affordable housing requirement and threshold (targets not yet available at this draft stage). Needs to meet the need of the community. More comments will be provided when targets are available. Policy confirming the need for infrastructure to be provided alongside development, as well as an expectation for developers to contribute towards infrastructure provision. Broad agreement with this policy Key issue for most communities and settlements a number perceive that infrastructure has not bee provided for adequately in the past and they are questioning the mechanisms by which requirement are measured. Infrastructure must meet existing need as well as new developments. Policy covering strategic as well as site specific transport infrastructure has not been provided for adequately in the past and they are questioning the mechanisms by which requirements a number perceive that transport infrastructure has new developments.

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		and drainage matters.
	WLDC Councillor Comments	 Broad agreement with the policy as it is set out here. Need to factor in the new Sustainable Drainage Scheme policies currently being consulted on by Government and what impact they will have on new developments across Central Lincolnshire.
	LP13: Community Facilities	Policy setting out the criteria that will be used to assess the proposed loss of any community facilities or the creation of new stand-alone facilities.
	WLDC Councillor Comments	Broad agreement with this policy.
	LP14: Development on Land	Policy setting out the approach to land with the potential
	affected by Contamination	to be affected by contamination.
	WLDC Councillor Comments	Broad agreement with this policy
	LP15: Our Landscape	Policy setting out the criteria for assessing the landscape impact of proposed development.
	WLDC Councillor Comments	 The AONB and other landscape designations need to be mentioned in the Introduction to this chapter at 5.1. Broad agreement with this policy and that: The agricultural land grades (1, 2 and 3a) should be added to this policy so that it is very clear that this land will be protected in most cases. The policy should link strongly to policy LP12 particularly in respect of agricultural uses. Mention the AONB and other landscape designations in this policy.
	LP16: Climate Change and Low Carbon Living	Policy sets out an expectation for development to contribute to minimising resource consumption and contribute towards combatting climate change.
A Quality Central Lincolnshire	WLDC Councillor Comments	 Broad agreement with this policy and that: More emphasis should be put on designing in carbon reduction and water saving technologies from the outset of a development balanced against not stifling growth by asking for technologies that impact on the viability of a scheme.
entra	LP17: Stand-alone Renewable Energy Proposals	Policy setting out the criteria for assessing stand-alone renewable energy proposals.
lity C	WLDC Councillor Comments	 Broad agreement with this policy Define agricultural land grades
A Qua	LP18: Green Infrastructure Network	Policy encourages developers to have regard to the Green Infrastructure Network.
	WLDC Councillor Comments	 Broad agreement with this policy Green corridors should mention green footpaths and ensure extensions between settlements. Green infrastructure networks need promoting as well as protecting More footpaths and cycle ways are needed particularly between existing and new developments. Mention green wedges here.
	LP19: Biodiversity and Geodiversity	Policy setting out the approach to assessing the impacts of development proposals on biodiversity and geodiversity.
	WLDC Councillor Comments	 Broad agreement with this policy Biodiversity by Design paragraph should be a stronger statement and made a 'duty'
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		Mitigation paragraph should be stronger.
	LP20: The Historic	Policy with criteria to preserve or enhance historic
	Environment	assets.
	WLDC Councillor Comments	 Rely on the strength of English Heritage role and mention here.
		 Make statements stronger with regard to protection of historic environment.
	LP21: Design Principles	Policy requires high quality sustainable design and sets out criteria for assessing the design of proposals.
	WLDC Councillor Comments	 Quality buildings not bland. More renewable technologies incorporated from outset. Comments a-g on this policy are bland statements.
	LP22: Open Space, Sports and Recreation Facilities	Policy introducing the requirement for development proposals to provide open space. (Standards will be prepared to support this policy).
	WLDC Councillor Comments	 Encourage more access to green spaces particularly in rural areas as there is a presumption that access is easy, however in most smaller settlements access is very limited. Brownfield sites should be used first where possible. Should also consider necessary buildings such as changing facilities as well. On site or contribution to nearby site if there are
	LP23: Shop Fronts and	already facilities in the area. Policy setting out criteria for assessing the impact of
	Advertisements	shop fronts and advertisements.
	WLDC Councillor Comments	 Broad agreement with this policy. CCTV cameras need to blend in to the surroundings. Delete point 'f' and provide proper policing in town centres or leave to local planning committees.
tral nire	LP24: Threshold Test for locally supported growth in Villages	Policy sets out a capacity threshold (based on dwelling stock) of new development in villages before developers must demonstrate community support for their proposal.
Your Central Lincolnshire	WLDC Councillor Comments	Broad agreement with this policy however it needs explaining more clearly – plain English.
	LP25: Local Green Spaces	Policy setting out the approach to Local Green Spaces.
	WLDC Councillor Comments	 Sites need to be put forward. Any sites put forward will be subject to an allocation process. Allocation should be done by each district council in consultation with Parish and Town Councils.
Deliver ing Locally	LP26: Sustainable Urban Extensions	Policy setting out a number of important general criteria as well as specific criteria in relation to design and energy, infrastructure and employment, and landscape which urban extensions should meet, where relevant.

WLDC Councillor Comments	 Broad agreement with this policy. Employment uses and development is as important as housing growth. Provision of facilities and services should add to and complement those already in the community but should not detract from the town centres. Allow flexibility in case new sites come forward during the life of the Plan so that they can be investigated and developed if necessary.
LP27: A Growing Lincoln	Policy setting out the sustainable extensions and options for growth in and around Lincoln (exact locations to be added at the next stage).
WLDC Councillor Comments	 In Paragraph 7.3.2, make clearer that the facilities/amenities listed in the second half of the paragraph are located in WL and NK and serve the greater area. The locations and numbers of houses to be promoted in these SUEs will be important in gauging the level of growth in the villages surrounding Lincoln. It is important to promote growth on these largely brownfield sites that have greater links with existing infrastructure than increasing the development in Lincoln fringe villages.
LP28: Transport Priorities/Movement Strategy	Policy promoting schemes to improve transport in and around Lincoln.
WLDC Councillor Comments	 That transport schemes that are needed to promote growth in the other SUEs around Gainsborough and Sleaford are not missed out in favour of Lincoln.
LP29: Houses in Multiple Occupation including Student Housing	Policy setting out criteria for assessing proposals for houses in multiple occupation including student housing.
WLDC Councillor Comments	No comments on this policy.
LP30: Protecting Lincoln's setting and character	Policy setting out criteria for assessing the impact of proposals on Lincoln's setting and character.
WLDC Councillor Comments	 The setting and views of Lincoln from West Lindsey are an important part of the landscape and should be protected strongly. The character of the city is important to the communities surrounding it and should also be protected.
LP31: Lincoln's Economy	Policy promoting a series of economic features in Lincoln.
WLDC Councillor Comments	 It is recognised that Lincoln is a key economic driver in Central Lincolnshire; however other key employment and economic sites in Central Lincolnshire must not be underestimated for their importance to the local economy.
LP32: Supporting the Natural Evolution of Lincoln	Policy setting out the allocations (housing sites, employment sites, Green Wedges, etc.) relating to Lincoln.

WLDC Councillor Comments LP33: A Growing Gainsborough	 The protection of Green Wedges is very important to the communities surrounding Lincoln. Identification of new ones that further strengthen the individual settlements will be important. It is hoped that this will be addressed in the Lincoln Sub-regional Study. Policy setting out the sustainable extensions (exact locations to be added at the next stage)
WLDC Councillor Comments	 Broad agreement with this policy. Encourage the growth of Gainsborough Encourage growth on brownfield sites before greenfield sites.
LP34: Building a Better Gainsborough	Policy setting out a range of criteria to assist in regenerating Gainsborough.
WLDC Councillor Comments	 Broad agreement with this policy. Broader mix of housing types needed from executive homes to single units and affordable housing. Do we still need to address just the SW Ward of Gainsborough as the other wards have also shown increased deprivation in latest figures?
LP35: Supporting the Natural	Policy setting out the allocations relating to
Evolution of Gainsborough WLDC Councillor Comments	 Gainsborough. Broad agreement with this policy. Add a marker about a second road bridge across the River Trent beyond the lifetime of this Plan. Employment land allocation.
LP36: A Growing Sleaford	Policy setting out the sustainable extensions (exact locations to be added at the next stage).
WLDC Councillor Comments	No comments on this policy.
LP37: Building a Better Sleaford	Policy setting out a range of criteria to assist in regenerating Sleaford.
WLDC Councillor Comments	No comments on this policy.
LP38: Supporting the Natural Evolution of Sleaford	Policy setting out the allocations relating to Sleaford
WLDC Councillor Comments	No comments on this policy.
LP39: Development in Rural Areas	Policy specifically for development in rural areas covering matters such as conversion of buildings in the open countryside and mobile homes within the rural area.

WLDC Councillor Comments	 Broad agreement with this policy. There is the need to remain fairly flexible to allow some growth in the villages that want it in order to protect their sustainability/services and keep them alive. If villages want to grow, move them up the hierarchy. Ensuring that settlements aren't joined together as ribbon developments. Allow conversion of large properties in the countryside into flats. Allow the development of all encompassing 'retirement villages' which include all facilities and housing from non-supported to high support care homes on one site. (New Zealand model) Strengthen Part D: No support for mobile or other 'temporary' homes in the open countryside, however keep the exception for need during construction.
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