

# CAISTOR NEIGHBOURHOOD PLAN

Caistor Neighbourhood Plan Examination,  
A Report to West Lindsey District Council

by Independent Examiner, Nigel McGurk BSc(Hons) MCD MBA MRTPI

Nigel McGurk

Erimax Land, Planning and Communities

[erimaxltd.com](http://erimaxltd.com)

July 2015

**Contents:**

- 1. Introduction**
- 2. Basic Conditions and Development Plan Status**
- 3. Background Documents and Caistor Neighbourhood Area**
- 4. Public Consultation**
- 5. The Neighbourhood Plan: Introductory Section**
- 6. The Neighbourhood Plan: Policies**
- 7. The Neighbourhood Plan: Other Matters**
- 8. Summary**
- 9. Referendum**

## 1. Introduction

### The Neighbourhood Plan

This Report provides the findings of the examination into the Caistor Neighbourhood Plan (referred to as the Neighbourhood Plan).

Neighbourhood planning provides communities with the power to establish their own policies to shape future development in and around where they live and work.

*“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need.”*  
(Paragraph 183, National Planning Policy Framework)

Caistor Town Council is the *qualifying body*<sup>1</sup> responsible for the production of this Neighbourhood Plan. This is in line with the aims and purposes of neighbourhood planning, as set out in the Localism Act (2011), the National Planning Policy Framework (2012) and Planning Practice Guidance (2014).

This Examiner’s Report provides a recommendation as to whether or not the Neighbourhood Plan should go forward to a Referendum. Were it to go to Referendum and achieve more than 50% of votes in favour, then the Plan would be *made* by West Lindsey District Council. The Neighbourhood Plan would then be used to determine planning applications and guide planning decisions in the Caistor Neighbourhood Area.

### Role of the Independent Examiner

I was appointed by West Lindsey District Council, with the consent of Caistor Town Council, to conduct an examination and provide this Report as an Independent Examiner. I am independent of the qualifying body and the local authority. I do not have any interest in any land that may be affected by the Neighbourhood Plan and I possess appropriate qualifications and experience. I am a chartered town planner and an experienced Independent Examiner of Neighbourhood Plans. I have extensive land, planning and development experience, gained across the public, private, partnership and community sectors.

As the Independent Examiner, I must make one of the following recommendations:

- a) that the Neighbourhood Plan should proceed to Referendum, on the basis that it meets all legal requirements;
- b) that the Neighbourhood Plan, as modified, should proceed to Referendum;

---

<sup>1</sup>The qualifying body is responsible for the production of the Plan.

- c) that the Neighbourhood Plan does not proceed to Referendum, on the basis that it does not meet the relevant legal requirements.

If recommending that the Neighbourhood Plan should go forward to Referendum, I must then consider whether or not the Referendum Area should extend beyond the Caistor Neighbourhood Area to which the Plan relates.

In examining the Plan, I am also required, under Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990, to check whether:

- the policies relate to the development and use of land for a designated Neighbourhood Area in line with the requirements of Section 38A of the Planning and Compulsory Purchase Act (PCPA) 2004;
- the Neighbourhood Plan meets the requirements of Section 38B of the 2004 PCPA (the Plan must specify the period to which it has effect, must not include provision about development that is excluded development, and must not relate to more than one Neighbourhood Area);
- the Neighbourhood Plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted for examination by a qualifying body.

Subject to the contents of this Report, I am satisfied that all of the above points have been met.

#### Neighbourhood Plan Period

A neighbourhood plan must specify the period during which it is to have effect. The title page of the Neighbourhood Plan states that it covers the period 2011-2031. The Foreword and Para 1.2 of the Neighbourhood Plan Period also refer to the plan period up until 2031. Para 1.4 of the Basic Conditions Statement provides an additional, relevant reference.

Taking the above into account, I confirm that the Neighbourhood Plan satisfies the relevant requirement in this regard.

## Public Hearing

According to the legislation, *when the Examiner considers it necessary* to ensure adequate examination of an issue, or to ensure that a person has a fair chance to put a case, then a public hearing must be held.

However, the legislation establishes that it is a general rule that neighbourhood plan examinations should be held without a public hearing – by written representations only.

Further to consideration of the written representations submitted, I confirmed to West Lindsey District Council that I was satisfied that the Caistor Neighbourhood Plan could be examined without the need for a Public Hearing.

## 2. Basic Conditions and Development Plan Status

### Basic Conditions

It is the role of the Independent Examiner to consider whether a neighbourhood plan meets the “basic conditions.” These were *set out in law*<sup>2</sup> following the Localism Act 2011. In order to meet the basic conditions, the Plan must:

- have regard to national policies and advice contained in guidance issued by the Secretary of State;
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies of the development plan for the area;
- be compatible with European Union (EU) and European Convention on Human Rights (ECHR) obligations.

I have examined the Neighbourhood Plan against all of the basic conditions above.

Page 24 of the Neighbourhood Plan refers to the Basic Conditions. Whilst I provide detailed comments on this, in part 5) of this Report, the Introductory Section, below, I note here that Page 24 states that the Regulations require a neighbourhood plan to have “appropriate regard” to national policies and advice contained in the National Planning Policy Framework. This is not quite the case. For clarity, Paragraph 8 (2) of Schedule 4B of the Town and Country Planning Act 1990 states

*“A draft order meets the basic conditions if – (a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.”*

In attempting to paraphrase the relevant part of the Town and Country Planning Act 1990, the term “appropriate regard” has been introduced. In addition, no reference is made on page 24 to the requirement for a neighbourhood plan to have regard to national advice.

However, the Basic Conditions Statement submitted alongside the Neighbourhood Plan does provide a correct summary of the Basic Conditions. Given this, I am satisfied that the reference in the Neighbourhood Plan is simply a mistake arising from paraphrasing.

Whilst this mistake highlights that care should be exercised whenever paraphrasing legislation, I am mindful that neighbourhood planners, by their very nature, tend not to be professional planners. There are examples – especially in neighbourhood planning - of where the “experts,” whether planners, lawyers or other practising professionals, have failed to properly grasp legislation. Given this, it is unreasonable

---

<sup>2</sup> Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990.

to expect neighbourhood planners to get everything right all of the time. Importantly, in this regard, I note that it is the Independent Examiner's role to consider whether or not the Neighbourhood Plan meets the Basic Conditions.

As above, I address these matters in part 5) of this Report, below.

### European Convention on Human Rights (ECHR) Obligations

I am satisfied that the Neighbourhood Plan has regard to fundamental rights and freedoms guaranteed under the ECHR and complies with the Human Rights Act 1998 and there is no substantive evidence to the contrary.

### European Union (EU) Obligations

There is no legal requirement for a neighbourhood plan to have a sustainability appraisal<sup>3</sup>. However, it is good practice to assess neighbourhood plan proposals to determine whether or not the plan is likely to have significant environmental effects. This process is referred to as a "screening assessment." If the screening assessment identifies likely significant effects, then an environmental report must be prepared.

The Basic Conditions Statement confirms that the Neighbourhood Plan Steering Group submitted a request for a formal screening opinion to West Lindsey District Council. The screening opinion was sought to determine whether a Strategic Environmental Assessment was required, together with an opinion on whether the Neighbourhood Plan is compatible with European Habitat Regulations.

The Basic Conditions Statement goes on to confirm that West Lindsey District Council concluded that the Neighbourhood Plan is not likely to have significant effects on the environment. It states that West Lindsey District Council also concluded that none of the Neighbourhood Area is within a sensitive area and I note that there is no suggestion from any party that any European sites would be affected by the Policies of the Neighbourhood Plan.

Taking the above into account, there is nothing to lead me to conclude that there was any requirement to undertake either a Strategic Environmental Assessment or a Habitats Regulations Assessment.

Whilst there is no legal requirement for a neighbourhood plan to have a sustainability appraisal, I note that one of the supporting documents submitted with the Neighbourhood Plan comprised a Sustainability Appraisal. This is a helpful

---

<sup>3</sup> Paragraph 026, Planning Practice Guidance 2014.

document that measures each of the Policies of the Neighbourhood Plan against specific criteria and which concludes that their impacts will be largely positive.

I note that, in providing a detailed response to the submitted Neighbourhood Plan, West Lindsey District Council states that “the Plan is positive in its approach and WLDC is happy for it to proceed to examination.” No issues are raised with regards compatibility with European obligations, a relevant point given that

*“the local planning authority must decide whether the draft neighbourhood plan is compatible with EU regulations.”* (Planning Practice Guidance 11-031)

Taking all of the above into account, I am satisfied that the Neighbourhood Plan is compatible with EU obligations.



### 3. Background Documents and Caistor Neighbourhood Area

#### Background Documents

In undertaking this examination, I have considered various information in addition to the Caistor Neighbourhood Plan. This has included:

- National Planning Policy Framework (The Framework) (2012)
- Planning Practice Guidance (2014)
- Town and Country Planning Act 1990 (as amended)
- The Localism Act (2011)
- The Neighbourhood Planning Regulations (2012)
- The West Lindsey Local Plan (2006) (the adopted Local Plan)
- Basic Conditions Statement
- Consultation Statement
- Sustainability Appraisal

Also:

- Representations received during the publicity period

In addition, I spent an unaccompanied day visiting the Caistor Neighbourhood Area.

#### Caistor Neighbourhood Area

A plan showing the boundary of the Caistor Neighbourhood Area is provided on page 9 of the Neighbourhood Plan. However, the plan is incorrectly labelled, as the Neighbourhood Area also includes an area within Cabourne Parish. For clarity, I recommend:

- **Change the title of the plan on page 9 to “Caistor Neighbourhood Area”**

Further to an application made by Caistor Town Council, West Lindsey District Council approved the designation of Caistor as a Neighbourhood Area, the boundary of which is defined on the above plan, on 3 September 2013.

This satisfied a requirement in line with the purposes of preparing a Neighbourhood Development Plan under section 61G (1) of the Town and Country Planning Act 1990 (as amended).

## 4. Public Consultation

### Introduction

As land use plans, the policies of neighbourhood plans form part of the basis for planning and development control decisions. Legislation requires the production of neighbourhood plans to be supported by public consultation.

Successful public consultation enables a neighbourhood plan to reflect the needs, views and priorities of the local community. It can create a sense of public ownership, help achieve consensus and provide the foundations for a successful 'Yes' vote at Referendum.

### Caistor Neighbourhood Plan Consultation

Caistor Town Council submitted a Consultation Statement to West Lindsey District Council. This document, including its appendices, sets out who was consulted and how, together with the outcome of the consultation. In this regard, the Consultation Statement meets the requirements of the neighbourhood planning *regulations*<sup>4</sup>.

Taking into account the evidence provided, I am satisfied that the production of the Neighbourhood Plan was supported by robust public consultation. It is clear that the views of the wider community were actively sought and taken into account. It is also clear that Caistor Town Council undertook public consultation above and beyond that required by legislation.

In May 2012, the Neighbourhood Plan Steering Group, created to progress the Neighbourhood Plan on behalf of Caistor Town Council, presented a vision statement for Caistor, based on the results of previous consultation events. More than 160 local residents and business representatives were invited to attend the event and responses to the presentation were submitted. A further seven members of the Steering Group were recruited during the event.

A further consultation event, in December 2012, provided the local community with an opportunity to consider and provide feedback on emerging policies. A further policy feedback event, attended by around 70 people, took place in August 2013. Together, these two events provided for significant community input.

The pre-submission plan underwent a six week statutory consultation period in November and December 2013. The consultation was advertised in the Grimsby Telegraph and the Market Rasen Mail and an abridged version of the plan was posted to each household within Caistor. The document referred people to the full plan, which was available on the Caistor.net website.

---

<sup>4</sup>Neighbourhood Planning (General) Regulations 2012.

During this time, a business engagement event was held, to encourage local businesses to take part in the consultation; and an additional engagement event was held at the Caistor Christmas Food Fair. Issues raised during consultation were considered and where appropriate, alterations made to the plan.

The Consultation Statement notes that a number of additional meetings were held - with landowners, Cabourne residents, schools and the health centre, during the preparation of the plan. The Steering Group met regularly and all of its meetings were minuted.

Taking the above and other information provided in the Consultation Statement into account, it is evident that Caistor Town Council actively sought comments throughout the plan-production period. The consultation process was publicised, via the Caistor.net website, through the use of posters, by advertisements in local newspapers, through social media, and by letters of invitation.

The Consultation Statement presents an audit trail to demonstrate that consultation was wide-ranging, comprehensive and transparent. It was well-publicised and comments were duly considered. There is evidence to demonstrate that the Neighbourhood Plan reflects the views of local people.

Consequently, I am satisfied that the consultation process was significant and robust.

## 5. The Neighbourhood Plan – Introductory Section

**Where modifications are recommended, they are presented as bullet points and highlighted in bold print, with any proposed new wording in italics.**

The policies of the Neighbourhood Plan are considered against the basic conditions in Chapter 6 of this Examiner’s Report. I have also considered the Introductory Section of the Neighbourhood Plan and make recommendations below - these are aimed at making it a clear and user-friendly document.

One of the most striking things about the Neighbourhood Plan is its overall design and in particular, the copious use of interesting and beautiful photographs. This approach has been extended to the supporting documents, submitted together with the Neighbourhood Plan. It results in an exceptionally attractive and visually interesting suite of documents. Clearly a great deal of time and effort has been spent on the design and production of the Neighbourhood Plan. The impressive result of this is clear to see and it is to be very highly commended.

The Contents are neatly and succinctly presented on one page and the introduction from the Mayor sets the scene for the Neighbourhood Plan in a positive manner.

Due to its focus on other planning matters, separate from the Neighbourhood Plan, the “Why do we have a plan” section is confusing. It contains out of date information, and to some considerable degree, details relating to things that haven’t happened and which lack direct relevance to the Neighbourhood Plan. This opening section should be much clearer, to provide for an appropriate introduction. I recommend:

- **Page 5, first line, change “were” to “was”**
- **Page 5, delete paragraphs 3 to 6, inclusive (from “The Neighbourhood...” to “...planning policy.”)**
- **Page 5, delete paragraphs 8 to 13, inclusive (from “With the progress...” to “...address those issues.”)**
- **Page 5, penultimate paragraph, first line, delete “...demonstrates how...”**
- **Page 5, last paragraph, second line, add “...vision *and* provides...”**
- **Page 5, last line, delete “...and demonstrates...policy.” (place full stop after “town.” in line above)**

The “Let us set the scene” section is highly informative and provides plenty of relevant and useful background information about the Neighbourhood Area. There are a small number of unnecessary and confusing references to other areas outside the Neighbourhood Area. I recommend:

- **Page 6, final paragraph, delete and replace with “*The following data is taken from the 2011 Census:*”**
- **Page 7, first bullet point, end at “...was 2674.” (delete the following two lines)**
- **Page 7, delete the third bullet point**
- **Page 7, under Social Profile, first bullet point, delete “...and Swallow...”**
- **Page 7, second bullet point, end at “...1 dimension.” (delete following 3 lines)**

The first paragraph of the “Neighbourhood Plan Area and Qualifying Body” repeats information and includes unnecessary detail. Legislation uses the definition “Neighbourhood Area” rather than Neighbourhood Plan Area. For clarity, I recommend:

- **Page 8, delete first paragraph**
- **Page 8, change the two references to “Neighbourhood Plan Area” in the title and the penultimate paragraph to “*Neighbourhood Area*”**

I have recommended, previously in this Report, that the title of the plan on page 9 is also altered.

The next section is entitled “Land use and housing profile.” It includes a number of plans. The opening sentence contains unnecessary references to other Parishes. I recommend:

- **Page 10, change first bullet point to “*there are no recorded shared dwellings in Caistor.*”**

The following paragraph appears long-winded and sets out information repeated later. It also refers to constraints, whereby the information that follows largely relates to land uses. I recommend:

- **Page 10, delete the first paragraph underneath the first three bullet points and replace with “*The Neighbourhood Plan has considered the following land uses in particular:*”**

The first sentence of the Green infrastructure paragraph makes little sense in planning terms. I recommend:

- **Page 10, Green infrastructure, first sentence, change to “...that are either designated for environmental purposes or provide recreational facilities.”**

The Heritage Assets paragraph is unclear. I recommend:

- **Page 10, Heritage assets paragraph, change to read “...of the town is a major asset. The Heritage Assets plan shows the Conservation Area and Listed Buildings within the town.” (delete last sentence)**

The Housing land allocations section is wholly confusing and misleading. The Neighbourhood Plan does not allocate any land. The Strategic Housing Land Availability Assessment (SHLAA) quoted does not allocate any land. The “Possible Sites for Housing Allocations” plan is as meaningless as it is confusing. It does not allocate land. Both this paragraph and the related plan simply cause confusion and at worse, provide misleading information. They detract severely from the Neighbourhood Plan. I recommend:

- **Page 10, delete the Housing land allocations paragraph**
- **Page 16, delete the Possible Sites plan**

The Development constraints paragraph is confusing. It provides reference to a general land use plan, rather than one that contains comprehensive coverage of constraints to development.

- **Page 10, delete final paragraph and the paragraph in small font underneath it**

The “Employment Land Review” plan is entirely unclear. It adds nothing to the Neighbourhood Plan.

- **Delete the plan on page 11**

The Keys for the plans on pages 12 – 15 and page 17 are so small as to be practically illegible. As such, the inclusion of the plans makes little sense.

- **Enlarge the Keys for the plans on pages 12-15 and 17, so that all text is clearly visible to the naked eye**

The Economic profile section provides interesting and useful background information. The introductory sentence is confusingly worded. I recommend:

- **Page 18, change first sentence to “Many of Caistor’s workers are engaged in Wholesale and...”**

As referred to above, a Consultation Statement was submitted in support of the Neighbourhood Plan. There is no need to repeat the information provided. Furthermore, the Consultation and engagement section in the Neighbourhood Plan includes incorrect and outdated information. I recommend:

- **Paages 20 and 21, delete all text, including boxed text. Replace with “*The Neighbourhood Plan has emerged through significant public consultation. In line with legislation, a Consultation Statement was submitted in support of this Neighbourhood Plan. This can be viewed on the Town Council’s website, Caistor.net, or can be requested from the Town Council.*”**

The Vision Statements provide a direct link between the aspirations of the community and the Policies that follow. A number of the titles refer to “Vision Statement,” however, there are six statements. I recommend:

- **Change titles on page 22 and 23 to “*Caistor Vision Statements*” and change third word of first line on page 22 to “*statements*”**
- **Page 22, second paragraph delete the confusing and unnecessary second sentence (“...This version is a refinement...Framework.”)**

It is the role of the independent Examiner to consider the Neighbourhood Plan against the Basic Conditions. The title “Assessment of General Conformity” is inappropriate – it simply relates to just part of one basic condition, whereas this section of the Neighbourhood Plan is concerned with wider issues. I recommend:

- **Replace title on page 24 with “*Basic Conditions*”**
- **Page 24, insert new introductory sentence “*In accordance with legislation, a Basic Conditions Statement was submitted alongside this Neighbourhood Plan. This confirmed that, in the view of the Town Council, the Neighbourhood Plan met all of the Basic Conditions as required by legislation.*”**

The first bullet point on page 24 misquotes legislation. I recommend:

**Page 24, first bullet point, change to “*Has regard to national policy and advice*”**

**Page 24, for grammatical reasons, change the first word of the third and fourth bullet points from “*Be*” to “*Is*”**

The following paragraphs on page 24 are confusing. They refer to emerging policy (against which the Neighbourhood Plan is not examined) and include reference to an anonymous opinion. As I recommend that much of the content of pages 24-26 inclusive be deleted, there is no need to include separate sub-titles. I recommend:

- Delete the four paragraphs below the bullet points on page 24 (from “An assessment...” to “...human rights.”)
- Delete the title “National Planning Policy Framework” on page 24 and replace the “NPPF” reference below it with “*National Planning Policy Framework*”
- Delete the final paragraph on page 24 (“The Plan has been subjected to...”)

There is no need to repeat information from the Sustainability Appraisal submitted alongside the Neighbourhood Plan. Without the detailed information contained in the rest of the Sustainability Appraisal, the table included in the Neighbourhood Plan is largely meaningless. I recommend:

- Page 25, delete the title “Contributes...”
- Page 25, delete the table and table key
- Page 25, delete the first sentence “The Plan is considered...”
- Page 25, re-word second paragraph “*A Sustainability Appraisal was carried out to assess the impact of the policies of the Neighbourhood Plan against a wide range of sustainability indicators. The Sustainability Appraisal was submitted alongside the Neighbourhood Plan and can be viewed on the Town Council website, Caistor.net, or can be requested from the Town Council.*”
- Page 25, delete the third paragraph of this section, which refers to emerging policy.

The General conformity section is highly confusing and contains much irrelevant information, based upon consideration of the Neighbourhood Plan against an emerging document. I note that it is not at all unusual for a Neighbourhood Plan to come forward whilst a Local Plan is under preparation. The dynamic nature of planning is such that the plan-making process tends to be ongoing. I recommend:

Delete the title and all text, on pages 25 and 26 under “General conformity...”

- Replace with “*The Basic Conditions Statement assesses the Neighbourhood Plan’s conformity with the strategic policies of the adopted Local Plan.*”
- Page 26, delete the title “Compatibility with European legislation”
- Under this section, first paragraph, fourth line, replace “Sustainable” with “*Strategic*”



## 6. The Neighbourhood Plan – Policies

As presented, each Policy in the Neighbourhood Plan is followed by a section setting out how, in the view of the plan-makers, the Policy is supported. This supporting section tends to include a single reference to the Framework, an occasional reference to the adopted Local Plan and multiple references to emerging policies and related information.

None of this information is necessary and some of it is not relevant. I find that the inclusion of this section underneath each Policy severely detracts from the impact of the Policy and its supporting text. In so doing, it draws attention away from the most important part of the Neighbourhood Plan. Its inclusion may have provided some helpful background during the plan-making stage, but I find it inappropriate to retain it in the Neighbourhood Plan. I recommend:

- **Delete the “This policy is supported by...” section underneath every Policy in the Neighbourhood Plan**

Also included underneath each Policy is a Monitoring Indicator and a Target. On consideration of these, I find both the Indicators and Targets to include vague and subjective references. Furthermore, it is not clear who will undertake the monitoring and when, and how any such information will be used. Again, I find that the inclusion of these detracts attention away from the Policies and supporting text.

In addition to the above, the introductory text to the Policy section provides unnecessary information and given the changes recommended below, can be made more concise.

I recommend:

- **Delete the Monitoring Indicator and Target sections underneath every Policy of the Neighbourhood Plan**
- **Delete the second, third and fourth paragraph of text and the indicative box under the title “Policies” on page 28.**

### **Policy No. 1: Growth and the presumption in favour of sustainable development**

This is a positive Policy. It has regard to national policy's presumption in favour of sustainable development, as set out in the Framework, and promotes positive engagement. In this way, in general, the Policy meets the basic conditions.

However, it is not clear how community engagement will, or can, "ensure that new development improves the economic, social and environmental conditions in the town." As such, this is an onerous requirement and no evidence has been presented to demonstrate that it has regard to national policy and advice. Similarly, there is nothing before me to demonstrate that according with the agenda for growth will "ensure community support and backing" as suggested in the Policy. I recommend:

- **Policy 1, second paragraph first line, change to "*Developers and applicants should demonstrate how...*"**
- **Policy 1 second paragraph third line, change to "*...Town Council and other community groups and/or residents directly affected by their proposals.*" (delete any remaining text to end of paragraph)**
- **Policy 1, third paragraph, delete second sentence ("Planning applications...backing.")**
- **Supporting text, delete first and fourth bullet points**

### **Policy No. 2: Type, scale and location of development**

Policy 2 is also a positive Policy that supports sustainable growth, having regard to the Framework. In this way, it contributes to the achievement of sustainable development and meets the basic conditions.

However, as worded, Policy 2 applies to all development. It is clear that the requirements of Policy 2 would be unduly onerous if applied to most development. As the Policy is seeking to ensure that major development should help to meet local needs, this should be made clearer in the context of the whole Policy.

There is no need for Policy 2 to repeat the requirements of other Policies in the Neighbourhood Plan or the Development Plan. I note that the phrase "address good principles of travel planning" is undefined and as such, fails to provide any clarity.

The term "preserve or enhance" is most commonly associated with heritage assets, rather than with the amenity of existing residents. It may be particularly difficult to demonstrate how development enhances any or all aspects of residential amenity. The Policy also includes reference to "appropriate provision of community and environmental protection" as something that is defined in "the Statutory Development Plan" but does not define it. The Neighbourhood Plan, if made, would

form part of the statutory development plan for the area and its Policies should not include vague, undefined references.

Taking all of the above into account, I recommend:

- **Policy 2, delete the second sentence (“Major new...needs.”)**
- **Policy 2, third sentence, insert “Planning applications *for major new development, as defined in national policy and advice, should be...development. Major new development should:*”**
- **Policy 2, delete second bullet point**
- **Policy 2, third bullet point, replace “properties” with “*buildings*”**
- **Policy 2, delete fourth bullet point**
- **Policy 2, sixth bullet point, replace “preserve or enhance” with “*safeguard*”**
- **Policy 2, delete seventh bullet point**
- **Policy 2, ninth bullet point, delete “as defined...Plan”**
- **Policy 2, tenth bullet point, delete “...where all..are met”**
- **Policy 2, last bullet point, delete “...where proposals...Plan.”**
- **Supporting text, second paragraph, delete “The distance has also...modes.”**
- **Supporting text, third paragraph, delete “...or sites allocated...documents.”**
- **Supporting text, last paragraph, delete “The importance of...growth” and delete “The Central...process.”**

### **Policy No. 3: Design quality**

Good design is recognised by national policy as comprising a key aspect of sustainable development, indivisible from good planning. National policy requires good design to contribute positively to making places better for people (National Planning Policy Framework Para 56).

This Policy sets out detailed design criteria aimed at promoting good design quality. In this way, it has regard to the Framework, contributes to the achievement of sustainable development and meets the basic conditions.

It is unduly onerous to expect all development proposals to provide a detailed design assessment, or to justify itself against all the criteria set out in Policy 3. For example, many applications are for small changes – for example, household extensions. The Framework is clear in requiring that only supporting information that is relevant, necessary and material to the application in question should be requested (Para 193). Similarly, it is not entirely clear how, or whether, all new development can reflect the character of the town. For example, is it possible or desirable for new telecommunications infrastructure to reflect the character of the town ?

The terms “community spirit,” “regimented” and “socially isolated” are undefined in the Neighbourhood Plan and as such, appear as subjective terms that do not provide decision makers with a clear indication of how to react to a development proposal, as required by paragraph 154 of the Framework.

I recommend:

- **Policy 3, change opening sentence to “*Proposals for all new development must be of a high quality.*”**
- **Policy 3, delete second and third sentences**
- **Policy 3, first bullet point, change to “*Wherever possible, development should be designed to...*”**
- **Policy 3, delete “community spirit”**
- **Policy 3, second bullet point, insert “the natural *environment* and...”**
- **Policy 3, third bullet point, delete “...and avoiding...developments”**
- **Policy 3, above the ten bullet points in the second column, add “*For larger scale proposals, including new dwellings:*”**
- **Policy 3, ninth bullet point, add “...to be *generally* avoided”**
- **Policy 3, delete final bullet point**
- **Supporting text, delete second sentence and last sentence**

#### **Policy No. 4: Housing mix and affordable housing provision**

Policy 4 seeks to ensure the provision of affordable housing on sites of a suitable size. In this way, it has regard to national policy, which requires the provision of a wide choice of high quality homes and the creation of inclusive and mixed communities (Framework, Para 50).

Further to a Ministerial Statement on 28 November 2014<sup>5</sup>, now incorporated into Planning Guidance (Planning Obligations Para 012), affordable housing and tariff-style contributions are not required for sites of 10 dwellings or less. There is no substantive evidence to demonstrate why the threshold should be lower in Caistor than that required by national advice. I recommend:

- **Policy 4, change first line to “...for more than 10 dwellings must...”**
- **Policy 4, line three, for clarity, add “...All new housing development should...”**
- **Policy 4, delete the penultimate and final sentences, “...This housing...in need.”**
- **Delete final sentence of supporting text**

The final change, above, removes a confusing and unnecessary reference to the development plan, of which the Neighbourhood Plan, if it was made, would form part. Also, by definition, a Caistor-specific housing mix would, anyway, go some way to providing affordable housing for local people.

#### **Policy No. 5: Empty homes/derelict land**

Policy 5 seeks to place a requirement on the owners of vacant and/or derelict land to bring property back into use. Whilst the Framework promotes the effective use of brownfield land, it is unclear how the proposed Policy can be implemented through the planning system. The Policy does not provide a clear indication of how a decision maker should react to a development proposal, as required by paragraph 154 of the Framework. Consequently Policy 5 does not meet the basic conditions.

I note that it is an aspiration of the local community to bring vacant and/or derelict land back into use and I recognise this in making my recommendation below:

- **Delete Policy No. 5 and supporting text**
- **Create a new “Aspiration: Empty homes/derelict land” (after the Policy section of the Neighbourhood Plan). Create new text for this Aspiration, as follows “*Caistor is committed to addressing the issue of derelict housing and the Town Council will seek to encourage owners of both derelict and unoccupied housing to provide a plan of action to bring the property back into use. The Town Council will investigate whether this could form a priority for the Community Infrastructure Levy in Caistor and where considered necessary, will investigate the scope for pursuing Compulsory Purchase Orders, to bring such properties back into use.*”**

---

<sup>5</sup> House of Commons: Written Statement (HCWS50)

### **Policy No. 6: Live work opportunities**

Policy 6 would effectively allow undefined “residential accommodation” to accompany any application for employment related development so long as a business plan can demonstrate viability of the proposal.

This would represent a major departure from any national or local strategic planning policy and there is no evidence to demonstrate that the proposed policy would have regard to national policy or be in general conformity with the strategic policies of the Local Plan. In addition, and importantly, I note that a requirement to provide a business plan is not a land use planning consideration.

Policy 6 fails to meet the basic conditions. I recommend:

- **Delete Policy No. 6 and supporting text**

### **Policy No. 7: Impact of traffic**

As worded, Policy 7 is extremely general. Effectively, it seeks to allow any type of development, subject to it meeting various traffic related considerations and “respecting” design considerations.

Thus, the Policy might support a well-designed nuclear power station or new community of 25,000 homes, so long as it funded a local transport strategy. There is no evidence to suggest that the local community would be in favour of any such development and as such, nothing to lead me to consider that it is the intention of the Neighbourhood Plan to allow any type of development subject to design and traffic considerations.

It is not the role of Neighbourhood Plan Policies to repeat the content of other Policies, nor to require consideration against other documents controlled by other authorities; and also, that planning obligations must meet the six tests set out in paragraph 206 of the Framework. Policy 7 conflicts with all of these requirements.

Taking all of the above into account, I find that Policy 7 fails to meet the basic conditions. I recommend:

- **Delete Policy No. 7 and supporting text**

### **Policy No. 8: Improved cycling and pedestrian linkages**

Policy 8 seeks to improve cycling and pedestrian linkages. It has regard to the Framework, which promotes sustainable patterns of movement; and is in general conformity with Local Plan policies SUS4 and SUS5, which support the creation of

cycle and pedestrian routes, along with cycle parking facilities. In this way, the Policy contributes to the achievement of sustainable development.

The reference to major development, which is defined in the Glossary, could be made simpler and there is no evidence to demonstrate that the prioritised introduction of place signage would be directly related to all major development. I recommend:

- **Policy 8, change first and second lines to “*All major development proposals should demonstrate...*”**
- **Policy 8, change fifth and sixth lines to “*Where appropriate and viable, new developments should provide new or enhanced facilities, including new signage...*”**
- **Policy 8, delete last sentence**

#### **Policy No. 9: Business units and start up units**

The aim of Policy 9 is to ensure that local business development can occur and sets out to encourage investment in Caistor. The Policy has regard to the Framework, which recognises that the planning system should do everything it can to support sustainable economic growth (Para 19, The Framework). In this regard, the Policy has regard to national policy and contributes to the achievement of sustainable development.

However, the policy does not define employment areas and refers to letting arrangements, which do not comprise a land use planning matter. Matters relating to the Disabled Discrimination Act are covered in Part M of Building Regulations and there is no requirement for an additional reference in Policy 9. As worded, the Policy also requires the provision of a statement setting out and quantifying economic, social and environmental benefits that will be achieved as a result of a proposed development. This places an onerous requirement on all applications for new business units and it is not clear what such a requirement would achieve, what would happen if a statement was not provided, and how any such statement would be considered.

Taking all of the above into account, I recommend:

- **Policy 9, change first line to “*The development of new business units will be supported where they:...*”**
- **Policy 9, delete first, fifth, sixth, seventh and last bullet points**
- **Policy 9, second bullet point, delete “...defined...”**

- **Policy 9, third bullet point, replace “...property...” with “...buildings...”**
- **Policy 9 supporting text, delete the last paragraph, which is not relevant to the Policy**

### **Policy No. 10: Social Infrastructure**

Policy 10 seeks to protect and improve community facilities. In this regard, I note that the title and first sentence of the Policy is unnecessarily confusing and no evidence is provided as to how, or whether, the Policy can be “encouraged.”

Also, no clear definition is provided as to what comprise “suitable locations.” Whilst the supporting text refers to the market place and surrounding streets, it is not clear how parks and open spaces could be provided in the market place or surrounding streets.

“Community support” is not defined and therefore does not provide decision makers with an indication of how they should react to a development proposal. For example, one member of the community might support a proposal and logically, this would comprise “community support.”

The Policy refers to community assets, but does not define these. In addition, the Use Class Order allows for some changes of use to occur without the need for planning permission and the Policy, as worded, would fail to have regard to this.

The final paragraph of the Policy is entirely unclear - “those policies” are undefined, as are “material considerations.”

Taking everything above into account, I recommend:

- **Policy 10, change title to “*Community Facilities*”**
- **Policy 10, first para, change to “*Development that delivers improvements to existing community facilities or delivers new community facilities will be supported.*”**
- **Policy 10, second para, change to “*Proposals that will result in the loss of community facilities, including retail facilities, pubs, post offices, community halls, sports facilities, parks and open spaces will be resisted unless it is demonstrated that the continuation of the existing use is unviable.*”**
- **Policy 10, delete final paragraph**

Subject to the above recommendations, Policy 10 has regard to the Framework, which recognises the important role that the planning system has to play in facilitating social interaction and creating healthy, inclusive communities (Para 69,



Framework). It contributes to sustainable development and meets the basic conditions.

### **Policy No. 11: Leisure Facilities**

Policy 11 supports the creation of leisure facilities. As with Policy 10, the Policy has regard to the Framework's promotion of healthy communities (Chapter 8, Framework) and contributes to the achievement of sustainable development.

However, as worded, the Policy refers to National Curriculum requirements. These are undefined and anyway, are beyond the control of the Neighbourhood Plan. In addition, in promoting facilities for younger people, the Policy does not set out how it will "encourage" and support their development at any location. Consequently, the Policy could result in development that harms residential amenity or local character and as such, would fail to be in general conformity with the policies of the Local Plan, or have regard to the Framework. Together amongst other things, the Local Plan and the Framework protect local character and residential amenity.

In addition, the Policy unnecessarily references one specific type of leisure facility (swimming pools), whereas it actually refers to all sports and leisure facilities. As worded, it also allows such development in any location, regardless of local character.

I recommend:

- **Policy 11, line two, delete "...and encouraged..."**
- **Policy 11, delete the second sentence**
- **Policy 11, delete the second paragraph**
- **Policy 11, change last paragraph to "...bmx track *will be supported, subject to being in an accessible location and not harming local character or residential amenity.*"**

### **Policy No. 12: Broadband access**

The Framework supports the development of high quality communications infrastructure and recognises that this is essential for sustainable economic growth. Policy 12 has regard to the Framework and subject to the recommendations below, meets the basic conditions. I recommend:

- **Policy 12, change first sentence to "*The development of broadband and communications technology will be supported...*"**

- **Policy 12, change second sentence to “All major development proposals should demonstrate how they will contribute...”**
- **Policy 12 supporting text. Move the third sentence to the supporting text, to follow the existing supporting text, and change to “To demonstrate how major developments will contribute to this aim, it is suggested that they provide a Connectivity Statement as part of the planning application. Such...networks.”**

### **Policy No. 13: Tourism**

Policy 13 supports tourism and to some degree, has regard to the Framework, which supports sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside.

However, Policy 13’s unqualified support for all development that creates tourist related businesses or uses is so sweeping that it could lead to significant conflict with national and local planning policy. For example, the development of three thousand chalets for rent may support tourism, but could also lead to social, economic and environmental harm. In this way, Policy 13 would fail to contribute to the achievement of sustainable development.

The Policy goes on to refer to business planning, which is not a land use planning matter and includes a general statement about what tourism developments should promote and what may be explored in future.

I recommend:

- **Policy 13, change opening sentence to “Proposals for development that creates tourist uses will be supported, subject to it demonstrating that it benefits the local community, local businesses and visitors; and subject to it demonstrating that it will not harm residential amenity or the character of the countryside.”**
- **Policy 13, delete the rest of the Policy**

### **Policy No. 14: Heritage**

National policy recognises the nation’s heritage assets as an irreplaceable resource (Para 126, Framework). The Framework establishes a clear and detailed policy approach for the conservation and enjoyment of the historic environment.

Policy 13 is a highly confusing and confused policy. It seeks to introduce an entirely different policy approach to protecting heritage assets to that set out in national

policy and consequently, results in significant conflict. It does not have regard to the Framework.

The Policy seeks to introduce a link between redundant buildings, development of the town's historical sites and heritage assets that is so complex and confusing that no recommendation can be made other than deletion.

The Policy refers to "re-use" without providing clarity as to the "re-use" of what. No clarity is provided as to how existing heritage can be "preserved and protected."

Altogether, the Policy seeks to introduce an approach to Listed Buildings and Conservation Areas entirely different to that set out in the Framework, without any evidence as to why such a departure is appropriate. I recommend:

- **Delete Policy 14 and supporting text**

#### **Policy No. 15: Visitor Accommodation**

Policy 15 supports the change of use of any dwelling or commercial property to hotel, bed and breakfast or guest house accommodation.

The Framework and the Local Plan protect residential amenity. There is no indication of how the approach proposed by Policy 15 would protect local residents from the impacts that may arise from, for example, the development of a new hotel in a residential street – such as those relating to highway safety, privacy, outlook, noise and disturbance and so on. The Policy does not meet the basic conditions.

I recommend:

- **Delete Policy 15 and supporting information**

#### **Policy No. 16: Visitor and tourism signage**

Policy 16 supports the introduction of new "appropriate" signage to promote the town. No indication is provided as to what is "appropriate." Consequently, the Policy fails to provide decision makers with a clear indication of how to react to a development proposal.

The Policy seeks to place requirements on West Lindsey District and Lincolnshire County Councils. It is not the role of a neighbourhood plan to place requirements on external authorities over which no control can be exercised.

There is no evidence to demonstrate that a signage "strategy" is a land use planning matter and in addition, it is unclear how an applicant might be expected to contribute to such a strategy.

Taking all of the above into account, I find that Policy 16 fails to meet the basic conditions. Whilst I recommend deletion of the Policy below, I recognise that better signage for the town and its facilities is a community aspiration. My recommendations are aimed at ensuring that sight is not lost of this aspiration:

- **Delete Policy 16**
- **Move the supporting text to a new “*Aspiration: Visitor and tourism signage*” after the Policy section**

### **Policy No. 17: Existing schools and educational establishments**

This Policy provides a positive approach to enabling the appropriate expansion of educational facilities. This has regard to paragraph 72 of the Framework, which gives great weight to the need to create, expand or alter schools. Subject to addressing the recommendation below, removing unnecessary references to the National Curriculum and other Policies in the Neighbourhood Plan, Policy 17 meets the basic conditions. I recommend:

- **Policy 17, end Policy in the second sentence “...impact on the countryside.” Delete the remainder of the Policy**

### **Policy No. 18: Training and apprenticeships**

The promotion of new training and apprenticeship opportunities is not a land use planning policy. However, it reflects a local aspiration. I recommend:

- **Delete Policy 18**
- **Move supporting text to a new “*Aspiration: Training and apprenticeships*”**
- **Add to the beginning of the Aspiration “*The Town Council will seek to encourage workplace training in the construction industry.*”**

### **Policy No. 19: Environmental Standards**

A Ministerial Statement<sup>6</sup> published 25 March 2015 states that “...neighbourhood plans should not set...any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. This

---

<sup>6</sup> House of Commons: Written Statement (HCWS488)

includes any policy requiring any level of the Code for Sustainable Homes...the Government has now withdrawn the Code...”

As a consequence of the above, Policy 19, which refers explicitly to the Code for Sustainable Homes/BREEAM, does not have regard to national policy. I note that the Policy also refers to Building Regulations – these are outside the control of the Neighbourhood Plan.

Policy 19 does not meet the basic conditions. I recommend:

- **Delete Policy 19 and supporting text**

#### **Policy No. 20: Renewable energy**

Policy 20 promotes renewable energy and has regard to national policy, which aims to increase the use and supply of renewable and low carbon energy (Para 97, Framework). To ensure that the Policy does not allow for development of an inappropriate scale, I make just one recommendation. Subject to this and the recommended change to the supporting text, the Policy requires no major changes and meets the basic conditions.

I recommend:

- **Policy 20, line three, add “...incorporate *appropriate* energy...”**
- **Policy 20, supporting text, delete the penultimate and final sentences, from “There is a well...residents.”**

#### **Policy No. 21: Environmental protection and enhancement**

Policy 21 lacks clarity and is an extremely confusing Policy.

The opening sentence requires all development to protect *and* enhance “the quality of the local environment.” No measure of the quality of the local environment is provided and it is therefore unclear as to how development can protect it. Furthermore, even if the quality of the local environment was clearly defined and measurable, a requirement for all development to enhance it would be unduly onerous and there is no evidence to the contrary.

The next part of the Policy effectively states that five areas of land have been defined as “green infrastructure.” However, no definition is provided as to what “green infrastructure” is, other than a geographical reference to a green infrastructure plan. This plan indicates that three large irregular shaped swathes of land within the Neighbourhood Area and a further, smaller site, together comprise

green infrastructure. Policy 21 states that development at these sites will be resisted.

Whilst I acknowledge that there is a high level of interest and concern for local wildlife and that people have listed areas that they would like to see being protected from development, it is unclear why a sports ground and a park should have the same designation as swathes of open countryside. It is also entirely unclear as to why these apparently random areas of land both within and well outside the settlement of Caistor have been allocated as, undefined, green infrastructure.

I note that the Framework provides an explicit policy approach to the designation of Local Green Space whereby

*“Local communities... through neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out development other than in very special circumstances...”* (Para 76, The Framework)

The Framework goes on to clearly set out how neighbourhood plans can designate Local Green Space.

However, rather than have regard to the Framework, Policy 21 seeks to introduce an entirely different approach that does not have regard to the Framework and does not meet the basic conditions.

The wording of the Policy then appears confusing and contradictory. It states that, if a proposal delivers “material economic, social and environmental benefits, the impact will be mitigated by the introduction of compensatory habitats...” It is unclear why the impact of benefits needs to be mitigated against, or indeed, how this will be measured.

Whilst it is not made clear whether this part of the Policy applies specifically to the proposed “green infrastructure” or to development in general, I note that if it applies to the proposed green infrastructure, it would provide an opportunity for the development of swathes of open countryside, that would be extremely unlikely to be developed otherwise, due to protection afforded by national and local policy. Also, if it applies to green infrastructure, it is unclear as to what the biodiversity value of a sports ground is that is so significant that it must be compensated if that sports ground is developed. It would seem to be a more reasonable requirement to simply replace the provision for sports.

The final part of the Policy states that all development should provide new green spaces, habitat areas, detailed landscaping proposals and management plans. This is clearly an unduly onerous requirement for most development and may not, in many circumstances, be viable or deliverable.

Taking all of the above into account, the Policy lacks clarity. It does not provide a decision maker with a clear indication of how to react to a development proposal (Para 154, The Framework). It does not have regard to the Framework. It does not contribute to the achievement of sustainable development and it fails to meet the basic conditions.

I recommend:

- **Delete Policy 21 and its supporting text**
- **Delete the Green Infrastructure Plan on page 12**

### **Policy No. 22: Allotment provision**

Generally, Policy 22 supports the provision of allotments. This has regard to Chapter 8 of the Framework, which recognises the important role of the planning system in facilitating social interaction and creating healthy, inclusive communities. In this way, the Policy contributes to the achievement of sustainable development.

However, as worded, the Policy also includes references to “market gardens” and “orchards” and it is not clear whether these would comprise commercial operations or community facilities. Also, there is no clarity as to what the “essential needs” referred to by the Policy actually comprise. It is also unclear as to how all new development proposals can include land for allotments and orchards, or can provide for management arrangements for their ongoing use and retention. This would clearly be an unduly onerous and potentially impossible requirement for many proposed developments, including, for example, applications for household extensions.

In addition to the above, the Policy refers to “the requirement to provide for local food production opportunities.” No indication is provided as to where such a requirement comes from. I note that paragraph 17 of the Framework simply refers to the fact that some open land can support food production.

Taking all of the above into account, the Policy fails to provide a clear indication of how a decision maker should react to a development proposal. It fails to have regard to national policy. I recommend:

- **Policy 22, delete and replace with “*The provision of allotments within new developments, and arrangements for their ongoing use and attention, will be supported.*”**

Subject to the above, Policy 22 meets the basic conditions.

### **Policy No. 23: Community infrastructure requirements**

Policy 23 sets out a requirement for development to provide necessary infrastructure. In this way, it has regard to the Framework, which recognises the role of the planning system of identifying and coordinating development requirements, including the provision of infrastructure (Para 7, Framework).

The Policy goes on to refer to “delivery of the necessary Section 106 contributions” and I note that this is not something that the Neighbourhood Plan has control over. In addition, the Policy’s reference to CIL payments suggests that the Town Council has full control over these, which is not the case. The Policy refers to a strategy that does not form part of the Neighbourhood Plan. I recommend:

- **Policy 23, change first sentence to “*Development will be expected to provide...*”**
- **Policy 23, delete everything after the first sentence (ending “...the proposal.”)**
- **The supporting text is confusing and part of it makes no sense. Delete the supporting text and replace with “*The Town Council will seek to use any Community Infrastructure Levy money it receives to address infrastructure needs based on an approved community infrastructure needs strategy.*”**

Subject to the above changes, the Policy contributes to the achievement of sustainable development and meets the basic conditions.



## 7. The Neighbourhood Plan – Other Matters

I recommend:

- Delete paragraph above Aspiration 1
- Aspiration 1 final paragraph, change to *“The Town Council will seek to address these aspirations in partnership...”* Otherwise the Aspiration reads as a Policy and places a requirement on other bodies
- Delete the *“This Policy and approach is supported by”* section
- Delete Aspiration 2 - there are no development briefs in the Policies of the Neighbourhood Plan and this Aspiration reads as though it is a Policy, which it is not
- Delete the Residential Design Brief. This does not relate to any of the Policies in the Neighbourhood Plan but is a largely illegible, due to the small print, Design Brief for a site not allocated in the Neighbourhood Plan. Its inclusion is confusing and unnecessary
- Glossary, delete the definitions of BREEAM, Conformity, Core Strategy, Examination in Public, Low Carbon Energy, Permitted Development, Secondary Attractor, Sequential Test, SEA, SHMA and SHLAA. These are either unnecessary or their inclusion is confusing and detracts from the clarity of the Neighbourhood Plan
- Glossary, end the Independent Examination definition at *“...Document.”* The rest of the definition is wrong
- Glossary, delete the second sentence in the definition of Infrastructure, which actually relates to Issues, Options etc, but is unnecessary
- Glossary. Use capital B in title *“Listed Buildings”*
- Glossary. Remove the second sentence of LDF definition, which is misleading.
- Glossary, change the definition of the NPPF to *“Sets out national planning policy and how it is expected to be applied.”*
- Glossary, delete last sentence of Open Space definition which doesn't add any clarity

## 8. Summary

I have recommended a number of modifications further to consideration of the Caistor Neighbourhood Plan against the basic conditions.

Subject to these modifications, the Caistor Neighbourhood Plan

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies of the development plan for the area;
- does not breach, and is compatible with European Union obligations and the European Convention of Human Rights.

Taking the above into account, I find that the Caistor Neighbourhood Plan meets the basic conditions. I have already noted above that the Plan meets paragraph 8(1) requirements.

## **9. Referendum**

I recommend to West Lindsey District Council that, subject to the recommended modifications, the **Caistor Neighbourhood Plan should proceed to a Referendum.**

### **Referendum Area**

Neighbourhood Plan Area - I am required to consider whether the Referendum Area should be extended beyond the Caistor Neighbourhood Area. I consider the Neighbourhood Area to be appropriate and there is no substantive evidence to demonstrate that this is not the case.

I recommend that the Plan should proceed to a Referendum based on the Caistor Neighbourhood Area as approved by West Lindsey District Council on 3 September 2013.

**Nigel McGurk, July 2015**  
**Erimax – Land, Planning and Communities**

[www.erimaxltd.com](http://www.erimaxltd.com)