



Local Development Framework for South Kesteven

Submission Core Strategy

Statement of Representations Made and Summary of Main Issues (Regulation 30 (1)(e))

August 2009



1. Introduction

- 1.1 This statement has been prepared in accordance with the requirements of Regulation 30(1) (e) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008.
- 1.2 The Council is required to prepare and publish a statement setting out the number of representations received in accordance with Regulation 28(2) following publication of the Development Plan Document (DPD) and a summary of the main issues raised in those representations.
- 1.3 Details of the consultation carried out during the preparation of the Core Strategy DPD up to publication of the submission document, including who was consulted, the methods of consultation, a summary of the main issues raised and how those issues have been addressed, are contained in the Regulation 30 (1)(d) Statement.
- 1.4 In response to a number of matters raised in the representations, a number of changes have been proposed to the Submission Core Strategy. These are intended to:
 - correct typographical errors
 - reflect adoption of the East Midlands Regional Plan (RSS8)
 - provide clarification
 - improve thoroughness

These are set out in a separate Schedule of Proposed Changes.

2. The Representation Period

- 2.1 The Core Strategy, the accompanying Sustainability Appraisal and supporting documents were published on Friday 16 January 2009. Representations were invited over a six-week period, closing on 27 February 2009, in accordance with Regulations 27 and 28.

3. Representations Received

- 3.1 A total of 486 responses were received from 79 different respondents.
- 3.2 A total of 29 respondents have indicated that they wish to participate at the examination: 27 to support their representations that the Core Strategy is not sound and two to support the Council.
- 3.3 The remaining respondents have stated that they do not wish to participate at the examination or have not indicated how they wish to progress.

4. Summary of the Main Issues Raised in the Representations

- 4.1 Set out below is a summary of the key issues raised in the representations submitted, starting with general comments applicable to the whole document. Comments have been summarised in respect of each policy/chapter.
- 4.2 The consultees that raised the issues are identified, with the number after their name refers to their representation number. Copies of representations are available to view in full separately via the Council's consultation website (<http://consult-southkesteven.limehouse.gov.uk>).

5 Conformity with Regional Spatial Strategy (RSS)

- 5.1 Under Regulation 29, the East Midlands Regional Assembly (EMRA) was requested to provide their opinion of the 'general conformity' of the Submission Core Strategy DPD with the RSS. The current statutory RSS for the East Midlands is RSS8. EMRA's opinion is that the South Kesteven Core Strategy is in general conformity with RSS8 (33).

6. General Comments

- 6.1 Although 481 separate responses were received to the Core Strategy, only 50% commented on its soundness and 35% on its legality.
- 6.2 A few representations were received which related to the document as a whole. Four of these were expressions of support.
- 6.3 Natural England (33) were concerned that the Core Strategy does not contain a specific green infrastructure policy and Sport England West Midlands (6) sport and recreation standards.
- 6.4 Five representations relating to the background evidence were received. Three of these were from developers who disagreed with specific assessments within the Strategic Housing Land Availability Assessment (SHLAA) (relating to sites they were promoting) (Mr Raymond (58), Mr Fearn (342) and Larkfleet Homes (345)). Lincolnshire Wildlife Trust (412) felt that the biodiversity evidence base is not robust and credible and one respondent (Mr Ablitt, 384) expressed concerns about flood protection for The Deepings.

7. Spatial Portrait

- 7.1 The respondents suggested that the spatial portrait text could be supplemented by including reference to the following:
- availability of local mineral supply for major infrastructure projects (Lafarge Aggregates, 21)
 - reference to cross boundary influences (GOEM, 465)
 - Stamford's strategic rail and road network (Strutt and Parker, 295)
 - the historic qualities of Grantham and The Deepings (English Heritage, 108)
 - Grantham's Canal (British Waterways, 364)
 - the pockets of rural deprivation (Community Lincs, 49)
 - the wider public benefits of the Districts' heritage attractions (The National Trust, 349)
- 7.2 One respondent (Mr Grove, 19) felt that it was incorrect to state that Stamford has a thriving tourist industry.

8. Challenges

- 8.1 There were few representations to this section. Concern was expressed that the importance of Stamford was not being recognised: planning for sustainable growth within Stamford should be given as much importance as Grantham (Stamford Chamber of Trade and Commerce, 299).

9. Vision and Spatial Objectives

- 9.1 The few responses received were largely in support of the vision, although it was suggested that it could be amended to reflect the emphasis placed by the Government on sustainable development and climate change (Environment Agency, 154) and references to the built environment be changed to historic environment (Heritage Trust for Lincolnshire, 296).
- 9.2 It was suggested the objectives should be more locally specific and clearly recognise the important role played by education, training and the health service in regenerating communities (GOEM, 466) and establish Stamford's role in accommodating future growth (Strutt and Parker, 300).
- 9.3 There was support for Objective 1, although a respondent felt the sentiments within it are not followed up in policies SP1 and H1 (Eastern Farm Implements, 134): this criticism was also made about Objective 5 by the same respondent.

- 9.4 It was felt that more development should be directed to the Local Service Centres and smaller settlements to prevent their stagnation (Carter Jonas, 3 and Community Lincs, 52) rather than the towns identified in Objective 2.
- 9.5 Concern was expressed that the emphasis on housing delivery through the Sustainable Urban Extensions (SUE) within Grantham to meet Objective 5, will lead to the housing needs not being achieved (Constable Homes, 409).
- 9.6 It was suggested that to meet Objective 8 additional housing in rural areas will be needed to support the rural economy (Community Lincs, 53).
- 9.7 English Heritage (358) and National Trust (113) would like the wording of Objective 11 reframing so that it offers stronger protection to the historic environment of Stamford.
- 9.8 The responses to Objectives 3, 12, 13 and 14 were in support.

10. SP1: Spatial Strategy

- 10.1 EMRA (35) states that the settlement hierarchy accords with the RSS. GOEM supports the policy and states it is consistent with the RSS (467).
- 10.2 It was claimed that the policy is too restrictive:
- development should be permitted on brownfield sites within or adjacent to Local Service Centres (LSCs) rather than "within the built up part of the settlement" (Larkfleet Homes (189), Mr Fearn (335), Gibbons Holdings Ltd. (74))
 - more growth should be directed to LSCs (Mr Fearn, 319)
 - new development should be considered on "suitable, deliverable" rather than "appropriate" greenfield sites (Strutt and Parker, 313).
- 10.3 Several respondents felt the settlement hierarchy does not accord with that in the RSS. It was suggested (The Welby Estate, 398 & Stamford Property Company, 29) that Stamford should be designated as a principal market town for growth, Bourne as a market town restricted to maintaining existing viability and the Deepings as a smaller market town to meet local needs.
- 10.4 An increase in the amount of housing at Grantham and allocation of another SUE was suggested [site suggested owned by respondent] (HPC Homes, Namulas Trustees & Pask, 255). However, the National Trust (352) is concerned that additional development at Grantham does not have an adverse effect on Belton House.
- 10.5 There were requests that development should be allowed in villages where it would deliver significant community benefits [e.g. Tallington and the possibility of securing a Bypass - also made in response to SP2] (Mr Thurlby, 211 and Mr Fearn, 319), and that allowing development in small settlements would take pressure of LSCs.
- 10.6. To discourage the conversion of shops to residential, it was suggested that "not proposed for use which will deplete the community of a valuable local service" should be added to the Policy bullet points (Rep 193).

11. SP2: Sustainable Communities

- 11.1 GOEM (468) is generally supportive, but raises issues related to the evidence justifying the LSC selection.
- 11.2 There was general support for the policy, although it was suggested that local communities should decide on local development and that growth should be allowed in smaller settlements to improve sustainability (Community Lincs, 56 & Mr Hydes, 66).

- 11.3 There were concerns about the identification of settlements as Local Service Centres. Fulbeck Parish Council (18) want LSC designation to maintain viability and the National Trust (353) want it removed from Woolsthorpe by Colsterworth to protect its historic significance.
- 11.4 There was concern that policies SP1 and SP2 are inconsistent, in that SP1 infers some LSCs are at capacity or constrained by services but SP2 explicitly supports provision of enhanced facilities (Billingborough Parish Council, 149).
- 11.5 Lincolnshire County Council (LCC) (5) is concerned the policy is inflexible and could prevent the disposal of community assets (e.g. schools) which are no longer required.
- 11.6 There was also concern that "assets" may be interpreted as being only those which are publicly or community owned, whereas the policy embraces private premises (Billingborough Parish Council, 197).

12. SP3: Sustainable Integrated Transport

- 12.1 EMRA (36) felt that the policy has strong accord with RSS policies 44 and 45 and GOEM (469) generally supported the policy.
- 12.2 One comment was received seeking to ensure that only residential development in the Grantham area pays the Strategic Infrastructure Tariff, (Macdonald Buchanan Trust, 104) [This comment would appear to be of more relevance to Policy SP4, but has clearly been submitted in respect of Policy SP3] and one response sought amendments to the policy to ensure that only development in the southern SUE contributes towards a relief road (Allison and Stamford Homes, 495).
- 12.3 There were several comments (Market Deeping Town Council, 443 among others) about the lack of public transport links in the District, especially east to west, and about remoteness (e.g. no public transport link between Grantham and the Deepings).
- 12.4 There were concerns that the policy makes no provision for a bypass for Tallington village (Market Deeping Town Council, 443 and Mr Thurlby, 209).

13. SP4: Developer Contributions

- 13.1 There were several comments on this policy, especially from developers seeking clarification of the detail. One respondent (Allison and Stamford Homes, 496) wanted Strategic Infrastructure Tariff references removed. GOEM (470) sought clarification that infrastructure required will be identified in the Grantham Area Action Plan (AAP).
- 13.2 Several respondents (all parish/town councils) were concerned to ensure that monies raised would be used locally and only for the purpose raised (Caythorpe Parish Council (280), Colsterworth Parish Council (439), Market Deeping Town Council (445)).
- 13.3 Clarification was sought on who would be consulted, the areas that the Tariff will apply to, the practicalities of administration and method of assessment of developer contributions. These concerns were mainly expressed by developers.
- 13.4 Clarification was sought by the Environment Agency (166) (concerned about the pressure on water resources and sewerage system exerted by hotel and factory developments) that contributions would be sought from major developments other than residential.
- 13.5 LCC (education) (91) stressed that implementation of Tariff should not affect the ability of the LCC to gain education contributions from all residential development where it is appropriate.

14. EN1: Protection and Enhancement of the Character of the District

- 14.1 EMRA (50) has concerns that the policy does not make reference to several regional policy matters, e.g. green infrastructure, woodland cover, strategic river corridors, air quality, culture, sport and recreation, car parking standards and freight.
- 14.2 There were several representations that the policy is not strong enough on the historic landscape and archaeology (The National Trust (356), Heritage Trust for Lincolnshire (301)). Some parties felt that it should be more proactive in conservation and restoration (English Heritage, 118).
- 14.3 There were representations that the policy is not strong enough on protection of the natural environment, especially Local Wildlife Sites. Lincolnshire Wildlife Trust (LWT) (422) wants a target of no local sites lost to development. Natural England (132) felt the policy should be more proactive and not just protect but also enhance and create natural habitats.
- 14.4 The National Trust (356) is concerned that, with the removal of Local Plan policies EN5 and EN6, there is insufficient protection for important open spaces.
- 14.5 Cambridge County Council (124) feels that the policy does not take account of green infrastructure proposals in Peterborough.

15. EN2: Reducing the Risk of Flooding

- 15.1 GOEM (471) questions whether the LA and the utility provider are actively engaged in providing a solution to the lack of sewer network.
- 15.2 Environment Agency (152) supports the policy, but suggests rewording to highlight specific areas where Flood Risk Assessments will be required.
- 15.3 Concerns were expressed, mainly by developers (Macdonald Buchanan Trust (106), Larkfleet Homes (326), Strutt and Parker (308)) but also British Waterways (367), that the policy is too restrictive and does not allow for the possibility that in some circumstances SUDS may not be appropriate or possible.
- 15.4 Market Deeping Town Council (447) hope the policy will be followed robustly. It is concerned about the possibility of flooding in the town and feels the present flood defences are not being maintained, and that development south of the River Welland (in a neighbouring local authority area) will impact on the flood plain.

16. EN3: Renewable Energy Generation

- 16.1 There were few responses, and all in support. Several amendments were suggested, all by the respondent, Billingborough Parish Council (206, 207, 208):
- addition to policy that the proposals maintain the District's share of any Regional targets, to stop the Policy being interpreted as giving unlimited or disproportionate development in the District.
 - changing "connected efficiently" to "connected efficiently and without environmental or community damage", to ensure that efficiency is not considered solely in monetary terms.
 - addition of a separation of 2km between wind turbines and human habitation cites sources for reason and suggests addition of sentence stating proposals should not cause unacceptable health risks to people living in the vicinity.

17. EN4: Sustainable Construction and Design

- 17.1 All the representations received were in support, although there were several comments that the policy lacked clarity and required further detail.

17.2 Natural England (426) and LWT (346) would like to see a requirement that development contributes to achieving East Midlands Biodiversity Plan targets.

17.3 One respondent (Community Lincs, 67) felt that the policy was too rigid, and suggested that it be reworded so that development should "seek" rather than be "required" to provide 10% of energy requirements.

18. H1: Residential Development

18.1 This policy received the largest number of responses, mainly from developers and landowners. There was concern that the overall strategy will stifle development in smaller communities and does not sit comfortably alongside Government policy to ensure everyone has the opportunity to live in a decent home, which they can afford, in the community where they want to live.

18.2 The Regional Spatial Strategy (RSS) housing requirements were set out as minima; several respondents wanted to clarify whether % requirement is a ceiling for each area (Welby Estate (401), Persimmon Homes East Midlands (405)).

18.3 The removal of five year tranches for housing provision and replacement with annual average being calculated across the remaining plan period as set out in the East of England Regional Plan was suggested (EMRA, 38).

18.4 Several respondents (Persimmon Homes East Midlands (405), Strutt and Parker (310), Constable Homes (408) among others) wanted clarification of policy requirements in relation to build rates in Stamford and Deepings with the numerical provision and annual build rate shown in the table.

18.5 Several respondents claimed the policy does not demonstrate that there are sufficient deliverable and developable sites and broad locations to deliver the district housing target, suggesting more housing should be identified for Stamford, and an additional SUE identified in Stamford (Reps Stamford Property Company (31 and 370), Strutt and Parker (318)).

18.6 It was suggested (Mr Smith, 314 & Mr Webster, 250) that the amount of housing identified for Grantham is too high: it exceeds the 2750 homes up to 2016 assumed by the Growth Point status. The ability of SUEs to deliver required number of homes was also questioned and alternative SUEs were suggested (see H2 below).

18.7 Several respondents disagree with the distribution of housing in the Policy:

- more housing and employment land should be identified for LSCs, to achieve the vision and other statements in the Core Strategy.
- housing figures should be reduced for Bourne and Stamford and increased for the Deepings (Messrs Brint, McCallion, Miller, 373).
- housing requirement for Grantham is excessive: redistribute to increase requirement for other towns and LSCs (Larkfleet Homes (328) and Macdonald Buchanan Trust (107)).
- Grantham's growth rate is supported (Mr Wilde, 371) but Bourne and Stamford's should be reduced and redistributed among LSCs to ensure their vitality.
- Grantham's housing requirement should be increased (HPC Homes, Namulas Trustees & Pask, 259) to allow for identification of third SUE at Belton Lane, Manthorpe.
- amend distribution to allow development below LSC level where it would secure key infrastructure improvements (e.g. Tallington Bypass) (Mr Thurlby, 221).

18.8 There were expressions of support for the policy:

- distribution in Bourne supported but no new sites needed (Mr Found (20) and Dr FitzPatrick, (82))

- Buckminster Estates (375) support the distribution – especially for Grantham. The two urban extension sites can be delivered.
- focus in Grantham supported, but greater flexibility needed to deal with possible increases in housing requirements arising from RSS review (Jelson Ltd. (462) and DLP (392)).

18.9 Rippingale Parish Council (383) opposes any affordable housing in village unless purely for locally identified need, and Caythorpe (an LSC) (285) does not wish to have large amounts of development, but does need low cost and social housing to meet local needs.

18.10 LWT (427) is concerned about the availability of water resources to support number of households proposed.

18.11 Two respondents (Mr Fearn (339) and Gibbons (Holdings) Ltd (75)) suggest that the text in relation to LSC (development confined to built up part of the settlement) is inconsistent with allocating land for development which is likely to extend beyond the confines of the existing settlement, and against objectives of PPS7.

19. H2: Urban Extension Sites (Grantham)

19.1 Additional mixed use sites suggested as urban extension adjacent to A1, A52 Grantham, and between Manthorpe and Belton Lane (Springfield Park Properties (343) and HPC Homes, Namulas Trustees & Pask (261)). It was also suggested (Springfield Park Properties, 344) that, in view of the need for strategic employment land, an urban extension for employment use should also be identified in Grantham.

19.2 Several respondents requested that SUEs be identified in locations other than Grantham:

- on the eastern side of Stamford, to maintain and enhance Stamford's role and achieve a critical mass for the delivery of essential infrastructure to accommodate future housing requirements (Stamford Property Company Ltd, 92).
- in Bourne, and Deepings (Larkfleet Homes (332), Mr Webster (257) and Stamford Property Company Ltd, (32)).
- Tallington which would deliver improvements to A16 and railway crossing (Mr Thurlby, 226).

19.3 The Environment Agency (175) is concerned that the policy does not reference the need to address problems identified in the Water Cycle Study relating to sewage issues which affect both SUEs.

19.4 Concerns were expressed about the effects of the development:

- The Heritage Trust for Lincolnshire (304) wants reference to protection of unscheduled archaeological features worthy of preservation in-situ.
- The National Trust (355) wants additional bullet point concerning the setting of the Belton Estate.
- English Heritage (123) support proposals but feel more analysis is needed of the archaeological and landscape impact.

19.5 Other concerns included:

- reassurance that shops within the SUEs would only serve a local need and not become new centres to draw trade away from the town centre (Wm Morrison Supermarkets, 97).
- whether two SUEs are needed rather than a single site.
- phasing between the two SUEs: essential to ensure that one is able to achieve a critical mass before the other is released so that they do not compete with each other (GOEM, 473).

20. Poplar Farm (Urban Extension)

20.1 Several representations in support of the SUE were received:

- the key landowner (Buckminster Estate, 376) is confident both sites are realistic and deliverable. Development will commence in the early in plan period and will be phased throughout at a rate of 150 – 200 dwellings per year.
- Jelsons (463) stated this site has fewer constraints to overcome, is a natural extension to the town and is close to the town centre with good public transport, and should be phased first to kick start the housing provision for Grantham.

20.2 There were a few objections to the inclusion of the site:

- LWT (428) object to possible loss of neutral grassland and potentially adverse impact on badger population in the western part of the site.
- site not deliverable and should be deleted with resulting deficit of 3500 homes redistributed to Stamford, Bourne and Deepings (Macdonald Buchanan Trust, 112).

20.3 The Environment Agency (175) want reference to be included to identify use of SUDs in the development of the site, and the National Grid (334) state that the 4VK 400kV overhead electricity transmission lines (in close proximity to the site) should be retained in situ.

21. Southern Quadrant (Urban Extension)

21.1 There were several representations about this site. As stated above, the key landowner (Buckminster Estate, 376) is confident that both sites are realistic and deliverable. Development will commence in the early in plan period and will be phased throughout at a rate of 150 – 200 dwellings per year.

21.2 Constable Homes (413) expressed concern that a number of factors will delay or prevent the delivery of housing here. In particular the cost implications of the new road and the fact that both SUEs are in same ownership means development rates will be restricted.

21.3 Other concerns include:

- provision of new road and loss of existing employment land at Southern Quadrant is counter to desire for balanced growth - resulting housing deficit should be redistributed to Stamford, Bourne and Deepings (Macdonald Buchanan Trust, 112).
- Southern Quadrant should be deleted - questions about its viability and deliverability in light of the high mitigation costs to overcome constraints (Strutt and Parker, 311).
- the proximity of Southern Quadrant to the Lafarge ready-mix operation at Springfield Lane (Lafarge Aggregates, 23).
- the possibility of harm caused to the Biodiversity value of the site and its surroundings (Natural England, 350).
- the biodiversity evidence base: LWT (428) concerned that SNCI information is out of date. Also concerned about potential impact of the development on the River Witham and the White clawed crayfish population has not considered in sufficient detail.
- The Heritage Trust for Lincolnshire (305) want the policy to be amended to say “The site will require investigation and protection of archaeological remains if appropriate”

21.4 GOEM (473) is concerned about lack of reference to the critical infrastructure necessary for the delivery of this SUE, also no indication given about the scale or type of employment allocation that would support the SUE in this location, or how this would contribute to infrastructure improvements.

22. H3: Affordable Housing

- 22.1 Most of the representations received to this policy were from developers and landowners.
- 22.2 There was support for the policy from two Parish Councils (Market Deeping Town Council (454) and Caythorpe Parish Council (288)).
- 22.3 Several objections were received to this policy as follows:
- the 40% target is too high and makes no allowance for site viability or negotiation on a site-by-site basis (Jelson Ltd. (464) and Strutt and Parker (312) among others).
 - target is excessive and may compromise the delivery of sites and services and infrastructure to support LSCs (Larkfleet Homes, 195).
 - will impact delivery of both affordable housing and market housing and compromise the ability to meet strategic housing requirements (Larkfleet Homes, 315).
- 22.4 Concerns were raised that policy on exceptions sites is too restrictive (Community Lincs, 71) and a more flexible approach is required to encourage village development.

23. H4: Gypsies and Travellers

- 23.1 Several responses were received in respect of this policy.
- 23.2 The Deepings Community Group (377, 380, 381 & 382) is concerned about:
- the assumptions and conclusions reached in the Fordhams report and the GTAA as set out in the consultation on possible sites, which they feel have not been addressed.
 - reference to the RSS providing a minimum requirement for Gypsy and Travellers pitches but doesn't say what this is.
 - policy fails to have appropriate regard to Circular 01/2006.
 - extent and quality of research.
- 23.3 Other concerns raised by this policy were:
- sites should not be in Bourne which has reached limit of its facilities - they should be in the countryside away from local towns and villages, as new villages to accommodate the need (Mr Lauanders, 26).
 - need must be proven before a site is identified for the Deepings Area (Market Deeping Town Council, 455).
- 23.4 English Heritage (125) wants re-instatement of the criterion about impact on landscape character in the policy.
- 23.5 The Environment Agency (177) welcome intention to avoid area at risk of flooding, but suggest the policy could be strengthened by referencing areas identified as at risk of flooding in the Strategic Flood Risk Assessment (SFRA).

25. H5: Travelling Showpeople

- 25.1 This policy received few responses. Market Deeping Parish Council (456) stated that "need must be proven before a site is identified for the Deepings Area". The Environment Agency (178) welcome the intention to avoid area at risk of flooding, but suggest that the policy could be strengthened by referencing areas identified as at risk of flooding in the SFRA.

26. E1: Employment Development

- 26.1 There were concerns (Billingborough Parish Council, 267 & 268) that the forecast increase in demand for office floorspace was not carried through into Policy E1 and reflected in the scale of allocations, nor was it clear what proportion of the allocation was for office compared to other employment uses.
- 26.2 The question of whether additional location criteria could be left to subsequent DPDs was raised (GOEM, 475).
- 26.3 There was support for the identification of Grantham as strategic location for employment development. However, some respondents sought additional allocations, at Grantham through a third, employment led, urban extension (Springfield Park Properties, 340), Roseland Business Park (Roseland Group Ltd., 324) and the identification of a strategic allocation to the west of Stamford (Strutt and Parker, 306) and at Market Deeping (Larkfleet Homes, 333). One respondent wanted a clear indication of the amount of employment land within Grantham's urban extensions (Allison and Stamford Homes, 500).
- 26.4 Some respondents sought refinements to the wording of Policy E1 around whether all or just one of the bullet point criteria should be met and recognition of leisure as rural diversification (EMRA (42), Caythorpe Parish Council (291) and British Waterways (362)).
- 26.5 One respondent felt that the policy did not adequately address provision in rural settlements to maintain their social and economic viability (Mr Fearn, 120).
- 26.6 Some respondents felt that the policy was silent on improvement to existing employment sites (Mr Fearn (311) and Market Deeping Town Council (457)).

27. E2: Retail Development

- 27.1 There was a view that recognition should be given to the role that consolidation and expansion of existing retail developments within, or on the edge of, existing centres could have in meeting need arising from an increased population (Sainsbury's Supermarket Ltd, 8).
- 27.2 There was a view that the evidence base was flawed as this did not recognise the need for additional convenience floorspace that would be needed over the Core Strategy period (ARCS, 480).

28. Monitoring and Implementation

- 28.1 Few representations were received to this section of the Core Strategy.
- 28.2 One developer commented that the approach is focussed solely on meeting housing target by the end of the plan period in 2026, and has little flexibility to meet housing needs in the short- to medium-term (Constable Homes, 410). Suggested a mechanism to allow for short-term shortfall to be remedied by release of appropriate sites for residential development (own site suggested).
- 28.3 Concern was expressed about limited or no capacity at sewage treatment works in some parts of the district, which may have a fundamental effect on housing and employment allocations (Billingborough Parish Council, 274).
- 28.4 Lincolnshire CC (94) proposed rewording of para 7.11 (education) to aid clarity.
- 28.5 Some concern was expressed (Rep 576) that the framework lacked specific targets.

29. Appendix A

29.1 Several representations were received objecting to the deletion of Local Plan Policies EN5 and EN6 (Welby Estate (403), Caythorpe Parish Council (292)). Concerns raised included:

- sensitive and important local areas left unprotected.
- areas should be identified in Site Specific Allocations DPD.
- importance of open spaces between communities.
- English Heritage (121) and the National Trust (375) do not regard EN1 and the LCA as adequate replacement.

29.2 The National Trust (375) is concerned that Policy EN1 is not an adequate replacement for Policies EN7 and EN8, which it wants retained and replaced by allocations in the Site Allocations DPD.

30. Appendix B

30.1 The Environment Agency (182) supports indicators for Policies EN2, EN3 and EN4 and requests inclusion of water quality indicators.

31. Appendix C

31.1 No representations were received in respect of the definitions within the Glossary.

