

MAIN MODIFICATION CONSULTATION RESPONSES

MM Ref No 1	Name or Organisation of Respondent	Response	Councils Response
Page 5, Key Diagram	North Somercotes Parish Council	<p>ED054 – CS3 – New addition to plan (page 6)</p> <p>Unfortunately, the Revised Policies Map Two is still unclear:</p> <ol style="list-style-type: none"> 1. It does not show the coastal East Lindsey area clearly. Where is the demarcation between the coastal east Lindsey and inland East Lindsey? The designated 'coastal' area needs to be properly defined so people can see where it starts and ends and shown precisely on the map. There is reference to it being shown correct on the policies map but there is no area marked out as Coastal and Inland on the maps – just a superimposed title of Coastal East Lindsey. Grainthorpe is shown above Covenham Reservoir instead of over the actual village which could be considered misleading, and similarly the name of North Somercotes is shown in the Marsh near the coast not over the village. 2. If the coastal flood hazard zones denote the Coastal zone, why are some settlements then still listed in the Inland tables and treated different when they are clearly within those stated Flood Risk Zones as identified by the Inspectors? 	<p>This matter was discussed at the Examination Hearings. The definition of the Coastal Zone is set out in Policy SP3 and the Council have suggested a modification to make it clearer under Main Modification MM4. Unfortunately the Coastal Zone does not run in a clear line along the Coast and it therefore also requires words as well as a map to define it.</p> <p>The matter of which settlements are in the Coastal Zone and which are not was also discussed at the Examination Hearings and the Council is satisfied with the list as it now stands for the reasons discussed, Marshchapel, Hogsthorpe, and Grainthorpe were discussed and their sites reviewed. Huttoft was not a settlement raised by the respondent previously at the hearings though they did attend and could have commented at that time.</p>

MM Ref No 4	Name or Organisation of Respondent	Response	Councils Response
Page 29, paragraph 6	Blue Anchor Leisure Ltd, represented by Robert Doughty Consultants Ltd	<p>We welcome the commitment to submit a revised plan by April 2022.</p> <p>In addition to the policies to constrain housing growth in the coastal area, the Council has also created a working group to explore the needs of the tourism industry to ensure the policy approach taken by the Council is helping meet the aspirations of the GLLEP economic strategy.</p> <p>A commitment to an early review of the Local Plan will provide an opportunity to review and, if necessary, update the policies that affect the tourism industry.</p>	No comment
Page 24	Broadgate Builders (Spalding) Ltd represented by Alister Hume, Hume Planning Consultancy Ltd	<p>Raises the Objectively Assessed Need to 9620 homes as a starting point for delivery 2011 to 2031 which is supported. The housing target for the plan period is then netted down to 7819 dwellings for the plan period. This target is stated to be a minimum figure (Amended Table A page 8), not a ceiling and this gives some flexibility for windfall opportunities and is supported by Broadgate Homes.</p>	No comment
Page 26	Broadgate Builders (Spalding) Ltd represented by Alister Hume, Hume Planning Consultancy Ltd	<p>It is agreed that MM 4 26-SP3 should meet the majority of the housing requirement for the district spatially to the inland area (some 6562 homes) away from the coastal zone.</p>	No comment

Page 27 - 28	Broadgate Builders (Spalding) Ltd represented by Alister Hume, Hume Planning Consultancy Ltd	Proposed MM 4 27&28-SP3 states that dwelling distribution is to be proportionally distributed across the inland area of the District in the towns and large villages. This spatial strategy and hierarchy led distribution for housing is supported by Broadgate Homes.	No comment
Page 29	Broadgate Builders (Spalding) Ltd represented by Alister Hume, Hume Planning Consultancy Ltd	Proposed MM 4 29-SP3 the coastal/inland split is proposed to be reviewed alongside the rate of delivery of housing by 2022. Broadgate support this additional flexibility should the anticipated planned numbers in these settlements not be delivered. The new Policy MM28 (pages 53, 54 and 55 of proposed mods) is also supported by Broadgate. Proposed MM 4 29-SP3 reviews the previous housing phasing and the revised projections of 565 homes in the first year and 558 per annum each subsequent year over the plan period (Page 16) is supported by Broadgate.	No comment
Page 29 - 30	Broadgate Builders (Spalding) Ltd represented by Alister Hume, Hume Planning Consultancy Ltd	Proposed MM 4 29-30-SP3 sets out the clear criteria (informed by the Sustainability Appraisal base) for the consideration of windfall development which Broadgate support.	No comment
Page 35, clause 1	Mr and Mrs Carter North Somercotes	No assessment of our housing and infrastructure needs has been done so the proposed plan is not compliant with the national planning policy framework. Our housing needs should be considered and then look at the social and environmental and economic issues. Why has Grainthorpe been allowed housing in a flood zone and why aren't Grainthorpe and Marshchapel in the coastal zone in Clause 1 when they are in the flood risk map area?	This matter was raised during the Examination Hearings and modifications proposed based on discussions at those Hearings.

Page 28, paragraph 30	Lincs Design Consultancy	Is there any information to show how the Council will monitor the supply of windfall housing?	Windfall housing is to be monitored via the Authority Monitoring Report
Page 29, clause 1	Lincs Design Consultancy	<p>There are areas along the coast which are shown within Flood Zones 2 and 3 but at the same time are white on the Hazard Map. Are these areas not considered to be in the Coastal Zone and as such suitable for dwellings; subject to meeting the other policies in the Plan?</p> <p>The amendments are contradictory. Is the Coastal Zone defined by the Hazard Maps or is it the list of settlements. Also there are settlements within the Hazard Mapping area which are not on the list: for example Friskney. Does that mean new dwellings are acceptable as Friskney is not on the list or is it still effectively banned due to being in the Hazard Zone</p>	Please see response below. The list of settlements in the Coastal Zone was agreed with the EA. Friskney is not in the Coastal Zone but development will still have to demonstrate how it passes the sequential test.
Page 21, paragraph 3	Lincs Design Consultancy	There are areas along the coast which are shown within Flood Zones 2 and 3 but at the same time are white on the Hazard Map. Are these areas not considered to be in the Coastal Zone and as such suitable for dwellings; subject to meeting the other policies in the Plan?	Please see response below.
Page 29, Clause 1	Andrew Clover – Lincs Design Consultancy for Brian Adam – Irby in the Marsh	The amendment is contradictory. Is the Coastal Zone defined by the Hazard Maps or the Settlement List? Out client has a site on the edge of Tetney, part with the low risk area on the hazard maps, part flood zones 1, 2 and 3. As Tetney is not on the list of settlements is it acceptable to develop the site or is it banned because of the hazard maps. Also there is not an explanation as to how the policies involving flood risk relate to the sequential and exception test.	<p>The Council considers that the respondent is correct is not as clear as it could be concerning what is covered by the Coastal Zone. In order to rectify this the Council is suggesting a modification (in purple) at paragraph 2 of the policy SP3 and clause 1 so that the paragraph would read;</p> <p>2. The District faces a significant issue with regard to housing. 38% of East Lindsey, including the important towns of</p>

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~~Mablethorpe and Skegness which are in an area of high coastal flood risk. Strategic housing development here would be out of conformity with national planning policy, because housing is classed as vulnerable development, and should be avoided by directing it away from the areas of highest risk. 38% of East Lindsey is in an area of high coastal flood risk. This area is covered by the Environment Agency's Coastal Flood Hazard Map and is called the Coastal Zone. The map is shown on the policy map on page 6 and on page 90 of the plan and the zone covers the red (danger for all), orange (danger for most), yellow (danger for some) and green (low hazard – caution) this includes the total built up area and edge of the towns, large, medium and small villages listed in clause 1 of the policy (including the white zones shown on the Coastal Flood Hazard Maps).~~ Therefore it is not realistic to promote an option of large-scale housing growth in this area. However, to meet our objectives of having a network of thriving, safer and healthy communities, and to try and address the causes and effects of climate change, we believe that we must deal with this issue head on.

In clause 1, for clarity the Council would suggest the following;

- 1. The overall District wide housing target requirement is ~~7768~~ 7819**

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homes for the ~~plan~~ period 2017 - 2031.

The ~~target~~ requirement will be.

- ~~On the coast~~ In the Coastal Zone the area which is covered by the Environment Agency's Coastal Flood Hazard Map. The map is shown on polices map 2 and on page 90 of the plan, the zone covers the red (danger for all), orange (danger for most), yellow (danger for some) and green (low hazard – caution) and includes the total build up area and edge of the towns, large, medium and small settlements listed below (including the white zones shown on the Coastal Flood Hazard Maps)., approximately ~~1308~~ 1257 homes ~~which covers the area of the Coastal Flood Hazard maps~~ these are existing commitments. Housing on the coast will be constrained to these existing commitments with the exceptions set out in Strategic Policy SP18 (SP18) Coastal East Lindsey, SP8 – Rural Exceptions and SP9 – Single Plot Exceptions

			<p><u><i>The following settlements are in the Coastal Zone; Addlethorpe, Anderby, Chapel St. Leonards, Croft, Ingoldmells, Mablethorpe, New Leake, North Cotes, North Somercotes, Saltfleetby All Saints, Saltfleetby St. Clements, Saltfleetby St. Peter, Skegness, Skidbrooke + Saltfleet Haven, South Somercotes, Sutton On Sea, Theddlethorpe All Saints, Theddlethorpe St. Helen, Trusthorpe</i></u></p> <p>As it is not clear where the respondent's site is, the Council cannot comment further with this regard.</p>
Page 30, Clause 5	Lincs Design Consultancy	Is it necessary to require a footpath? And is this a roadside path or public footpath? It could be that the footpath may be provided as part of a development and this in turn could improve accessibility for existing dwellings. A suggestion is to require either an existing footpath or a feasible route for a footpath link/extension to an existing pedestrian route.	The Council believes that this is a very important consideration and that development should demonstrate how it is connected to the settlement – otherwise development is isolated and occupiers are more likely to use their vehicle to access services.
Amended Table A	A Elliott – Toynton St Peter	The figure of 24 homes has been crossed out in the amended table A for housing target figures under windfall analysis for possible brownfield redevelopment in small and medium villages. These brownfield sites should be re-instated for housing redevelopment. The council during the consultation stated that small and medium villages have lots of brownfield sites but are too numerous to list, the Government Housing White paper 2017 and NPPF state to develop brownfield sites for housing before greenfield the council put forward a	The legislation for the brownfield land register does not state that the council must put sites on in medium and small villages. The Council does not know if those sites conform to policy SP4 because there are parts of the policy that can only really be demonstrated through the submission of a planning application. The target figure for medium and small villages should not be reinstated because

		list as evidence of small and medium villages that had possible brownfield sites that may or may not come forward for redevelopment, these conform to the policy SP4. In fact SP4 paragraph 1 actually states the reason for the brownfield policy SP4 is the amount of brownfield sites in small and medium villages that are too numerous to put on the brownfield register and take up a lot of resource.	these sites are windfall and therefore not a predicated supply of housing.
Page 28 Paragraph 19 - Trajectory	Lincolnshire County Council	The predicted delivery of 565 is inconsistent with the Housing Trajectory 2011 – 2031 bar chart which indicates 400 (yellow bar). The substantial spike in forecast annual delivery between 2018/2019 and 2023/2024 needs to be explained in the text in order to provide a better understanding of a confidence in future provision.	The bar chart needs amending to show the forecast in line with the trajectory set out in paragraph 19.
Page 23, paragraph 12	Mr Jack Mowbray Estate, David Sims, Gin Property Ltd, and Robert Gant represented by Robert Doughty Consultants Ltd	We support the changes that confirm that a minimum of 6562 new homes will need to be provided in the inland area. This provides clarity regarding the growth requirements of the Plan area.	No comment
Page 24, Paragraph 15	Mr Jack Mowbray Estate, David Sims, Gin Property Ltd and Robert Gant represented by Robert Doughty Consultants Ltd	We support the change of wording to clarify the Plan's approach of distributing growth across a range of settlements to support the existing settlement hierarchy and the distribution of services. This approach meets the core planning principles set out in the National Planning Policy Framework and will deliver the homes, businesses and industrial units, infrastructure and thriving local places that the country needs. Concentration of growth would lead to the decline of many currently thriving settlements across East Lindsey.	No comment
Page 26, paragraph 32	Mr Jack Mowbray, David Sims and Robert Gant,	We support the new emphasis on the benefit of windfall development in supporting local communities and to meet the Local Plan Growth targets. We note	No comment

	represented by Robert Doughty Consultants Ltd	the Plan will no longer include a figure for the expected contribution from windfall and that the Council is reviewing its monitoring procedures in order to quantify the past and expected future contribution from this form of supply. It is important to confirm the Council's continued support to windfall development.	
Page 30, Clause 5	Mr Jack Mowbray, David Sims and Robert Gant, represented by Robert Doughty Consultants Ltd	Support the introduction of the definition of "appropriate locations for new growth". This provides useful clarity in the assessment of potential windfall sites.	No comment
Page 29 Clause 1 page 23 paragraph 2	North Somercotes Parish Council	<p>1. Marshchapel, Hogsthorpe, Huttoft, Grainthorpe and Tetney appear to have been excluded from the list when they are clearly in the described areas of Flood Risk on the coast? Is this so that housing could later come forward in these settlements and be permitted, perhaps as 'windfall' without going through the planning process? This is clearly unjustified given the stance towards North Somercotes, which has not even been assessed for housing need which is 155 against extant permissions of 50.</p> <p>2. Similarly, why are Marshchapel, Hogsthorpe, Huttoft, Tetney and Grainthorpe still showing in the 'Inland' housing numbers tables?</p> <p>3. The proposed modifications do not appear to accurately reflect the Inspector's comments.</p>	<p>The Council is unsure why Huttoft is now under discussion by the respondent when it was not raised as an issue during the Examination Hearing which the respondent attended.</p> <p>The Council set out at ED022 and ED055 how it determined which settlements should be in the Coastal Zone and which sites should and should not be removed from those settlements. The proposed modifications do accurately reflect what was discussed at the Examination Hearings and the Council has complied with the Inspectors directions regarding this matter. North Somercotes is clearly within the Coastal Zone and justification has been provided for placing Marshchapel, Hogsthorpe and Grainthorpe outside the zone, the Council's position on this remains the same. These three settlements fall inland in this Plan and therefore they do still need to appear in the table of</p>

			<p>settlements and do not need to appear in the list of settlements covered by the Coastal Zone. As inland settlements development will need to comply with the sequential and exception test as set out by National Policy.</p> <p>No sites can come forward in any settlement without going through the planning process because they will require planning permission.</p>
Page 22, paragraph 8	St Andrews Healthcare, represented by Sam Lake of Turley	<p>St Andrew's Healthcare welcomes the clarification on how the past undersupply of housing between 2011 and 2016/17 will be dealt with and the subsequent adjustment to the housing requirements from 2017 to 2031.</p> <p>The proposed main modification is consistent with paragraph 47 of the National Planning Policy Framework ("NPPF") which sets out that to boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area.</p> <p>The proposed main modification will ensure the Core Strategy is positively prepared based on a strategy which seeks to meet objectively assessed development.</p>	No comment
Page 25, paragraph 20	St Andrews Healthcare, represented by Sam Lake of Turley	<p>St Andrew's Healthcare support the proposed main modifications to Tables A and B to take into account the new housing requirement, which includes the past undersupply of housing between 2011 and 2016/17. In particular, St Andrew's Healthcare welcomes the inclusion of text stating that the housing requirement</p>	No comment

		<p>between 2017 and 2031 is a “minimum figure not a ceiling”, as it is considered that the objectively assessed need should not be viewed as a maximum. The proposed main modification is consistent with paragraph 14 of the NPPF which outlines that local planning authorities should, through plan-making, positively seek opportunities to meet the development needs of their areas. In addition, the exclusion of reference to a ‘maximum’ housing requirement allows for sufficient flexibility to adapt to rapid change in the housing market.</p> <p>St Andrew’s Healthcare acknowledge the proposed main modification to the number of homes distributed to Alford which will be allocated in the Alford Neighbourhood Plan and support the inclusion of text confirming that the allocation of 66 new homes between 2017 and 2031 is “the minimum amount of housing that should be allocated in that Plan”.</p> <p>The proposed main modification is consistent with paragraph 184 of the NPPF, in which neighbourhood plans are encouraged to positively plan to support the strategic policies of the Local Plan and allows the flexibility for Alford Town Council to shape and direct sustainable development for more than 66 homes over the plan period.</p>	
Page 26, paragraph 21. Table B	St Andrews Healthcare, represented by Sam Lake of Turley	St Andrew’s Healthcare welcomes the clarifications that Policy SP3 is a strategic policy, in which the Alford Neighbourhood Plan will need to be in general conformity with, as required by paragraph 185 of the NPPF.	No comment
Page 28, paragraph 32	St Andrews Healthcare, represented by Sam Lake of Turley	It is noted that the entirety of paragraph 32 has been deleted and replaced with text to further clarify where support will be afforded regarding windfall development in East Lindsey District. Windfall development sites have a role to play in boosting significantly the supply of housing in East	No comment

		<p>Lindsey District given the evidence that such sites have become available in the local area and will continue to provide a source of supply. St Andrew's Healthcare welcome the adoption towards a flexible approach to ensuring windfall development can come forward on sustainably located sites.</p> <p>Moreover, St Andrew's Healthcare supports the insertion of the new text, which states the following: "The towns within East Lindsey have a good level of services and facilities and additional growth through windfall development can be supported, providing sites conform to the policies in the Plan and national policy."</p> <p>St Andrew's Healthcare consider the direction of windfall development to the towns of East Lindsey, particularly Alford, is the most appropriate strategy for ensuring the needs of the District are met in a sustainable manner over the plan period.</p> <p>The proposed main modification is consistent with the 'eleventh principle' of paragraph 17 of the NPPF which sets out that plan-making should actively manage patterns of growth in locations which are sustainable.</p>	
Page 30, Clause 5	St Andrews Healthcare, represented by Sam Lake of Turley	<p>It is acknowledged that the entirety of Clause 5 has been deleted and replaced with text to further clarify where support will be afforded to housing growth on windfall sites.</p> <p>St Andrew's Healthcare supports the concept that more control over where windfall development sites are located should be incorporated into the Core Strategy. However, there are parts of the newly inserted text which are onerous and not consistent with national policy, such as the definition of 'developed footprint' which is not defined in the NPPF and should not be referred to within the Core Strategy. It is considered that the explanatory text supporting Policy SP3 as set out at Clause 5 should be further amended to read:</p>	<p>The Council is satisfied with the content of the Policy and does not believe it is onerous or unclear. It is for the Alford Neighbourhood Plan to set out its vision for growth in Alford not the Council and for it to ensure there is sufficient housing to meet the identified need.</p>

		<p>“Towns and large villages – Housing growth on windfall sites in sustainable locations within or outside of, but immediately adjacent to the settlement boundary will be supported.</p> <p>All windfall developments will be assessed against the policies of the Local Plan and the NPPF, which sets out a presumption in favour of sustainable development with reference to its economic, social and environmental dimensions. With regard to housing development, local considerations include the following:</p> <ul style="list-style-type: none"> • retain the broad shape and form of the settlement; • not significantly harm the settlement’s character and appearance; and • not significantly harm the character and appearance of the surrounding countryside.” <p>Notwithstanding the above, St Andrew’s Healthcare considers it would be appropriate and a robust strategy for the Core Strategy to indicate broad locations for windfall development sites adjacent to towns, such as Alford.</p> <p>It is considered that the proposed main modification in its current form does not offer a clear indication towards the direction of growth to steer the Alford Neighbourhood Plan and the location of windfall sites. This could be achieved through an illustration of a broad location on a diagram or further amendments to the proposed main modifications to state “growth will be directed towards the west of Alford”.</p>	
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MM Ref No 5	Name or Organisation of Respondent	Response	Councils Response
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New Clause 2	Louise Allison – South Reston	I do not agree with this proposal. The Countryside and village characters are precious. I would feel more comfortable for change of use on existing unused buildings as they are already there than I would on new applications. South Reston is 7 miles from any amenities and is unsustainable. South Reston have only 19 scored on the Settlement Pattern after the closure of the farm shop is taken into account. There have been a number of planning applications submitted in South Reston over the last few years all have been refused. Most have gone to Appeal and also been turned down by the Planning Inspectors. A sample are as follows APP/D2510/W/15/3035725, APP/D2510/W/15/3004628. You will see the main reasons they were turned down is that South Reston is unsustainable. It would be extremely difficult to live here without using private vehicles. The bus route currently in force is due for review. The Inspectors commented on the detriment impact any development would have on the village.	The representor sent in along with their response a copy of a letter objecting to a planning application in South Reston. They indicated that the response related to MM2 but it appears to be more related to MM5. South Reston is classed as a small village and the representor is correct in that it has very few services and facilities in the same way as most of the other small villages in the District.
Page 28	Broadgate Builders (Spalding) Ltd represented by Alister Hume, Hume Planning Consultancy Ltd	Proposed MM 5 28-SP3 states that the principle of windfall development is acceptable under policies SP4,5,8,9,12 and 18. Broadgate support the additional clarity provided in the re-wording of this paragraph.	No comment
Page 30 - 32	Broadgate Builders (Spalding) Ltd represented by Alister Hume, Hume Planning Consultancy Ltd	Proposed MM 5 30&32-SP4 is a change that Broadgate Homes support as it gives greater clarity to the criteria. Proposed MM 5 30-32 -SP4 (page 18) Broadgate consider that the policy wording could be clarified (See B5).	This is an exceptions policy and therefore “may” us considered to be an appropriate form of wording in this case.

		Proposed MM 5 30-32 -SP4 (page 18) Broadgate consider that the policy wording could be clarified by a small change to the text to read "Infill development will be supported where it does not impact on....." This serves to make the wording more positive and is improves "may" which is generally not a word that should be used in policy because it is imprecise.	
New Clause 2	J Coe – South Reston	South Reston is not an appropriate location. There are virtually no facilities in this village at all. To live here travel is essential by private car for almost everything. Schools, doctors, leisure facilities, shopping, filling station, employment, etc. To access these facilities means a round trip of fourteen miles to the nearest towns. South Reston is not a mile or so away from facilities it is a minimum of seven miles. It is therefore for more logical to consider new houses closer to these areas with the facilities. There has been a flurry of planning applications in South Reston over the last few years and all have been refused by the Council and/or Planning Inspectors, in my view this is the correct decision. South Reston is not a sustainable location. South Reston would not as a village benefit in any way by more development. It would spoil the open countryside character of the village to add infill as the character of the village is to have large open spaces between dwellings which on one side given clear views of the Wolds.	South Reston is classed as a small village and the representor is correct in that it has very few services and facilities in the same way as most of the other small villages in the District.
Page 32, Clause 1	A Elliott – Toynton St Peter	As per page 30/SP4 paragraph 1 modification this deletes the addition of agricultural buildings as brownfield in order to conform to the meaning in the NPPF for brownfield but then the council re-adds it here at 32/SP4 through the back door.	The Council would suggest amending the wording of the sentence to make it clearer so that it reads (addition shown in purple)

		<p>By adding the word agricultural and in the way this is written suggests that brownfield sites are only sites that have agricultural buildings on them. This does not conform to the meaning of brownfield in the NPPF which states --- <i>respondent quotes the NPPF</i> In fact the meaning of brownfield in the NPPF excludes land that is or has been occupied by agricultural buildings so this is a contradiction and does not conform to the NPPF.</p>	<p><i>Within the medium and small villages, the conversion and redevelopment of sites for housing will be supported, where those sites are brownfield and also sites that have agricultural buildings on them that have become disused.</i></p> <p>The Council wish to keep agricultural buildings in to the terms of the policy because there are disused farms in settlements which could be developed for housing providing the criteria of the policy can be conformed to. This was a matter discussed at the Examination Hearings.</p>
Page 32, new clause 2	A Elliott – Toynton St Peter	<p>Small infill sites are now supported, greenfield sites are now allowed to be developed for housing in small and medium villages, these sites do not have the constraints as brownfield do. Brownfield sites have to first seek their use for a community economic or leisure use at an appropriate price for a period of 12 months before they go for housing. The Brownfield register does not put constraints on brownfield redevelopment as the council do in policy SP4 in restricting development to frontage and only 2 dwellings regardless of site size. The whole point is to develop brownfield for housing before greenfield. This policy is working back to front and is against the NPPF and housing white paper. The policy also now states frontage development only and no more than 2 dwellings whether greenfield or brownfield. This does not conform to brownfield redevelopment in only allowing 2 dwellings on a brownfield site regarding its size and furthermore restricting to frontage only. In fact limiting of infill development and limiting</p>	<p>The respondent has not understood the policy and has misinterpreted it. Greenfield sites are covered under clause 2. Brownfield sites under clause 1, they are not interlinked therefore the criteria of clause 2 does not apply to clause 1. This therefore negates that respondents concerns regarding infill, frontage and no more than 2 plots on brownfield sites because they do not apply to these sites.</p>

		<p>brownfield development is what the NPPF use as an exception to greenbelt. ELDC have no greenbelt. In comparison Policy SP1 inland flood risk areas for housing on brownfield now includes small and medium villages does not control the amount of housing quota allowed on brownfield like it does in policy SP4 for inland small and medium villages which it should be the flood risk areas that are controlled. This makes no sense.</p>	
Pg 19, para 32	Firsby Group Parish Council	<p>Developed foot print needs to be defined with definitive boundaries. Small and medium villages need to have settlement boundaries or cluster boundaries. Does the restrictive approach in medium and small village in policy SP4 comply with the framework?</p>	<p>The Council considers that development boundaries are not necessary across the District. They are considered to be restrictive, having criteria is a more flexible approach to considering development in medium and small villages. The Council considers that the amended policy is in conformity with the NPPF.</p>
Clause 2	H Ellis – South Reston	<p>Clause 2 states that housing will be supported in the medium and small villages where it can conform to the criteria. I would like to add my objection to this move. South Reston is not an appropriate location due to the fact that the village is not sustainable due to a lack of facilities. The settlement pattern score in this small village is 19, which speaks for itself. National policy is against residents being reliant on private vehicles. To live in South Reston there is no option but to do just that being a minimum of 7 miles from the nearest towns, Alford and Louth. In dismissed appeals in recent years the Planning Inspectors have confirmed that the village is unsustainable. They have also stated that the village pattern is groups of dwellings with large open spaces between. To allow development would threaten this and spoil the countryside.</p>	<p>South Reston is classed as a small village and the representor is correct in that it has very few services and facilities in the same way as most of the other small villages in the District.</p>

SP4	Baumber Parish Council	<p>"SP4 Housing in the Medium and Small villages, As windfall development will now be allowed on greenfield sites in medium and small villages (rather than just on brownfield sites) it is unknown where these sites will come forward. and may lead to development in locations which do not increase access to services and facilities. These villages have very low levels of services and facilities; particularly small villages, some of which have no built services other than a church".</p> <p>Outcome: "Landscape Positive to Uncertain. There are landscape criteria in the policy but some of the small villages are particularly landscape dominated and it is not clear what the impact of this new policy approach will be". In addition to Landscape criteria positive to uncertain there should also be reference to uncertainly to the criteria highlighted:</p> <p>1 Protect and enhance the quality and distinctiveness of the areas' biodiversity (native plants and animals) and geodiversity. Flora, Fauna and Biodiversity</p> <p>As well as;</p> <p>2 Protect and enhance the quality and distinctiveness of the areas' landscapes, townscapes and historic environment Landscape and Cultural Heritage, within the outcome as uncertain, particularly as the windfall site may be located in or close to an area which has been locally identified as being of significance for Flora Fauna and Biodiversity and or, of historic significance with concerns of potential impacts on local historic and cultural heritage environments.</p>	<p>The representor is correct in that medium and small village have very few services and facilities.</p>
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Page 31, new paragraph after 2	Lincs Design Consultancy	Is there any definition of important views?	No further comment
Page 32, clause 1	Lincs Design Consultancy	Given the welcomed change to allow dwellings in the medium and small villages is it really necessary to require redevelopment sites to be marketed? Particularly as many of these sites will be more appropriate to develop ahead of the windfall sites? Is there any definition of unused? Does this mean that an active commercial or agricultural site does not have to be marketed?	This comment does not refer to a modification and the marketing of sites was in the publication version of the Plan that was discussed at the Examination Hearings.
Page 32	Mr S Lumb – Old Bolingbroke	'There is sometimes reason to support the development of a site/eyesore in a small otherwise unsustainable location if the proven benefits otherwise outweigh the wider regional/district/consequences. But unless these benefits are evidence based are tangible and are supported locally (e.g. by the Parish Council it is impossible to see the positive, benefits or justifications for the proposed modification in the smaller settlements. Thus the modification is not sound. The wording is also imprecise and open to wide interpretation and abuse. The modification would simply open the door for speculative mostly small scale landowners to, maximise land value, resulting in new housing in those locations without infrastructure and providing property for an ageing population wishing to move into small villages. It is an unnecessary policy and it is a policy worded in a way which is woolly, lacking criteria and would be a Development Management nightmare in terms of practical interpretation and definition. I consider the modification: Not to be positively prepared - it does not meet any strategy need, is	The Council agrees with the respondent that Old Bolingbroke along with the other small villages does not have the necessary facilities to support housing growth and the use of the car will always be necessary in order to access everyday needs. Also the respondent is correct in that those coming to live in the smaller settlements do tend to be retirees and this accords with the evidence that population growth is driven by the in migration of older persons. However the Council disagrees that in order for housing to go ahead it should get parish council support. This takes out of decision making a clear and transparent process and brings in popular opinion and personal views, which in smaller settlements can be polarised. The respondent believes the wording is not very clear in the policy, the Council included in the policy Clause 2 of Strategic Policy SP25 because that policy seeks to protect green open space. No more than 2 dwellings was chosen because many of the applications submitted in smaller settlements are for up to 2 dwellings. The

not based on any assessed development need or unmet requirement and it does not achieve Sustainable development. Its wording is unclear and open to the widest of interpretations Further- the modification proposes no more than 2 dwellings how is that number arrived at - justification/evidence? Is it no more than '2 dwellings per application or per frontage or per site, or per year? Once an application for two dwellings is permitted, how is a further application for another two houses adjacent, considered if submitted a year later? There is nothing in the modification to assess this and there are no criteria. There is no strategy. The modification is not sound.

Not to be justified – there is no evidence that additional houses on gap and infill sites in small villages achieve any unmet housing need, other than to serve landowners and those moving in to the area – mostly retirees. If this were specifically intended to providing housing to retain young people or to meet affordable needs the modification may have justification if the evidence supported that.

No effective – the modification as worded is difficult to deliver effectively due to the subjective nature of the terminology and by its ver wooliness. It would be a development management nightmare to deliver. What is appropriate – the definition as detailed remains wooly and unclear – what does “not conflict when taken as a whole with national policy or policies of the local – what whole? – the national/local policy and which of those) This wording will not mean a lot to most people and gives no clarity or certainty. It can be interpreted widely and differently depending if one is

Council understands the concern regarding the creep of development but it is for the decision maker to view the Plan as a whole in order to assess the cumulative impact of development on a settlement.

developer/landowner, community or planning officer. This leaves far too much for speculative housing. When is garden ground not garden ground? In my own village of Old Bolingbroke a house was sold separately from its large side garden area many years ago. That garden has now since become an attractive meadow. So is it garden still or a meadow? And if a meadow, it could be classed as infill or frontage development and the site might be considered as an appropriate location. Too many judgements to be made here and with no criteria. As already set out above the modification proposed no more than 2 dwellings. How is that number arrived at – justification/evidence? Is it no more than 2 dwellings per application or per frontage or per site or per year. Once an application for two dwellings is permitted how is a further application for another two houses adjacent say considered if submitted a year later? There is nothing in the modification to assess this and there are no criteria. There is no strategy. The modification is not sound. These small villages – e.g Old Bolingbroke – have no facilities mostly no transport links other than the car and they have open spaces and character which is usually very much valued, is intrinsic and respected locally. Yet these spaces would come under intense pressure from this modification, with local landowner voices and the tendency would be for permissions to be forthcoming. Cumulatively 2 dwellings on 2 dwellings on 2 dwellings would lead to a creeping form of over development and lead to further unattainability and a draw from the housing required in those places with infrastructure. Some small village

		locations, might be able to accept development, where they were considered by the community to positively enhance and support the settlement. But in such cases that lead and inpput should come primarily from the community itself. In such cases application could, in development management terms be considered as a justifiable departure from policy – those instance do not need a policy modification such as is proposed. It is not necessary. Finally national polices are not met with modification as such small villages without infrastructure, transport links or facilities is an unsustainable location.	
Page 14, after paragraph 32	Natural England	Whilst Natural England welcomes the addition of this paragraph we suggest that the second sentence would be clearer if it were reworded as follows; "Great weight should be placed on conserving the landscape and the scenic beauty of the Area of Outstanding Natural Beauty because it is a national designation ".	The Council has no objection to this proposed modification
Page 18 new clause 6	Natural England	Welcomes the new clause	No comment

MM Ref No 6	Name or Organisation of Respondent	Response	Councils Response
Page 32, paragraph 4 and Clause 1	Mr Jack Mowbray, represented by Robert Doughty Consultants Ltd	We welcome the new supporting text and amendment to clause 1 of Policy SP5 to ensure new housing for the elderly will be allowed in the coastal area, over and above the existing commitments, if it meets an evidenced need for those people already living in the coastal area or it is necessary for them to move to be near families who already live in the area.	No comment

		<p>This measure acknowledges the reality that specialist needs may not otherwise be met due to the wider restriction to new development in the coastal area. Failure to meet this need would lead to existing residents having to move away from family and other carers, and the Plan would fail to meet the social dimension of sustainable development set out in paragraph 7 of the NPPF.</p> <p>The changes are a sensible measure to predict and address unwanted implications of the new policy approach to the coastal area.</p>	
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MM Ref No 7	Name or Organisation of Respondent	Response	Councils Response
Page 34, paragraph 2	St Andrews Healthcare, represented by Sam Lake of Turley	St Andrew's Healthcare support the insertion of "general" before conformity which accords with paragraph 184 and 185 of the NPPF, which both state that neighbourhood plans must be in general (rather than full) conformity with the strategic policies of the Local Plan.	No comment

MM Ref No 8	Name or Organisation of Respondent	Response	Councils Response
Page 35 - 36	Broadgate Builders (Spalding) Ltd represented by Alister Hume, Hume Planning Consultancy Ltd	Proposed MM 8 35-36-SP7 is supported. The recognition of the need for greater flexibility deriving from the many factors that can impact on the delivery of affordable housing is supported Proposed MM 47-SP7 is also supported.	No comment

Page 38	Lincs Design Consultancy	Who are the accredited bodies?	No further comment
Paragraph 11	National Federation of Gypsy Liaison Groups	We regret the removal of the proposal to seek commuted sums to assist in the provision of Travellers sites.	The sentence was removed from the paragraph so ensure that the Plan conformed to National Planning Policy as discussed at the Examination Hearings.

MM Ref No 9	Name or Organisation of Respondent	Response	Councils Response
Page 39, paragraph 3	Lincs Design Consultancy	There is no definition of rural workers	No further comment

MM Ref No 11	Name or Organisation of Respondent	Response	Councils Response
Page 49, Clause 1	A Elliott – Toynton St Peter	Clause 1 states: where possible supporting the use of brownfield land for development unless it is of high environmental value (this should be the end of clause 1) and a new clause 2 should be added for seeking the use of areas of poorer quality agricultural land in preference to that of a higher quality. As following brownfield with this clause implies agricultural land is brownfield.	The Council agrees with the respondent and would support the separation of the two sentences into two clauses.

MM Ref No 12	Name or Organisation of Respondent	Response	Councils Response
Policy SP11	Historic England	We support the modifications in relation to Policy SP11:Historic Environment	No comment

MM Ref No 13	Name or Organisation of Respondent	Response	Councils Response
Clause 2 and 4	A Elliott – Toynton St Peter	Where it is stated these should be small scale no more than 3 pitches or plots, is this 1 x 3 pitches or plots per medium village or 1 x 3 pitches or plots per site in or around the medium village. This need to be explained precisely.	The sentence before in the explanatory paragraph says “sites” in the plural therefore it is clear that the policy means sites not one site per medium village. The policy is about the scale of larger sites having an impact on the smaller settlement.
New text after 2.17	A Elliott – Toynton St Peter	<p>The Council has undertaken a Gypsy and Traveller Accommodation Assessment 2016 which assessed the need for Gypsy and Traveller provision within the plan period. This is incorrect as this assessment is for the 5 years so needs to be changed.</p> <p>The Council state they will allocate land for both permanent and transit Gypsy and Traveller provisions an list 11 permanent pitches on site GYP/TRA 1 Brackenborough Road, Louth. There is however still no alternative site put forward for the permanent pitches. If the Council cannot buy the site they have no permanent site. The site has another more viable use which has already commenced for holiday lodges, this use is therefore a constraint to the site from the view of being developed for Gypsies/Travellers against holiday lodges and also from the purchase price that the Council can justify in spending, the price for the site being £1m. The use of this site as the only option in the emerging plan is simply to make the plan sound from the Council` s point of view, not from a viability or deliverability option. The Council have consistently stated from the start of the consultation in the 2016 they are looking at buying the site and are in</p>	<p>The identified need that should be planned for and is being planned for by the Council was for the first five years. There is no identified need beyond that period but that does not negate the need to demonstrate that the GTAA has considered a wider period of need than the first five years.</p> <p>The Council are in negotiations with the owner of the site GYP/TRA1. We have employed a third party to carry out these negotiation on our behalf. These negotiations are at present commercially sensitive. The Council` s position is that it will buy the site, either through meaningful negotiation or by implementing its powers of compulsory purchase. The site has planning permission already for 11 pitches and the permission has been legally implemented. The site is overgrown and has not been used for a number of years.</p>

		negotiations. Yet under FOI in December 2017 negotiation have not even commenced.	
Paragraph 1	A Elliott – Toynton St Peter	Paragraph 1 – says to add for the period 2016 to 2028 to the last sentence but then this would read wrong as the Council’s 2016 updated Gypsy and Traveller Accommodation Assessment identified the following needs for the period 2016 to 2021. This is wrong in that the need identified for the first 5 years of the local plan so can only be 2016 to 2021. So this needs to be changed.	The identified need that should be planned for and is being planned for by the Council was for the first five years. There is no identified need beyond that period but that does not negate the need to demonstrate that the GTAA has considered a wider period of need than the first five years.
Paragraph 6	A Elliott – Toynton St Peter	Paragraph 6 – The Council will therefore support new sites in reasonable proximity to medium villages – What is reasonable proximity? This should be stated in the form of a measurement say within 2km of the village or essential services. The figure of 2km of the essential services complying with the recent appeal won for the transit site in Burgh le Marsh Appeal. Re: APP/D2510/W/17/3174011 where it is stated this is a short distance to travel by vehicle. Which means this is a sustainable development. Although would this be the same figure for reasonable proximity to medium villages as medium villages do not have essential services. Why not small villages, lots of small villages are within 2km of essential services. Policy should be consistent with the policies in the NPPF including the presumption in favour of sustainable development and the application of specific policies in the Framework and the planning policy for Traveller sites 2015. Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end they should be consistent with the policies in the NPPF, including	The Council would comment that it considers that it is for the decision maker to determine what reasonable proximity means in each individual case and this would include taking into account other factors such as the overall impact on the relevant settlement.

		the presumption in favour of sustainable development.	
Clause 4	National Federation of Gypsy Liaison Groups	We support the changes to Policy SP12 with the exception of the final change relating to clause 4. We see no sound basis for an arbitrary limit to the size of the pitches.	The limit in size is based on the fact that medium villages have very limited services and facilities, they are small in size and are rural in character and nature. A large site could overwhelm a medium village in terms of impact on character and rurality, this would be the same if a large housing site came forward and is therefore not considered acceptable.

MM Ref No 14	Name or Organisation of Respondent	Response	Councils Response
Page 63, new clauses after Clause 1 – 1i and 1ii	Lincs Design Consultancy	Why is Louth Industrial Estate allowed to have leisure, business/office and retail use (subject to certain criteria) but none of the other industrial estates are? Given the effective ban on housing on the coast is this another penalty for these area and other block to investment.	This matter was discussed at the Examination Hearings including the reason why Louth Industrial Estate could have under certain criteria retail, business, leisure and office uses.

MM Ref No 16	Name or Organisation of Respondent	Response	Councils Response
Page 75	Lincs Design Consultancy	Does this mean that a site beyond a settlement but connected to it by a public footpath is acceptable? The amendment only allows existing sites to extend if they are in close proximity to a town, large or medium village. This effectively existing sites in the countryside from expanding is too restrictive. Policies in the old local plan enabled existing rural sites to extend if there were wider benefits; such as improved landscaping. There have been a significant number of approvals for such sites and most if	It is important the Council does not support continued open countryside development leading to sprawl and an impact on countryside character, this has happened in the past and the policy seeks to prevent further impact and protect the open countryside for its own sake.

	not all have been implemented. For example Halfway House (between Skegness and Burgh le Marsh) Willow lake (outside Croft), Hill View Park (outside Hogsthorpe) and Woodthorpe Hall. This policy and its amendments penalise existing holiday sites for being in the countryside and will prevent them from adapting and expanding which could affect the viability of the business, the local economy and jobs. This goes against the NPPF which aims to support a prosperous rural economy.	
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MM Ref No 17	Name or Organisation of Respondent	Response	Councils Response
Clauses 6 and 9, page 79	Anglian Water	Ticked the boxes on the form to state that the main modification is legally compliant and sound	No comment

Page 78 & 79 and Clause 3	A Elliott – Toynton St Peter	This policy is for inland flood risk areas which was primarily for towns but now adding large, medium and small village. It states that brownfield sites that have become empty, buildings that have become disused and run down or combination of both. On these occasions developers will be expected to have evidence that they develop/market sites for business, leisure or commercial use. It states the reason for this is because alternate uses to housing will always be preferred in flood risk areas. This is the process of dealing with brownfield sites in towns, large, medium and small villages which makes sense but why is this process also being used for inland medium and small villages in non-flood risk areas. As stated in objections for policy SP4 should be removed. The policy SP16 controls the flood zone areas of brownfield in this manner which makes more sense. Policy SP16 does not control the amount of housing quota allowed on brownfield in the flood areas in small and medium villages like it does in policy sp4 for inland small and medium villages. These flood risk areas are where housing quotas should be restricted on brownfield sites and not in the inland small and medium villages that are not in flood risk areas. This makes no sense otherwise.	There is no restriction on the number of houses coming forward on brownfield sites in medium and small villages other than only the brownfield element of the site should be considered for development and buildings on the site should be considered for conversion first. Housing development in medium and small villages should be controlled because of the lack of services and facilities in these settlements, large unchecked development will impact on their character, undermine the overall thrust of the Local Plan to support development in the most sustainable locations and because of the older population lead to more isolation from services and facilities for the most vulnerable section of the community. It will also lead to an increase in car usage. The policy SP4 is designed to enable small amounts of growth which conforms to criteria which protects smaller communities from unfettered growth. In the same way that policy SP16 supports housing growth on brownfield sites in areas of flood risk but not in an unfettered way but in a way that ensures that it is an option when other options have been evidenced to fail.
Page 78, clause 2	Lincs Design Consultancy	If the criteria is complied with is it automatic that the proposal passes the sequential test. General point – There seem to be little in the way of discussion on the sequential and exception test within the Plan	The Council believes that it will be for the developer to evidence that they have passed the sequential test by evidencing that the criteria in the clause have been satisfied.
Page 78/79 clause 2	Daniel McNally – North Somercotes	This same policy should be applied to allowing housing in ALL flood risk areas and not just INLAND flood areas. Flood risk has the same	The wording almost mirrors the wording for brownfield sites in inland flood risk areas, there are criteria around both areas for brownfield sites

		constraints whether it be coastal, fluvial or surface water. If brownfield sites in Inland areas can be mitigated to make them suitable for housing, then the same should apply to brownfield sites in all other flood risk areas.	because sites for housing in areas of high flood risk whether they be inland or on the coast should only be supported in exceptional circumstances which are set out in policy.
Page 78/79 Clause 2	North Somercotes Parish Council	To be positively prepared, justified and sound, this same policy wording should apply to the 'coastal' flood risk Areas. All flood risk areas should be treated the same. If Brownfield sites in Inland areas can be mitigated to make them suitable for housing, then the same should apply to all other flood risk areas. This is particularly important as coastal flood zone areas have a 1 in 200 risk while inland fluvial flooding is 1 in 50.	The wording almost mirrors the wording for brownfield sites in inland flood risk areas, there are criteria around both areas for brownfield sites because sites for housing in areas of high flood risk should only be supported in exceptional circumstances.

MM Ref No 18	Name or Organisation of Respondent	Response	Councils Response
Page 86	Jack Mowbray, represented by Robert Doughty Consultants Ltd	We welcome the changes to Clause 3 of policy SP18. The previous expectation that housing need can only be evidenced by reference to the Council's waiting list is overly restrictive. Whereas the Waiting list is a useful source of information, it is not the only source. Some people will have very real and specific needs for housing that is not currently available, either to buy or rent and they may not qualify for Council housing. Limiting evidence to the waiting list would deny these people the same opportunities as others with a definite need. The proposed wording will help ensure communities continue to thrive and deliver the sustainable development required by NPPF.	No comment

MM Ref No 19	Name or Organisation of Respondent	Response	Councils Response
Pages 89 and 90	Blue Anchor Leisure Ltd, represented by Robert Doughty Consultancy Ltd	<p>We support the confirmation that more restrictive occupancy conditions will not be applied where a planning application is submitted to extend the geographic area of holiday accommodation (caravans, log cabins and chalets) without increasing the number of units.</p> <p>This measure will allow the modernisation of established holiday sites to provide more spacious, landscaped layouts, incorporating new drainage measures. The remodelled sites will help protect the visitor economy, which is a major feature of the area. Growth of the visitor economy is also a priority of the Greater Lincolnshire Local Enterprise Partnership (GLLEP) that states on page 35 of the Strategic Economic Plan 2016 Refresh that, "Significant growth (in the visitor economy) can be generated from extending the season and converting day visitors to overnight stays". Although this measure may not increase the number of beds, it will improve the tourist offer of the area, maintain supply and improve the appeal of the area to make more effective use of the number of units already available.</p> <p>The measure will not increase the numbers of people at risk of flooding but will improve the tourist offer, enhancing the attractions of the area. The new layout may be able to incorporate new flood mitigation measures and help manage risk.</p>	No comment

Paragraph 9, Clause 7	Bourne Leisure Ltd	<p>Whilst we welcome MM19 allowing for more flexible occupancy periods to be maintained on extended/redeveloped sites, we maintain – as per our earlier representations (dated 21st June 2017) made in relation to Matter 15 – that a more comprehensive revision to Policy SP19 should be made. Specifically, it should allow occupancy limits to be applied flexibly on all existing sites, in circumstances where the net increase in pitches is considered to be small scale and where the site-specific circumstances make it appropriate to do so. This will allow individual planning applications to be considered on their merits and avoid Policy SP19 unnecessarily restricting the occupancy period of extended sites where there is no technical justification to do so. This in turn will ensure that Policy SP19 does not undermine the Plans support for opportunities for growth within the tourism sector.</p>	<p>This is a repeat of the representation already made with regard to Matter 15 and offers no further evidence to support the views put forward. The Council would not support any changes to the occupancy period, it was developed in conjunction with the Environment Agency and offers a way of supporting further vulnerable caravan development in the Coastal Zone in conformity with National Planning Policy.</p>
Page 99, Paragraph 9 and Page 101, Clause 7	Environment Agency	<p>The Environment Agency supports the principle of what we believe the proposed Modifications are trying to achieve but we have concerns that as the modifications are currently worded they will be open to interpretation. We think different interpretations of which seasonal occupancy condition would apply, and also whether the policy relates to extending the occupancy period or the site area would be possible.</p> <p>We suggest amended text below, which we believe will address this and ensure that the Policy and supporting text accords with National Policy and will not be open to interpretation.</p>	<p>The Council supports this minor alteration in the wording of the Modifications, it does make it clearer and it would still be in conformity with national planning policy.</p>

		<p>Paragraph 9 Where it is proposed to extend <u>the site area</u> or redevelop an existing site <u>that currently has</u> with a different occupancy period <u>to that in Policy SP19</u>, providing that the development would not increase the number of caravans, log cabins or chalets on the site, the occupancy limits in this policy will be applied flexibly so that no disadvantage should result, <u>i.e. the existing occupancy period will be retained.</u></p> <p>Policy SP19, Clause 7Sunday, except where it is proposed to extend <u>the area of</u> or redevelop an existing site <u>with that currently has</u> a different occupancy period, <u>and but where</u> no net increase or an overall reduction by an improved layout or density in the number of caravans, log cabins or chalets would result. In such cases, the <u>existing</u> occupancy period will <u>continue to</u> be applied to the whole site.</p>	
Page 90, paragraph 10 and Clause 8	Lincs Design Consultancy	It is wrong to remove the paragraph. Allowing longer seasons for sites not within the present day risk areas will have a significant positive effect on the economy and will help those who rely on seasonal employment.	This was discussed at the Examination Hearings.
Page 133 annex 1	Jack Mowbray represented by Robert Doughty Consultancy Ltd	We welcome the clarity provided by the inclusion of a new annex to define the types of vulnerable groups in terms of the operation of Policy SP7 in the delivery of affordable housing across East Lindsey, including the Coastal area. Meeting the needs of these groups, including the young, single parents, the elderly, etc will be essential in maintaining local communities and meeting	No comment

		the social dimension of the NPPF. If large groups of local people are made to move away to meet their housing needs, this can have a significant impact on the economy, as the workforce may shrink, and the costs of care, if vulnerable groups cannot stay close to families and carers.	
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MM Ref No 23	Name or Organisation of Respondent	Response	Councils Response
Clause 1	Natural England	Welcomes the re-written clause which offers greater clarification	No comment

MM Ref No 24	Name or Organisation of Respondent	Response	Councils Response
Page 103	Broadgate Builders (Spalding) Ltd represented by Alister Hume, Hume Planning Consultancy Ltd	Proposed MM 24. 102-SP24 (page 44) This change is supported but it is suggested that the word "typicalness" is replaced with the phrase "and which are typical".	The Council would support this minor modification
Page 44, 102	Natural England	Welcomes the additional paragraphs regarding the Local Wildlife Sites and Local Geological Sites	No comment

MM Ref No 25	Name or Organisation of Respondent	Response	Councils Response
Page 110, and 111 paragraph 8	Lincs Design Consultancy	If the facilities required by the lower table exist within the distances set out in the upper table, does the mean the development does not need to provide them? Please clarify? The scale of development in the lower table is too wide for the first group. Providing a LAP, LEAP and MUGA within a development of 10 dwellings is excessive and given the cost of a MUGA is likely	This matter was discussed at the Examination hearings and the modification proposed to make sure it was clear. The policy quite clearly also states that it will reflect the relevant settlement.

		to make a development unviable. There may be other issues which would prevent the incorporation of a MUGA such as amenity and character. It is suggested that an additional scale is added. Perhaps excluding a MUGA from developments between 10 -5- dwellings; but maintaining this requirement for developments of 51 -200. Will there be clear definitions for the LAP, LEAP, NEAP and MUGA? For example will a MUGA have flood lighting?	
Page 110 and 111, paragraph 8 and clause 2	Jack Mowbray Estate, David Sims, Gin Property Ltd and Robert Gant represented by Robert Doughty Consultancy Ltd	The proposed Main Modification clarifies the situation regarding existing and future deficiencies in the provision of playing fields. It is right and reasonable to address this issue. The proposed Modification, however, seeks to adopt the "Fields in Trust" standard of areas of different open spaces (Playing pitches, play areas, amenity green space, etc). This standard, developed from the 6-acre standard, sought to deliver an amount of open space for a set number of people, which is appropriate in towns and urban areas, but is perhaps less so when applied to a dispersed population. We note the last sentence in proposed paragraph 8i accepts that the application of the standard will have to reflect the settlement in which development is proposed, which is a tacit acknowledgement of our point. We contend that this approach is not strong enough. No evidence has been provided to demonstrate the "Fields in Trust" standard is relevant to the East Lindsey area. As part of the review, the Local Authority should commit to examine this matter further with a view to developing a locally relevant standard and approach.	This matter was discussed at the Examination hearings and the modification proposed to make sure it was clear. The policy quite clearly also states that it will reflect the relevant settlement.

The Modification states the Council will "require the provision of new or improved open space, recreational or outdoor sport facilities on development of 10 and above". Many sites will not be able to accommodate open spaces to the standards discussed and, in some settlements, there will not, in fact, be a shortfall in provision. Formal sports provision is generally made within the context of a club. Provision of isolated pitches, not associated with a club or management body, are unlikely to be used effectively. In the first case the Council may in turn seek financial contributions towards off site provision of open space or the enhancement of existing facilities to help accommodate increased need, but there is no evidence of a strategy or programme of works to spend the money in proximity to the development. In the second case, where provision in a rural settlement meets the standard, there is no justification to demand the payment. As such, the contribution would not be directly related to the development and would not meet the tests set out in Regulation 122 of the CIL regulations.

The Council also fails to demonstrate a strategy for the delivery and management of open spaces, drawn up collectively with other bodies, such as the Parish Councils and sports clubs, which would be the vehicle through which contributions could be made.

Until an appropriate standard can be agreed, and a mechanism put in place to co-ordinate the delivery and management of open spaces put in place (especially the more formal elements, such as playing fields) it would not be appropriate for

		<p>the council to require the delivery of open spaces.</p> <p>We support the wording of clause 2 in that it indicates developments should provide open space, and not shall provide (our emphasis). In the absence of locally appropriate standards and a delivery strategy there is no basis on which to require the full range of open space set out in paragraph 8i. We note that this is accepted in principle by the proposed replacement wording of Clause 1 of Policy SP26 which highlights the role of a recent assessment of need when considering the loss of existing indoor and outdoor sports and recreational facilities and open spaces. A similar assessment should be provided by the Council to justify its requirements for new open sports facilities and larger scale open spaces.</p>	
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MM Ref No 27	Name or Organisation of Respondent	Response	Councils Response
Page 121, new paragraph after 9	Blue Anchor Leisure Ltd, Jack Mowbray Estates, David Sims, Gin Property Ltd and Robert Gant represented by Robert Doughty Consultants Ltd	We welcome the statement that infrastructure requirements will only be sought from developments of 10 or more dwellings. This clarification, however, should be included in the policy itself in clause 4, which currently states, "Where appropriate, developer contributions will be sought towards the delivery of infrastructure where it is shown to be necessary for the development to proceed, and where it will not compromise the viability of the Scheme."	The Council agrees with the respondent that the modification appears to be saying that contributions will be required as if the list is definitive and contributions are required for everything on the list. This can be rectified easily by altering the "will be" to "could be" a modification that the Council would support.

The paragraph also goes on to list various infrastructure types. The current wording indicates the list itself is a minimum to be applied in all cases and, in fact, that other contributions could be sought. The five listed elements will, however, not be appropriate, or justified, in all cases.

The policy does not accept that the range of contributions would potentially make the development unviable. The Whole Plan viability report (CD23) made assumptions regarding the level of S106 contributions from developments as set out below:

Table 13 – Indicative S106 Allowances

No of dwellings	Section 106 Contribution per dwelling
Less than 25 dwellings	£1, 275
26-50 dwellings	£1,685
51-150 dwellings	£2,250
151 – 350 dwellings	£3,000
351 -500 dwellings	£5,600
Greater than 500 dwellings	£7,000

These figures were based on contributions towards education and health and not the wider range of works promoted in the new paragraph 9. If all the infrastructure listed in the new paragraph were subject to contributions, the requirement would far exceed the assumed levels used in the Whole Plan Viability report. The viability assessment should be revisited to test whether development is still viable, considering the scale of payments that could be

		imposed on developers following on from the amendment.	
Page 121-128, new paragraph after 9	Lincs Design Consultancy	Who defines the level of contribution and will the projects be defined? Will there be a CIL?	The Council is not implementing CIL within the District. Levels of contribution are set by those asking for them such as County Council Education and the NHS
Page 32, paragraph 4 and Clause 1	Jack Mowbray Estate, David Sims, Gin Property Ltd and Robert Gant represented by Robert Doughty Consultants Ltd	We welcome the Policy commitment to update and review the Infrastructure Delivery Plan on an annual basis. This will give the opportunity for Infrastructure providers to review the needs and opportunities of an area and ensure developers are not presented with unreasonable and unjustified demands.	No comment

MM Ref No 28	Name or Organisation of Respondent	Response	Councils Response
Page 122, new policy after SP18	Blue Anchor Leisure Ltd, David Sims and Jack Mowbray represented by Robert Doughty Consultants Ltd	<p>We support the new commitment to review the impact of significant new policy approaches, specifically the introduction of constraints to development in the Coastal Area and to submit a revised plan by April 2022.</p> <p>The new policy approach is a significant change and the impact on the affected communities must be monitored closely to ensure the policy has the expected effect and any unforeseen negative impacts are addressed promptly and effectively.</p>	No comment

Page 122 new policy after SP28	A Elliott – Toynton St Peter	The new policy does not include review for Gypsy and Traveller Accommodation, and this therefore should be added to comply with the NPPF.	There is nothing in the NPPF that states that every review of a local plan has to include a review of the Gypsy and Traveller Accommodation. Council`s regularly carry out GTAA`s and if an updated one shows a need when the local plan is reviewed then the Council will consider allocating new sites. At the present time there is no evidence of need beyond the first five years and therefore the Council does not see the need to specifically state it will carry out a review of this subject in the policy.
Page 122-128, new policy after Policy 28	Lincs Design Consultancy	How will the Council carry out this monitoring?	It will be done through the Authority Monitoring Report.
Page 136, new policy 28	Lincolnshire County Council	The proposed policy SP29 provides an outline review programme. However, these topics should be viewed as a definitive or exhaustive list. In particular the need to review the current settlement hierarchy and distribution of housing should be included to allow consideration of future growth points and a more sophisticated assessment of housing allocations linked to the potential for new infrastructure.	The Council considers the wording of the policy sufficient to express the intention to review the Plan. The Council will on adoption of the Plan consider with Members the details of the review. The policy is designed to give a broad overview of the review work not drill down into its detail which is a matter for the Council to consider in due course. The Council is therefore not proposing any changes to the policy in terms of its overall context.
Page 122, new policy after Policy 28	St Andrews Healthcare, represented by Sam Lake of Turley	St Andrew`s Healthcare acknowledge a new policy has been inserted to the Core Strategy to set out the Local Plan review process and note that a Local Plan review will need to be submitted for examination by April 2022. It is considered that the new policy is partly consistent with national policy particularly paragraph 153 of the NPPF which states:	The matter has been overtaken by national guidance and it will be for the Council to determine the extent of the review whether the whole plan or in part. There are parts of the Plan that may not change and therefore these may not be necessary to review.

		<p>"Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances."</p> <p>St Andrew's recommended that the Inspector considers adding text to clarify whether the Local Plan should be reviewed in whole or in part. In addition, the purpose of the new policy is consistent with guidance set out by the Ministry of Housing, Communities & Local Government ("MHCLG") in National Planning Practice Guidance ("PPG"), which provides clarity in production and deliverability of Local Plans. The guidance states at paragraph 008 [Reference ID: 12-008-20140306] the following:</p> <p>"Most Local Plans are likely to require updating in whole or in part at least every 5 years. Reviews should be proportionate to the issues in hand. Local Plans may be found sound conditional upon a review in whole or in part within 5 years of the date of adoption."</p> <p>St Andrew's consider the five points of justification as set out in the newly inserted policy are strategic issues which will change over time and are proportionate enough to justify a full review of the Local Plan within five years of the date of adoption.</p>	
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MM Ref No 30	Name or Organisation of Respondent	Response	Councils Response
Page 7, paragraph 1.8	Jack Mowbray Estates, Gin Property Ltd and	We support the commitment to maintain a continuous delivery of housing until the end of the Plan period.	No comment

	Robert Gant represented by Robert Doughty Consultancy Ltd	We also support the commitment to review the impact of the housing policies in advance of the submission of a revised plan before April 2022. The approach to growth in both the Coastal and Inland areas of East Lindsey is unique in Lincolnshire and represents a significant change. The impact of the new approach on the delivery of sustainable development is unknown and will need to be closely monitored, to identify its success and failure.	
Page 11, Paragraph 2.7	Gin Property Ltd, David Sims and Robert Gant, represented by Robert Doughty Consultants Ltd	We support the clarification that the growth figures for each settlement are not intended as maximum figures. We understand the discussion at the Hearing Sessions concluded that the table showed the expected capacity of the housing allocations in each settlement, that the figures are not a policy requirement for each site and a different number of dwellings could in fact be provided and did not represent an allocation of growth to each settlement. A minor change to the wording should be promoted to align with MM4 (page 26, policy SP3, paragraph 21 Table B).	No comment
Page 4 et seq	Mr T Osbourne - Withern	The NPPF clearly states that rural communities must not be allowed to decay and die. By completely limiting significant development to ONLY take place in a limited, few in number, selection of towns and villages – only those villages defined as 'large' by ELDC ratings, the whole policy goes against the above stated NPPF. This would lead to excessive expansion of the county's small to moderate Market Towns, destroying all their historic characters and leading to a completely unmanageable lack of	The Council is unsure how this relates to the modification, the settlement pattern and distribution of growth was discussed at the Examination Hearings.

		<p>essential infrastructure – such as schooling, medical facilities, public services, policing, and completely unacceptable strain on roads. We see this already starting to happen in Louth. The same applies to the 'large villages' deemed acceptable for development, but of course it would affect them to a much greater extent. As a result I see the whole plan as being both legally not compliant with Government Policy as outlined in NPPF. It is unsound as it would lead to a total imbalance between our small and medium towns particularly, and some of our large villages also (not all the large villages of the county are included in the 'permitted list') being inflated far beyond their capacity to absorb expansion – and the very many medium and small settlements and communities decaying and dying off... the latter just becoming virtually 'geriatric collections' for incoming older people and retirees. This would also contribute strongly to the decay and death of those communities as there would be no opportunity for young, local, rural, couples to obtain housing in the areas of their family's history, and the death of rural schools. That last being among many village assets which would be under direct threat.</p>	
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MM Ref No 31	Name or Organisation of Respondent	Response	Councils Response
Pages 13 and 14, new policy after	Gin Property Ltd represented by Robert Doughty Consultancy Ltd	We support the principle of including a new policy to list all the housing allocations in each settlement across the plan area. This approach provides essential clarification within the Plan of the status of the various allocations shown on	There is no need to alter the wording of the SPY310 with regard to the Health facility if the need is taken up elsewhere it is a given fact that the need will not need to be provided on the site. It is a key piece of infrastructure that should be

<p>paragraph 1.2</p>		<p>the amended policies map. The Policy provides an ideal opportunity to identify factors to be considered when promoting the development of individual allocated sites.</p> <p>We note that for site SPY310 the policy requires a Doctor's surgery to be provided in the first phase of development to meet the immediate need to expand of the GP practice to meet current and anticipated growth in the town and changing health policy. The Clinical Commissioning Group (CCG) has agreed to fund the relocation of the GP practice and the expansion of services in the town and is exploring the opportunity to co-locate other services at the new facility.</p> <p>Discussions are ongoing between the site proponent and the CCG to deliver the new health facilities as part of the development of SPY310. The need for the facility is not challenged. The possible inclusion of the Medical Practice would form a key part of the overall development, and the site, with its direct access to the town centre, is an ideal location for such a facility.</p> <p>It is possible, however, that the need for health services may be met in some other way, elsewhere in the town, hence removing the need for delivery of the facility as part of this development. As such the wording should be revised to acknowledge the possibility that health facilities could be provided elsewhere.</p>	<p>provided to assist growth in the town, the community support the provision of new health care and it should be clear in the plan that this is going to occur.</p>
<p>Pages 13 and 14, new</p>	<p>Robert Gant represented by</p>	<p>We support the principle of including a new policy to list all the housing allocations in each settlement across the plan area. This approach</p>	<p>The site is not suitable to access onto Chapel Lane which is narrow and constrained. Therefore to assist with surface water drainage and ensure</p>

policy after 2.12	Robert Doughty Consultancy Ltd	<p>provides essential clarification within the Plan of the status of the various allocations shown on the amended policies map. The Policy provides an ideal opportunity to identify factors to be considered when promoting the development of individual allocated sites.</p> <p>The Mareham le Fen site commentary, however, introduces a requirement for site MLF 303 to be accessed through MLF021, with pedestrian access only off Chapel Lane. The only place where we are aware of linking the two sites on access grounds has been raised is in our representations to the publication version of the Plan, in which we stated that site MLF021 would provide a suitable access if the sites were linked. There has at no time been any evidence prepared to suggest Chapel Lane would not provide a suitable access. The new requirement in the policy requiring access through third party land is misleading and unjustified, and would, as a consequence, make the Plan unsound and limit the development potential of both sites.</p>	<p>a safe access it was proposed that MLF303 has its access through MLF021. This was raised at the Examination Hearing and the representor at the hearing did not state that this was an issue at the time. This was also a requirement set out in the publication version of the Plan so the issue could have been raised at the Hearing stage.</p>
Pages 13 and 14, new policy after paragraph 2.12	David Sims represented by Robert Doughty Consultancy Ltd	<p>We support the principle of including a new policy to list all the housing allocations in each settlement across the plan area. This approach provides essential clarification within the Plan of the status of the various allocations shown on the amended policies map. The Policy provides an ideal opportunity to identify factors to be considered when promoting the development of individual allocated sites.</p> <p>The commentary regarding site Burgh Le Marsh BLM 320 provides clarification regarding the acceptable form of development of the allocation</p>	No comment

		and confirms there are no known constraints on other allocations in the settlement, including BLM318.	
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MM Ref No 35	Name or Organisation of Respondent	Response	Councils Response
Burgh Le Marsh	A Elliott – Toynton St Peter	The explanatory box for the Gypsy and Traveller transit site GYP/TRA2 suitability part of the site line 12 and 13 states. "However although this is a transit site so will not be occupied all year round." This should be changed as the appeal APP/D2510/W/17/3174011 for this site, occupation to be open throughout the year but with most stays likely to be within the summer months.	The meaning of the sentence is that the site is not a permanent site with all year round occupancy, which a transit site does not have.
Site BLM310	Lindsey Marsh Drainage Board	Notes the modification and welcomes the change	No comment

MM Ref No 37	Name or Organisation of Respondent	Response	Councils Response
Site FRIS317	Historic England	Welcomes the main modification in respect of the site	No comment

MM Ref No 38	Name or Organisation of Respondent	Response	Councils Response
Site GRA211	Lindsey Marsh Drainage Board	Notes the modification and welcomes the change	No comment

Pages 51 and 52	North Somercotes Parish Council	Grainthorpe and Hogsthorpe (and Tetney) are within the coastal flood risk zones. Some small islands of land within those settlements may be in the white zones but the settlements sit within the coastal flood risk zone and evacuation routes (one of the criteria used by ELDC in the selection for 'coastal') are the same as those for North Somercotes. Similarly, North Somercotes has some building land which is in the Danger to some and Danger to most, which should be considered acceptable using the sequential test when considering the importance to the community of meeting its housing need of 155 houses for its population, according to ELDC housing needs assessment methodology.	The modification refers only to Grainthorpe, and a site to be deleted, it does not refer to Hogsthorpe, Tetney or North Somercotes so the Council cannot comment further on the representation.
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MM Ref No 39	Name or Organisation of Respondent	Response	Councils Response
Pages 54	North Somercotes Parish Council	Grainthorpe and Hogsthorpe (and Tetney) are within the coastal flood risk zones. Some small islands of land within those settlements may be in the white zones but the settlements sit within the coastal flood risk zone and evacuation routes (one of the criteria used by ELDC in the selection for 'coastal') are the same as those for North Somercotes. Similarly, North Somercotes has some building land which is in the Danger to some and Danger to most, which should be considered acceptable using the sequential test when considering the importance to the community of meeting its housing need of 155 houses for its population, according to ELDC housing needs assessment methodology.	The modification refers only to a change in site numbers for one of the sites in Hogsthorpe, it does not discuss why Hogsthorpe is or is not in the Coastal Zone so the Council cannot comment further.

MM Ref No 45	Name or Organisation of Respondent	Response	Councils Response
Mareham Le Fen, page 96	Anglian Water	<p>The proposed modification includes wording based upon the findings of the Council's Water Study (dated June 2016) relating to Mareham Le Fen.</p> <p>As drafted the text refers to Red-Amber-Green (RAG) rating presented in the Study for Mareham Le Fen but does not clarify what is meant by each rating. For example reference is made to potential sewage treatment upgrade and foul sewerage network improvements in this catchment. It is therefore suggested that the wording be amended to make the plan effective.</p> <p>It is therefore suggested that the main modification be amended as follows:</p> <p>'Water Infrastructure – Mareham le Fen is served by its own Water Recycling Centre. Using red, amber and green to indicate issues with the water system the facility is amber with water resources/supply being green. As set out in the East Lindsey Water Cycle Study (dated June 2016) there may be a need for treatment upgrades at Mareham Le Fen Water Recycling Centre (WRC). Any further investment which is required at Mareham Le Fen WRC would be made by Anglian Water through their business planning process.</p>	<p>The Council is content with the suggested amendment it makes the issue of water infrastructure clearer in Mareham le Fen. The comments about the Witham 4th Drainage Board would follow on from this so the whole paragraph on water infrastructure would read as follows;</p> <p>'Water Infrastructure – Mareham le Fen is served by its own Water Recycling Centre. As set out in the East Lindsey Water Cycle Study (dated June 2016) there may be a need for treatment upgrades at Mareham Le Fen Water Recycling Centre (WRC). Any further investment which is required at Mareham Le Fen WRC would be made by Anglian Water through their business planning process. The developed area of the village is outside of the Witham 4th Drainage Boards legislative District but within its catchment area. Access to managed surface water outfalls in the village is problematic and requires improvement or new services to be constructed for any major development. The piped systems on Watery Lane and Fen Lane cannot cope with extreme events resulting in surface water flooding, the board has recently adopted the open dyke on Fen Lane. However, development coming forward in the village is able to demonstrate that drainage issues can be overcome.</p>

		<p>The Study identifies a need for improvements to be made to the foul sewerage network to accommodate the sites at Mareham Le Fen subject to a more detailed assessment as part of the planning application process. There is currently capacity within the existing water supply network to accommodate sites at Mareham Le Fen.'</p>	
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MM Ref No 46	Name or Organisation of Respondent	Response	Councils Response
Site MAR226	Historic England	Welcomes the main modification in respect of the site	No comment
Pages 112, 114-116	R Sargent representing Mossop Farms Ltd	<p>In paragraph of the inspectors letter to ELDC dated the 11th. October 2017, they make the following comments: 11. Unless there is strong evidence available now to indicate otherwise, the allocations that Fall wholly mainly within one of the four hazard zones do not appear to be justified in line with sequential test requirements and so should be deleted from the plan. These appear to include : Marshchapel- MAR 217, 226, 300 and 304.</p> <p>Whilst it is our contention that strong evidence has already been submitted in accordance with the sequential test requirements, which support and justify the allocation of the four housing sites in Marshchapel, we would highlight</p>	<p>Marshchapel is a village classed as outside the Coastal Flood Hazard Zones and this was discussed at the Examination Hearings with a paper at EDO22 which set out why Marshchapel was designated as outside the zone compared to other settlements. Given the information set out below in respect of Easdon Consultants Ltd, the Council is satisfied that the site can be developed with suitable flood mitigation. Discussions had already started to take place to bring the sites forward and up to the point of them being removed from the Plan flood risk issues were being mitigated. It was only ever intended that the suitable portions of the sites should be developed and the areas in higher flood risk would have been either part of a sustainable drainage system or green space on the site. The</p>

the existing evidence already submitted to date as well as some additional relevant assessments and planning policy requirements. In the ELDC November 2016 SHLAA document, the LPA set out a detailed analysis for assessing the suitability of land for housing, which included a "flood risk assessment" based on the Environment Agency's (EA) 2014 Flood Hazard Maps together with other relevant planning criteria. Having undertaken this detailed assessment of all the qualifying data, four sites (the allocated housing land) were chosen as being suitable for housing in the village, with six other sites rejected as being unsuitable. With the publication of the Submission Modifications Draft Part Two (March 2017) document, further detailed evidence is provided to support and justify the housing sites selection in Marshchapel. This additional information provides information on possible flood risk to each site with the advice that - "A sequential approach to development should be applied and appropriate mitigation to design out the impacts of flood risk." With regards to other parcels of land in Marshchapel, which have not already been discarded as a result of the SHLAA process, there would appear to be only two "pockets" of land in Flood Zone 1. The first of these is the land around St Mary's Church (a grade 1 Listed Building) located to the south of the village, with the other area being the grounds and adjacent rear gardens to The Old Hall (a grade 2 Listed Building). Taking into account that both areas comprise small parcels of land within the immediate setting of "listed buildings", whilst these might be suitable for some minor infilling, neither is large enough for a housing allocation. From the latest E. A. Flood

Council would support reinstating these sites into the Plan, which would, albeit only by a small quantity also increase housing supply.

Map whilst there are a small number of Flood Zone 2 areas shown in and around Marshchapel, most of the Flood Zone 2 "pockets" are located outside of the village framework, with a few shown to be within the existing built up area. Two of these Flood Zone 2 "pockets" occur within the housing allocations of MAR 217 and MAR 304, with another two immediately surrounding The Old Hall and St. Mary's Church. A further two are located in Church Lane and along Littlefield Lane, where they are significantly constrained with regards to providing any substantive housing as they are in the main, rear garden areas to existing residential properties and would only be suitable for minor infilling, at best. In the Modifications Draft Local Plan (February 20L6-2A3t), Marshchapel is identified as a large village which has a good range of facilities including shops, a garage, 2 public houses and a fish and chip shop, a village hall and primary school and playing fields. With the deletion of all the proposed housing allocations in the settlement, there would be "no growth" in Marshchapel for the next 25 years, the consequence of which would have a devastating impact on the viability of all these existing services and facilities? As such, the removal of all housing allocations would conflict with and be contrary to the advice in the NPPF Section 3 Supporting a prosperous rural economy. In particular, the policy in paragraph 28.-"To promote a strong rural economy, local and neighbourhood plans should: promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues,

		<p>cultural buildings, public houses and places of worship."</p> <p>Taking into account the strong evidence provided in these representations with regards the sequential test requirements there is clear justification for the retention of the housing allocations within the village. As such, the proposed changes set out under MM46 in the Schedule of Proposed Main Modifications, which would result in all the housing allocations for Marshchapel (i.e. MAR 217, MAR226, MAR 300 and MAR 304) being deleted, would be contrary to the relevant advice in the National Planning Policy Guidance (NPPF) and result in the Local Plan being unsound.</p>	
Pages 112, 114-116	D Frosoni, Cole Easdon Consultants Ltd representing Mossop Farms Ltd	<p>In paragraph of the inspector's letter to ELDC dated the 11th. October 2017,they make the following comments:</p> <p>11. Unless there is strong evidence available now to indicate otherwise, the allocations that fall wholly mainly within any of the four hazard zones do not appear to be justified in line with sequential test requirements and so should be deleted from the plan. These appear to include : Marshchapel - MAR 217,226,300 and 304</p> <p>It is our contention that strong evidence has already been submitted in accordance with the sequential test requirements, which support and justify the allocation of the four housing sites in Marshchapel. In the ELDC November 2016 SHLAA document, the LPA set out a detailed analysis for assessing the suitability of land for housing, which included a "flood risk assessment" based on the Environment Agency's (EA) 2014 Flood Hazard Maps together with other relevant</p>	

planning criteria. The EA's Flood Hazard Mapping shows the consequences should a breach or overtopping of existing sea defences occur. The Environment Agency has advised in correspondence with the landowner that, based on Hazard Mapping, the sites can be developed safely and in accordance with NPPF requirements as long as the following mitigation measures are incorporated into development proposals:

The minimum mitigation measures required for single storey developments, or developments that include ground floor sleeping accommodation, should be informed by the flood depths arising from the 2115 0.1% breach scenario. Any proposals that do not include ground floor sleeping can be informed by the flood depths arising from the 2115 0.5% breach scenario'. 2115 0.1% {1:1000yr) breach

Flood depths across the four sites would vary from 0 to 1m deep maximum across most of the area. If ground floor bedrooms are proposed then mitigation would comprise:

1. For areas where flood depths are 0.5m - 1.0m: FFL should be set a minimum of 1.0m above ground level, with flood resilient construction incorporated to a minimum height of 300mm above the predicted flood level.
2. For areas where flood depths are 0.25m - 0.5m: FFL should be set a minimum of 500mm above ground level, with flood resilient construction incorporated to a minimum height of 300mm above the predicted flood level.
3. For areas where flood depths are 0 - 0.25m: FFL should be set a minimum of 300mm above ground level, 2115 0.5% (1:200 yr) breach

Flood depths would vary from 0 to 0.5m deep maximum across most of the area. Where ground

	<p>floor bedrooms are not proposed then mitigation would comprise:</p> <ol style="list-style-type: none"> 1. For areas where flood depths are 0.25m - 0.5m: FFL should be set a minimum of 500mm above ground level, with flood resilient construction incorporated to a minimum height of 300mm above the predicted flood level. 2. For areas where flood depths are 0 - 0.25m: FFL should be set a minimum of 300mm above ground level. <p>Taking into account the EA's advice that the sites can be developed safely in flood risk terms provides further evidence in support of the sequential test process that has been followed and clear justification for the retention of the housing allocations within the village. As such, the proposed changes set out under MM46 in the Schedule of Proposed Main Modifications, which would result</p>	
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MM Ref No 47	Name or Organisation of Respondent	Response	Councils Response
Site SPY310	Historic England	Welcomes the main modification in respect of the site	No comment
Site SPY310, page 123	Gin Property Ltd, represented by Robert Doughty Consultancy Ltd	We support in principle the replacement of the last paragraph of the settlement text for Spilsby. For clarity, however, the reference to the road to the east of the town could be misleading, as it may suggest that a relief road or bypass is anticipated. The wording should be replaced using the text box for sites SPY301, SPY303, SPY304 and SPY305 that say,	There is no need to alter the wording of the SPY310 with regard to the Health facility if the need is taken up elsewhere it is a given fact that the need will not need to be provided on the site. It is a key piece of infrastructure that should be provided to assist growth in the town, the community support the provision of new health care and it should be clear in the plan that this is going to occur.

	<p>"A vehicle link connection between Ashby Road and the B1195, relieving pressure from the town centre ...".</p> <p>Support the provision of a new descriptive box for SPY310. Reference is made in the text, however, to the inclusion of a medical centre. We do not doubt that new medical provision is required in the town. Gin Property Limited has entered into positive discussion with the CCG to explore the opportunity to locate the medical centre SPY310. We understand that the CCG has committed to relocating the medical centre on this site. As stated above in response to MM31, however, it is possible that the need for health services may be met in some other way, elsewhere in the town, hence removing the need for delivery of the facility as part of this development. As such, the wording should be revised to acknowledge the possibility that health facilities could be provided elsewhere and, if so, the need for SPY310 to provide another facility would be removed. The wording should reflect this possibility and not insist on the provision of a health centre if the need has gone.</p> <p>We note the reference in "Deliverability of the site" to the owner. Gin Property Limited has an interest in the site, but does not own the land.</p>	
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MM Ref No 49	Name or Organisation of Respondent	Response	Councils Response
SIB303	Anglian Water	Just to confirm that as the site boundary as shown in document CD109 is greater than 400m from Sibsey WRC. Therefore we would have no	No comment

		concerns relating to the removal of the existing wording relating to the preparation of an odour assessment.	
Site SIB303	Historic England	Welcomes the main modification in respect of the site	No comment
Site SIB406	Historic England	Welcomes the main modification in respect of the site	No comment

MM Ref No 52	Name or Organisation of Respondent	Response	Councils Response
Site TNY308	Lindsey Marsh Drainage Board	Notes the modification and welcomes the change	No comment

MM Ref No 53	Name or Organisation of Respondent	Response	Councils Response
Woodhall Spa – Site WSP314, pages 156/157	Anglian Water	Ticked the boxes on the form to confirm that the modification is legally compliant and sound.	No comment

MM Ref No 54	Name or Organisation of Respondent	Response	Councils Response
Page 163	North Somercotes Parish Council	Box showing the existing coastal housing commitments 1. Why does this table not include the other settlements clearly in the coastal flood zone, eg Marshchapel, Hogsthorpe, Huttoft, Tetney and Grainthorpe?	The table was discussed at the Examination Hearings and is therefore clarity to set out how the 1257 existing commitments is made up across the Coastal Zone.

		<p>2. There is nowhere that a member of the public can look at a map in this plan and see for each settlement what housing commitments are already there, and what is in the plan.</p> <p>3. If settlements like Marshchapel and Huttoft are shown with their 0 allocations, why are not all settlements shown, whether coastal or inland, with their allocation?</p>	<p>The Council set out at ED022 and ED055 how it determined which settlements should be in the Coastal Zone and which sites should and should not be removed from those settlements. North Somercotes is clearly within the Coastal Zone and justification has been provided for placing Marshchapel, Hogsthorpe and Grainthorpe outside the zone, the Council`s position on this remains the same. These three settlements fall inland in this Plan and therefore they do still need to appear in the table of settlements and do not need to appear in the list of settlements covered by the Coastal Zone</p>
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CHANGES TO SUBMISSION POLICIES MAP COMMENTS

CS Map 1	Name or Organisation of Respondent	Response	Councils Response
Page 5	Lincolnshire Wildlife Trust	<p>Core Strategy Map CS1 does not represent any internationally designated nature conservation sites (ie Ramsar wetlands, Special Protection Areas (SPA) and Special Areas of Conservation (SAC)) on the map or key.</p> <p>It was agreed at the Stage 2 hearing session that as Policy SP24 identifies these sites for protection, they should also be shown on the maps and we are pleased to note that ancient woodlands have been added as requested. We would argue that for Policy SP24 to be properly enacted and effective, all of the sites and designations it covers should be mapped for clarity. It is also inconsistent with national policy as paragraph 117 of the NPPF states that: 'To minimise impacts on biodiversity and geodiversity, planning policies should: identify</p>	<p>This overlapping happens in a number of areas where there are multiple overlays. To make changes to the notations to suit one site may have a knock on effect on legibility on other sites. To put all the overlays on the map will mean a less legibility. The important thing is that anyone looking at the site can see it is nationally protected.</p>

		and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation...’.	
	Greater Lincolnshire Nature Partnership	<p>At the Examination hearing it was agreed by the Inspector that all sites referred to by Policy SP24 should be included on the maps in order for the policies to be duly enacted.</p> <p>The Policies Map now appears to have included all Local Sites (although the scale makes this difficult to be certain), but international sites have been missed.</p> <p>These international sites include SACs, SPAs and Ramsar sites. These almost exclusively overlap with the SSSI designations on the coast so a means of adding these designations with clarity should be determined.</p> <p>A lack of these designations on the Policies Map means that the Plan is not:</p> <ul style="list-style-type: none"> • Legally compliant because: policies and proposals to protect the integrity of internationally important nature conservation sites will be ineffective because they are unaware of the presence of such sites. • Sound because: it is not effectively enabling the delivery of sustainable development in accordance with the policies in the NPPF, in particular paragraphs 7, 17, 109, 110, 117 and 118 	<p>This overlapping happens in a number of areas where there are multiple overlays. To make changes to the notations to suit one site may have a knock on effect on legibility on other sites. To put all the overlays on the map will mean a less legibility. The important thing is that anyone looking at the site can see it is nationally protected.</p>

CS2	Name or Organisation of Respondent	Response	Councils Response
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Addition of a key for maps CS1 and CS3	Greater Lincolnshire Nature Partnership	<p>At the Examination hearing it was agreed by the Inspector that all sites referred to by Policy SP24 should be included on the maps in order for the policies to be duly enacted.</p> <p>The Policies Map now appears to have included all Local Sites (although the scale makes this difficult to be certain), but international sites have been missed (see previous representation to CS1). With the addition of these sites to the map the key will also need to be amended to represent these sites.</p> <p>These international sites include SACs, SPAs and Ramsar sites. These almost exclusively overlap with the SSSI designations on the coast so a means of adding these designations with clarity should be determined.</p> <p>A lack of key to identify these designations on the Policies Map means that the Plan is not:</p> <ul style="list-style-type: none"> • Legally compliant because: policies and proposals to protect the integrity of internationally important nature conservation sites will be ineffective because they are unaware of the presence of such sites. • Sound because: it is not effectively enabling the delivery of sustainable development in accordance with the policies in the NPPF, in particular paragraphs 7, 17, 109, 110, 117 and 118 	<p>This overlapping happens in a number of areas where there are multiple overlays. To make changes to the notations to suit one site may have a knock on effect on legibility on other sites. To put all the overlays on the map will mean a less legibility. The important thing is that anyone looking at the site can see it is nationally protected.</p>
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CS5	Name or Organisation of Respondent	Response	Councils Response
Page 5	Lincolnshire Wildlife Trust	Core Strategy Map CS5 (Wind Energy Policy map) includes some internationally designated nature conservation sites (i.e. Special Protection Areas (SPA) and Special Areas of	The Council can add the word "Ramsar Sites" against the key of the map.

		<p>Conservation (SAC)), however it excludes Ramsar sites. Paragraph 6 of the supporting text for SP24 identifies all three designations as being those represented by the policy and it was agreed at the Stage 2 hearing session that as Policy SP24 identifies these sites for protection, they should also be shown on the maps. We would argue that for Policy SP24 to be properly enacted and effective, all of the sites and designations it covers should be mapped for clarity. This map is currently incomplete and does not provide a clear and comprehensive geographical illustration of the policies.</p> <p>It is also inconsistent with national policy as paragraph 117 of the NPPF states that: 'To minimise impacts on biodiversity and geodiversity, planning policies should: identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation...'</p>	
Page 5	Greater Lincolnshire Nature Partnership	<p>At the Examination hearing it was agreed by the Inspector that all sites referred to by Policy SP24 should be included on the maps in order for the policies to be duly enacted.</p> <p>The map includes the international sites SACs and SPAs but misses Ramsar sites. These almost exclusively overlap on the coast so a means of adding this designation with clarity should be determined.</p> <p>A lack of this designation on the Wind Energy Policy Map means that the Plan is not:</p>	The Council can add the word "Ramsar Sites" against the key of the map.

		<ul style="list-style-type: none"> • Legally compliant because: policies and proposals to protect the integrity of internationally important nature conservation sites will be ineffective because they are unaware of the presence of such sites. • Sound because: it is not effectively enabling the delivery of sustainable development in accordance with the policies in the NPPF, in particular paragraphs 7, 17, 109, 110, 117 and 118 	
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SP3	Name or Organisation of Respondent	Response	Councils Response
Page 23 and MM35 pages 23 and 24	David Sims represented by Robert Doughty Consultancy Ltd	We support the deletion of Site BLM310 from the Burgh Le Marsh inset map. The site has many constraints that would undermine the delivery of development on the site. The retention of the BLM310 would obscure clarity regarding the development aspirations in the settlement and could have delayed delivery of other allocated sites, such as BLM 318, which does not suffer from any such constraints.	No comment

SP20	Name or Organisation of Respondent	Response	Councils Response
Page 124	Gin Property Ltd, represented by Robert Doughty Consultancy Ltd	We support the deletion of the references to housing sites SPY303, SPY301, SPY304, SPY306 and SPY305 on the Spilsby inset map. The land to the west of Spilsby is now known by the reference SPY310 and is promoted as a single large-scale development. Deletion of the different site references reduces the potential for confusion.	No comment

		<p>We note and support the update to the Sustainability Appraisal acknowledging the inclusion of five sites in the wider allocation SPY310. The larger site will clearly have a more significant impact on the surrounding landscape than each site individually. The level of demand for housing necessitates the allocation of more than one site. Amalgamating the sites into one allocation, however, provides the opportunity to secure a comprehensive landscape scheme to limit development in sensitive areas in a way that would not be possible if the sites were brought forward individually. A single scheme also has the benefit of enabling a comprehensive approach to drainage, pedestrian circulation, highways etc, which will provide a greater benefit than the development of smaller sites in isolation.</p> <p>Promotion of the single allocation is a key way to ensure delivery of the necessary homes, at the appropriate time and in sustainable location. Updating the Sustainability Appraisal is a key measure to delivering a sound plan.</p>	
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SP24	Name or Organisation of Respondent	Response	Councils Response
Woodhall Spa page 154	Lincolnshire Wildlife Trust	Revised Woodhall Spa Settlement Proposals Map (SP24) is unclear in its depiction of nature conservation sites. In particular Coal Pit Wood Local Wildlife Site and Ancient Woodland is shown at the northern edge of the map, however the overlay of the two designations means it isn't clear what the site is. In	This overlapping happens in a number of areas where there are multiple overlays. To make changes to the notations to suit one site may have a knock on effect on legibility on other sites. The biodiversity interest of the site is highlighted and the more detailed analysis for the reasons for its protection can be dealt with when a planning

		particular, the Ancient Woodland designation is difficult to see and we would request that the display of the overlapping layers is improved for clarity. This map currently does not provide a clear illustration of Policy SP24	application is assessed. The important thing is that anyone looking at the site can see it is nationally protected.
SP25	Name or Organisation of Respondent	Response	Councils Response
Woodhall Spa page 155	Lincolnshire Wildlife Trust	<p>Revised Woodhall Spa Settlement Proposals Map (SP25) appears to display a number of errors. There are a number of sites shown on this map which appear to match the key item for Ancient Woodland, however they do not appear to be ancient woodland when checked against the layers we possess. Judging by the labelling of the key, we would suggest that these sites should have been shown as Protected Open Space.</p> <p>Additionally, Bracken Wood Local Wildlife Site and Ancient Woodland is shown at the western edge of the map and the overlay of the two designations means it is not clear what the site is. In particular, the ancient woodland designation is difficult to see and we would request that the display of the overlapping layers is improved for clarity. This map currently does not provide a clear or accurate illustration of Policy SP24.</p> <p>It is therefore also inconsistent with national policy as paragraph 117 of the NPPF states that: 'To minimise impacts on biodiversity and geodiversity, planning policies should: identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated</p>	<p>It would appear as if this is plotted correctly, protected open space and ancient woodland, this is the overlays that the Council has.</p> <p>This overlapping happens in a number of areas where there are multiple overlays. To make changes to the notations to suit one site may have a knock on effect on legibility on other sites. Bracken Wood has been checked the site is denoted properly to its full extent. It is ancient woodland, a local wildlife site and part of it is also a SNCI. The biodiversity interest of the site is highlighted and the more detailed analysis for the reasons for its protection can be dealt with when a planning application is assessed. The important thing is that anyone looking at the site can see its full extent and that it is nationally protected.</p>

		sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation...'.	
Woodhall Spa inset map	Greater Lincolnshire Nature Partnership	<p>At the Examination hearing it was agreed by the Inspector that all sites referred to by Policy SP24 should be included on the maps in order for the policies to be duly enacted.</p> <p>The map includes a LWS that is also ancient woodland in the north. From the shading of this site it is not clear that it is both of these designations and as such Policy SP24 cannot be effectively enacted.</p> <p>The lack of clarity on these designations means that the Plan is not:</p> <ul style="list-style-type: none"> • Sound because: it is not effectively enabling the delivery of sustainable development in accordance with the policies in the NPPF, in particular paragraphs 7, 17, 109, 110, 117 and 118 	<p>It would appear as if this is plotted correctly, protected open space and ancient woodland.</p> <p>The Council is not sure which site is being discussed but overall this overlapping happens in a number of areas where there are multiple overlays. To make changes to the notations to suit one site may have a knock on effect on legibility on other sites. The biodiversity interest of the site is highlighted and the more detailed analysis for the reasons for its protection can be dealt with when a planning application is assessed. The important thing is that anyone looking at the site can see it is nationally protected.</p>

SP32	Name or Organisation of Respondent	Response	Councils Response
Saltfleet page 183	Lincolnshire Wildlife Trust	The areas identified on the map as Sites of Special Scientific Interest (SSSI) are also internationally designated as Ramsar wetlands, Special Protection Areas (SPA) and Special Areas of Conservation (SAC) though this has not included on the map or key. Paragraph 6 of the supporting text for SP24 identifies all three designations as being those represented by the policy in addition to national and local designations and it was agreed at the Stage 2 hearing session that as Policy SP24 identifies	The Council does have the SAC designation but it is such a thin line that it does not show up on the map – it can be added anyway onto the map. The area is already shown as a national designation and therefore putting additional designations on it does not provide any additional visibility to the site through the plan and actually might make it more confusing with a lot of overlays that you cannot see the detail of. The important thing is that anyone looking at the site can see it is nationally protected.

		<p>these sites for protection, they should also be shown on the maps. We would argue that for Policy SP24 to be properly enacted and effective, all of the sites and designations it covers should be mapped for clarity. This map is currently incomplete and does not provide a clear and comprehensive geographical illustration of the policies.</p> <p>It is also inconsistent with national policy as paragraph 117 of the NPPF states that: 'To minimise impacts on biodiversity and geodiversity, planning policies should: identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation...'</p>	
Saltfleet inset map	Greater Lincolnshire Nature Partnership	<p>At the Examination hearing it was agreed by the Inspector that all sites referred to by Policy SP24 should be included on the maps in order for the policies to be duly enacted. The GLNP has two points to make on this modification:</p> <p>Incorrect shading of Ancient Woodland This map identifies a number of areas as Ancient Woodland however these do not match the Natural England Ancient Woodland Inventory. Instead they seem to match the allocations for Protected Open Space. The GLNP suggests that these areas have been incorrectly shaded. The error means that the Plan is not: Sound because: it is not effectively enabling the delivery of sustainable development in accordance with the policies in the NPPF, in</p>	<p>The area is already shown as a national designation and therefore putting additional designations on it does not provide any additional visibility to the site through the plan and actually might make it more confusing with a lot of overlays that you cannot see the detail of. The important thing is that anyone looking at the site can see it is nationally protected.</p>

		<p>particular paragraphs 7, 17, 109, 110, 117 and 118</p> <p>Unclear shading of overlapping designations</p> <p>Similar to the point made on SP24, the map includes a LWS that is also ancient woodland in the west. From the shading of this site it is not clear that it is both of these designations and as such Policy SP24 cannot be effectively enacted. The lack of clarity on these designations means that the Plan is not:</p> <p>Sound because: it is not effectively enabling the delivery of sustainable development in accordance with the policies in the NPPF, in particular paragraphs 7, 17, 109, 110, 117 and 118</p>	
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SP33	Name or Organisation of Respondent	Response	Councils Response
Skegness, Page 187	Lincolnshire Wildlife Trust	<p>The map should also identify the Saltfleetby-Theddlethorpe Dunes & Gibraltar Point Special Area of Conservation which partly overlies the area of SSSI designation shown. Paragraph 6 of the supporting text for SP24 identifies the international designations represented by the policy and it was agreed at the Stage 2 hearing session that as Policy SP24 identifies these sites for protection, they should also be shown on the maps. We would argue that for Policy SP24 to be properly enacted and effective, all of the sites and designations it covers should be mapped for clarity. This map is currently incomplete and does not provide a clear and comprehensive geographical illustration of the policies.</p> <p>It is also inconsistent with national policy as paragraph 117 of the NPPF states that: 'To</p>	<p>The Council does have the SAC designation but it is such a thin line that it does not show up on the map – it can be added anyway onto the map. The area is already shown as a national designation and therefore putting additional designations on it does not provide any additional visibility to the site through the plan and actually might make it more confusing with a lot of overlays that you cannot see the detail of. The important thing is that anyone looking at the site can see it is nationally protected.</p>

		minimise impacts on biodiversity and geodiversity, planning policies should: identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation...’.	
Skegness inset map	Greater Lincolnshire Nature Partnership	<p>At the Examination hearing it was agreed by the Inspector that all sites referred to by Policy SP24 should be included on the maps in order for the policies to be duly enacted. This map includes the SSSI but international sites have been missed.</p> <p>These international sites include SACs, SPAs and Ramsar sites. These overlap with the SSSI designations so a means of adding these designations with clarity should be determined. A lack of these designations means that the Plan is not:</p> <ul style="list-style-type: none"> • Legally compliant because: policies and proposals to protect the integrity of internationally important nature conservation sites will be ineffective because they are unaware of the presence of such sites. • Sound because: it is not effectively enabling the delivery of sustainable development in accordance with the policies in the NPPF, in particular paragraphs 7, 17, 109, 110, 117 and 118 	<p>The Council does have the SAC designation but it is such a thin line that it does not show up on the map – it can be added anyway onto the map. The area is already shown as a national designation and therefore putting additional designations on it does not provide any additional visibility to the site through the plan and actually might make it more confusing with a lot of overlays that you cannot see the detail of. The important thing is that anyone looking at the site can see it is nationally protected.</p>

SP35	Name or Organisation of Respondent	Response	Councils Response
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<p>Burgh le Marsh</p>	<p>Lincolnshire Wildlife Trust</p>	<p>The map should also identify the Saltfleetby-Theddlethorpe Dunes & Gibraltar Point Special Area of Conservation which partly overlies the area of SSSI designation shown. Paragraph 6 of the supporting text for SP24 identifies the international designations represented by the policy and it was agreed at the Stage 2 hearing session that as Policy SP24 identifies these sites for protection, they should also be shown on the maps. We would argue that for Policy SP24 to be properly enacted and effective, all of the sites and designations it covers should be mapped for clarity. This map is currently incomplete and does not provide a clear and comprehensive geographical illustration of the policies. It is also inconsistent with national policy as paragraph 117 of the NPPF states that: 'To minimise impacts on biodiversity and geodiversity, planning policies should: identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation...'</p>	<p>The Council does have the SAC designation but it is such a thin line that it does not show up on the map – it can be added anyway onto the map.</p>
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Other Comments not related to the Main Modifications	Name or Organisation of Respondent	Response	Councils Response
ED035a	Askey Family Rents – Agent John Chappell	Querying the wording set out against a site to the south of Church Road South, Skegness in that the owners have not gone bankrupt.	The Council have correct this information on ED035a.
Request for a minor modification to the wording of site LO311 in Louth	Barton Willmore	We would request that a minor modification is made to the site specific description of our clients site (reference L0311), in order to provide clarification to the vehicle access to the site, at present it states that the access is going to be off Chestnut Drive with the demolition of two properties and through the adjacent development site, there are footpath links to the centre. We would suggest the following amendment, "the vehicle access is going to be off Chestnut Drive with the demolition of two properties. Pedestrian linkages will be provided to the adjacent development site to enable access to the centre of Louth"	The Council has no objection to this minor modification of the wording connected to LO311, it does not alter the context of the site in terms of its location or numbers and provides clarity over the access.
Overall comment	Canal & River Trust	The Trust confirms that they do not have any comments to make	No comment
General Comment	Mr G Cox - Louth	I have read the District Plan and the modifications but apart from a one line mention under tourism of exploiting the Louth Navigation and River Witham I cannot find any further details. For example: the Multi-User Path along the Canal and the plans to connect it to existing pathways and the report drawn up by Sustran to meet these objectives? Or to the historical built environment along the Canal (warehouses, water mills) and other features that could be used to increase tourism with	The Core Strategy is an over-arching policy document and does not drill down into specifics of areas as such, a sentence drawing attention to the Louth Canal would be sufficient. Development which supports tourism would be supported by the Council providing it conformed to the Local Plan and National Planning Policy and the more strategic a policy is means that it tends to be more flexible for decision making.

		<p>increased interpretation and access to the Navigation? I would have thought the District Plan was a suitable home for these developments?</p>	
Ref Site NTH308 – North Thoresby	Historic England	Welcomes the main modification in respect of the site.	There is no modification on this site.
Informal comment	Lincolnshire County Council	<p>The County Council acknowledges that at this stage representations will only be accepted on the Proposed Main Modifications, and proposed map changes, and as such does not wish to raise any objections to the Plan in this respect. The Authority would however like to make the following informative comments for the consideration of the District Council.</p> <p>The adopted Lincolnshire Minerals and Waste Local Plan (MWLP) forms part of the development plan, and therefore is of direct relevance to the East Lindsey Local Plan. Amongst other policies, the MWLP designates Mineral Safeguarding Areas, and also identifies individual waste sites that should be safeguarded from incompatible development. Relevant Policies include M11, M12 and W8 of the Core Strategy and Development Management Policies (CSDMP), and SL2 of the Site Locations document (SLD). Minerals and waste safeguarding relies on cooperation between District and County Councils. The District Council is required to Consult the County Council on relevant development proposals that affect safeguarded minerals sites and resources, and waste sites, as per the above policies.</p>	<p>The County Council have not made previously any formal comment on the local plan around this issue. Having checked the maps that the County have on their website, none of the safeguarded areas affect the settlements which are having allocations – the Council can either post a link to LCC`s maps on the local plan section of its website or add the maps as an overlay onto the final version of the plan.</p> <p>With regard to the distance from waste treatment plants – LCC have not made any comments previously but Anglian Water have as it is their plant and their comments have been taken into account during the site allocation process.</p>

		<p>Para 5 of the Planning Practice Guidance (Minerals) requires District Councils to show Mineral Safeguarding Areas on their policies maps. We would therefore request that the Mineral Safeguarding Areas set out in the MWLP are shown on the final Policies Maps of the East Lindsey Local Plan. This information was previously provided to District Councils in July 2016 following adoption of the CSDMP. We will also shortly be sending additional GIS layers to the Districts setting out the sites and areas allocated in the recently adopted SLD (including additional site specific Mineral Safeguarding Areas).</p> <p>We would also draw your attention to the supporting text to Policy W8 of the CSDMP which notes that "Where new non-waste development involving buildings which would normally be occupied is proposed within 400m of a water recycling centre, the application should be accompanied by an odour assessment report" This would therefore apply to future planning applications the District may receive on a number of Allocations proposed in the East Lindsey Local Plan where they are close to Water Treatment Works, including Housing allocations in Legbourne, North Thoresby, Wainfleet and Woodhall Spa. Details of water treatment works, along with other safeguarded waste sites were previously provided to the District Councils as set out above.</p>	
SIB303	John Neal Farms Ltd	The Council has indicated that SIB303 should cover 8 hectares. However the area shown on	This is not a comment on a modification. The map has not altered from the publication

		<p>the map measures 6.6 hectares. If part of this is given over to the school then the area for housing will be reduced. The Council needs to amend the map to show the full 8 hectare extent of the allocation. Please treat this letter as an objection as the boundary line is inaccurate.</p>	<p>version of the Plan. The developer of the site has confirmed the boundary in their representation in the publication stage consultation and they appeared at the Examination Hearings to confirm again the boundary. The Council has however noticed a mistake in the text box for the site which still states 8 hectares, this should read 6.6 hectares which is the amount of land confirmed by the developer and shown in the publication version of the Plan.</p>
<p>Comment from Mablethorpe Town Council</p>	<p>Mablethorpe Town Council</p>	<p>As resolved at the meeting of the Planning Committee of the Town Council held on Monday 12th February 2018 to express support on behalf of the Town Council for the Main Modifications to the Local Plan</p>	<p>No comment</p>
<p>Comments made by Skegness Town Council – no indication if they relate to the Main Modifications</p>	<p>Skegness Town Council</p>	<p>The Plan does not seem to be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements to meet locally evidenced need. There are inconsistencies in the approach and some parts of the strategy, plan and policies appear to be counter intuitive.</p> <ul style="list-style-type: none"> <input type="checkbox"/> The plan does not seem to provide a convincing strategic and appropriate way forward that has been considered against alternative approaches and that is supported by good quality evidence. <input type="checkbox"/> The plan will not be effective because the evidence it is based on is already substantially out of date in some key areas. <input type="checkbox"/> The plan quotes National Planning Policy in respect of Town Centre vitality but does not provide a suitable framework to actually deliver this. 	<p>This is the same response as submitted during the June 2016 consultation. The Town Council made no response to the Publication Version consultation in November 2016, though they were sent a letter as a statutory consultee. They also offered up no evidence during the June 2016 consultation to support their comments.</p> <p>The comments against Chapter 4 actually relate to a previous Gypsy and Traveller consultation when the Council were looking at a range of sites including Skegness Industrial estate.</p> <p>Therefore it is not possible to comment against these comments because they appear to relate to a version of the Local Plan which has been modified at least twice since the comments were made and which offer no new evidence.</p>

		<p>Chapter 2 - The prevention of housing growth works against the policy of economic development and growth. Alternative sites may be available within the ELDC area but these are not connected to the coast by adequate and suitable public transport provision.</p> <p>The plan does not enable Housing Land Allocation to be managed through the NDP in Skegness which is currently the primary residential area in East Lindsey.</p> <p>Chapter 4 - The proposed 20 pitch site is inadequate to enable Police to take enforcement action against large groups parking in areas that are not allowed as it will not provide an adequate area to move them to.</p> <p>The proposals to site this on an industrial site is not acceptable. As well as the potential health and safety issues for those who would be using the site (including children), no other residential or semi residential site would be allowed here and such a mix of residential and non-residential will be a departure from existing policy.</p> <p>There are already indications that if the site is located on the industrial site this will harm existing and future economic investments and this will consequentially impact job prospects.</p> <p>Chapter 6 - Retail evidence is significantly out of date for Skegness.</p> <p>Skegness is described in the local plan as a primary retail site. However, there has been</p>	<p>With regard to the Neighbourhood Development Plan, the Town Council has had a designated area for the last two years but has, as far as the Council is aware not progressed with the NDP, as with all NDP's it will have to be in general conformity with the Development Plan in terms of flood risk and this will have to be demonstrated through the NDP examination process.</p>
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a significant impact of on-line retail and this needs to be tackled if Skegness is to be secure in its retail offering. The Local Plan offers nothing in this regard and relies on an evidence base that is 8 years old (i.e. pre significant on-line retail offerings and loss of major retailers). The Local Plan is simply not robust enough and lacks any ambition or strategic thinking.

For the largest settlement in East Lindsey this is unacceptable. National Planning Policy has a strong focus on protecting the vitality and viability of town centres, but these are just words unless there are strategic and innovative policies to support this aim. The policies as set out seem to be aimed at maintaining the status quo rather than tackling the issues and supporting Skegness to grow its economy.

Chapter 7 - Evidence is 6-7 years old outside the time suggested when a plan would require significant revision (i.e. 5 years). This section is very weak and does not meet the ambitions of the strategy.

Chapter 9 - Evidence Base

There is concern that the evidence base for some aspects of the proposed local plan is out of date. The East Lindsey Retail & Leisure study dates from 2008 which is pre the explosion in on-line retail which has completely changed the pattern of retail commerce and impacted the requirements of retail within Skegness.

The economic baseline is 6 years old.

The hidden communities' project is 5 years old, but caravan parks siting residential style vans have significantly increased during this period.

There is a lack of any transport or movement of people surveys showing how retail, leisure and residential areas connect currently and how this will be developed to improve viability and economic prosperity in the future.

Strategic Thinking

The plan lacks coherent strategic thinking for the Coastal area and in particular Skegness, which is the Districts main area of population. In areas, the approach and policies seem to be contradictory in aim and ambition.

Economic growth and job creation is a key issue to tackle deprivation, which the plan seeks to address and support. However, there is no planned growth for housing other than the permissions that have already been granted. The plan refers to a "technical over supply" due to permissions already granted. But this places the responsibility and decision making for housing growth and development into a very small number of developers whose main focus may not align with the needs of the town. If the town is to be vibrant and prosperous, then either there will need to be an increase in supply of the correct type of homes or significant improvement to public transport links to other residential areas where growth is permitted. The plan acknowledges the need for "affordable" housing in the area and is willing to allow development in this respect. But this position completely ignores the

market situation whereby "affordable housing" is only built by private developers where it can be funded through the sale of "market value" houses. This essentially means that new affordable houses would need to come from the public or housing association sectors which with current financial constraints is unlikely. This also affords no growth to enable the benefit of the prosperity ambition, enabling those who can move on from lower cost housing to free these up for others.

The plan on the one hand appears to support additional or extended caravan parks but on the other hand does not wish to encourage more people using these as their main home. The only policy set to influence this is to restrict the occupation times from March to October. This presents many contradictory elements which are not fully explored or considered: -

- They can still be occupied as a "main residence" for 7.5 months per year with the associated strain placed on local services.

Those in permanent or semi-permanent residence will have a lower daily spend than those holidaying, but will also be much less likely to contribute to local infrastructure costs than those in permanent dwellings.

- ELDC's economic development policy is to extend the season – this policy seems to be encouraging holiday accommodation which is incapable of supporting this policy

- No account has been taken of the levels of demand for new caravan spaces and what a sustainable number for the future is. Without this evidence base there is a risk that new

demand is simply coming from existing parks which will leave these semi-occupied and eventually lead to their decline.

The plan vaguely refers to the employment and leisure opportunities and that ELDC support the principle of this, but surely the Local Plan should be setting the level of ambition at this early stage by identifying policies in support of the site?

Policies (SP13):

E. The Local Plan should set out that existing permissions for phases on larger developments that have not been started, may be withdrawn if these are not being used to meet local demands.

F. Could the updated Brownfield Site register be included as an Appendix?

L. "...advertised at the prevailing market value.."

W. This should include permanent living for a substantial period of the season (e.g. where the caravan is clearly being used as an alternative to permanent accommodation rather than as a holiday let or as a weekend retreat.

Chapter 10 - Evidence Base

There is concern that the evidence base for some aspects of the proposed local plan is lacking. There is a lack of any transport or movement of people surveys showing how retail, leisure and residential areas connect currently and how this will be developed to improve viability and economic prosperity in the future.

The most recent car park survey appears to be 2011 and does not take into account

changes including the removal of Pier Field, the changes to parking restrictions on the parades and the introduction of height barriers.

The LCC Local Transport Plan is notably weak in addressing problems in the East Lindsey Area in general and Skegness and the Coast specifically. There is little consideration of managing holiday traffic with the traffic surveys being carried out on a weekday in October. The Local Plan encourages economic growth but does not show how increases in economic activity will be managed from a transport perspective.

Strategic Thinking

The Local Plan sets aims for the coast to develop and grow and encourages Skegness to be an all year round holiday resort. The plan does not demonstrate real aspiration or ambition for the future to reduce deprivation and increase good opportunities for the working age residents of Skegness, or to full fill their potential and it does not go far enough to improve the experience of visitors to our town and the coastal economy.

Transport links are essential whether it is to complete a college education, access healthcare or visit all areas in Lincolnshire and beyond.

Skegness has a resident population of approximately 22,000 people which increases significantly during the holiday season. If this increase is to be maintained all year round, the plan needs to support improved road and public transport infrastructure to ensure easy access for business, tourists and residents.

The Local Plans main priority is in support of good foot and cycle routes, using call connect and the plan wants to reduce traffic congestion with the Western relief road. But these alone do not sufficiently support the strategic aspirations of the Local Plan.

Policies (SP14)

1. Define the "key facilities"

3. This would surely need to be shown to link to existing footpaths and cycleways and part of a strategic approach?

4. Specific mention also for Blind users having regard to national best practice in respect of road and pathway surfaces.

5. This sounds as if it is anticipated that car parks may be sold off for development.

Simply having a robust survey is not sufficient, showing that there is a) alternative parking arrangements and b) this will not compromise future development must be a pre-requisite.

Where are the policies to encourage the delivery of an improved transport infrastructure?