Appendix 1

Central Lincolnshire Local Plan
Regulation 18 Consultation June 2021

Form B: Consultation Response Form

From 30th June to 24th August 2021 we are consulting on the Draft version of the Central Lincolnshire Local Plan, plus the accompanying Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA). This is the second of three rounds of consultation on this new Plan, which can be viewed at:

www.central-lincs.org.uk

This form can be used for responding to the consultation, however we would prefer you to make comments online using the Online Consultation Portal found at the link above. Alternatively you can email this form to talkplanning@central-lincs.org.uk or post it to Central Lincolnshire Local Plan Team, c/o North Kesteven District Council, Kesteven Street, Sleaford, NG34 7EF.

All comments must be received by **11.59pm** on **24th August 2021**. Late comments **will not** be accepted.

Part A: Your Details

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contacted at subsequent stages of the Plan, please let us know using the contact details at the top of this page. **By submitting this form you are agreeing to these conditions.**

Part B: Your Comments

If you want to comment on several policies, paragraphs or other matters, please use a separate Part B for each representation. Please provide as much information as possible: for example, if you disagree with a policy please let us know why and tell us what alternative wording or approach you think we should use. If you need more space, please continue on a separate sheet.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	
Theme 1 Introduction, Context, Vision and Objectives	

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*
Theme 1 aligns with the 'People' and 'Place' themes identified in West Lindsey District Council's current Corporate Plan (2019-2023), namely the following areas of focus and corresponding objectives: • Health and Wellbeing • Vulnerable Groups and Communities • Education and Skills • Economy • Housing Growth In addition, theme 1 seeks to address many of the issues identified in West Lindsey's annual State of the District Report, such as social equality and community, employment, the local economy, health and wellbeing and the effects of climate change.	

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 2: Spatial Strategy

Policy S1 The Spatial Strategy and Settlement Hierarchy

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*
Welcome inclusion of Hawthorn Avenue ('Little Cherry') and Scampton (RAF) in medium villages.	

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Main Town and Market Towns – "growth will *primarily* be through…" needs to cross reference policy S3 and set out that unallocated sites will need to be compliant with policy S3.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 2: Spatial Strategy

Policy S3 Housing in Urban Areas

Support: *I support the above referenced document/ si policy / paragraph because:*	**Object:** *I object to the above referenced document/ sit policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Needs to be bolder and clear in saying that appropriate intensification, infill and brownfield regeneration will be supported.

First Homes Exceptions Sites – the Plan needs to specifically set out what Local Design Criteria under NPPF71(b) applies.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 2: Spatial Strategy

Policy S4 Housing Development in or Adjacent to Villages

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*
Support the opportunity to allocate in small and medium villages and the removal of growth percentages including the community support element of the policy. Value to the opportunity to better integrate Neighbourhood planning into the Development Plan to help shape communities from within.	

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Concern around the ongoing challenge of national policy not aligning or being 'rural proofed' for local priorities and needs. Challenge around the concept of sustainability and what this means in rural areas and supporting people to remain in communities they have grown up in.

Support the inclusion of the guidance note for Neighbourhood Plans Groups, as consider high value in Neighbourhood Plans, specifically drawing attention to potential sites for the smaller allocations / windfalls. Acknowledge this is a positive and democratic way for communities to shape their future, equally note that current Neighbourhood Plans securing high levels of community support through the referendums.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 2: Spatial Strategy

Policy S5 Development in the Countryside

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Should Part G set out our position on the introduction of more intensive agricultural practices?
Such as horticulture glass houses etc. specifically the criteria for landscape impacts and water sustainability?

Enquiries for these applications are starting to come in and as such it is considered important to have a policy framework to assess against, particularly as the Central Lincolnshire Area is predominately agricultural.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 3: Energy, Climate Change and Flooding

Generic Theme Commentary

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Consider that the Local Plan requires one overarching policy, up front to state that all new developments will require an energy statement that addresses:

- Energy Hierarchy (paragraph 3.2.3)
- Reducing Energy Consulmption (see policies S6/S7)
- Circular Economy (s9)
- Embodied Carbon (S10)
- Water Efficiency… (s11)
- Electric Vehicle Charging (S17)

It should also clearly distinguish between major developments and non-majors. There is a concern that small/medium developers, self-builders will find this insurmountable and delay the delivery of small/medium sites which form a significant part of our land supply.

The paragraph below (3.2.3) is a critical element of the policy – it needs to be firmly enshrined within policy(ies) and should be part of the Energy Statements submitted by developers.
i.e. they should clearly state how the hierarchy has been addressed in their scheme on a point by point basis to make it easier to assess and ultimately enforce, if necessary.

Energy Hierarchy
Overall, developers should follow the energy hierarchy as part of all design proposals, and
in the following order:
1. Orientation of buildings
2. Form (i.e. shape and design) of buildings
3. Fabric of buildings
4. Heat supply
5. Renewable energy generated

The more effort that is put into each step outlined above, the more reward can be
achieved, and the least amount needs to be achieved by steps 4 and 5. Put another way,
developers should not start their thinking at step 4 or 5; they will be the least effective and
most expensive options towards reducing carbon emissions.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 3: Energy, Climate Change and Flooding

Policy 6: Reducing Energy Consumption – Residential Development

Support: *I support the above referenced document/ site / policy / paragraph because:* Support technical and viability exclusions included to support development, particularly in lower value areas or in relation to important heritage assets.	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:

I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Ensure policies within this theme are not too specific to ensure that new technologies that come in can remain reflected and supported within the Local Plan.

Concerns around the practical implication of this policy and Policy S7, goes well beyond planning remit due to cross over with Building Control profession due to function, role and expertise. How could it be feasible to prevent sites being connected to the gas main? Is this a reasonable condition to impose?

Development Management officers bound to assess application against the wording of the policy and the policy read alone would be difficult to implement. Equally, terminology used within the policy is unclear. What does on-site mean? Does this mean during construction?

It potentially is an unreasonable to include obligations on the developer which homeowners then do not have to implement against any action plan that is produced, as detailed further down the policy.

Understand that this is a small first step but essentially national government need to provide focus and direction to ensure this approach is effective, implementable and resourced appropriately. The requirements in terms of assessment and understanding should not be under-estimated. Nor should the impact on housing delivery.

Template / pro-forma and guidance is an absolute must and should be available as part of the consultation on the Local Plan at Reg.19 due to the interdependency.

This policy should require the setting out of Energy Hierarchy at paragraph 3.2.3 as part of the application.

Will small-medium developers and self-builders be able to comprehend and address this?

Need to consider resource implications for monitoring every major residential performance over 5 years (will we be consistently chasing up monitoring reports… or being swamped with them?) Will we need to secure these through s106s/legal agreements? Potential to add lengthy delays to applications and layer more cost into the process.

Are we going to use a Local List to require Energy Statements at validation? Or will applications without them simply be in breach of policy S6, delaying the application whilst they seek to undertake one, or we have to refuse PP.

How will developers deal with instances where there is a clash or contradiction between planning permission in place and Building Regulations in force at the time? If a requirement is conditioned/secured through s106 but can't be safely implemented under Building Regulations, would the developer have to apply to vary the condition/s106 agreement to ensure the development conforms to permission given? At whose cost?

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 3: Energy, Climate Change and Flooding
Policy 7: Reducing Energy Consumption – non-Residential Development	
Support: *I support the above referenced document/ site / policy / paragraph because:* Support there may be some offsetting and other ways that can mitigate the energy usage – policy should not stifle innovation to mitigate or provide solutions.	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:

I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Ensure policies within this theme are not too specific to ensure that new technologies that come in can remain reflected and supported within the Local Plan.

Concerns around the practical implication of this policy and Policy S6, due to cross over with Building Control profession due to function, role and expertise. Equally non-residential build often more complex due to end use, concern understanding/assessments in this area could be specialised and cause delays in application determination process.

Development Management officers bound to assess application against the wording of the policy and the policy read alone would be difficult to implement. Equally, terminology used within the policy is unclear.

Understand that this is a small first step but essentially national government need to provide focus and direction to ensure this approach is effective.

Template / pro-forma and guidance is an absolute must and should be available as part of the consultation on the Local Plan at Reg.19 due to the interdependency.

This policy should require the setting out of Energy Hierarchy at paragraph 3.2.3 as part of the application.

Will small-medium developers and self-builders be able to comprehend and address this?

Need to consider resource implications for monitoring every major development performance over 5 years (will we be consistently chasing up monitoring reports… or being swamped with them?) Will we need to secure these through s106s?

How will the development of speculative employment units be dealt with under this policy, when the end-user and final fit out will be unknown? As discussed within the policy the variety of uses in a non-residential unit can be vast and ultimately the requirements of the building can be at odds with energy efficiency measures.

Are we going to use a Local List to require Energy Statements at validation? Or will applications without them simply be in breach of policy S7, delaying the application whilst they seek to undertake one, or we have to refuse PP.

How will developers deal with instances where there is a clash or contradiction between planning permission in place and Building Regulations in force at the time? If a requirement is conditioned/secured through s106 but can't be safely implemented under Building Regulations, would the developer have to apply to vary the condition/s106 agreement to ensure the development conforms to permission given? At whose cost?

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 3: Energy, Climate Change and Flooding

Policy: S8 Decentralised Energy Networks and Combined Heat and Power

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

How will the developer / local authority know if there is an "existing decentralised energy network" in the locality? Is there a requirement for an accessible database which captures this information?

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 3: Energy, Climate Change and Flooding

Policy: S9 Supporting a Circular Economy

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Far too vague and broad. What is a "Circular Economy"? What is being asked of the developer? How will this be assessed and considered as part of a planning application and the requirements secured?

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 3: Energy, Climate Change and Flooding

Policy: S11 Water Efficiency and Sustainable Water Management

Support: *I support the above referenced document/ site / policy / paragraph because:*	Object: *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Concerns that the restriction of water consumption, strays into the remit of Building Regulations and the implementation and monitoring of this would create a duplication of work and inefficiencies with the planning and Building Regulation process, particularly where Building Control inspections are carried out by Approved Inspectors who are under no obligation to undertake this additional check.

Is it expected that the Development Management Team or Enforcement intensively monitor all sites once commenced? Is this reasonable and can it be resourced?

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 3: Energy, Climate Change and Flooding

Policy: S12 Reducing Energy Consumption in Existing Buildings

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Consider the requirements of this policy could be bolder and suggest all change of use / (larger) extensions now require a "Reducing Energy Consumption" statement as part of the application.

Please can it be clarified whether the term 'buildings' include residential buildings? Would be worth specifying both residential and non-residential if that is what is meant.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 3: Energy, Climate Change and Flooding

Policy S13: Renewable Energy

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*
Accept it is necessary to test public opinion on the issues raised in this policy and acknowledging there has been a shift in public perception. Very important for residents to have a say over their local environments and communities, particularly in relation to this policy area. Support the policy element which ensures that community support is in place for any proposals. Support the opportunity for community involvement at the point of detailed application submission to assess and comment on a range of matters and impacts. Particularly keen to ensure policy supports local community energy generation and community benefits. Consider opportunities around smaller, localised schemes for community/local business benefit as these as far more appropriate for Central Lincolnshire that large scale renewable schemes. Support the specific criteria for assessing solar and small and medium turbines and the separation of large scale renewable schemes.	

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Ensure policies within this theme are not too specific to ensure that new technologies that come in can remain reflected and supported within the Local Plan.

Wider infrastructure availability is a limiting factor in some cases in relation to large scale renewable scheme and this isn't always possible to deliver through traditional methods due to expense and environmental risks.

Is only one small-medium turbine a bit restrictive? Compulsory pre-app consultation (art3 of DMPO2015) doesn't apply for up to 2 turbines where the hub height doesn't exceed 15m…. this may be acceptable in principle?

Small-medium turbines policy needs to address the "local community support" element of government policy to those where mandatory pre-app consultation is required (art 3 of DMPO) - https://www.gov.uk/guidance/renewable-and-low-carbon-energy#Do-local-people-have-the-final-say
Policy (or supporting text) should give a steer as to what level of consultation we'd expect.

*"For the avoidance of doubt, any medium to large scale wind turbine proposals outside of the identified Broad Area Suitable for Larger Scale Wind Energy Turbines should [**will**] be refused."*

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 3: Energy, Climate Change and Flooding

Policy S16: Carbon Sinks

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Where are the plans identifying peatland? Will they form part of the CLLP mapping layer?

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 3: Energy, Climate Change and Flooding

Policy S17: Electric Vehicle Charging

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Policy supported in principle. To be effective, and captured in overall planning application assessment, this requirement needs to be amalgamated into overarching energy statement required from developers.

Reference to whether these will be conditions and whether they will require ongoing management for any breaches. i.e ongoing provision of charging points?

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 3: Energy, Climate Change and Flooding

Policy S18: Fossil Fuel Exploration, Extraction, Production or Energy Generation

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Policy is very much welcomed to facilitate a step in the right direction, but considered not to be consistent with the NPPF (chapter 17) as currently drafted.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 3: Energy, Climate Change and Flooding

Policy S19: Resilient and Adaptable Design

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Considered that a lot of information being asked of the developer. All of these policy requirements need setting out in one specific "Energy / Climate Change" document to be produced by the developer, which can then be assessed against a clear check list of inclusions so that both the Developer and the development management team are clear on requirements.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 3: Energy, Climate Change and Flooding

Policy S20: Flood Risk and Water Resources

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*
Support this policy, however wonder if the policy could go further and require all surfacing to be permeable, rather than having to have areas identified as permeable and areas not. The removal of all hard surfacing would be a positive step.	

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

A general comment here is one in regards to whether these types of requirements will become conditions (i.e. is there going to be an ongoing expectation that these will feature on the development). See the extract below:

Water management
In addition to the wider flood and water related policy requirements (Policy S20), all residential development or other development comprising new buildings:
• with outside hard surfacing, must ensure such surfacing is permeable (unless there are technical and unavoidable reasons for not doing so in certain areas) thereby reducing energy demand on the water recycling network;
• with any flat-roofed area, should be a green roof (for biodiversity, flood risk and water network benefits), unless such roof space is being utilised for photovoltaic or thermal solar panels; and
• which is residential and which includes a garden area, must include a rain harvesting Water-butt(s) of minimum 100l capacity.

If ensuring these requirements are required to remain in place (in perpetuity), the ability to secure and enforce these to be considered within the plan.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 4 Housing

Policy S21 Affordable Housing

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*
The recognition of the diverse nature of the Central Lincolnshire and associated value zones is a positive step and it is hoped will facilitate a positive approach to development and reduce further the use of site specific viability appraisals. Affordable rented housing is detailed in the HNA as the only truly affordable housing tenure across Central Lincolnshire therefore the priority the policy gives to affordable rented as a tenure is supported.	

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

"Affordable housing should integrate seamlessly into the site layout amongst the private housing." Can often prove difficult in practice as Registered Providers often require the units grouped together on maintenance grounds.

Would suggest that the evidence required for tenure mix should be evidenced through a HNA and through local housing needs data which can provide a more specific picture of needs in the area.

The value zones are not clear on the map – should a scheme come in on the boarder, not sure it is clear from the map which value zone it is in as the map is blurs at certain points when zooming in.

Is there evidence to suggest that affordable housing is viable to deliver in specialist private schemes? It is considered but not evidenced that an Registered Providers would not take on that type of accommodation within a private setting so it may be unrealistic to expect it to be delivered on-site?

Rural affordable housing, the policy doesn't suggest a requirement for community support? But appears it is a requirement of the NPPF? Should that requirement be referenced if not explicitly detailed within the policy?

Not clear if it is appropriate to stipulate having affordable rented accommodation on first homes site if the developer wishes to put market housing on there. *Might need to check this requirement/wording.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 4 Housing

Policy S22 Meeting Accommodation Needs

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Does the sentence below require this as part of the application, or not? "viewed favourably" policies are not easy to interpret or indeed implement as the threshold is not defined, for example; if a planning application is fundamentally poor – is it suddenly acceptable if they provide a "viewed favourably" criteria?

"Proposals which deliver housing at the higher access standards of Part M Building Regulations (Access to and use of buildings) to M4(2) of the Building Regulations or M4(3) standard will be viewed favourably."

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme: 4 Housing

Policy: NS23: Custom and Self-build Housing

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*
Support acknowledgement of opportunity for Self Build, particularly on a small scale within communities. Support self-build allocations being led by Neighbourhood Plans and the community. Support the need for plot passports and the defined requirement on large sites, to enable delivery of self-build.	

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Do self-builds still need to meet policy S6? This should be made clear either way.

Is Part 3 a little hidden away? Would a major house-builder see this within our policies? Does it need cross-referencing from a broader residential development policy?

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 4: Housing

| **Policy S25 – Caravan pitches and park homes** ||

Support: I support the above referenced document/ site / policy / paragraph because:	**Object:** I object to the above referenced document/ site / policy / paragraph because:

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Are we missing an opportunity to request contributions on these types of developments?

If the land is allocated or suitable for permanent/traditional dwellings, then surely there needs to be a requirement for contributions, specifically affordable housing? It is highly unlikely that a Registered Provider would take on a non-traditional build property and as such should the policy require a commuted sum commensurate with the value of the build proposed in the application?

The policy approach to this type of development need to be made more clear especially as this type of application is becoming more frequent.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 5: Employment

Policy S28: Strategic Employment Sites (SES)

Support: I support the above referenced document/ site / policy / paragraph because:	**Object:** I object to the above referenced document/ site / policy / paragraph because:

General Comments:

I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Hemswell Cliff Business Park Extension, status update: Both Local Development Order and masterplan in place. The site is featured in Hemswell Cliff Neighbourhood Plan which is at draft regulation 14 consultation stage.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme: 5 Employment

Policy: S32 Non-designated Employment Proposals within Identified Settlements

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:

I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Opportunity to include reference and a clear position on whether live/work type employment uses will be suppo
especially given the growing trend of working from home.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme: 5 Employment

Policy: S33 Non-designated Employment Proposals in the Countryside

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

The paragraph below implies that a new build can be acceptable, but not reinstating a derelict building, (g) should also require the robust business plan?

Opportunity to include reference and a position on whether live/work type employment uses will be supported, especially given the growing trend of working from home.

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> f) If it would involve the construction of a new building in the countryside, the development
> is supported by a robust business plan that demonstrates;
> i. the demand for the development; and
> ii. that the facilities to be provided would constitute a viable business proposition on
> a long-term basis; and
> g) In the case of a conversion, the building is not in such a state of dereliction or disrepair
> that a significant reconstruction would be required.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 6: Retail City and Town Centres, and District, Local and Village Centres

| **Policy S34 Network and Hierarchy of Centres** ||

Support: *I support the above referenced document/ site / policy / paragraph because:* Support for retail hierarchy and recognition of Local Centres. Very important to protect wherever possible the smaller retail centres / larger village retail centres. Would be keen to see as much protection as possible for these vital facilities, particularly in light of changes to the GPDO coming in Aug 2021.	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Where does Dunholme fit in terms of a village centre?

A current problem with LP5… it doesn't properly recognise other tier 2 town centres – i.e. Market Rasen or Caistor, where a robust impact assessment is probably of greater need than anywhere else!
It should be revised to say…

> *In addition, a robust assessment of impact on nearby centres will be required for any edge-of centre or out-of-centre proposal for retail and leisure use that is located:*
> *a) within 1km of the Lincoln, Gainsborough or Sleaford primary shopping area and is greater than 2,500m²; or*
> *b) Within 500m of a Town Centre and is greater than 500m²*
> *b) within 500m of the boundary of a District Centre and is greater than 300m² gross;*
> *c) within 500m of the boundary of a Local Centre and is greater than 200m² gross; or*
> *d) in any other location not covered by a-c above and is greater than 500m².*

No definition of comparison shopping. Not clear where a definition would come from. In order to use this in a policy, it would need to be very clear and a precise referenced definition given, in order to determine applications against this policy. It appears that comparison retail does not include convenience retail i.e. food

shops. Therefore where does convenience retail sit in the policy?

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 6: Retail City and Town Centres, and District, Local and Village Centres

Policy S36 Gainsborough Town Centre and Primary Shopping Area

Support: *I support the above referenced document/ site / policy / paragraph because:*	Object: *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Not all town centre uses fall under Use Class E, we would support any 'town centre uses' within the town centre. Wording below could perhaps be tweaked/expanded to reflect that?

b) would not result in the over concentration of non-retail uses
"Over concentration" needs defining / illustrating – how many changes can take place until we are at "over-concentration"

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 6: Retail City and Town Centres, and District, Local and Village Centres

Policy S38 Market Rasen and Caistor Town Centres

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*
Specific policy for Caistor and Market Rasen town centres is most welcome!	

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 7: Tourism and Visitor Economy

Policy S41 Sustainable Urban Tourism

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*
Specific policy for sustainable urban tourism is most welcome and considered against S42 Sustainable Rural Tourism!	

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 7: Tourism and Visitor Economy

Policy S42 Sustainable Rural Tourism

Support: *I support the above referenced document/ site / policy / paragraph because:* Specific policy for sustainable rural tourism is most welcome and considered against S42 Sustainable Urban Tourism!	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Supporting text:
Para: 7.2.2 (page 89)
Please add: *the Wolds are a destination for walkers, cyclists and for outdoor pursuits*

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 8: Transport & Infrastructure

Policy S44 Strategic Infrastructure Requirements

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*
Co-location of health facilities is fully supported giving the opportunity for early intervention and new service models opening up opportunities for a system wide approach. **Health:** As stated engagement with the NHS is required to implement this policy effectively. **Transport:** Understand that the emphasis on areas of development being closer to amenities, reducing travel. However, also need to ensure that developments have the space required (driveways) for low and ultra-low emission vehicle refuelling infrastructure. **Walking & Cycling:** Agree that the infrastructure needs to be considered from the outset and integral to the design and development of all schemes.	

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Walking & Cycling: All partners need to work collaboratively on behaviour change otherwise the infrastructure will not be fit for purpose and therefor under-utilised.

Community Facilities: Unfortunately most community facilities are underutilised. There is no easy answer to understanding usage of these facilities and to enable a case to be built to support existing community facilities which can keep pace with growth, whilst continuing to provide a quality offer.

Open Spaces: Support the policy, however, there needs to be increased onus on the management and safeguarding of these spaces to ensure they are properly maintained and provisioned into the future.

Education: Continued capacity levels within educational setting remain an issue in certain areas of the District/Central Lincolnshire area, which only exacerbates inequalities across areas.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 8 – Transport and Infrastructure

Policy S47 Walking and Cycling Infrastructure

Support: I support the above referenced document/ site / policy / paragraph because: The policy supports accelerated transition towards active travel impacting on improved air quality as well as health and wellbeing outcomes. Demonstrates the link between the environment and health and offers the opportunity to deliver on both simultaneously, which is welcome.	**Object:** I object to the above referenced document/ site / policy / paragraph because:

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

In the policy, it mentions protecting existing infrastructure for walking and cycling, this could go a little further in terms of proposals not being supported at all if existing walking and cycling infrastructure is not protected, specifically if a proposal do away with a cycle lane or footpath, it couldn't go ahead, unless it is replaced/relocated to allow continued usage.

On site provision of open space should be of such that it can make a meaningful contribution to both the environment and health and wellbeing. Could emphasis be placed on opportunities to 'pool' contributions to provide enhanced provision off site and recognise the challenges of ongoing management of these areas/facilities?

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 8: Transport & Infrastructure

Policy S49 Community Facilities

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Should also cross reference with policy S39 – regarding loss of "local community use" shops in villages.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 8: Transport & Infrastructure

Policy S50 Creation of New Open Space, Sports and Leisure Facilities

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

This policy indicates a clear preference for on-site open space creation for new developments with 10 plus dwellings. There are many examples of poor quality open space creation within new site development purely to meet the planning policy requirements. They regular lack wider community benefit and do not have longer term sustainability factored. Preference should equally split between either new or existing open spaces within suitable proximity of a new development. Existing open spaces will see increased usage from new developments in its proximity.

Please can Mercer Wood in Gainsborough be identified as an important green space as part of the review as it wasn't included last time.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 8: Transport & Infrastructure

Policy S51 Universities and Colleges

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

This policy may benefit from referencing other college sites within the Central Lincs area such as Lincoln College campus in Gainsborough.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 9: Design and Amenity

Policy S52 Design and Amenity

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*
Good quality mature trees are proven in various studies/papers to improve the desirability of a property and to increase property prices. Retaining and designing in appropriate space for existing trees, with arboriculture impact considerations regarding proximity, orientation, positioning in relation to windows, usable garden space etc. should help raise the quality of new developments.	

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

How would the criteria below be assessed? Is there a defined standard/good practice guide which could be referred to? If so, this should be detailed within the policy.

"c) Ensure areas are accessible, safe and legible for all including people with physical accessibility difficulties and people with conditions such as dementia or sight impairment for example;"

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 9 Design and Amenity

Policy S53 Health and Wellbeing

Support: I support the above referenced document/ site / policy / paragraph because:	**Object:** I object to the above referenced document/ site / policy / paragraph because:

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Support the principle of the policy however it could be considered that it falls short of what could be achieved through the planning system (see below).

The expectation of the policy is that development proposals promote, support and enhance physical and mental health and wellbeing – thus contributing to reducing health inequalities. Health inequalities are ultimately about the differences in the status of people's health however the opportunities that they have to lead healthy lives contributes to their health status. The planning system has an important role to play in influencing the determinants of health which should be maximised

Developer contributions are provided in line with the SPD towards new or enhanced health facilities. In order to really tackle health inequalities is there an opportunity to develop a more system wide approach and proactively engage with health partners to encourage innovation and a shift away from asset based responses.

This needs further development but as an example are there opportunities for developer contributions from health partners to contribute towards physical activity within a community rather than rooms in a GP surgery.

Relationships with those responding to planning consultations should be further developed to encourage cross departmental consideration of what could be achieved through the planning system.

Does the policy encourage innovation and creativity to enable health and wellbeing outcomes?

We should also seek to understand the outcomes from Health Impact Assessments and influence where possible to ensure these are not just a box ticking exercise and that outputs are addressed and acted upon.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 11: Natural Environment

Policy S58: Green Infrastructure Network	
Support: *I support the above referenced document/ site / policy / paragraph because:* Agree with the policy, but the resource and capacity barriers facing Local Authorities makes the implementation of the policy very challenging.	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:

I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Policy S62, S63, S64 & S65: Agree entirely regarding the proposals and policies, however, similar to the above, there is a distinct lack of capacity within large rural authorities for green space management.

Very few developers include appropriate consideration for existing natural features such as hedges, trees, watercourses. Even when developers have a tree report carried out, recommendations are rarely fully implemented and layout designs often allow too little space for trees to thrive and be retained, leading to nuisance to new residents and the prospect of being removed.

It is important to consider the wider context of the development site in relation to how it fits in with and connects with its surrounding landscape or townscape. However, quite often only the confines of the site boundary are considered during the design process and often developers don't even want to retain good quality boundary hedges or proposed new hedges if it means they can have houses closer to a road and squeeze more properties in. This has happened on a number of developments where frontage hedgerows are allowed to be removed against the advice of professionals and the Lincs Wildlife Trust). Hedgerows are 'priority habitats' in the Lincs & UK BAPS & NERC Act, important as wildlife corridors (part of the green infrastructure network). This policy should work hand in hand with the Environment Bill 2020 (when it eventually receives Royal Assent).

Q – what if the 'greenery' ends at a road, or is not physically connected to other 'greenery', would a developer be able to argue that their hedgerow or groups of trees is not an integral part of a green infrastructure network?

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 11: Natural Environment

Policy S59: Protecting Biodiversity and Geodiversity

Support: *I support the above referenced document/ site / policy / paragraph because:* It emphasises the importance of these sites and requires developers to give adequate care and consideration to such sites and the flora and fauna within them or that visit them, for the benefit of all. The hierarchy and staged approach to assessment detailed within this policy makes perfect sense and is very transparent.	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Part One: Designated Sites, point 3:

This para says *'planning permission will be refused for development resulting in loss, deterioration or fragmentation of irreplaceable habitats……. unless there are wholly exceptional reasons and a suitable compensation strategy will be delivered.'*

Is this misleading as the whole point of an irreplaceable habitat is that it cannot be replaced… it is irreplaceable! Unclear what a "wholly exceptional reason" could be, as that could differ from one person to another. Not clear on how a "compensation strategy" could be put in place and delivered, as it would be impossible to come anywhere close to replacing or compensating for the loss of such a habitat. Even if the same species of trees, plants, grasses etc.. can be found a new location to be planted nearby, it would take decades, probably centuries, to sufficiently establish, mature, and attract the same level of biodiversity as what was lost, if ever! If a habitat is so important and special that it is irreplaceable then under no circumstances should planning permission ever be granted that would destroy, deteriorate or fragment such a site?

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 11: Natural Environment

Policy S60: Biodiversity Opportunity and Delivering Measurable Net Gains

Support: *I support the above referenced document/ site / policy / paragraph because:* Using national standards for consistency is positive and ensures effective implementation and transparency.	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 11: Natural Environment

Policy S61: Area of Outstanding Natural Beauty and Areas of Great Landscape Value

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*
Agree with the policy position however in some cases the interpretation and implementation within Areas of Outstanding Natural Beauty can be challenging and create barriers to innovation and development where there shouldn't be.	

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Agree with the policy position however in some cases the interpretation and implementation within Areas of Outstanding Natural Beauty can be challenging and create barriers to innovation and development where a pragmatic approach should be taken.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 11: Natural Environment

Policy S62: Green Wedges

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*
Fully support this policy, however have some concerns in relation to the appropriate management of these spaces, particularly resources and capacity of Local Authorities/Parishes to support where necessary.	

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 11: Natural Environment

Policy S63: Local Green Spaces

Support: *I support the above referenced document/ site / policy / paragraph because:* Fully support this policy, however have some concerns in relation to the appropriate management of these spaces, particularly resources and capacity of Local Authorities/Parishes to support where necessary.	Object: *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 11: Natural Environment

Policy S63: Local Green Spaces

Support: *I support the above referenced document/ site / policy / paragraph because:* Fully support this policy, however have some concerns in relation to the appropriate management of these spaces, particularly resources and capacity of Local Authorities/Parishes to support where necessary.	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 11: Natural Environment

Policy S64: Important Open Space

Support: *I support the above referenced document/ site / policy / paragraph because:* Fully support this policy, however have some concerns in relation to the appropriate management of these spaces, particularly resources and capacity of Local Authorities/Parishes to support where necessary.	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 11: Natural Environment

Policy S65: Trees, Woodland and Hedgerows

Support: *I support the above referenced document/ site / policy / paragraph because:*	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*
Fully support this policy, however have some concerns in relation to the appropriate management of these spaces, particularly resources and capacity of Local Authorities/Parishes to support where necessary.	

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Full consideration should be given to section 197 duty to consider the protection and planting of trees, and unless it's got important biodiversity/habitat, in the AONB/AGLV, a special site (SSSI, LWS etc…), green wedge, open spaces, or a TPO, they place little importance on the average tree or hedge around a field or in someone's garden. This policy should reinforce that appropriate tree survey data should be provided so any tree or hedge should still be given appropriate consideration, protected and be retained where appropriate without it having to have some special designation on it. We regularly get applicants/agent submitting plans and documents that show no trace of any trees being present, even though there are trees on or adjacent to the site.

The policy says hedgerows are expected to be retained where appropriate, and development involving the loss of a hedgerow protected under The Hedgerows Regulations 1997 under certain circumstances. However under The Hedgerows Regulations all countryside hedgerows over 30 years old are protected, and the processes and criteria in the legislation determine which hedgerows are "important" for retention.

The policy does not mention a need for a hedgerow survey to be submitted with an application that proposes hedgerow removal. Unless a hedgerow survey is supplied, it is unknown whether or not a specific hedgerow is classed as "important" under The Hedgerows Regulations. There is no duty of the Local Planning Authority to survey hedgerows within a development site to understand if the hedgerow meets the criteria to be "important", therefore the data should be supplied as part of the application process.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 15: Ministry of Defence Establishments

Policy S74 RAF Scampton	

Support: *I support the above referenced document/ site / policy / paragraph because:* Support the approach, level of detail and vision set out within the policy.	**Object:** *I object to the above referenced document/ site / policy / paragraph because:*

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme:

Policy S79 Housing Sites in Large Villages

Support: I support the above referenced document/ site / policy / paragraph because:	**Object:** I object to the above referenced document/ site / policy / paragraph because:

General Comments:

I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

The indicative number of houses detailed for site WL/CW/001 is incorrect. As presented this provides a density of around 7dpha. Consider, based on published methodology that the indicative number should be more in the region of 116 dwellings, in line with the HELAA,

It would help site identification if settlement name included in all site addresses.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Theme 13: Site Allocations

Policy S80: Housing Sites in Medium Villages

Support: I support the above referenced document/ site / policy / paragraph because:	**Object:** I object to the above referenced document/ site / policy / paragraph because:

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

It would help site identification if settlement name included in all site addresses.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	

Policy - Appendix 1: Housing Requirement for Neighbourhood Plans

Support: I support the above referenced document/ site / policy / paragraph because:	**Object:** I object to the above referenced document/ site / policy / paragraph because:

General Comments:

I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

It would be helpful if this Appendix had a policy link.

Which document, site, policy, paragraph or other matter are you commenting on? e.g. Policy 1	Additional Appendix – planning application checklist / Local List
Policy	

Support: I support the above referenced document/ site / policy / paragraph because:	Object: I object to the above referenced document/ site / policy / paragraph because:

General Comments:
I neither support nor object to the above referenced site / policy / paragraph but I make the following observations:

The Local Plan now requires significantly more information to make a planning application than ever before – and these requirements are spread throughout the Local Plan and policies in various places.
There needs to be a clear checklist for developers – suggest as an appendix?

i.e.

Major Residential Developments
- o Energy Statement (see policies S6, S8, S9, S11 etc.)
- o Flood Risk Assessment and Drainage Strategy (policy S20)
- o Affordable Housing details (S21)
- o Housing Mix (S22)
- o Strategic Infrastructure statement (S44)
- o Car parking provision (S17, S48)
- o Etc….

This should also become a Local List across the Central Lincolnshire Authorities to ensure consistency of approach.

☐ **Please tick if you are submitting more information relating to the above representation**

Please submit your comments to: talkplanning@central-lincs.org.uk or Central Lincolnshire Local Plan Team, c/o North Kesteven District Council, Kesteven Street, Sleaford NG34 7EF.
If you need assistance, call 01529 414155 or email talkplanning@central-lincs.org.uk.

Thank you for taking the time to respond