

Comments on the SKDC Reg 18 Draft Local Plan (2024)

(Central Lincolnshire Local Plan Team)

Comments:

- Throughout the Draft Plan it is stated that various study results are still awaited (e.g. Para 5.11 states that the results of the commissioned Climate Change Study will be used to formulate new policy). Given that this is the first time that some of the policies will have been drafted, will there be another consultation, either informal or formal before the pre submission stage of the Plan? When Para 5.15 refers to information being shared, does this mean an informal or targeted consultation, partial further Reg 18 consultation or only the Reg 19 consultation. Given that the Reg 19 consultation would only permit comments on legal compliance and soundness, if there is not intended to be an additional Reg 18 consultation, we would like to be notified, perhaps under duty to cooperate, when policy direction is confirmed.
- We are not sure that RE1: Renewable Energy Generation meets the requirements of footnote 58 of the NPPF. Without identifying areas as suitable for wind energy development in the development plan or supplementary planning document, any intended wind energy development would not be considered acceptable.
- H5 & H6, we have assumed that the gypsy and traveller sites have not been identified if the call for sites is still being undertaken. If there is not intended to be an additional Reg 18 consultation, we would like to be notified, perhaps under duty to cooperate, when an indication of sites is confirmed.
- There is currently 236ha of designated employment land, plus 35ha with potential for intensification. The 2023 Employment Land Study establishes a need for 79.5ha, easily met by current designations with no additional designations required (Para 9.18). The Local Plan Review allocates 338ha of “**new** employment sites across the district.” (Para 9.35). We have assumed that the 338ha is the total for the district consisting of some new sites, some removed sites and some carried over from the adopted Local Plan (as suggested in the summary of changes but not made clear by the comment in Para 9.35) and that the 338ha are not new and in addition to the current 236ha. Whilst we understand that you wish to provide a range and options for employment sites we do have some concerns about the amount that is provided over the identified need.
- We noticed that things have evolved since the drafting of New Policy 4: Biodiversity Opportunity and Delivering Measurable Net Gains, but as Govt advice and guidance continues to change there may be need for some further amendments to the new policy.

Notes:

There also appears to be a few typing errors and possible extra or missing words in a few areas:

- Para 1.17, last sentence, should the next stage say “scheduled for winter **2024**”.
- List of New Policies SKPR-268, it is assumed that “â €” is a typing error rather than a missing word or perhaps an autocorrect and the same for the minor change to GR3-H1 and where it has appeared elsewhere in the Draft Plan.
- Policies Removed (grey), does this need to be included in the list above to make it clearer?
- Policy SD1 k) should this say “**naturally** store”?
- Para 5.22, **There** is also...
- SP5, we wondered if the gypsy and traveller sites should have been listed as bullet e).
- H2, although it is in the affordable housing policy, should the 1st sentence say 27-57% **affordable housing**? And under bullet point d) ... affordability... the area... Is there a word missing?
- Para 9.29, is the ‘the’ an extra word in the second sentence, “...supports **the** one...”?
- E1, is there an extra word in the first sentence, “...of **for**...”?
- Para 9.31, is there a word missing in the last sentence?
- Para 9.34, “...taking **into** account **of**...” It is suggested that either into or of be removed.
- Para 9.36, last sentence, “... provided locally important employment.”
- Para 11.22, first sentence, “...was to assess **at** the overall...” and the last sentence, “...on each ‘sub-area’ be found within...”. Should there be another word between ‘sub-area’ and be or should the word ‘be’ be replaced with ‘is’?
- Para 11.23, there appears to be an extra word after the date... Open Space, Sport and Recreation Study (2023) **to**).
- Para 11.30, first sentence, is there a word missing? “type of open space, based population figures...” should there be an ‘on’ after ‘based’?
- OS1, first sentence, there is a * after “...adequate open space...” but no footnote. Is the symbol an error or should there be a footnote?
- 12.21, Spitalgate Hea**(H)**th Garden Village.
- 12.22, last sentence, think an ‘as’ is missing between ‘role’ and ‘a’.
- GR4: Grantham Town Centre Policy, first sentence under Town Centre Boundary “...proposals for E-uses classes **(space needed)** and appropriate residential development on upper floors (wondered if **‘will be supported’** is missing from here), provided that the use...”