

Morton Neighbourhood Plan



Evidence Paper 7 – Policy Context

June 2019

Policy Context (Central Lincolnshire and West Lindsey Local Plans)

This paper is based on a review of past/current/emerging Local Plans. It highlights policies which support the Morton NP and/or need to be taken in to account to meet the Basic Conditions.

Central Lincolnshire Local Plan (CLLP) The CLLP covers the period 2012 to 2036 and was adopted in April 2017. It replaced the Local Plans of the City of Lincoln, West Lindsey and North Kesteven District Councils, (the Local Plan team comprises officers drawn from existing planning policy teams within City of Lincoln Council, North Kesteven District Council and West Lindsey District Council). In the CLLP, the key policies on housing affecting Morton are Policy LP2: The Spatial Strategy and Settlement Hierarchy and Policy LP4: Housing Growth in Medium and Small Villages. In Policy LP2 Morton is designated as a “Medium Village” and it includes the following provisions.

Policy LP2: The Spatial Strategy and Settlement Hierarchy

-The spatial strategy will focus on delivering sustainable growth for Central Lincolnshire that meets the needs for homes and jobs, regenerates places and communities, and supports necessary improvements to facilities, services and infrastructure.

- Development should create strong, sustainable, cohesive and inclusive communities, making the most effective use of previously developed land (except where that land is of high environmental value), and enabling a larger number of people to access jobs, services and facilities locally.

- Development should provide the scale and mix of housing types and a range of new job opportunities that will meet the identified needs of Central Lincs. to secure balanced communities.

- Decisions on investment in services and facilities, and on the location and scale of development, will be assisted by a Central Lincolnshire Settlement Hierarchy.....

5. Medium Villages ...Morton....

*“Unless otherwise **promoted via a neighbourhood plan** or through the demonstration of clear local community support, the following applies in these settlements:*

- they will accommodate a limited amount of development in order to support their function and/or sustainability.

- no sites are allocated in this plan for development, except for Hemswell Cliff and Lea.

*- typically, and only in appropriate locations**, development proposals will be on sites of up to 9 dwellings or 0.25 hectares for employment uses. However, in exceptional circumstances***** proposals may come forward at a larger scale on sites of up to 25 dwellings or 0.5 hectares per site for employment uses where proposals can be justified by local circumstances.*

Other areas of the Parish are designated as “Countryside”. Restrictions apply to new development based on the following policy wording: “Unless allowed by:

a. policy in any of the levels 1-7 above; or

b. any other policy in the Local Plan (such as LP4, LP5, LP7 and LP57), development will be regarded as being in the countryside and as such restricted to:

- that which is demonstrably essential to the effective operation of agriculture, horticulture, forestry, outdoor recreation, transport or utility services;

- renewable energy generation;

- proposals falling under policy LP55; and

- to minerals or waste development in accordance with separate Minerals Waste Local Plans.

***Throughout, the term ‘appropriate locations’ means a location which does not conflict, when taken as a whole, with national policy or policies in the Local Plan (e.g., but not exclusively, Policy LP26). In addition, to qualify as an ‘appropriate location’, a site, if developed, would:*

- retain the core 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 or the rural setting of the settlement.*

****Throughout this policy and Policy LP4 the term ‘developed footprint’ of a settlement is defined as the continuous built form of the settlement and excludes:*

- a. individual buildings or groups of dispersed buildings which are clearly detached from the continuous built up area of the settlement;*
- b. gardens, paddocks and other undeveloped land in the curtilage of buildings on the edge of the settlement where land relates more to the surrounding countryside than to the built up area;*
- c. agricultural buildings and associated land on the edge of the settlement; and*
- d. outdoor sports/recreation facilities and other formal open space on the edge of the settlement.*

*****Throughout this policy and Policy LP4 the term ‘demonstration of clear local community support’ means that at the point of submitting a planning application to the local planning authority, there should be clear evidence of local community support for the scheme, with such support generated via a thorough, but proportionate, pre-application community consultation exercise. If, despite a thorough, but proportionate, pre-application consultation exercise, demonstrable evidence of support or objection cannot be determined, then there will be a requirement for support from the applicable Parish or Town Council. If an applicant is in doubt as to what would constitute a ‘thorough, but proportionate, pre-application consultation exercise’, then the applicant should contact the applicable local planning authority.*

******‘Exceptional circumstances’ in this policy is a matter for the decision maker to determine, but could be, for example, where the development delivers a community facility (see Policy LP15) substantially above and beyond what would ordinarily be required by Policy LP12 or LP15 (or any other policy in the Local Plan), and for which a clear need has been identified”.*

Policy LP4 provides a strategic steer on the level of growth over the plan period is appropriate for small and medium villages (as identified in Policy LP2). It does so by establishing a total level of % growth for each small village. It does not limit development absolutely but clarifies the anticipated level of growth for each settlement. Where a proposed development would exceed the identified growth level, in conjunction with other developments built since April 2012, other extant committed (permitted) growth and any sites allocated in the Local Plan, it will be expected to be accompanied by clear evidence of appropriate levels of community support **or supported by either allocations or policies in an adopted Neighbourhood Plan..**

Policy LP4 indicates that such settlements should accommodate 15% additional new housing. In Morton, based on the existing stock (633), this equates to 95 new dwellings. *A recent WLDC monitoring report states that, since the 2012 base date of the Plan, there is a net need for 66 new homes. However, Policy LP 4 also recognises the constraints on new development in Morton (especially flood risk) and the 15% requirement is “Subject to significant strategic constraints being overcome,” (see paras 3.4.5 and 3.4.6).*

3.4.5 In the opposite direction, some settlements in levels 5-6 of the settlement hierarchy have known, significant, strategic constraints. In these settlements, whilst the 10-15% growth level has not been altered to take account of these constraints, it is questionable whether development proposals will be able to overcome these constraints. The constraints include:

- Flood risk – where a settlement is entirely at risk of flooding so that any likely development site would be in an area of flood risk.....

3.4.6 If these constraints can be overcome, proposals will be supported up to the growth level proposed for each settlement. However, for the purpose of meeting the growth targets in LP3, this Local Plan assumes a zero per cent increase to take account of the uncertainty that much, if any, growth can take place in these locations.

Other paragraphs are helpful to the approach that should be taken in the Neighbourhood Plan.

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3.4.13 In order to ensure that the most suitable sites are developed first, development in villages should follow a sequential approach to growth, utilising suitable brownfield and infill sites first, and only then should sites at the edge of villages be considered. Where a site is proposed for development lower in the priority list, an application should be accompanied with evidence that alternative sites are not suitable or available for development.

3.4.14 Communities could have a greater influence over their local area through a Neighbourhood Plan. It allows Parish Councils, or Neighbourhood Forums where Parish Councils do not exist, to prepare a plan that sets policies for the use of land in their area.

3.4.15 Neighbourhood Plans can be produced in locations in all tiers of the settlement hierarchy but may be particularly suitable for those in the lower tiers of the hierarchy. Each Neighbourhood Plan will need to conform to the strategic policies of the Local Plan. A Neighbourhood Plan could not set lower growth than set by the Policy below, but it could set higher levels of growth or make decisions on precisely where the growth should go.

In the Policy, the “reasons for alternatively levels of growth are: LSG/Flood Risk/Key Facilities” and the 15% nominal allocation for Morton is qualified by the footnote; “Growth levels indicated with* are subject to known significant strategic constraints being overcome (see supporting text).”

Other paragraphs include comments on site selection and the role of Neighbourhood Plans:

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Finally, Policy LP 4 sets out a sequential test that should be made in making site allocations or considering development proposals, as set out below.

In each settlement in categories 5-6 of the settlement hierarchy, a sequential test will be applied with priority given as follows:

- 1. Brownfield land or infill sites, in appropriate locations** in the developed settlement footprint***
- 2. Brownfield sites at the edge of a settlement, in appropriate locations***
- 3. Greenfield sites at the edge of a settlement, in appropriate locations***

Proposals for development of a site lower in the list should include clear explanation of why sites are not available or suitable for categories higher up the list.

*A proposal within or on the edge of a village in categories 5-6 of the settlement hierarchy should be accompanied by demonstrable evidence of clear local community support** for the scheme if, in combination with:*

- a. other development built since April 2012;*
- b. any extant permissions; and*
- c. any allocated sites,*

the proposal would increase the number of dwellings in a village by more than 10% or, where relevant, the identified growth level in the above table; or for non-dwellings, have a floorspace of 1,000 sqm or more or have an operational area (including, for example, parking and storage spaces) of 0.5ha or more.

Local communities can, through Neighbourhood Plans or other means, deliver additional growth over the levels proposed by this Policy.

*** See definitions of 'appropriate locations', 'demonstrable evidence of clear local community support' and 'developed footprint' in Policy LP2.*

Flooding Policy LP14 (Managing Water Resources and Flood Risk Flood Risk), will be a key determinant on choices for the level and location of new housing in Morton. It is reproduced in full in Appendix 1 and considered in more detail in the note on flooding and drainage.

Character – Although it relates to the impact of Gainsborough the comment in Para. 8.3.4. is pertinent to Morton; *“8.2.8 Existing undeveloped land and green spaces help to maintain the individual identities of Lea and Morton and prevent further coalescence with Gainsborough. In accordance with Policy LP23, areas of land have been identified on the Policies Map which are protected from future development”*. Policy LP 38 (Protecting Character of Gainsborough applies, especially Para. b – *“Protect important local views from both within and outside the town”*;

Other Policies. The Morton Neighbourhood Plan should not seek to adjust or duplicate the context provided by the following policies in the CLLP:

Policy LP5: Delivering Prosperity and Jobs

- Policy LP7: A Sustainable Visitor Economy
- Policy LP9: Health and Wellbeing
- Policy LP11: Affordable Housing

- Policy LP12: Infrastructure to Support Growth
- Policy LP13: Accessibility and Transport
- Policy LP14: Managing Water Resources and Flood Risk
- Policy LP15: Community Facilities
- Policy LP16: Development on Land Affected by Contamination
- Policy LP18: Climate Change and Low Carbon Living
- Policy LP19: Renewable Energy Proposals
- Policy LP20: Green Infrastructure Network
- Policy LP21: Biodiversity and Geodiversity
- Policy LP22: Green Wedges
- Policy LP24: Creation of New Open Space, Sports and Recreation Facilities
- Policy LP25: The Historic Environment
- Policy LP55: Development in the Countryside
- Policy LP56: Gypsy and Traveller and Travelling Showpeople Accommodation

- It is however, intended to apply local requirements in respect of the mix of housing types and sizes in new development, complementing the CLLP Policy LP10: Meeting Accommodation Needs.
- Local design requirements will also be set, based on a local Character Study, to complement the CLLP Policy LP17: Landscape, Townscape and Views and Policy LP26: Design and Amenity.
- Local Green Spaces will be designated based on the guidance in the NPPF and with reference to the CLLP Policy LP23: Local Green Space and other Important Open Space.

The Morton Neighbourhood Plan will be prepared taking into account the guidance in the CLLP (Appendix 1 on Neighbourhood Planning), including acknowledgement of the listed Strategic Policies. There will be a focus on the topics listed in the appendix (together with any other, evidence based, local policies to address issues in Morton), as set out below:

- *Criteria for future housing development;*
- *Local character considerations;*
- *Design and building materials;*
- *Support for community facilities and services to ensure a thriving settlement;*
- *Policies to support sustainable lifestyles;*
- *Housing type/size (e.g. small/large dwellings, bungalows).*
- *Transport concerns*

Central Lincs. Local Plan Review – The NPPF was updated in July 2018 and Planning Practice Guidance has also changed. In response, the Joint Strategic Planning Committee (14th Jan. 2019) approved a proposed review of the Local Plan. A review of the effectiveness/relevance of current policies and evidence is due in March. The longer-term programme is shown in the table over.

- 1** Public Participation (Regulation 18) Opportunities to consider options for the plan before the final document is produced. Two rounds are intended. **June-July 2019 and Feb.-Mar. 2020.**
- 2** Pre-submission (Reg. 19) 6-weeks for formal representations to be made. **Oct.- Nov 2020.**
- 3** Submission (Regulation 22) to the Secretary of State. **December 2020.**
- 4** Independent Examination/Hearing Held by a Planning Inspector into objections raised at Regulation 19 stage on the Local Plan April – **June 2021 estimate** (dates set by inspector).

5 Inspector's Report Issued. This will report whether if the Plan is 'Sound' or 'Not Sound'. The Inspector may make recommendations to make the plan 'sound' **August 2021 (estimate)**.

6 Adoption of DPD (Local Plan). Final stage, the Council will formally need to adopt the Local Plan and it will then be used planning decisions. **Sept. 2021** (dependent on time of examination).

There is no reason to suppose that the policy context for Morton will change significantly. In particular flood risk constraints will remain. A criteria-based approach, enabling future development proposals to be considered against stated measures, rather than site allocations for a specific housing requirement, is appropriate. Completion of an NP, with a referendum in the first half of 2020, is reasonable. Guidance states that NPs can take account of the Local Plan Review, such that it will not become out of date soon after being "Made". (See Appendix 2 for update).

The (old) West Lindsey Local Plan. The West Lindsey Local Plan (WLLP) 2006 was the adopted plan for Morton until the adoption of the CLLP. The policies of that Local Plan no longer apply as material planning considerations but there are elements of the 2006 Local Plan that will be drawn upon in the preparation of the Morton Neighbourhood Plan. These include:

Policy RES 3 – Backland and tandem development.

Policy RES 11 – Extensions to dwellings within settlements.

Rural Economy Policies (2,3,4 and 5).

Policy NBE 10 – Protection of Landscape Character (around Gainsborough).

Appendices: 1 SSSIs, & NNRs, 2 Nature Conservation Importance & LNR, 3 Scheduled Ancient Monuments, 4 Listed Buildings, 6 Ancient Woodlands, 7 Regionally Important Geological Sites.

As a consequence of that Local Plan and its predecessors, which included a development requirement of 60 or so dwellings, most if not all of the realistically available development land (taking account of flooding constraints) has been taken up. Taking this into account, the Morton Inset Map, including a defined settlement boundary (see below), remains relevant to the NP now.



Appendix 1 – Central Lincs Local Plan: Policy LP14: Managing Water Resources and Flood Risk

4.8.5 Many of Central Lincolnshire's settlements were originally established adjacent to rivers or other water bodies. Over time these same settlements have grown into the main centres of population in Central Lincolnshire and now represent, in terms of wider sustainability criteria, the most sustainable locations for future development. A careful balance therefore needs to be struck between further growth in these areas to ensure their communities continue to thrive and the risk of flooding.

4.8.6 To support the planning process and provide a better understanding of flood risk in the area, Strategic Flood Risk Assessments (SFRAs) have been prepared for Central Lincolnshire. SFRAs have been produced for West Lindsey, North Kesteven and the wider Lincoln area, supplemented by additional flood risk information data from the EA, LLFA and IDBs. Other documents that inform the Local Plan include: Catchment Flood Management Plans for the River Witham, River Trent and Grimsby and Ancholme; Anglian and Humber River Basin Management Plans; The Joint Lincolnshire Flood Risk and Drainage Management Strategy; and Water Cycle Studies for Central Lincolnshire and the Gainsborough area.

4.8.7 With the increased likelihood of more intense rainfall combined with further development in Central Lincolnshire, there will be an increase in the incidence of surface water runoff, placing greater pressure on existing drainage infrastructure. The discharge of surface water to combined sewer systems should be on an exceptional basis only. This will ensure that capacity constraints of existing systems are not put under severe pressure by placing unnecessary demands on existing sewage works and sewage systems which in turn could compromise the requirements of the Water Framework Directive. The discharge of surface water to combined sewer systems can also contribute to surface water flooding elsewhere.

4.8.8 Sustainable Drainage Systems (SuDS) are used to replicate, as closely as possible, the natural drainage from a site before development without transferring pollution to groundwater. Developers should ensure that good SuDS principles consistent with national standards are considered and incorporated into schemes as early on in the development process as possible.

4.8.9 Protecting the water environment: The Central Lincolnshire authorities work closely with water companies, the EA and other relevant bodies to ensure that infrastructure improvements to manage increased waste water and sewage effluent produced by new development are delivered in a timely manner, and to ensure that, as required by the Water Framework Directive, there is no deterioration to water quality and the environment.

4.8.10 Groundwater Source Protection Zones (SPZs) are areas of groundwater where there is a particular sensitivity to pollution risks due to the closeness of a drinking water source and how the groundwater flows. They are used to protect abstractions used for public water supply and other forms of distribution to the public such as breweries and food production plants. Development in the SPZs will be expected to comply with the EA's guidance document, 'Groundwater Protection: Principles and Practice (GP3)' or any subsequent replacement.

4.8.11 Parts of Central Lincolnshire are currently constrained by the capacity of water recycling infrastructure and will require coordinated timing between development and new or improved infrastructure provision. The predominantly rural nature of the area means that there are

developments without mains drainage connection that will require careful design and management.

4.8.12 Central Lincolnshire lies within the East Midlands area of serious water stress where drought is a cause for concern. This is a major challenge in the context of Central Lincolnshire's planned growth and will require careful conservation and management of water resources to ensure that demand for water can be achieved in a sustainable manner. It also provides the justification to require, via this Local Plan, the higher water efficiency standard of 110 litres/day.

4.8.13 The River Trent as it skirts the edge of Central Lincolnshire and runs adjacent to the main town of Gainsborough, from Cromwell Weir to the River Humber, is tidal and flows into the internationally important Humber Estuary. The River Witham passing through Central Lincolnshire and the City of Lincoln flows into the Wash, also of international importance. As such, any proposals that affect or might affect the marine area should make reference to and be guided by the Marine Policy Statement or any subsequent replacement. The Marine Policy Statement provides a shared UK vision for clean, healthy, safe, productive and biologically diverse oceans and seas by ensuring a consistent approach to marine planning across UK waters.

4.8.14 All relevant development proposals, where appropriate, should be discussed with the Local Planning Authority in liaison with the EA, Water Services Provider, IDBs and the LLFA at the earliest opportunity, preferably at pre-application stage. This should ensure flood risk and drainage solutions, particularly where required on site, can be factored into the development process as early as possible.

Policy LP14: Managing Water Resources and Flood Risk Flood Risk

All development proposals will be considered against the NPPF, including application of the sequential and, if necessary, the exception test.

Through appropriate consultation and option appraisal, development proposals should demonstrate:

- a. that they are informed by and take account of the best available information from all sources of flood risk and by site specific flood risk assessments where appropriate;*
- b. that there is no unacceptable increased risk of flooding to the development site or to existing properties;*
- c. that the development will be safe during its lifetime, does not affect the integrity of existing flood defences and any necessary flood mitigation measures have been agreed with the relevant bodies;*
- d. that the adoption, ongoing maintenance and management of any mitigation measures have been considered and any necessary agreements are in place;*
- e. how proposals have taken a positive approach to reducing overall flood risk and have considered the potential to contribute towards solutions for the wider area; and*
- f. that they have incorporated Sustainable Drainage Systems (SuDS) into the proposals unless they can be shown to be impractical. Protecting the Water Environment Development proposals that*

are likely to impact on surface or ground water should consider the requirements of the Water Framework Directive. Development proposals should demonstrate:

g. that water is available to support the development proposed;

h. that development contributes positively to the water environment and its ecology where possible and does not adversely affect surface and ground water quality in line with the requirements of the Water Framework Directive;

i. that development with the potential to pose a risk to groundwater resources is not located in sensitive locations to meet the requirements of the Water Framework Directive;

j. they meet the Building Regulation water efficiency standard of 110 litres per occupier per day;

k. how Sustainable Drainage Systems (SuDS) to deliver improvements to water quality, the water environment and where possible to improve amenity and biodiversity have been incorporated into the proposal unless they can be shown to be impractical;

l. that relevant site investigations, risk assessments and necessary mitigation measures for source protection zones around boreholes, wells, springs and water courses have been agreed with the relevant bodies (e.g. the Environment Agency and relevant water companies);

m. that adequate foul water treatment and disposal already exists or can be provided in time to serve the development;

n. that no surface water connections are made to the foul system;

o. that surface water connections to the combined or surface water system are only made in exceptional circumstances where it can be demonstrated that there are no feasible alternatives (this applies to new developments and redevelopments) and where there is no detriment to existing users;

p. that no combined sewer overflows are created in areas served by combined sewers, and that foul and surface water flows are separated;

q. that suitable access is safeguarded for the maintenance of water resources, flood defences and drainage infrastructure; and

r. that adequate provision is made to safeguard the future maintenance of water bodies to which surface water is discharged, preferably by an appropriate authority (e.g. Environment Agency, Internal Drainage Board, Water Company, the Canal and River Trust or local council).

Appendix 2 – Report to June 2019 SG meeting on the CLLP review

Item 5 - Implications of the review of the CLLP for the Morton Neighbourhood Plan.

An earlier note outlined the intended review of the CLLP, which was adopted as recently as 24th April 2017. The Central Lincs. Joint Planning Unit (JPU) decided on a review because the National Planning Policy Framework (NPPF) was updated in July 2018 along with the Planning Practice Guidance (PPG). The timetable for the Local Plan review was set out as follows.

1 - Public Participation (Regulation 18) Opportunities for interested parties and statutory consultees to consider the options for the plan before the final document is produced. We intend **two rounds of Local Plan consultation. June-July 2019 & February-March 2020.**

2 Pre-submission Publication (Regulation 19) Publish the Local Plan, followed with a 6-week period when formal representations can be made. **October – November 2020**

3 Submission (Regulation 22) The Joint Committee submits the Local Plan to the Secretary of State together with the representations received at Regulation 19 stage. **December 2020**

4 Independent Examination Hearing Held by a Planning Inspector into objections raised at Regulation 19 stage on the Local Plan **April – June 2021** (estimate: dates set by inspector).

5 Inspector's Report Issued This will report whether if the Plan is 'Sound' or 'Not Sound'. The Inspector may make recommendations to make the plan 'sound' **August 2021 (estimate).**

6 Adoption of DPD (Local Plan) Final stage, the Council will formally need to adopt the Local Plan and it will then be used in making planning decisions. **September 2021** (estimate).

In February 2019 the Neighbourhood Planning Officer at WLDC informally advised preparation on the Neighbourhood Plan continue in accordance with the adopted CCLP but it should acknowledge early work on the review.

First Consultation The JPU has issued an invitation to comment on Issues & Options, see website: <https://central-lincs.inconsult.uk/consult.ti/CLLP.Issues.Options/consultationHome> The JPU comments that this is the first stage of public consultation on the revised Local Plan stating that much of the plan is not proposed to be changed, but there are some areas where policies need to be reviewed to address changes to national policy and to local circumstances. Views are being sought on proposals and options for what should be in the revised Plan. The **Consultation runs for six weeks, from 6th June until 18th July 2019.** The elements on which opinions are being sought are detailed in Appendix 1 of this report, including the consultation questions. For the Morton Neighbourhood Plan (MNP) the main implications are:

1 - Timing. At present the intention is to submit the MNP to WLDC by January 2020. Assuming that it goes through Examination that would suggest a Referendum around June 2020, before the revised CCLP undergoes Pre-Submission consultation and over a year before it is adopted. The MNP would, therefore, need to be compliant with the existing CLLP but it could be overtaken in policy terms by the new Local Plan within 12 months. It is worth noting that Local Plan timetables often slip. The extent that the MNP becomes outdated by a new Local Plan can be minimised by reflecting emerging policies, especially given that it is unlikely to include site allocations and because of the recognition of the flooding constraints in Morton.

2 - Settlement Hierarchy. There are 5 questions posed on this matter, on whether current approach should be retained. If this was the case, Morton would remain as a Medium Village (250 to 749 dwellings). Other questions concern settlement in which site allocations should be made.

This relates to a concern about the role of Neighbourhood Plans, See (5) below.

3 - New Dwelling Requirements.

A -The review suggests that the average annual rate of delivery is reduced from 1540/year to a range of to 983 to 1300/year, based on what has been achieved since 2012. Other questions concern the need for alteration to policies to address delivery issues. From a Morton perspective, there is no real concern other than one point/question, (Para 4.25): *“However, it is considered necessary to take into account the likely delivery and market capacity in each location where growth is distributed to ensure it is deliverable. As such, it is proposed that work is undertaken to better understand the housing market and distribute accordingly. This could include the separation of the “Elsewhere” category to distinguish between parts of this area within North Kesteven and parts in West Lindsey; the amendment of the Gainsborough and Sleaford areas to incorporate nearby areas where there is a strong relationship with the towns;”* The point needs to be made that Morton is separate from Gainsborough and should remain so in terms of achieving sustainable development focussing on the SUEs.

B – In terms of the baseline settlement size, the review aims for more accurate dwelling numbers, using address point data and looking at settlement boundaries. The consequence for Morton is a reduction from 633 dwellings to 623. This is not significant if the growth requirement of a 15% increase in dwellings is retained. The current plan gives a requirement of 95 new dwellings. Monitoring figures in Sept. 2018 recorded 22 commitments for Morton leaving a net 73 dwellings. 15% of 623 would result in the loss of only 1 dwelling from the requirement. In any event, the recognition of the significant flood risk constraint in Morton remains. However, depending on the choices made for the new CLLP, a different % may be applied, there will be an increase to reflect the longer plan period, from 2036 to 2040, and some of the 22 commitments may be reassessed.

4 - Site Allocations. Related to the settlement hierarchy and dwelling requirements, the review suggests that the threshold for site allocations be reduced from 25 units to 10 (Proposal 9 and Q9a). This should not affect the Morton NP because there are to be no site allocations, but as a matter of principle, it seems to run counter to Localism/the role of Neighbourhood Plans, see (5) below. this intervention in local affairs by a Strategic Plan is unnecessary and undesirable. **NB.** *The evidence paper on flooding shows that it will be very difficult to promote new development in Morton, beyond single plots, conversions and (perhaps) infill sites up to 3 dwellings. The question could be posed whether the new CLLP should specifically exclude the theoretical development of 95 and make provision for that requirement in other settlements?*

5 - The role of Neighbourhood Plans. The CLLP area includes Lincoln, North Kesteven and West Lindsey. At present there are 69 NPs made/in progress in the CCLP area. For the current version of the CCLP, the JPU helpfully prepared an advice note on aligning NPs with the CLLP. This has been updated but it is more about process than how the review can enable NPs. **It is very disappointing, therefore, that the consultation paper itself for the CLLP Review makes no reference to the role of NPs.** This omission becomes a greater concern when set alongside the questions on the threshold for site allocations, the possibility of the CLLP making site allocations in smaller settlements and the definition of open spaces (see 6 Q19 below).

6 - Other points. In addition to the key issues, other potential areas of concern/interest are:

Q8 - The potential for the scale/rate of building in the SUEs to be revised downwards.

Q11e - A possible increase in the 15% growth requirements for some settlements.

Q18 - The role of NPs in designating Local Green Spaces should be acknowledged.

Q19 - The need firm criteria to protect Important Open Spaces and other Open Spaces.
Q25 - The potential value of minimum car parking standards being included in the CLLP.