

Central Lincolnshire Local Plan 2018 - 2040

Response to Consultation from Lincolnshire Independents

August 2021



Foreword

The Lincolnshire Independent Councillors recognise that the Local Plan is a set of rules against which every planning application will be compared. It is a vital tool in shaping the future of our area.

The Lincolnshire Independents have consulted nationally on the issues through the Local Government Association, and through the Independent Network's series of events called "Greening our Local Plan". Locally, members consulted with Parish Councils and three public meetings over the consultation period ending on August 24th. The group has collated this combined response, reflecting Lincolnshire's rural villages and towns. The draft plan is here. www.central-lincs.org.uk

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Introduction

We welcome the lower average numbers of dwellings, but object to the heavier pressure on villages which have few facilities and little capacity. Most likely to be controversial is the continued requirement for more dwellings, without any guarantee of matching services and facilities, and we object to the removal of any maximum on the growth of small and medium-sized villages. Also controversial is the U-turn on wind turbines from being a general presumption against, to a general presumption in favour of turbines up to 40m and an invitation to much larger turbines in an open landscape. There are also good things to support and to strengthen. For example the encouragement of dwellings being built to reduce carbon emissions in future, open spaces, tree protection and the inclusion of biodiversity net gain.

Policy S1

Village Hierarchy

Proposal: The hierarchy gives relative sizes of villages and to keep that intact, the thresholds between categories should raise in line with the average rate of development. Villages with an average rate of development should stay in the same category, rather than suddenly facing a different set of rules designed for villages of a different character.

Policy S2 Growth Levels and Distribution p16

The Vision page 10 and connected policies in S1 and S2 page 17 2.2.5, 2.2.8 and 2.2.10

... "homes needed to support economic ambitions... delivering economic growth within the region."

Object to the statement that the fundamental objective of this plan is "economic ambition". The previous plan had regard to local need as this plan should.

Propose this should be carried forward into the new plan, thus,

"Housing: To ensure that the housing stock meets the housing needs of the Central Lincolnshire area." This would strengthen the ability to control house types to meet local need.

We **welcome** the lower average numbers of dwellings, but it is still over-ambitious and we **object** to the heavier pressure on villages which have few facilities, little capacity and an important rural character that we need to maintain.

With the trend in population reduced by Brexit and Covid this figure of 1,060 new dwellings per year, now looks over-ambitious and unlikely to be achieved, jeopardising the five year land supply and making us vulnerable to unwanted developments.

The scale of development proposed is unnecessary and counter-productive in reducing carbon emissions, especially when it is front-loaded as indicated in figure 1 on page 163. This is both environmentally and thus economically dangerous.

The high number of dwellings, disconnected with local need, encourages large houses, inward migration, extra car travel and huge pressure on existing services and infrastructure, which are already over-burdened. The numbers should be as lower, at a level to fulfil local need and to enable matching infrastructure and maintenance to be provided.

Proposal: The plan targets the minimum number of dwellings allowed by Government negotiation, as that gives us the best chance of attaining the five-year land supply required by Government and avoid the plan becoming vulnerable to unwanted speculative developments.

A lower rate of build reduces the pressure and gives the best opportunity of building healthy communities with fulfilled local requirements in infrastructure and without spoiling the character of the villages.

Proposal: The “need” of house types and locations should be better evidenced and connected to robust policies to ensure house types are built to match what local people need and want. An inventory of current housing stock and the gap of what’s needed would be an important starting point if this plan is to serve residents.

“Locations best suited and most attractive to the market”. Map 52

This means the locations and types of houses do not fit local need. More robust policies are needed to control development in villages and to strengthen our ability to control the types of housing, such as more smaller houses for older people and affordable housing in all areas.

Phasing of development

Proposal: A clause on phasing developments to assist in getting services and infrastructure in place and also allow technological innovation in low carbon building materials.

Without phasing, the increased development can only add to the climate emergency, contrary to the stated objectives of the plan.

Front-loading development also gives *less* opportunity for innovation in renewable energy and in building materials. A phasing approach would also allow time for better, more sustainable development as technology develops.

Policy S4 Housing Development in or adjacent to villages p20

2.4.3 “Development in villages will be of a modest scale.”

We **strongly object** to removing the “maximum new dwellings” in medium and small villages and the requirement for community consultation, if that maximum is to be exceeded.

The “maximum new dwellings” or “caps” were said to be removed because the developers took them up quickly, leaving no room for other perhaps better developments. Removing the cap on small and medium villages does not address the problem of controlling the rate of development.

There is insufficient control on development in this policy. Developers can still quickly snap up the first 10%, but then carry on with further developments, five or ten houses at a time as much as they wish.

A controlled phasing approach is required overall and certainly the cap needs to be maintained if we are to keep the quality of build, sustainability in all its senses, and character of our villages and towns.

Proposal: There needs to be a clear “maximum number of dwellings” per village, transferred from the current Local Plan to this draft. The paragraph in 3b should be extended to cover all of Policy S4, applying a 10% cap to all small and medium sized villages.

We also call for an effective reference to the cumulative impact of multiple applications.

To allow for the 10% to be superseded, the “community consultation” should also be transferred from the previous plan to this draft. Rewording the guidance detail would make it far more effective, more fully representative of community support.

Ten houses at a time is too many for medium-sized villages, as a single application could be a 4% increase. Medium villages should be restricted to five dwellings at a time and small villages remain at 4 dwellings at a time. We welcome the lowering of the number of dwellings per application in larger villages moving from 25 to 10 dwellings per application.

Exceptions sites Policy S4 para 3b

The wording here could be clearer.

A 10% increase in the number of dwellings or footprint of the village is too much, damaging to the character of the village and because these people also have higher needs, yet the development will not attract any 106 contributions.

In this policy, to go over the 10% increase, a developer would simply need to evidence that their particular development is proportionate to the village as a whole. This is imprecise, leading to confusion and lack of consistency.

Proposal: There needs to be a clear cumulative maximum, such as 5% of the current settlement. Each application should also be of the same four or five dwellings only in keeping with the character of the built community.

Policy S5 Development in the Open Countryside p23

Proposal: Tighter control on the scale of industrial development in the open countryside as in S33

Industrial development in the open countryside should be better controlled, even if associated with agriculture under part f, “agricultural diversification” and part g “agricultural development”.

Industry is best suited to industrial sites with good road links and applications in the open countryside, even associated with agricultural activities, should be discouraged.

For applications under f and g, a sequential test should be applied to test if the development could reasonably be accommodated on a designated industrial site.

New developments should not materially alter the character of the rural location, so the size and scale is important.

Where vehicular traffic is significantly increased, a sequential test should be applied to consider if the development should be closer to major roads and settlements, or to the source.

The policy needs to clarify that lagoons of digestate need permission if above a certain size and to fulfil criteria relating to proximity to dwellings, watercourses etc.

Policy S6 and 7 Reducing Energy Consumption p28

We **welcome** these proposals. Could they be implemented before the legislation requires it?

We **suggest** that there needs to be some flexibility without compromising the objective in 2, for example, other zero carbon forms of energy may be delivered, such as green hydrogen, so the infrastructure such as gas pipes, need to be allowed.

Policy 21 Affordable housing p54

This local plan does not address the need for affordable homes in the number required. Affordable housing levels need to be higher to closer match local demand, closer to the 50% of calculated need and in all locations where it is needed, including small villages.

Proposal: The policy needs to be clear that housing needs to be genuinely affordable, not just cheap, built to a lower specification, and in perpetuity.

Land values are depressed by the rate of development and this diminishes the opportunities for the affordable housing needed. A policy should be included to prevent developers paying too much and then requiring the Council to reduce their infrastructure contributions.

The contribution to affordable housing is far too low, leaving too big a gap in the evidenced need for affordable housing and what is found from development. The requirements need to be raised.

Proposal: Proportionate contributions should be made by all new dwellings, not a ten new dwelling threshold. For smaller contributions, it should be a commuted sum paid to the District or City Council.

Policy S13 Renewable Energy Generation. From p36

Support the move to encourage housing to be sustainable in its energy use, hence a need to be closer to carbon neutral in future. The policy should not allow an easy option of paying into private renewable energy companies instead.

Object to the reliance of wind turbines for renewable energy

Lincolnshire is already well supplied with offshore turbines. Electricity is easily transportable. The need for each planning authority to be self-sufficient in renewable energy is not evidenced and is not necessary.

The renewable energy companies say that 40m turbines are not cost-effective. This puts heavy pressure to build much larger turbines in the very small parts of the area that are more than 2km from any settlement. For example, the Navenby lowfields area and Metheringham heathland that will both have significant impact on the neighbouring protected cliff edge environment and on wildlife corridors.

This is not an appropriate form of development in a flat landscape, as upheld in the previous planning refusals of turbine applications, such as at Nocton. The cooling towers at Cottam Power Station 25 miles away from the Cliff Edge are 114.3m. If larger turbines are allowed, and efficiency is “maximised”, then turbines will be at their tallest, over 200m high less than two miles from the Cliff Edge. The Cliff Edge is approximately 50m above the adjacent white turbine area, so turbines over 50m would be an alien industrial feature in the landscape, overshadowing the protected areas and significantly changing the character of those areas.

Two of the white areas for large turbines shown on map 2 page 39 are in the red value zone shown on Map 3 on page 52, damaging opportunities for economic gain through housing development.

The larger turbines are required to be more than 2km from a settlement (para 3.3.12). The impact of turbines on the value of the red zones should be considered. The industrialisation of the countryside does have an adverse impact on tourism and quality of life for residents, contrary to the NK Plan.

The Cliff Edge is an area of Great Landscape Value because it is the views *from* the Cliff Edge, which are significant. The white area (Map 2) to the west of the Cliff Edge should therefore be excluded, because of their significant impact on the Cliff Edge. Previous turbine applications at Nocton and Potterhanworth Fen were refused.

The document accepts there is a need to require a 2km minimum gap between settlements and large turbines because of the impact on health and visual intrusion.

Proposal: An individual dwelling also suffers significant disadvantage of proximity to large turbines and must also be allowed a similar buffer zone.

3.3.4 This paragraph suggests a further 81MW of solar energy, but a further 150MW from wind. There is too much emphasis on turbines where we get huge objections to the visual intrusion of industrialising the countryside, effects of noise on mental health and impact on wildlife. We receive far less objection to solar panels, to which our landscape is better suited, hidden behind high hedges in flat landscape. The land under the panels significantly enhances our biodiversity. They are less permanent than the concrete base of large turbines and can be returned to farmland as more efficient renewable energy sources develop. Solar energy has proven deliverability, but wind power has not. By 2040, we will be a third short on energy because this is no evidence that it is deliverable.

All new dwellings and industrial buildings should have solar panels and be angled accordingly as far as possible.

A policy for dismantling renewable energy structures when no longer required needs to be included.

Demonstrable local support should need to apply to all dwellings *within sight* of the turbine. The difficulty with assessing local community support has been previously identified, especially where money can be made available for local projects by energy companies in a way not done by housing development companies. We do not see community support as a viable mechanism when the impact of what could be very high turbines is so far reaching.

The heights of the turbines are unlikely to be as low as suggested in the text, since the newer turbines are over 200m, creating an impact which cannot be mitigated in our landscape.

Similar objections are well explained in the submission from one of our members. Peter Lundgren, following group discussions, and which we support.

We **support** solar panels when well screened and we have seen very successful increase in biodiversity underneath. The Natural Environment Research Council has identified the need for an increase in biodiversity which should be supported here in this policy.

Policy S50 Creation of new open space, sports and leisure facilities p104

We **support** this policy as open spaces are vital for our health and that of the natural world.

Proposals: This should be proportionate to *all* new development, not just making up a shortfall as in a) in Policy S50. This can be by an agreed commuted sum offsite, working through the Parish or Town Council.

Funding mechanisms should include a proportionate contribution from all dwellings, not just when in batches of ten.

Developments need to leave sufficient space for all trees, newly planted or existing mature trees, to grow to their full capacity without root impairment and housing density will need to take this into account.

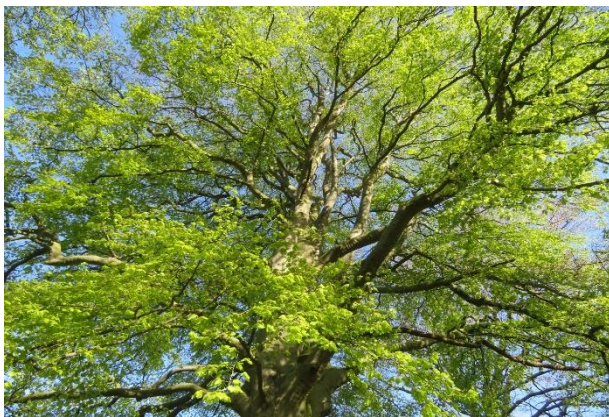
New developments should contribute to a proportion of the required tree canopy for the District and Central Lincolnshire as their contribution to the green infrastructure as well as open space.

The open space requirement was higher in the previous plan. This should be reinstated. Need for open space is increasing with more people working from home.

With new pressures on Biodiversity Net Gain and on developing better tree canopy, each dwelling should make a proportionate contribution.

and veteran trees.

Policy S65 Trees and woodlands and hedgerows p137



Mature trees are vital for health, carbon capture, aesthetics and important in schools. Protection of trees needs to be much stronger to stop the trees being felled.

Mitigation Proposal: The mitigation measures need to be much more stringent to prevent the trees being cut down and added as a simple cost on the development.

Any removal of trees needs to be immediately compensated by an equivalent carbon footprint

of trees. Otherwise it would be a net loss. This could be connected to the diameters of the standards with a significant increase to allow for attrition and planted with space to become mature.

The suggestion that you can cut down a 300 year oak a meter across and replace it with 11 “standards” that may or may not survive is not adequate.

The policy does not say how far apart they need to be, and therefore how much land is allocated, nor a commitment to the maintenance needed. This needs to be prescribed.

If a commuted sum were to be payable, it would need to be significant as the carbon value, biodiversity supported by the tree, visual impact and the impact on people’s health and wellbeing are important.

Under the National Planning Policy, footnote 48, the local plan would be “unlawfully produced if it was not ‘radical’ and did not meaningfully contribute to reducing emissions, help mitigate against climate change and help society adapt to a changing climate”. Thus the mitigation measures must at least immediately replace what is lost.

Policy S16 Carbon Sinks p43

We welcome the focus on peatland and the importance of peatland in carbon sequestration. The Local Plan states in policy S16 that existing carbon sinks must be protected. All trees are carbon sinks. This should be clearer in the opening paragraphs of S16.

The carbon sequestration value of a mature tree of a meter across, for example, between 1.3 and 1.8 metric tonnes of Carbon per year. Source. [Forestry Commission 2003](#). Trees absorb carbon at

different rates, but as a rule of thumb, a typical hardwood tree can absorb as much as [48 pounds of carbon dioxide per year](#). Cutting down a forty year-old tree releases about a ton of carbon. Hence the need for any mitigation to involve the replacement of tree's carbon footprint allowing for mortality.

Proposals: The clause a) in Policy S16 that suggests carbon sinks can be removed for development should be *deleted*.

High value carbon sinks such as mature trees and broad-leaved woodlands, are priority habitats under *the* Natural Environment Research Council's Biodiversity Action Plan and should be protected in this local plan. Priority habitats should not be allocated for development or if already allocated, they should be deallocated and an alternative site offered.

S65 Support Expanding woodland p139

Support and propose long term protection: Because there are relatively few trees in North Kesteven, at least as much emphasis should be put on protecting those that are already mature in the landscape. (*1.1 para 3 NK Tree Strategy*). Decaying trees should be protected and made safe, rather than removed. Removing decaying trees up uses fossil fuel and, in many cases, does not yield a useful crop for heat generation. (*see 3.3.16 Pests and diseases NK Tree Strategy*). Trees need protection during construction.

S22 Meeting Accommodation Needs p57

Support and proposal: There is no need to restrict residential care accommodation to only tier 1-4. This should be extended to within 100m of a shop and a pub. Residential care can every usefully be placed in lower tier villages as long as they have a shop and a pub. It is important for people who need care not to be extracted from their existing support networks. For example, Welbourn housing for the elderly or infirm works very well. Homes for older people in the bigger villages 1-4

Policy NS23. Custom or Self build housing is encouraged policy p59

We welcome the custom or self-build policy.

The definition of self-build needs to be clearly defined to ensure it is genuinely a self-build.

The self-build sites on a development should be made available in a phased manner.

These sites need to be subject to the same sustainable locations and design constraints as other new dwellings.

Policy S47 Walking and Cycling Infrastructure p99

Proposal: Point b) mentions attractive routes, but also important are routes connecting communities and facilities which should be added in point b or in a new point c.

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

Support the protection of the Cliff Edge page 132 **Proposal:** Please include note it is the views from the Cliff Edge that give it its quality and need protection, as well as views of the Cliff Edge.

Additional Points:

Sleaford is a significant conurbation and deserves enhanced health and further education facilities and businesses that encourage graduate jobs.

We would like to support the following policies:

S11 Water Efficiency and Sustainable Water Management p34

S12 Reducing Energy consumption in existing buildings p35

S63 Protection of Local Green Spaces p134

S58-S64 Environment and Biodiversity policies p123 -136 Support recognition of the land and water protection, already in habitat regulations

S25 Caravan pitches or park homes supported if acceptable for permanent dwellings page 61 •

S27 Employment areas large p 65 to small ½ ha

S33 Employment p71 •

S39 Shop and pub protected- village centres p 85 •

S42 Local Tourism encouraged p 90 •

S44 Strategic Infrastructure Requirements p93

S49 Community Facilities p103

S51 Universities and Colleges p105

S52 Design and Amenity p107

S53 Health and Wellbeing p110

Car Parking Rural areas: 1 per bedroom up to 3 max •

S56 Historic Environment protecting heritage, conservation areas, where possible p115

S56 Natural Heritage "Aim to Protect trees, or mitigate" p117 and s65 p139

S58 Green Infrastructure network supporting Links between green areas p124

S66 Land for Agriculture p254

Allocations

The allocations listed in appendix 1 and 2 already have permission. The new sites are currently not included. Our members would need to properly engage if the sites were actually coming forward for development.

Large housing estates tacked onto villages are very difficult to incorporate without changing the character of the village and putting heavy pressure on the facilities. The distance from new dwellings to the shop or pub means that people are travelling by car to get to the local facilities, which detracts from character of being in a village. These additional plots are extremely large in proportion to the current village. The proposed external sites are therefore **not supported**.

Proposal: In the previous plan, it was deemed a 10% increase in villages was reasonable without changing the character of the village. The allocations need to be included under the same premise, included in the 10% increase in the life of the plan.

Proposal: The distances of dwellings from amenities that are given are misleading, and need to be corrected. For example, some of the 'approximations' are half the true distances. For example, most of the distances quoted for Bassingham Ward for villages to urban areas & other villages are way out. For example,

Bassingham to North Hykeham - 5km when it's 10km

Brant Broughton to Witham St Hughs - 7km when it's 13km

Brant Broughton to North Hykeham 11km when it's 15km and so on....

The **Lincolnshire Independents** are Independents in Lincolnshire who speak and vote independently and work together for residents.

This is a network of support, affiliated to the Independent Network

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