

From: Simon Tucker [REDACTED]
Sent: 13 August 2018 09:14
To: WL - Neighbourhood Plans
Subject: Willoughton Neighbourhood Plan Regulation 19 Consultation

Dear Sir/Madam

Thank you for your consultation upon the above Consultation upon the Willoughton Neighbourhood Plan.

Having reviewed the document, we wish to confirm that the Canal & River Trust do not have any comment to make upon the above Neighbourhood Plan.

Kind Regards

Simon Tucker MSc MRTPI
Area Planner North East, Canal and River Trust

[REDACTED]
[REDACTED]

Canal & River Trust

Fearns Wharf; Neptune Street; Leeds; LS9 8PB

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Mae Glandŵr Cymru yn gwmni cyfyngedig drwy warant a gofrestrwyd yng Nghymru a Lloegr gyda rhif cwmni 7807276 a rhif elusen gofrestredig 1146792. Swyddfa gofrestredig: First Floor North, Station House, 500 Elder Gate, Milton Keynes MK9 1BB.

Nev Brown
West Lindsey District Council
Development Policy
Guildhall
Marshall's Yard
Gainsborough
DN21 2NA

Our ref: AN/2007/101718/OT-19/SB1
Your ref: Willoughton Neighbourhood
Plan
Date: 30/8/18

Dear Nev

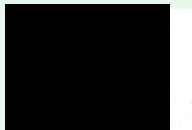
Thank you for consulting us on the Neighbourhood Plan for Willoughton.

We aim to reduce flood risk, while protecting and enhancing the water environment. We have had to focus our detailed engagement to those areas where the environmental risks are greatest.


Based on the environmental constraints within the area, we have no detailed comments to make in relation to your Plan. However, as the plan promotes growth we recommend you contact Lincolnshire County Council (as Lead Local Flood Authority) who will be able to advise if there are areas at risk from surface water flood risk (including groundwater and sewerage flood risk). The Surface Water Management Plan will contain recommendations and actions about how such sites can help reduce the risk of flooding. This may be useful when developing policies or guidance for particular sites.

As your plan proposes development we recommend early consultation with Severn Trent Water to determine whether there is (or will be prior to occupation) sufficient infrastructure capacity existing for the connection, conveyance, treatment and disposal of quantity and quality of water associated with any proposed development within environmental limits of the receiving watercourse. This may impact on the housing figures and the phasing of development. Please note that if there is not sufficient capacity in the infrastructure then we must be consulted again with alternative methods of disposal.

Yours faithfully



Mr Andy Bailey
Sustainable Places - Planning Specialist



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Subject: Notification of Submission of the Willoughton Neighbourhood Development Plan under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012

NOTIFICATION OF SUBMISSION OF THE WILLOUGHTON NEIGHBOURHOOD DEVELOPMENT PLAN UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012

Dear Consultee,

The Willoughton Neighbourhood Development Plan and its supporting documents, as listed below, have been submitted to West Lindsey District Council as required under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012.

- Willoughton Neighbourhood Development Plan 2017-2037 (with Appendices 1 and 2)
- Willoughton NDP Character Appraisal (Appendix 3)
- Willoughton NDP Non-Designated Assets (Appendix 4)
- Willoughton NDP Basic Conditions Statement
- Willoughton NDP Consultation Statement
- Willoughton NDP Survey Results
- Willoughton NDP Strategic Environmental Assessment Screening Report

In accordance with Regulation 16 the Council, as the relevant local planning authority, is now required to publicise these documents prior to examination and referendum of the plan. They are available on the Council's website at www.west-lindsey.gov.uk/neighbourhoodplans and links are also provided on the consultation form attached. Paper copies can be viewed at the Council's offices at the Guildhall, Marshall's Yard, Gainsborough, Lincs, DN21 2NA.

West Lindsey District Council would welcome your representations on the Willoughton Neighbourhood Development Plan which you can make by completing the consultation form attached. You can also make comments on the plan's supporting documents. Should you prefer not to use the consultation form, please make sure that when you make your comments, that you clearly state which document, page and/or policy your comment relates to.

You can return your representations by email to [REDACTED] or post them to the Neighbourhood Planning Team at the council's address as above. When making your representations please indicate if you wish to be notified of the Council's decision on the Willoughton NDP under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.

Consultation begins on Monday 6th August 2018 and ends 5.00pm Monday 1st October 2018.

If you have any questions please contact me.

Regards,
Nev Brown

Senior Neighbourhood Planning Policy Officer
[REDACTED]

West Lindsey District Council, Guildhall, Marshalls Yard, Gainsborough, DN21 2NA



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Our ref:
Your ref:

West Lindsey District Council
Marshall's Yard
Gainsborough
DN21 2NA
via Email: [REDACTED]

Adrian Chadha
Spatial Planning and Economic
Development Team
Highways England
The Cube
199 Wharfside Street
Birmingham B1 1RN

7 September 2018

Dear Nev Brown,

Consultation on the Submission Version of the Willoughton Neighbourhood Development Plan

Highways England welcomes the opportunity to comment on the Willoughton Submission Neighbourhood Development Plan which covers the period 2017 to 2037. The document provides a vision for the future of the area and sets out a number of key objectives and planning policies which will be used to help determine planning applications.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Willoughton Submission Neighbourhood Development Plan, our principal interest is safeguarding the operation of the A46 which routes some 13 miles to the south of the Plan area.

We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for Willoughton is required to be in conformity with the adopted Central Lincolnshire Local Plan (2012-2036) (CLLP) and this is acknowledged within the document.

We understand that Willoughton Parish is defined as a 'small village' within the CLLP and has been allocated a 10% increase in housing stock over the Plan period to 2037. Additional growth will only be supported where it contributes towards a sustainable neighbourhood and there is demonstrable community support for small scale infill development of no more than 4 units (as per CLLP Policy LP4). Considering this small scale growth it is not considered that there will be any impacts on the operation of the SRN. We have no further comments to provide and trusts the above is useful in the progression of the Willoughton Neighbourhood Development Plan.

Yours sincerely,

[REDACTED]
Adrian Chadha
Spatial Planning and Development team
[REDACTED]



Historic England

EAST MIDLANDS OFFICE

Mr Nev Brown
Senior Neighbourhood Planning Policy Officer
West Lindsey District Council
Guildhall
Marshalls Yard
Gainsborough
DN21 2NA

Direct Dial: [REDACTED]

Our Ref: PL00179206

7 August 2018

Dear Mr Brown

re: - Willoughton Neighbourhood Plan

Thank you for consulting Historic England on the Neighbourhood Plan for Willoughton. We do not have any detailed comments to make on the plan at this time, and refer to our previous letter dated 02 November 2017. However, if there are any specific issues that you feel would merit our closer involvement please advise us of this.

The policy considerations relating to the historic environment are dealt with extensively in the National Planning Policy Framework (NPPF) and its associated Guidance (NPPG). For general advice on neighbourhood planning and the historic environment, we refer you to the Neighbourhood Planning section of the Historic England website: <https://www.historicengland.org.uk/advice/hpg/historicenvironment/neighbourhoodplanning/>.

Yours Sincerely

[REDACTED]

Clive Fletcher
Principal Adviser, Historic Places

[REDACTED]



2nd Floor, WINDSOR HOUSE, CLIFTONVILLE, NORTHAMPTON, NN1 5BE

[REDACTED]
HistoricEngland.org.uk



From: [REDACTED]
Sent: 01 August 2018 10:28
To: Nev Brown
Cc: [REDACTED]
Subject: RE: Notification of Submission of the Willoughton Neighbourhood Development Plan under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012

Good morning,

At this time there are no HSE licensed explosives sites in this area so we have no comment to make. However, please be aware that any future licensed explosives site applications will be subject to the relevant planning application processes.

Many thanks

Gill

Gill McElvogue
CEMHD7 Operational Policy and Strategy (Explosives Inspectorate)
Health & Safety Executive,
Redgrave Court,
Merton Road,
Bootle.
L20 7HS

[1]

[2]

[illegible]

[REDACTED]

[REDACTED]

[REDACTED]

Subject: Notification of Submission of the Willoughton Neighbourhood Development Plan under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012

NOTIFICATION OF SUBMISSION OF THE WILLOUGHTON NEIGHBOURHOOD DEVELOPMENT PLAN UNDER REGULATION 16 OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012

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West Lindsey District Council would welcome your representations on the Willoughton Neighbourhood Development Plan which you can make by completing the consultation form attached. You can also make comments on the plan's supporting documents. Should you prefer not to use the consultation form, please make sure that

when you make your comments, that you clearly state which document, page and/or policy your comment relates to.

You can return your representations by email to neighbourhoodplans@west-lindsey.gov.uk or post them to the Neighbourhood Planning Team at the council's address as above. When making your representations please indicate if you wish to be notified of the Council's decision on the Willoughton NDP under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.

Consultation begins on Monday 6th August 2018 and ends 5.00pm Monday 1st October 2018.

If you have any questions please contact me.

Regards,
Nev Brown

Senior Neighbourhood Planning Policy Officer

[REDACTED]

[REDACTED], DN21 2NA



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Willoughton Neighbourhood Development Plan

Consultation Response Form (Regulation 16)

Willoughton Parish Council have formally submitted their Neighbourhood Development Plan to West Lindsey District Council and we would welcome your comments on the plan's contents and its supporting documents too. The consultation period runs from **Monday 6th August 2018 until 5pm on Monday 1st October 2018**.

In order for your comments to be taken into account at the Neighbourhood Plan examination, and to keep you informed, should you wish, of the future progress of the Neighbourhood Plan your contact details are needed.

If you want to know more about how the district council uses your data, what your rights are and how to contact us if you have any concerns, please read our privacy notice:

www.west-lindsey.gov.uk/planning-privacy

The Neighbourhood Plan and supporting documents can be viewed on West Lindsey District Council's website and in paper form at the Guildhall, Marshall's Yard, Gainsborough, Lincs, DN21 2NA.

To view them on the district council's website please use the following link: www.west-lindsey.gov.uk/neighbourhoodplans

Please return this form by **5pm Monday 1st October 2018**. Either

By e-mail to:



Or by post to:

Neighbourhood Planning
West Lindsey District Council
Guildhall
Marshall's Yard
Gainsborough
Lincolnshire DN21 2NA

Comment 1

To which part of the plan (or supporting document) does this comment relate?

Whole Document.

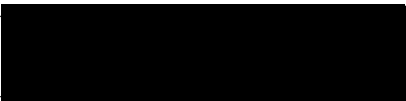
Do you support, oppose, or wish to comment on this part of the plan (or supporting document)?
(Please tick one answer)

Support ☐ Support with modifications ☐ Oppose ☐ Have Comments ☒

Please give details of your reasons for support/opposition, or make other comments here:

As long as all of the required Safeguarding rules are adhered to and that Humberside Airport will be notified of planning applications that might impact on the airport, Humberside Airport will respond to the individual planning applications.

Signature:



Date:

10 August 2018

Comments offered on behalf of the Places Team, Lincolnshire County Council on the Willoughton Neighbourhood Development Plan

This response was provided by Ian Marshman (Historic Environment Officer), the county's archaeological advisor to West Lindsey District Council.

This office is supportive of the community's clear intention within the plan to preserve and enhance the village's character through encouraging well-designed new developments. The section on the village's history is particularly detailed and carefully researched and gives an invaluable basis on which the present village can be understood and new development planned. We endorse the full list of non-designated heritage assets proposed in appendix 4, and have a couple of suggestions to add.

It is unfortunate that this office was not able to contribute at an earlier stage in the plan making process, but it is hoped that the comments provided below can help fill any gaps and further strengthen the plan as it relate to the protection of the historic environment. In particular we strongly recommend that the village's two Scheduled Monuments and the 1930s 'improvements' to local housing both be given greater attention in the plan, to ensure the contribution both make to the village's character is fully acknowledged.

Full comments on the particular elements of the plan are provided below under the relevant headings.

1. What is the Willoughton Neighbourhood Plan?

The history section should explicitly state that both the earthworks in Monks Garth and Temple Garth are protected as Scheduled Monuments. This means they are of national importance having been given formal legal protection by the Government (through Historic England) as being worthy of preservation. Only 2% of archaeological sites are this important, and their contribution to the village should be promoted here and throughout the plan. Their protection will also continue to have a significant impact on future development in the village and this needs to be fully acknowledged, particularly as it supports the community's desire to focus new development within the existing village core.

Likewise this section should make greater reference to the interwar improvement of village housing by its estate landlords. Whilst I understand residents may have mixed feelings about this (especially the loss of the cottages they replaced), they make a significant contribution to the village's sense of place and local distinctiveness. They are also very unusual and historically significant, since across Britain the power of landowning estates was in sharp decline in this period, with schemes of this kind being more common in the 19th century. Interwar housing improvements were usually carried out by local authorities and focused on urban areas, and where they did happen in villages, it was typically as distinct new development on the edge of villages rather than in the replacement of cottages scattered throughout the historic centre as at Willoughton. The design of many of the cottages also expresses a distinctive interest in vernacular architecture its form and materials, which would have been very unusual, probably even 'old fashioned' in this period of modernism and progress. The plan should consider how it would like these buildings to be treated in future developments, such as extensions that could harm their significance.

1.13 "It is suggested the inhabitants of Helpesthorpe farmed ~~the~~ this manor."

1.18 "The Hospitallers owned the land until Henry VIII's Dissolution of the Monasteries ~~Act~~" (this process involved 3 separate acts of parliament, none of which had this title).

4. Public Open Space

This section should also acknowledge the role of the village's two large Scheduled Monuments, both of which contribute to the setting and character of the village, with public rights of way across them ensuring both are accessible. Whilst not public (like LGS1), they are important open spaces, which

are statutorily protected and it seems very strange not to mention this in a development plan such as this.

5. Local Character and Design Principles

The historic environment should be explicitly referred to throughout this section. At present phrases such as 'landscape character' and 'natural features' are used which whilst presumably including elements of the historic environment is ambiguous. Its exclusion also fails to accord with the National Planning Policy Framework which defines the environmental objectives of the planning process as "protecting and enhancing our natural, built and historic environment" (section 2, paragraph 8). It is also important to keep in mind that what some might now consider 'natural' features in villages like Willoughton were created by its past inhabitants, whether it be hedges, verges, trees, field boundaries and street patterns. Underlining this reminds developers of their role in shaping and creating the environment that future generations will inherit.

5.7 "...embedding existing landscape and other natural **and historic** features into the design"

5.10 This office fully supports the desire by the community to preserve the village's character through maintaining its lanes and wide verges, and seeing this continued in new development. In addition to referring developers to Manual for Streets we highly recommend that the plan should direct them to Lincolnshire's own guidance the Streetscape Design Manual, which has been developed by this office in cooperation LCC Highways in order to preserve local character and develop sense of place.

<https://www.lincolnshire.gov.uk/upload/public/attachments/1250/streetscapedesignmanual.pdf>

5.12 "**historic** built form, massing, and materials (including street furniture and boundaries)"

5.16 This section should discuss the historic as well as natural environment of the local area, for instance the extensive medieval earthworks surrounding the village, including the two Scheduled Monuments, but also the 'tofts and crofts' of former settlement and the ridge and furrow of the medieval open fields. At Willoughton this survives well and is something increasingly being lost in other villages across Lincolnshire through spreading residential development and a shift from pasture towards ever larger arable fields.

Since the plan seeks to protect the village's immediate surroundings by focusing development within its existing boundaries, emphasising the historic significance of this area around it will justify why it should be protected, and thus help achieve this goal. Reference could also be made to the English Heritage and Lincolnshire County Council Historic Landscape Characterisation study, which was designed specifically for planning purposes such as these.

<https://www.lincolnshire.gov.uk/residents/environment-and-planning/conservation/archaeology/historic-landscape-characterisation/70142.article>

5.18 This paragraph could be reworded as it doesn't quite make sense. All villages have evolved within their historic confines, as that is what defines what we now think of as their historic confines. It would be better to say something like "When tracking the evolution of Willoughton over time, a pattern starts to emerge of development over many centuries (until the 1960s) within a historic core of interconnecting streets. Many of the buildings in the village are therefore either replacements or previous ones or infill development occurring on vacant land and through the sub-division of plots."

5.19 It is best to avoid ambiguous terms like 'recent' as it depends on who the reader is and their assumptions. You can be specific here, as the evolution of the village (mapped on pg 22 of the Character Assessment) shows that this uncharacteristic "recent" development has actually only taken place on any scale since the 1960s.

5.24 As noted above, this uncharacteristic linear development dates to the mid-20th century not the 19th as stated here.

5.25. This character area should have included all of the Scheduled Monument at Temple Garth, as the earthworks of these important protected open spaces contribute to the historic significance and character of the buildings within and around them.

5.28 Likewise, this character area includes some of the Monks Garth Scheduled Monument, when all of it makes an important contribution to the character of this part of the village, including the setting of the church, which is typified by open greenspace.

5.30 This paragraph slightly contradicts 5.9 which asks for new streets to have space for parked cars, cyclists and pedestrians. It could be worth explaining how you anticipate the balance between accessibility and rural character being struck in new developments. This office supports the plan's intention here, but it would be best to clarify your priorities since a developer may use a potential contradiction as a loophole to try to avoid following one or both and opting for an 'off the shelf' solution.

Figure 9. This should show the Scheduled Monuments in the same way as the Listed Buildings (and public open space on other maps) as filled polygons not just outlines, as this will better emphasise just how much of the historic village and its environs they encompass.

Policy 3: Design and Development Principles

1. "Developments should create places or character based upon an appreciation of the site and surrounding area, responding positively to its natural, **historic**, and build context."

e) "Architectural design shall reflect high quality standards and, where possible, reflect local design references in both natural and **historic built** environment and reflect and reinforce local distinctiveness."

j) "New development shall take care to ensure that the setting of such heritage assets is not compromised. ~~and where possible,~~ Efforts should be made to enhance and relate positively to the heritage asset and its wider setting."

This change is important for several reasons, firstly the NPPF makes clear than all heritage assets can be harmed by developments within their setting, and the setting of designated heritage assets have additional legal protections beyond this, so this is not only necessary 'where possible', because 'effort' should be made in all instances. Similarly there is no qualification needed for the second part of/new sentence either, as NPPF already states that it is desirable to protect and enhance heritage assets and their setting, so there would never be a circumstance where no effort should be required to these ends, it may just be that the public benefits of a new development outweigh a degree of harm to a heritage asset, but the effort to mitigate this harm will still always be required.

7. Community Aspirations

7.4 The village's historic environment, particularly its two nationally significance Scheduled Monuments and its Listed church are amongst its greatest assets for encouraging tourism, and we strongly recommend that the plan expresses its support for developments that would enhance them or better reveal their significance to locals and visitors alike.

Appendix 2: information on potential sites

Site 1. Any development on this site would require archaeological mitigation as it lies within an area of known medieval settlement. Consideration would also need to be given to the setting of the former Wesleyan church which is a non-designated heritage asset.

Site 5. Any development here would require archaeological mitigation because of its position within the medieval settlement and adjacent to the preceptory. It should also be explicitly stated that any

future development on this site would need to be carefully designed so as not to harm the setting of the Scheduled Monument and Listed building opposite at Temple Garth.

Site 6. Any development on this site would require archaeological mitigation as it lies within an area of known medieval settlement.

Appendix 4: Non-designated heritage assets

This is an excellent selection and we commend the community on its work developing the list. However, it is essential that a map is also produced to accompany it as in other neighbourhood plans we have commented on in West Lindsey. This is something that this office can assist the Parish Council with if needed, using mapping from the Lincolnshire Historic Environment Record. Without a map it is likely that developers will find it difficult to understand which specific buildings or features are indented, particularly where a list of buildings or streets is given. Again, this is important because any scope for misinterpretation can lead to the plan's recommendations being disregarded by a developer so potential for confusion needs to be addressed.

We also recommend that careful consideration be made regarding whether specific architectural features are the only aspects of a building that have heritage value, such as the plaque at Mount Stables, the letter box/shop front, and boot scraper on Vicarage Road as it is difficult to see how either could realistically be preserved in future development without the buildings they form part of.

This office would also recommend the inclusion of several buildings for the following reasons:

The Old School House, 2 Vicarage Road. This very attractive 19th century former schoolmaster's house purpose built in High Victorian style and is one of the most attractive houses of this date in the village, featuring a range of architectural detailing such as elaborate polychrome and diaper brickwork, and an original door with ornate Gothic ironworks. It is the best preserved part of the village's original school, and represents a valuable element of the educational and social history of Willoughton.

Willoughton County School. The new school was designed by renowned local architects Scorer & Gamble, who also created architecturally important public buildings including the Horncastle Grammar School, Lee Road School in Gainsborough, Gainsborough Library (Grade II Listed), and the County Offices in Lincoln (Grade II Listed). It was designed in their characteristic style combining both neo-Georgian and neo-vernacular elements alongside what were at the time the most modern "open air" school principles, which sought to provide ventilation and natural light as well as modern heating, sanitary and recreational facilities. Whilst it has had an unfortunate extension to the front, much of the original fabric remains and in future it is hoped that it will be possible to ensure any development of the school is more in keeping with its character and significance. It was a welcome relief in 1929 when it opened, after the conditions of the old school which had been condemned in 1919 mainly on account of its sanitary conditions and lack of outdoor space but complaints had been made as early as 1912, and its replacement was postponed throughout WWI. Generations of Willoughton children have been educated there and local people employed there giving it great communal significance. It is also unusual in terms of Scorer & Gamble's work, in being rather smaller and adapted to suit the confines of village centre site, when compared to their contemporaneous 'open air' schools at Scotter and Sandsfield Lane (Benjamin Adlard) in Gainsborough, both of which had extended linear plans.

Some consideration should also be given to nominating at least one representative example of the better redeveloped 1930s cottages in the village, some of which preserve important archaeological information in their lower stone built sections, or represent architectural compositions very unusual in a Lincolnshire village; such as No. 1 Middle Street, 26 Vicarage Road, or 7 Church Street, the latter of which includes an armorial device of equal value to that on Manor House Stables.

From: Consultations (MMO) [REDACTED]
Sent: 31 July 2018 14:06
To: Nev Brown
Subject: Automatic reply: Notification of Submission of the Willoughton Neighbourhood Development Plan under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012

Consultation response - PLEASE READ

Thank you for including the MMO in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

Kind regards,

The Marine Management Organisation

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Activities taking place below the mean high water mark may require a [marine licence](#) in accordance with the [Marine and Coastal Access Act \(MCAA\) 2009](#). Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. Local authorities may wish to refer to our [marine licensing guide for local planning authorities](#) for more detailed information. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

Marine Planning

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas.

Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the [Marine Policy Statement](#) for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the [Marine and Coastal Access Act](#) and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service soundness self-assessment checklist](#). [If you wish to contact your local marine planning officer you can find their details on our gov.uk page.](#)

[The East Inshore and Offshore marine plans](#) were published on the 2nd April 2014, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East and Inshore and Offshore Plans please visit our [Marine Information System](#).

[The South Inshore and Offshore marine plans](#) were published on the 17th July 2018, becoming a material consideration for public authorities with decision making functions. The South Inshore and South Offshore Marine Plans cover the coast and seas from Folkestone to the River Dart in Devon. For further information on how to apply the South Inshore and South Offshore Marine Plans please visit our [Marine Information System](#).

The MMO is currently in the process of developing marine plans for the remaining 7 marine plan areas by 2021. These are the [North East](#) Marine Plans, the [North West](#) Marine Plans, the [South East](#) Marine Plan and the [South West](#) Marine Plans.

Minerals and waste plans and local aggregate assessments

If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:

- The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry.
- The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply.
- The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply.
- The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply.

The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.

If you wish to contact the MMO regarding our response please email us at consultations@marinemanagement.org.uk or telephone us on 0300 123 1032.

The Marine Management Organisation (MMO) The information contained in this communication is intended for the named recipient(s) only. If you have received this message in error, you are hereby notified that any disclosure, copying, distribution or taking action in reliance of the content is strictly prohibited and

may be unlawful. Whilst this email and associated attachments will have been checked for known viruses whilst within MMO systems, we can accept no responsibility once it has left our systems. Communications on the MMO's computer systems may be monitored and/or recorded to secure the effective operation of the system and for other lawful purposes.

From: Consultations (MMO) [REDACTED]
Sent: 31 July 2018 14:06
To: Nev Brown
Subject: Consultation response- PLEASE READ

Thank you for including the MMO in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

Kind regards,

The Marine Management Organisation

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

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Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the [Marine Policy Statement](#) for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance

with the [Marine and Coastal Access Act](#) and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our [online guidance](#) and the [Planning Advisory Service soundness self-assessment checklist](#).

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If you wish to contact the MMO regarding our response please email us at consultations@marinemanagement.org.uk or telephone us on 0300 123 1032.

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From: Paul Tame [REDACTED]
Sent: 31 July 2018 15:48
To: WL - Neighbourhood Plans
Subject: FW: Willoughton Neighbourhood Development Plan

Thank you for consulting the NFU about the neighbourhood development plan. Our general comments on the neighbourhood plan are as follows:-

The NFU has 4,800 farmer members out of the 6,000 farmers in the East Midlands region who are commercial farmers. About 90 per cent of land within this part of Lincolnshire is farmed. The viability and success of farmers near Willoughton is crucial to the local economy and the environment. Farmers need local plan policies which enable:-

- New farm buildings needed by the business. This could be for regulatory reasons (e.g. new slurry stores) or because new or more crops and livestock are being farmed (grain stores, barns, livestock housing etc).
- Farm and rural diversification. Some farmers will be in a good position to diversify into equine businesses, on farm leisure and tourism and in other sectors which will help boost the local economy and support the farm business.
- On farm renewable energy. Farms can be ideal places for wind turbines, pv, solar, anaerobic digestion, biomass and biofuels plant provided they do not cause nuisance to others. The UK must meet a target of 15% renewables by 2020. Currently we are not meeting this target but on farm renewables can help us to meet it.
- Conversion of vernacular buildings on farms into new business use or residential use. This enables parts of older buildings to be preserved whilst helping the economy and the farm business.

Fast broadband and mobile connectivity. Rural businesses depend on these but so often these are not provided and planning can be an obstacle to their provision rather than the enabler that it should be.

The NFU will be looking to see that the neighbourhood plan has policies which positively encourage the above and do not deter them because of, for example, restrictive landscape designations and sustainable transport policies which imply that all development needs to be by a bus stop. There can also be issues about new buildings being sited too close to noisy or smelly farm buildings which cause nuisance to new householders and lead to abatement notices being served on longstanding businesses. We would urge the local planning authority to be especially careful before granting permission to residential development near to bad neighbour uses.

Paul Tame, Regional Environment and Rural Policy Adviser, NFU East Midlands Region, Agriculture House, North Gate, Uppingham, Rutland, LE15 9NX, tel. [REDACTED]

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NFU, Registered in England No. 245E

Neighbourhood Planning Team
West Lindsey District Council
Guildhall
Marshall's Yard
Gainsborough
DN21 2NA

Hannah Lorna Bevins
Consultant Town Planner

Sent by email to:

2 August 2018

Dear Sir / Madam

**Willoughton Neighbourhood Plan Consultation
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

About National Grid

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

Specific Comments

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus.

National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.

Key resources / contacts

National Grid has provided information in relation to electricity and transmission assets via the following internet link:

<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

The electricity distribution operator in West Lindsey Council is Northern Powergrid. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Gables House
Kenilworth Road
Leamington Spa
Warwickshire CV32 6JX
United Kingdom
woodplc.com

Wood Environment
& Infrastructure Solutions UK Limited
Registered office:
Booths Park, Chelford Road, Knutsford,
Cheshire WA16 8QZ
Registered in England.
No. 2190074



Hannah Lorna Bevins
Consultant Town Planner

[REDACTED]

Wood E&I Solutions UK Ltd
Gables House
Kenilworth Road
Leamington Spa
Warwickshire
CV32 6JX

Spencer Jefferies
Development Liaison Officer, National Grid

[REDACTED]

National Grid House
Warwick Technology Park
Gallows Hill
Warwick
CV34 6DA

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

Yours faithfully

[via email]

Hannah Lorna Bevins
Consultant Town Planner

cc. Spencer Jefferies, National Grid

Date: 01 October 2018
Our ref: 253956



Nev Brown
Neighbourhood Planning
West Lindsey District Council
Guildhall
Marshall's Yard
Gainsborough
Lincolnshire DN21 2NA

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

Dear Nev

Willoughton Neighbourhood Plan - Publication of plan consultation (Reg 16)

Thank you for your consultation on the above dated 01 August 2018

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex 1.

If you have any queries relating to the advice in this letter please contact me on 0208 026 8695. For any new consultations, or to provide further information on this consultation please send your correspondences to [REDACTED].

Yours sincerely

Laura Alvey

**Planning Adviser
Area Delivery
East Midlands Area Team**

[REDACTED]

Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)⁵ website and also from the [LandIS website](http://www.landis.org.uk/index.cfm)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or

¹ <http://magic.defra.gov.uk/>

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) ¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

[REDACTED]

From: Abigail Gilbert [REDACTED]
Sent: 14 September 2018 09:19
To: WL - Neighbourhood Plans
Subject: Willoughton Neighbourhood Development Plan

Dear Sir/Madam,

North East Lindsey has no comments on this development plan as it is outside of our district.

Kind Regards,

Abi Gilbert
Technical and Operations Assistant

Witham First District Internal Drainage Board
Witham Third District Internal Drainage Board
Upper Witham Internal Drainage Board
North East Lindsey Drainage Board

J1 The Point
Weaver Road
Lincoln
LN6 3QN

[REDACTED]

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From: Nina Wilson [REDACTED]
Sent: 06 August 2018 13:32
To: Nev Brown
Subject: WILLOUGHTON NEIGHBOURHOOD DEVELOPMENT PLAN UNDER REGULATION 16
OF THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012

Dear Mr Brown,

Thank you for consulting NCC on the above, we have no comments to make.

Regards
Nina

Principal Planner (Policy)
[REDACTED]

The following message has been applied automatically, to promote news and information from Nottinghamshire County Council about events and services:

Not sure what to do with the kids during the summer holidays? [Visit our dedicated page](#) for ideas and inspiration to keep the kids active this summer. Don't forget to let us know what you're up to and use #ExploreNotts on social media!

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Nottinghamshire County Council Legal Disclaimer.

From: Planning Central [REDACTED]
Sent: 13 August 2018 08:53
To: WL - Neighbourhood Plans
Subject: Willoughton Neighbourhood Plan

Thank you for consulting Sport England on the above neighbourhood plan.

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

<http://www.sportengland.org/playingfieldspolicy>

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

<http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/>

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery. Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

If you need any further advice, please do not hesitate to contact Sport England using the contact details below.

Yours sincerely,

Planning Admin Team

[Redacted]
[Redacted]
[Redacted]



Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF



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Willoughton Neighbourhood Plan - Comments on Heritage Aspects

Willoughton is an ancient settlement, and presents today primarily as a well-kept estate village. I note the characters statement on the Willoughton Parish Council website.

Generally, the positive approach to heritage assets is good, and the details considered to be part of the character of the village is appreciated. However, some of the features noted are not items within the definition of what a heritage asset is. The National Planning Policy Framework (NPPF) glossary describes a heritage asset as:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. Heritage asset includes designated heritage asset and assets identified by the local planning authority (including local listing).

The above definition gives rise to some problems about the features the village would like to see protected, such as street names, plaques, letterbox, shop fronts and scrapers as these are not a building or any other element of the NPPF description of a heritage asset. This is not insurmountable in most cases, because these features are found on buildings which in themselves are non-designated heritage assets. I would therefore suggest that the document be amended to include the buildings themselves are included (this would avoid some duplication too in the case of the post office) and a specific mention is made of important features on the building. The same can be said of buildings and walls that are noted already as non-designated heritage assets. Where a feature that adds to the character of the village is noted but is not attached to a non-designated heritage asset, then a mention should be made in the plan about important features and detailing that contribute to the village instead.

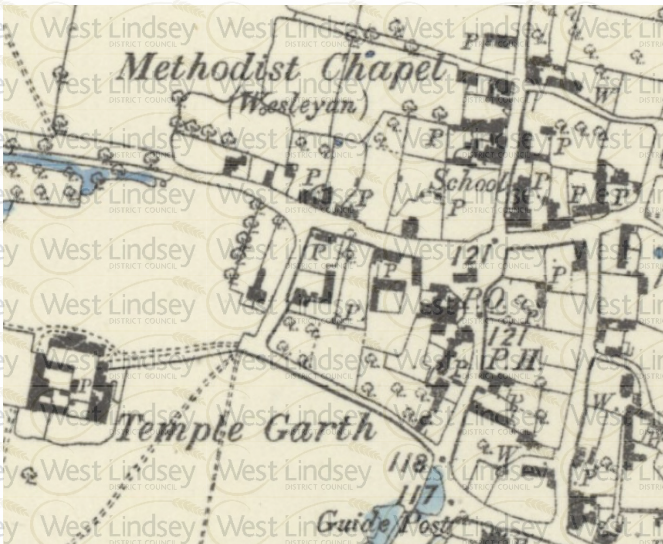
Having visited the village, I also consider there are quite a number of additional buildings which should be noted on as being non-designated heritage assets. This includes estate cottages on the way into the village from the main Gainsborough Road, and a number of stone built cottages and several agricultural buildings that contribute strongly to the character village.

A plan showing the heritage assets should be included in the plan (so if names of houses change, there is ready recognisable site). This also shows the high quality of the vernacular architecture in the village at a glance, so any potential developer can see they will need to make an effort to design new

structures to accord with that strong heritage.

The village is also of sufficient architectural and historic merit to warrant consideration as a conservation area.

Policy 1 item 3. It may be the case that development is not possible within the setting of heritage assets because it may be harmful, even in principle. The policy is worded in such a way that the principle of development is accepted. I would have serious concerns about developing site numbers 3 (setting of



the church) and 5, which is directly opposite a scheduled monument and close to Templegarth Farm, the two together forming a tableaux of very high heritage significance, and as shown has formed a part of that setting with little change since 1889 (except for modern single storey open cart shed). This site also contains several traditional farm buildings including a substantial stone and pantile barn, and again, these are non-designated heritage assets and as such, the starting point should be retention and sympathetic conversion and not demolition and re-development.

Over and above any policy or adopted plan, the LPA are required to have special regard for the setting of listed buildings and scheduled monuments. Historic England would also be consulted. Any development would need to demonstrate that there would be no harmful impact from development (meaning outline planning applications would not be appropriate). The policy perhaps needs some refinement re the setting of designated heritage assets, particularly Templegarth Farm, which sites within an extensive scheduled monument. It should not be the situation that the adopted CLLP and primary legislation do not accord with a neighbourhood plan.

As mentioned previously, there are a number of old barns in the village, and almost all are considered to be non-designated heritage assets. The sympathetic conversion of these buildings should be considered rather than loss and redevelopment.

Character areas are defined on a map but a description is would be helpful too (or reference to the descriptions in the character statement)

Annotation for photographs (e.g., the old smithy) would be helpful too.

Liz Mayle
Conservation Officer
West Lindsey District Council
9 July 2018



Guildhall
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[REDACTED]
Web www.west-lindsey.gov.uk

Your contact for this matter is:

[REDACTED]
[REDACTED]
[REDACTED]

31/08/2018

Dear WLDC,

West Lindsey District Council Comments on the Submission Willoughton Neighbourhood Development Plan Consultation – Regulation 16

Thank you for consulting West Lindsey District Council on the above Willoughton Neighbourhood Development Plan.

The District Council's comments on the Regulation 16 submission plan are included in the table below and which are followed by separate comments from the Council's conservation officer.

For reference we have also included the comments the Council made on the earlier draft Regulation 14 version of the Plan which Willoughton NP group consulted on in September/October 2017.

If you need any further information, please do not hesitate to contact us on the above details.

Yours sincerely
Neighbourhood Planning Team

**Willoughton Neighbourhood Development Plan 2017 -2037
Regulation 16 Submission version**

West Lindsey District Council's comments

Paragraph / Policy / Appendix	WLDC comments
3.5	Reference could be made here to the current growth target for Willoughton as set out in Policy LP4 of the CLLP. At 9th August 2018 it was 16 dwellings.
3.7	<p>The CLLP policy LP2 (not LP4) actually sayslimited to around 4 dwellings... and ...not 4 or less units.. as stated here.</p> <p>This para further states to come forward on sites within the existing settlement footprint (see character assessment) of Willoughton. It appears that the use of 'the existing settlement footprint' in this way is a new introduction to the plan. It was not used in the Regulation 14 draft version for this purpose and there appears to be no evidence since justifying its inclusion (see consultation statement). In the character assessment it is referred to as ... a settlement boundary as prepared in consultation with the community.. – see page 14. Here it appears that the boundary has been used to help identify character areas rather than guiding development.</p> <p>The plan's settlement footprint should interpret the definition of appropriate location as given in for example policies LP2 and LP4 of the CLLP. That is, it should generally speaking identify the settlement core area but discourage new building opportunities which would harm the character of the settlement and surrounding open countryside.</p> <p>It is considered that the plan's settlement footprint does not entirely do this. It would offer up development opportunities that the CLLP would normally resist. For example in Templegarth and Mount House areas and around the recreational ground pavilion. And of course sites directly adjoining the boundaries of these areas but outside the settlement footprint would also have potential for residential development.</p> <p>The footprint boundary also has an unusual relationship with the plan's preferred sites as some on the edge of the built fabric of the village are included in it eg sites 1 and 2(partly) but Site 9 is shown as outside.</p>

	In choosing to have a settlement footprint to guide development it is vital that it has appropriate land opportunities in and around it to meet the housing growth target set by the Local Plan. The plan attempts to do this by the identification of preferred sites. But as previously stated their status as future housing sites is undermined by lack policy or allocation backing.
3.9	The preferred sites would be better identified as allocations to avoid any planning confusion. Currently they are only seen as areas of land available to meet growth and do not even merit a reference in Policy 1. It appears that is the village's wish for these sites to be developed first before additional sites. But as it currently stands it would be difficult to resist unwanted development on alternative sites if these preferred sites are not given policy status and are made allocations.
Policy 1 part 1	This policy needs to give directions as to where the settlement footprint can be viewed
Policy 1 part 1	The plan would benefit from a policy to manage the delivery of new housing in the settlement. Something on these lines: Willoughton's growth target as set by CLLP LP4 is 16 units and will be met by <ul style="list-style-type: none"> - committed sites (none?) - preferred sites identified on Figure 4 - additional sites including conversions which come forward during plan period and which can demonstrate community support.
Policy 1 part 1 b) proposals for more than 5 dwellings.... The CLLP says proposals in small villages like Willoughton should be limited to around 4 units. However it appears that some of the preferred sites could take more than 4 units (eg sites 5 and 8) and in which case the CLLP would expect them to deliver higher accessibility standards see LP10 for small villages.
Policy 1 part 2	Title is... conversion of rural buildings... but policy seems to only apply to properties in the village. What about proposals to properties in the surrounding open countryside/parish area ? The plan is very much Willoughton village centric. Provides little guidance for proposals elsewhere. Same with part 3 which states ... replacement buildings within Willoughton.
Policy 1 part 3	Has this policy taken into consideration the impact it could have on the future redevelopment of preferred housing sites 5 and 8 which have existing buildings on them some possibly of note.
Section 5	Much of what is said under development principles heading may be better as policy guidance rather than supporting text as there are many "should" statements

	here.
Views of rural lanes around Willoughton page 36	Photos need cross refs to Figure 8.
Policy 3 h) and Figure 8	Rural lanes help form the boundaries of 5 preferred housing sites. The plan needs to provide stronger guidance to ensure these lanes are not harmed by this development.
Appendix 2	Need to ensure that any preferred site that was previously in agricultural use is not referred to as brownfield eg sites 5 and 8. Potential site 8 has currently not got planning permission.
10.1	This states that development will be within the existing settlement footprint of the village. But paragraphs 3.7 and Policy 1 (part 1) also say ... directly adjoining. Which is it to be? This paragraph then sayssome of this growth to be on other sites.... Would this be sites within the footprint or directly adjoining it? These are all important statements which need to be consistent throughout the plan especially when they are guiding residential development.
Heritage Assets	Please see Liz Mayle's comments on next page. Liz is West Lindsey District Council's conservation officer.

Liz Mayle
Conservation Officer
West Lindsey District Council
9 July 2018

Willoughton Neighbourhood Plan - Comments on Heritage Aspects

Willoughton is an ancient settlement, and presents today primarily as a well-kept estate village. I note the characters statement on the Willoughton Parish Council website.

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The above definition gives rise to some problems about the features the village would like to see protected, such as street names, plaques, letterbox, shop fronts and scrapers as these are not a building or any other element of the NPPF description of a heritage asset. This is not insurmountable in most cases, because these features are found on buildings which in themselves are non-designated heritage assets. I would therefore suggest that the document be amended to include the buildings themselves are included (this would avoid some duplication too in the case of the post office) and a specific mention is made of important features on the building. The same can be said of buildings and walls that are noted already as non-designated heritage assets. Where a feature that adds to the character of the village is noted but is not attached to a non-designated heritage asset, then a mention should be made in the plan about important features and detailing that contribute to the village instead.

Having visited the village, I also consider there are quite a number of additional buildings which should be noted on as being non-designated heritage assets. This includes estate cottages on the way into the village from the main Gainsborough Road, and a number of stone built cottages and several agricultural buildings that contribute strongly to the character village.



A plan showing the heritage assets should be included in the plan (so if names of houses change, there is ready recognisable site). This also shows the high quality of the vernacular architecture in the village at a glance, so any potential developer can see they will need to make an effort to design new structures to accord with that strong heritage.

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Policy 1 item 3. It may be the case that development is not possible within the setting of heritage assets

because it may be harmful, even in principle. The policy is worded in such a way that the principle of development is accepted. I would have serious concerns about developing site numbers 3 (setting of the church) and 5, which is directly opposite a scheduled monument and close to Templegarth Farm, the two together forming a tableaux of very high heritage significance, and as shown has formed a part of that setting with little change since 1889 (except for modern single storey open cart shed). This site also contains several traditional farm buildings including a substantial stone and pantile barn, and again, these are non-designated heritage assets and as such, the starting point should be retention and sympathetic conversion and not demolition and re-development.

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Annotation for photographs (e.g., the old smithy) would be helpful too.



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Your contact for this matter is:

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31/10/2017

Willoughton Neighbourhood Plan Group

Dear Neighbourhood Plan Group,

West Lindsey District Council Comments to the Draft Willoughton Neighbourhood Plan Consultation

Thank you for consulting West Lindsey District Council (WLDC) on the draft Willoughton Neighbourhood Plan. WLDC support the intentions of this proposed Neighbourhood Plan and will continue to support and assist the group when necessary.

When reviewing the Neighbourhood Plan documents, it is clear the Neighbourhood Plan Group have undertaken public consultation exercises when preparing the Plan. As part of the process of producing a Neighbourhood Plan, groups are required to actively engage with all members of society within the Parish. The Willoughton Neighbourhood Plan group can demonstrate that.

In terms of compliance with existing planning policy, the Neighbourhood Plan Regulations make it clear that Neighbourhood Plans have to be in "general" conformity with current statutory Local Plans. At present, the Central Lincolnshire Local Plan (2012) is the development plan for the local area, having recently been adopted in April 2017.

In respect to the content of the proposed Neighbourhood Plan, the District Council have the following comments to make:

For ease of understanding the Willoughton Neighbourhood Plan is referred to as WNP and the Central Lincolnshire Local Plan as CLLP.

Overview

- It is very positive that Willoughton are seeking to influence development in their area through a Neighbourhood Plan.
- The plan is set out, designed and written clearly and concisely.

- The area has a number of unique characteristics that could be protected and enhanced through a more locally distinctive and effective neighbourhood plan.
- Please insert a list of policies under the contents for ease of identification.
- The clarity of some of the maps is poor, this could be a formatting issue rather than a mapping issue.
- Could the policy boxes be outlined in a different colour so that they stand out from the background text?

Objectives

No 3 – this objective refers to highway improvement – Currently there are no policies on highway improvement. In isolation this objective seems oddly placed given that the objectives should inform the plan's policies. Therefore, should a policy around highways be developed and incorporated? If not, this should be removed or placed as a community aspiration.

Policy 1 –

- 3.5 – The 10% growth target for Willoughton is 16 dwellings over the plan period. Please note that this figure is not an absolute limit to development over the plan period.
- The policy in its current form, adds no more detail than that of the CLLP policies LP2, LP4 and LP26.
- There is no reference to figure 3 in the policy text.
- Criterion 3 refers to '*designated and non-designated heritage assets*' – where are these defined? What are the non-designated heritage assets?
- A number of the terms used in the policy are subjective. Could the group define the following terms in relation to this policy; "*Small Scale*", "*Existing Built Form*", "*Existing Frontage*".
- The CLLP outlines that developments in Category 6 Small Villages "*will be considered on their merits but would be limited to around 4 dwellings*", can the NPG show justification to evidence why they are providing an absolute limit of 4 dwellings per site?

It is recognised that the group have gone out of their way to include '*potential priority sites*' within the plan. However, because the group have not completed the process of allocating these sites for residential use, the sites must remain as indicative and add little weight to the decision making process. WLDC supports the approach for Neighbourhood plans to allocate sites for residential use where appropriate. The process of allocating sites provides wider benefits than simply identifying '*potential sites*'. WLDC advises that the neighbourhood planning group reconsider their approach to allocating the sites that have been identified. Preferably opting towards the more comprehensive approach of site allocations which would have increased weighting in the decision making process.

Moreover, the sites in their current form have the following constraints which seem to have not been assessed. The below information is factual and provided in good faith to outline that although the sites are identified as 'priority', the principle of development on the site may not be acceptable when assessed against all material considerations. A full site selection process would assess each site to establish the principle of development on the most suitable sites.

- Numerous sites have possible contradictions with the rural lane designation. Input from Lincolnshire County Council Highways department should be obtained to assess if highways improvements would be required to develop any of these sites. If highway improvements are required, this could impact upon the designation. A full site selection process would assist this.
- Site 4 – part of the site is designated as an important open space within the CLLP. The site is also located in different character areas (Willoughton Character Assessment).
- Numerous sites are located within an Area of Great Landscape Value, to which no consideration has been given.

- d) No sites have regard to potential impact upon heritage assets (Listed Buildings, Ancient Monument & Historic Park)
- e) Site 5 – Allocated within WLDC’s previous spatial plan.

Have the group fully assessed the cumulative impact if all the identified sites were to be developed? In line with policies and density guidance within the WNP and CLLP all the sites are capable of accommodating at least 4 dwellings. Should all of the identified sites develop, in line with the 4 dwelling maximum in Policy 1, the plan could accommodate 36 dwellings over the plan period, a 23% increase in housing stock. A rough capacity study suggests that the indicative capacity of all sites taken cumulatively is around 69 dwellings, a 44% increase.

As part of the consultation it would be helpful if the group could answer the following questions.

1. Are all of the sites owned by a single landowner?
2. Are there any infill plots, not identified on the map that are in alternative ownership? i.e not owned by the estate.
3. How have the group identified the sites?
 - 3a. Has the landowner submitted them to the group?
 - 3b. Have the sites been selected through public consultation?
 - 3c. Have the public been consulted on the sites in their current form?
4. Is there any reason, other than land ownership, why the group opted against a full site selection process?
5. Have the public been consulted on the preferred level of growth for the village? If so;
 - 5a. Does it align with the capacity figures as identified above?
 - 5b. What is the preferred figure?
6. Are there any possibly conversions within the built form?
7. Have the group considered residential conversions in the countryside?

Policy 2 –

- 3.10 – the group may need to reconsider the wording of this paragraph, it currently contains subjective statements which could be interpreted as supporting backland development, which is in conflict to WNP policy 1.
- Consider replacing “*welcomed*” with “*supported*” to make the policy wording stronger.
- The most recent housing needs assessment was completed through the CLLP, which is already a consideration.
- The term “*starter units*” needs clarification.

The first part of the policy is very similar to the considerations contained within CLLP LP10 and is therefore already a consideration within the decision making process. Neighbourhood plans should avoid replication of the CLLP policies.

The intentions of the 2nd part of the policy are positive. The justification text refers to the character of the area and housing construction type rather than looking specifically at the amount of bedrooms in each property and the population trends, which could give you more indication of what is needed in the area. Also, have the village been consulted on what types of properties they would like to see more of? If so, could a statement about the results of that be included to justify the policy further?

Policy 3 –

- 4.5 - Is there a better photograph of the Churchyard?
- Could the policy be broken into 2 separate criterion? The second starting with “*Where opportunities exist...*”
- Figure 5 only outlines 2 areas of green infrastructure, it was evident from a site visit that the green infrastructure network is much larger within the village. Are CF1&2 the only pieces of

green infrastructure within the settlement? Are there any other important green gaps such as those designated within CLLP? (which are not shown) Are there any important tree lines or frontages which contribute to the green infrastructure network that are not considered? Do all proposals within the parish have to contribute to the identified infrastructure when potentially having no relationship to that area of the village? Or does the policy refer to green infrastructure in the wider sense i.e. not just what's identified on the map?

Policy 4 –

- This type of unique policy is particularly welcomed by WLDC.
- 5.12 – this paragraph seems to set criteria for development, is this supposed to be a policy or incorporated into a policy? The wording specifically requires developers to address character in their design and access statements. If the group want this as a consideration, it must be embedded into the text of the policy.
- Figure 6 – The map is incorrect. The orientation of the village has been mirrored across a horizontal axis. Please look at the most northerly properties which should be on the west side of Vicarage Road, not the East.
- Could this policy be incorporated into Policy 5? So the plan has a large design and character section. The policy could include many more recommendations which are provided in detail within the Character Assessment, this would make the policy very unique and locally distinctive. The policy also has the ability to provide a design criteria for each character area given the content of the character assessment.
- The current approach to use the character assessment should be reconsidered, it would be beneficial if more of the character assessment could be incorporated into the plan, not simply labelling the document as an appendix. The Parish Council have commissioned this work to help influence the Neighbourhood Plan design and character policies, not simply to be read in conjunction with the Plan, the plan should provide detailed criteria/recommendations which are formed from the assessment. WLDC would like to see a better use of this very comprehensive document.

Policy 5 –

- The recent housing white paper encourages Neighbourhood plans to cover local design – therefore this approach is supported.
- The policy currently reads “*This policy should be read in conjunction with the most recent Willoughton Character Assessment*”. As previously mentioned, the group have commissioned a professional study as an evidence base for this policy. This study goes into great detail about the local design of the area, it should therefore be incorporated into the policy as much as possible. This policy could incorporate more detail to transform the professional work into distinctive planning policy.
- For example, orientation and solar gain forms part of the character assessment but is not transferred into the body of the policy.
- Criterion 5 – gives no regard to foul water drainage and incorporation of SUDs.
- There is little reference given to the physical designations within the village – could these be incorporated?
- Criterion 6 – Could more details of this be provided as part of the policy?

Policy 6 –

- 6.1 – this paragraph could be locally distinctive to Willoughton and less generic. Replace “*important part of any community*” with “*important part of the Willoughton Community*”
- Figure 8 – the exact boundary of the community facilities should be defined. This map should be amended accordingly.

- Generic text – no reference here to any specific local needs in the policy itself, i.e. does not set out what the area needs/lacks and what types of developments should be encouraged.
- The policy is similar to other neighbourhood plan community facilities policy within WLDC. Neighbourhood Plan policies should be locally distinctive to the area that they relate.

Monitoring of the NP –

- 7.6 - refers to projects – but what projects?
- 7.7 – Is this information up to date and correct?

Character study –

The character study is a good document and could be utilised much more by this neighbourhood plan. The study provides context to the local area, and goes into great detail about building materials and the local vernacular, all of which should be reflected and incorporated within the NP design and character policy.

Further Comments –

- Although not a statutory part of neighbourhood planning, there are currently no community aspirations incorporated into the plan.
- The WNP does not carry forward a heritage based policy, which could link with the character work.
- The WNP does not show important open spaces which are identified by the CLLP.
- There is no mention of the Football pitch or pavilion – have the group assessed these as possible community facilities or green space?
- There is no mention of Tourism development.
- It is plain to see that Willoughton has a rich equine history, in fact much of the current business and land use is for the purpose of equine. Have the group considered a policy to support and enable future equine uses?
- The village incorporates an Area of Great Landscape Value, with this in mind, have the group considered protecting any important views that may be associated with the cliff?
- It may be useful for the plan to have a policy considering the future growth of the estate, and whether that gives rise to other planning issues that could be covered by the plan, such as the potential for new live/work units connected to the estate's function.
- The group seem to have concentrated on the built settlement, have the group considered enabling rural diversification outside of the built form to possibly strengthen the rural economy?
- There is no mention of enabling residential or business conversions. Instead the housing section concentrates on infill development. Could the group identify any potential conversion opportunities, and provide design criteria for them?

If you need any further information, please do not hesitate to contact us on the above details.

Yours Sincerely
Planning Department