

Dunholme Neighbourhood Plan Review
Regulation 16 Submission Consultation
Responses

From: Strategic Growth [REDACTED]
Sent: 20 September 2024 13:19
To: WL - Neighbourhood Plans
Subject: Dunholme Neighbourhood Plan Review (Regulation 16 consultation) - Anglian Water response
20/09/24

Dear Nev,

Thank you for consulting Anglian Water on the draft review Dunholme neighbourhood plan. Anglian Water is the statutory water and sewerage undertaker within the designated area.

Anglian Water is identified as a consultation body under the Neighbourhood Planning (General) Regulations 2012 and we support neighbourhood plans and their role in delivering environmental and social prosperity in the region.

Overall, Anglian Water is the water supply and water recycling provider for over 6 million customers. Our operational area spans between the Humber and Thames estuaries and includes around a fifth of the English coastline. The region is the driest in the UK and the lowest lying, with a quarter of our area below sea level. This makes it particularly vulnerable to the impacts of climate change including heightened risks of both drought and flooding, including inundation by the sea. Additionally, parts of the area have the highest rate of housing growth in England.

Anglian Water has amended its Articles of Association to legally enshrine public interest within the constitutional make up of our business – this is our pledge to deliver wider benefits to society, beyond the provision of clean, fresh drinking water and effective treatment of used water. Our Purpose is to bring environmental and social prosperity to the region we serve through our commitment to Love Every Drop.

Anglian Water wants to proactively engage with the neighbourhood plan process to ensure the plan delivers benefits for residents and visitors to the area, and in doing so protect the environment and water resources. Anglian Water has produced a specific guidance note on the preparation of NPs found using this link under our Strategic Growth and Infrastructure webpage - [Strategic Growth and Infrastructure \(anglianwater.co.uk\)](#) The guidance also has sign posting/ links to obtaining information on relevant assets and infrastructure in map form, where relevant.

The comments set out below are made, ensuring the making of the plan contributes to sustainable development and has regard to assets owned and managed by Anglian Water. Overall, we are supportive of the policy ambitions within the neighbourhood plan, subject to the proposed amendments.

-
Policy 2 – Allocation of Land at Honeyholes Lane

For clarity, the indicative figure for the number of dwelling units should be included within the policy. The supporting text states there is an 'at least' indicative figure for 63 dwellings. In order to ascertain an appropriate number of dwellings that the site could deliver this would be determined by a design led approach, taking account of the criteria (a) to (k) and other relevant planning policy considerations. This amendment would be consistent with the approach taken for the other housing allocation sites, where the indicative housing figures are referred to within the corresponding policies.

-
Policy 6 – Priority site for Custom and Self-Build Housing (Site NP08)

There are water mains and wastewater assets within the proposed site that should be considered as part of any scheme coming forward. This existing infrastructure is protected by easements and should not be built over or located in private gardens where access for maintenance and repair could be restricted. The existing water mains/ sewer(s) should be located within the highway or public open space. If this is not possible a formal application to divert Anglian Water's existing assets may be required. It is important to ensure that any Anglian Water assets that may be affected by development proposals are reflected in any site allocation policy.

Anglian Water would, therefore, recommend that the following wording is inserted into the policy to ensure that the developer undertakes early engagement with our pre-development team to ensure the necessary measures are undertaken about any connections or diversions that may be required.

"Early engagement with Anglian Water regarding their infrastructure on and adjoining the site to ensure suitable access for the maintenance of water supply and foul drainage infrastructure is safeguarded."

-
Policy 8 – Mitigating and Adapting to Climate Change

Anglian Water supports the aims of this policy.

Criterion (d)

As a region identified as seriously water stressed, we encourage measures to improve water efficiency in developments. Anglian Water's water resources management plan (WRMP) for 2025-2050 identifies key challenges of population growth, climate change, and the need to protect sensitive environments by reducing abstraction. See [Water resources management plan \(anglianwater.co.uk\)](#)

Managing the demand for water is therefore an important aspect of maintaining future supplies. This can be achieved by a fixtures and fittings approach, including through rainwater/storm water, harvesting and reuse, and greywater recycling. Such measures to improve water efficiency standards and opportunities for water reuse and recycling also reduces the volume of wastewater needed to be treated by our water recycling centres. This will help to reduce customer bills (including for other energy bills) as well as reduce carbon emissions in the supply and recycling of water.

For information, the Defra [Plan for Water: our integrated plan for delivering clean and plentiful water - GOV.UK \(www.gov.uk\)](#) supports the need to improve water efficiency and the Government's [Environment Improvement Plan](#) sets ten actions in the Roadmap to Water Efficiency in new developments including consideration of a new standard for new homes in England of 100 litres per person per day (l/p/d) where there is a clear local need, such as in areas of serious water stress. Given the proposed national focus on water efficiency, Anglian Water encourages

Local Plans and Neighbourhood Plans to cover this issue through a policy-based approach.

It is suggested that a suitable cross reference to corresponding Central Lincolnshire Local Plan Policy S12 could be made on water efficiency measures required as part of new development proposals.

Criterion (e)

Anglian Water is supportive of measures to address surface water run-off, including the preference for this to be managed using Sustainable Drainage Systems (SuDS) and requiring permeable surfaces for new areas of hardstanding within developments to align with the drainage hierarchy. Such measures help to avoid surface water run-off from entering our foul drainage network, and connections to a surface water sewer should only be considered where all other options are demonstrated to be impracticable. Any requirements for a surface water connection to our surface water sewer network will require the developer to fund the cost of modelling and any upgrades required to accept the flows from the development.

It would be helpful if a specific cross reference was made under Policy 8 or in the supporting text to Central Lincolnshire Local Plan Policy 21 Flood Risk and Water Resources.

It is the Government's intention to implement Schedule Three of The Flood and Water Management Act 2010 to make SuDS mandatory in all new developments in England. However, we welcome the policy approach to ensure SuDS measures are incorporated within new developments, until the Schedule is formally implemented and the necessary measures are in place.

Anglian Water encourages the use of nature-based solutions for SuDS wherever possible, including retrofitting SuDS to existing urban areas to enhance amenity and biodiversity within the neighbourhood plan area and contribute to green and blue infrastructure.

Policy 10 – Important Open Space and Policy 14 – Green Wedge

These policies designate a number of areas of land to intended to be safeguarded from development. Anglian Water does have assets forming part of our water and water recycling network (e.g., rising mains and sewers) located within or in the vicinity of these designated areas. For example, there are several underground pipes which cross the Green Wedge area north of Dunholme. There are also underground pipes located within sites 1, 4 and 7.

We do not consider that these policies should prevent any operational development that would be normally permitted, such as maintenance and repair our assets to be undertaken to ensure our network is maintained.

For information, maps of Anglian Water's assets detailing the location of our water and water recycling infrastructure are available at: www.utilities.digdat.co.uk

Policy 11 - Green and Blue Infrastructure

Anglian Water supports this policy and prioritising the delivery of biodiversity net gains within the neighbourhood planning area to support habitat recovery and enhancements within existing and new areas of green and blue infrastructure.

As the neighbourhood plan progresses, there may also be benefit in referencing the emerging Greater Lincolnshire Local Nature Recovery Strategy [Greater Lincolnshire Local Nature Recovery Strategy - Greater Lincolnshire Local Nature Recovery Strategy \(glinclslnrs.org.uk\)](http://Greater Lincolnshire Local Nature Recovery Strategy - Greater Lincolnshire Local Nature Recovery Strategy (glinclslnrs.org.uk)) which will identify priority actions for nature and map specific areas for improving habitats for nature recovery.

Anglian Water has made a corporate commitment to deliver a biodiversity net gain of 10% against the measured losses of habitats on all AW-owned land.

Section 17. Flooding and Drainage

The draft Neighbourhood Plan makes reference to Policy 21 of the Central Lincolnshire Local Plan Policy S21 on managing flooding for new development. Anglian Water supports new development to be served by sustainable infrastructure provision and that does not result in a detrimental impact on existing infrastructure, including sewers and surface water and watercourse flooding. Developers are, therefore, encouraged to engage in early discussions with Anglian Water's pre-development team, to ensure the necessary measures are addressed (i.e. any connections, diversions or upgrades to our network) for when planning applications are submitted to the local planning authority. [Developing \(anglianwater.co.uk\)](http://Developing (anglianwater.co.uk))

Anglian Water recommends that the following wording is inserted into the neighbourhood plan, to ensure that the developer undertakes early engagement with our pre-development team.

"Early engagement with Anglian Water regarding their infrastructure on and adjoining the site to ensure suitable access for the maintenance of water supply and foul drainage infrastructure is safeguarded."

I should be grateful if you could please acknowledge receipt of this representation and keep me updated on further progress made on the neighbourhood plan.

For your records, please note we are now using a new team email address for neighbourhood plan correspondence - strategicgrowth@anglian.water.co.uk. Thank you.

Yours sincerely,

Carry Murphy

Chartered Town Planner - MRTPI

**Spatial and Strategic Planning Manager – Sustainable Growth
Quality & Environment**

Tel. [REDACTED]



Web: www.anglianwater.co.uk

Anglian Water Services Limited

Lancaster House, Lancaster Way, Ermine Business Park, Huntingdon, Cambridgeshire. PE29 6XU

From: Nev Brown <[REDACTED]>
Sent: Friday, July 26, 2024 4:07 PM
Subject: Dunholme Neighbourhood Plan - Review - Regulation 16 Submission Consultation

Some people who received this message don't often get email from nev.brown@west-lindsey.gov.uk. [Learn why this is important](#)

EXTERNAL MAIL - Please be aware this mail is from an external sender - THINK BEFORE YOU CLICK

Dear Consultee,

Dunholme Parish Council has submitted its Neighbourhood Plan Review (the Plan) and supporting documents to West Lindsey District Council (WLDC) in accordance with Regulations 15 and 16 of the Neighbourhood Planning (General) Regulations 2012.

WLDC is now inviting comments on the submitted Plan and you are being notified as a consultee.

The Plan and its supporting documents are available from:

<https://www.west-lindsey.gov.uk/planning-building-control/planning/neighbourhood-planning/all-neighbourhood-plans-west-lindsey/dunholme-neighbourhood-plan>

If you require assistance accessing the documents, please call WLDC's customer services on (01427) 676676.

The consultation period is until 20th September 2024.

All comments on the Plan should be made in writing and sent to:

Email: neighbourhoodplans@west-lindsey.gov.uk

Post: Neighbourhood Planning, Guildhall, Marshall's Yard, Gainsborough, Lincs, DN21 2NA.

When making your comments please indicate if you wish to be notified of WLDC's decision on the Plan under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.

If you would like to know more about how WLDC uses your data in respect of the Plan's consultation, 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

Regards

Nev Brown
Senior Neighbourhood Planning Policy Officer

OC 44 - 100

From: box.assetprotection [REDACTED]
Sent: 01 August 2024 16:49
To: Nev Brown
Subject: RE: Dunholme Neighbourhood Plan - Review - Regulation 16 Submission Consultation
Attachments: West Lindsey Neighbourhood plan.pdf

CAUTION: External email, think before you click!

Nev,

Thank you for your email.

The map provided within the neighbourhood plan doesn't appear to be affected by our High Pressure Gas Pipelines. I have attached a map showing our assets.

If there are any changes, please let us know.

Asset Protection, National Gas Transmission

From: Nev Brown [REDACTED]
Sent: Friday, July 26, 2024 4:08 PM
Subject: Dunholme Neighbourhood Plan - Review - Regulation 16 Submission Consultation

[EXTERNAL EMAIL] This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe. If you suspect this email is malicious, please use the 'Report Phish'.

Dear Consultee,
Dunholme Parish Council has submitted its Neighbourhood Plan Review (the Plan) and supporting documents to West Lindsey District Council (WLDC) in accordance with Regulations 15 and 16 of the Neighbourhood Planning (General) Regulations 2012.

WLDC is now inviting comments on the submitted Plan and you are being notified as a consultee.

The Plan and its supporting documents are available from:

<https://www.west-lindsey.gov.uk/planning-building-control/planning/neighbourhood-planning/all-neighbourhood-plans-west-lindsey/dunholme-neighbourhood-plan>

If you require assistance accessing the documents, please call WLDC's customer services on (01427) 676676.

The consultation period is until 20th September 2024.

All comments on the Plan should be made in writing and sent to:

Email: neighbourhoodplans@west-lindsey.gov.uk

Post: Neighbourhood Planning, Guildhall, Marshall's Yard, Gainsborough, Lincs, DN21 2NA.

When making your comments please indicate if you wish to be notified of WLDC's decision on the Plan under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.

If you would like to know more about how WLDC uses your data in respect of the Plan's consultation, 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

Regards

Nev Brown
Senior Neighbourhood Planning Policy Officer

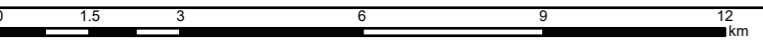
DM 27 - 71



Legend

- GT ASSETS
- Gas Zone
- Commissioned
- Named Pipeline
- Section

Notes



Date: 8/1/2024
Time: 3:46 PM

Page size: A3 Landscape
Printed by: Jackie Webb



NG Disclaimer: National Gas UK Transmission. The asset position information represented on this map is the intellectual property of National Gas. It is not to be used without prior authority of National Gas.

Note: Any sketches on the map are approximate and not captured to any particular level of precision.

OS Disclaimer: Background Mapping information has been reproduced from the Ordnance Survey map by permission of Ordnance Survey on behalf of the Controller of His Majesty Stationery Office. Copyright © Crown Copyright and the Ordnance Survey. National Gas - 100024886.

Scale: 1:125,000



**Canal &
River Trust**

Making life better by water

Neighbourhood Planning
Guildhall
Marshall's Yard
Gainsborough
DN21 2NA

Our Ref CRTR-POL-2024-42301

Friday 20 September 2024

Dear Nev Brown,

Dunholme Neighbourhood Plan

Thank you for your consultation on the above document.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.

The River Witham is the Trust's nearest waterway to Dunholme village at a distance of approximately 7.5km to the south. As such the Trust have no waterways, assets or land interests within the area covered by the document and as such we have no comment to make.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Hazel Smith MRTPI
Area Planner - Midlands



<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

Canal & River Trust Planning Team

Canal & River Trust, National Waterways Museum, Ellesmere Port South Pier Road Ellesmere Port Cheshire CH65 4FW
T: 0151 355 5017 E: nationalwaterwaysmuseum@canalrivertrust.org.uk W: canalrivertrust.org.uk



Defence
Infrastructure
Organisation

Christopher Waldron
Ministry of Defence
Safeguarding Department
DIO Head Office
St George's House
DMS Whittington
Lichfield
Staffordshire WS14 9PY

Your reference:
Dunholme Neighbourhood Plan Review-
Regulation 16

Mobile: +44 (0) 7800 505824

E-mail: [REDACTED]

Our reference:
10063782

Nev Brown
Senior Neighbourhood Planning Policy Officer
West Lindsay District Council
Guildhall
Marshall's Yard
Gainsborough
Lincolnshire
DN21 2NA

19th September 2024

Dear Nev,

It is understood that West Lindsey District Council are undertaking a regulation 16 submission consultation regarding Dunholme Neighbourhood Plan Review. This document will guide the future development of the parish.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

Paragraph 101 of the National Planning Policy Framework (December 2023) requires that planning policies and decisions take into account defence requirements by '*ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*' Statutory consultation of the MOD occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued to Local Planning Authorities by the Ministry of

Housing, Communities & Local Government (MHCLG) in accordance with the provisions of that Direction.

Copies of these relevant plans, in both GIS shapefile and .pdf format are issued to Local Planning Authorities by MHCLG. An assurance review was conducted by the MOD in 2023 which confirmed that, at that time, Local Planning Authorities held the most recent relevant safeguarding data. Any subsequent updates to those plans were then issued by MHCLG. If there is a requirement for replacement data, a request can be made through the above email address

The MOD have an interest within the area covered by the Dunholme Neighbourhood Plan, as it contains areas that are washed over by safeguarding zones that are designated to preserve the operation and capability of defence assets and sites. RAF Waddington, located to the South-West, benefits from safeguarding zones drawn to preserve the airspace above and surrounding the aerodrome to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. New development may have detrimental impacts depending on site location relative to safeguarded sites and assets.

The MOD also have an interest within the plan area, in a new technical asset known as the East 1 WAM Network, which contributes to aviation safety by feeding into the air traffic management system in the Eastern areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Elements of this asset pass through the Dunholme Neighbourhood Plan authority area.

The review or drafting of planning policy provides an opportunity to better inform developers of the statutory requirement that MOD is consulted on development that triggers the criteria set out on Safeguarding Plans, and the constraints that might be applied to development as a result of the requirement to ensure defence capability and operations are not adversely affected

The Safeguarding map associated with the East 1 WAM Network has been submitted to MHCLG for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines or solar photo voltaic panels and their associated infrastructure) are of particular concern. Wherever the criteria are triggered, the MOD should be consulted in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated.

To provide an illustration of the various issues that might be fundamental to MOD assessment carried out in response to statutory consultation, a brief summary of the main safeguarding areas of concern is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

The airspace above and surrounding aerodromes is safeguarded to ensure that development does not form a physical obstruction to the safe operation of aircraft using that aerodrome. Colour coded zones are marked on safeguarding maps that provide heights which, if proposed development would reach or exceed them, would trigger MOD

consultation. These zones also indicate areas where development might reduce the capability or otherwise compromise the operation of technical assets such as communications, navigation, or surveillance systems including radar. In addition to permanent physical development within these zones, the change of use of land to allow/facilitate flying activities; and the use of cranes, piling rigs or other tall plant or equipment to implement development may also be of concern.

Technical assets that facilitate air traffic management, primarily radar, navigation, and communications systems are safeguarded to limit the impact of development on their capability and operation. The height, massing, and materials used to finish a development may all be factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to provide large expanses of metal at height, for example where proposals include a wind turbine or roof mounted solar PV system

In addition, and where development falls outside designated safeguarding zones, the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability by virtue of scale, height, or physical properties. Examples of these types of development include renewable energy development such as the installation of wind turbine generators or solar photo voltaic panels, or any development that would exceed a height of 50m above ground level. Both tall (of or exceeding a height of 50m above ground level) structures and wind turbine development introduce physical obstacles to low flying aircraft.

Solar PV development can compromise the operation of communications and other technical assets by introducing substantial areas of metal that degrade signals and, depending on the location of development, may produce glint and glare to the detriment of aviation safety. Wind turbines may impact on the operation of surveillance systems such as radar where the rotating motion of their blades can degrade and cause interference to the effective operation of these types of installations, potentially resulting in detriment to aviation safety and operational capability. This potential is recognised in the Government's online Planning Practice Guidance which contains, within the Renewable and Low Carbon Energy section, specific guidance that both developers and Local Planning Authorities should consult the MOD where a proposed turbine has a tip height of, or exceeding 11m, and/or has a rotor diameter of 2m or more.

I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.

Yours sincerely



Chris Waldron
DIO Assistant Safeguarding Manager

Nev Brown
West Lindsey District Council
Development Policy
Marshalls Yard
Gainsborough
Lincolnshire
DN21 2NA

Our ref: AN/2007/101718/PO-04/SB1-L01

Date: 13 September 2024

Dear Nev

Dunholme Neighbourhood Plan Review - Regulation 16 Submission Consultation

Thank you for consulting us on the Dunholme Neighbourhood Plan Regulation 16 Submission on 26 July 2024.

We aim to reduce flood risk, while protecting and enhancing the water environment. Our comments on this matter are therefore made solely from these points of view.

Environment Agency position

We have reviewed the Neighbourhood Plan (dated May 2024) and can confirm that it raises no concerns for us.

However, we would like to update and add to the previous comments we made in our letter referenced 'AN/2007/101718/SE-14/DS1' (dated 08 March 2024), which was in response to the Strategic Environmental Assessment Screening and Final Draft Plan consultation.

Flood risk

Whilst the Neighbourhood Plan submission has not included any amendments related to our comments on both Policy 8 and Policy 12, we do not object to the Plan. However, the below advice still stands:

Policy 8

We still recommend that the text in Policy 8, point 1.b is reworded so that it is more specific and comprehensive to provide more clarity for applicants.

We suggest the following:

'b) Provide adequate mitigation for the flood risk to the occupants of the development, through the raising of finished floor levels and/or using flood resistance and resilience measures.'

Policy 12

We would like to reiterate our previous advice, as outlined in our letters dated 03 January 2024 and 08 March 2024, that development may require a Flood Risk Activity Permit from the Environment Agency for works to or within proximity to the Dunholme Beck. We recommend that this is referenced within the supporting text.

Environment Agency

Ceres House, Searby Road, Lincoln, LN2 4DW
Email: LNplanning@environment-agency.gov.uk
www.gov.uk/environment-agency

*Customer services line: 03708 506 506
Calls to 03 numbers cost the same as calls to standard
geographic numbers (i.e. numbers beginning with 01 or 02).*

Cont/d..

Development/works taking place within 8 metres of Dunholme Beck may require a permit under the Environmental Permitting Regulations 2016. Please visit [Flood risk activities: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/flood-risk-activities-environmental-permits) for more information.

Related to this, we also advised we would likely discourage raised paths being created which could change how the water flows if it exceeds the river channel capacity. This should also be referred to in the Plan.

In our previous letter, dated 03 January 2024, (in referring to page 48, now page 54) we also highlighted that the Environment Agency is not the only consultee on flood risk. Other Risk Management Authorities (RMAs) are also consulted to respond to planning applications. Therefore, the Plan should also note other RMAs. These include the Lead Local Flood Authority – Lincolnshire County Council who lead on surface water, ground water and ordinary watercourses and the Internal Drainage Board, which is Witham Third in this area. This point does not seem to have been addressed. Please can this be included.

Foul drainage

As stated in our previous letters we note that the updated Neighbourhood Plan no longer includes a specific policy on ‘water and waste’ but Objective 9 does seek to support and encourage improvements to infrastructure and services such as drainage capacity, which we support.

The data available to us indicates that there is currently headroom within the current permit for the Water Recycling Centre (WRC) that serves Dunholme for new developments. However, it is important that there is enough capacity available for developments. Therefore we recommend that you consult with Anglian Water before the Plan is finalised and developers have ongoing discussions with them as there may be other issues causing strain when it comes to foul drainage that development may exacerbate. Related to this, we note from the consultation statement dated May 2024 that Severn Trent Water have no comments to make on the Plan. There do not appear to be any views from Anglian Water who operate the Dunholme WRC.

Water efficiency

In our previous letters, we provided comments on the topic of water efficiency in the Neighbourhood Plan and recommended that reference is made to more specific measures to maximise the opportunity for water efficiency in the area.

We note that reference to the water efficiency standard has not been included in the final Neighbourhood Plan, however, as Policy 8 (2) states ‘Development should be in accordance with relevant policies in the Local Plan.’ We are satisfied that development in the area will be encouraged to higher water efficiency standards, in line with the Central Lincolnshire Local Plan 2023.

Biodiversity and ecology

We support the inclusion of Policy 11 – Green and Blue Infrastructure.

However, we would like highlight that the Welton/Dunholme Beck is a ground water fed, Limestone Beck and has potential to support a diverse range of aquatic species and habitats, for example we know that trout from the Barlings Eau have spawned here in previous winters. Therefore, it is important that the Beck, it’s habitat and ecology are recognised and protected. The East Mercia Rivers Trust have a long running initiative to support this work across all of the Limestone Becks of central Lincolnshire.

Other matters

EPR permitted installations

We would also like to highlight the presence of numerous EPR permitted installations near Dunholme Village. To Ensure that operations at these sites does not cause amenities issue with residents of Dunholme, we recommend that sighting of any new development is planned with consideration to proximity of any nearby installations which could become a source of noise and odour complaints.

Contaminated land

We have no further comments in regards to contaminated land.

We would like to be notified by the Local Planning Authority of the decision on the Neighbourhood Plan under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me using the details below.

Yours sincerely
Hannah Kelly

Planning Adviser

✉ Ceres House, Searby Rd, Lincoln, LN2 4DW



From: East and East Midlands Forest Area Enquiries [REDACTED]
Sent: 26 July 2024 16:15
To: Nev Brown
Subject: RE: Dunholme Neighbourhood Plan - Review - Regulation 16 Submission Consultation

CAUTION: External email, think before you click!

Thank you for inviting the Forestry Commission to respond to the consultation on the Neighbourhood Plan, Unfortunately we do not have the resources to respond to individual plans but we have some key points to make relevant to all neighbourhood plans.

Forestry Commission and Neighbourhood Planning

Existing trees in your community

The Forestry Commission would like to encourage communities to review the trees and woodlands in their neighbourhood and consider whether they are sufficiently diverse in age and species to prove resilient in the face of tree pests and diseases or climate change. For example, if you have a high proportion of Ash, you are likely to see the majority suffering from Ash Dieback. Some communities are proactively planting different species straight away, to mitigate the effect of losing the Ash; you can find out more [here](#). Alternatively, if you have a high proportion of Beech, you may find they suffer particularly from drought or flood stress as the climate becomes more extreme. There are [resources](#) available to help you get ideas for other species you can plant to diversify your tree stock and make it more resilient.

Ancient Woodland

If you have ancient woodland within or adjacent to your boundary it is important that it is considered within your plan. Ancient woodlands are irreplaceable, they have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless "there are wholly exceptional reasons and a suitable compensation strategy exists" ([National Planning Policy Framework](#) paragraph 180).

The Forestry Commission has prepared joint Standing Advice for the treatment of Ancient Woodland

If you have ancient woodland within or adjacent to your boundary it is important that it is considered within your plan. Ancient woodlands are irreplaceable, they have great value because they have a long history of woodland cover, with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless "there are wholly exceptional reasons and a suitable compensation strategy exists" ([National Planning Policy Framework](#) paragraph 180).

The Forestry Commission has prepared joint [Standing Advice](#) with Natural England on ancient woodland and veteran trees.

This advice is a material consideration for planning decisions across England and can also be a useful starting point for policy considerations.

The Standing Advice explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It provides advice on how to protect ancient woodland when dealing with planning applications that may affect ancient woodland. It also considers ancient wood-pasture and veteran trees. It will provides links to Natural England's [Ancient Woodland Inventory](#) and [assessment guides](#) as well as other tools to assist you in assessing potential impacts.

Deforestation

The overarching policy for the sustainable management of forests, woodland and trees in England is a presumption against deforestation.

Woodland Creation

The UK is committed in law to net zero emissions by 2050. Tree planting is recognised as contributing to efforts to tackle the biodiversity and climate emergencies we are currently facing. Neighbourhood plans are a useful mechanism for promoting tree planting close to people so that the cultural and health benefits of trees can be enjoyed alongside their broader environmental benefits. Any planting considered by the plan should require healthy resilient tree stock to minimise the risk of pests and diseases and maximise its climate change resilience, a robust management plan should also be put in place.

with Natural England on ancient woodland and veteran trees. This advice is a material consideration for planning decisions across England and can also be a useful starting point for policy considerations.

The Standing Advice explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It provides advice on how to protect ancient woodland when dealing with planning applications that may affect ancient woodland. It also considers ancient wood-pasture and veteran trees. It will provides links to Natural England's [Ancient Woodland Inventory](#) and [assessment guides](#) as well as other tools to assist you in assessing potential impacts.

Deforestation

The overarching policy for the sustainable management of forests, woodland and trees in England is a presumption against deforestation.

Woodland Creation

The UK is committed in law to net zero emissions by 2050. Tree planting is recognised as contributing to efforts to tackle the biodiversity and climate emergencies we are currently facing. Neighbourhood plans are a useful mechanism for promoting tree planting close to people so that the cultural and health benefits of trees can be enjoyed alongside their broader environmental benefits. Any planting considered by the plan should require healthy resilient tree stock to minimise the risk of pests and diseases and maximise its climate change resilience, a robust management plan should also be put in place.

Kind regards
Mary

Forestry Commission | Santon Downham | Brandon | Suffolk | IP27 0TJ

eandem@forestrycommission.gov.uk



[Forestry Commission contacts page](#)
[Forestry Commission](#)

Subscribe to our newsletter to be the first to hear about the latest information, advice, and news from the Forestry Commission.

From: Nev Brown [Redacted]
[Redacted], 2024 4:08 PM
Subject: Dunholme Neighbourhood Plan - Review - Regulation 16 Submission Consultation

This Message originated outside your organisation.

Dear Consultee,
Dunholme Parish Council has submitted its Neighbourhood Plan Review (the Plan) and supporting documents to West Lindsey District Council (WLDC) in accordance with Regulations 15 and 16 of the Neighbourhood Planning (General) Regulations 2012.
WLDC is now inviting comments on the submitted Plan and you are being notified as a consultee. The Plan and its supporting documents are available from:
<https://www.west-lindsey.gov.uk/planning-building-control/planning/neighbourhood-planning/all-neighbourhood-plans-west-lindsey/dunholme-neighbourhood-plan>

If you require assistance accessing the documents, please call WLDC’s customer services on (01427) 676676.

The consultation period is until 20th September 2024.
All comments on the Plan should be made in writing and sent to:
Email: neighbourhoodplans@west-lindsey.gov.uk
Post: Neighbourhood Planning, Guildhall, Marshall’s Yard, Gainsborough, Lincs, DN21 2NA.
When making your comments please indicate if you wish to be notified of WLDC’s decision on the Plan under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.
If you would like to know more about how WLDC uses your data in respect of the Plan’s consultation, 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

Regards

Nev Brown
Senior Neighbourhood Planning Policy Officer

DM2 - 23





Historic England

Mr Luke Brown
West Lindsey District Council
Guildhall
Marshall's Yard
Gainsborough
Lincolnshire
DN21 2NA

Direct Dial: 0121 625 6870

Our ref: PL00027809

29 July 2024

Dear Mr Brown

Thank you for consulting us on the Regulation 16 Consultation of the Dunholme Neighbourhood Plan.

We have no further comments to make in addition to those we made at Regulation 14 stage - a copy of which I have attached for your information.

Yours sincerely,

Rose Thompson

Rose Thompson
Historic Places Adviser



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Historic England

Mr Luke Brown

Direct Dial: 0121 625 6870

West Lindsey District Council

Guildhall

Our ref: PL00027809

Marshall's Yard

Gainsborough

Lincolnshire

DN21 2NA

23 November 2023

Dear Mr Brown

DUNHOLME NEIGHBOURHOOD PLAN -CONSULTATION ON REVIEW

Thank you for the invitation to comment on the review of the Neighbourhood Plan.

Our previous comments on the earlier regulation 14 consultation remain entirely relevant, that is:

“The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.

If you have not already done so, we would recommend that you speak to the planning and conservation team at your local planning authority together with the staff at the county council archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Historic England

Gateway (www.heritagegateway.org.uk
<<http://www.heritagegateway.org.uk/>>).

It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.

Historic England has produced advice which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at:-

<<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>>

You may also find the advice in “*Planning for the Environment at the Neighbourhood Level*” useful. This has been produced by Historic England, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information. This can be downloaded from:

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf

<http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf>

If you envisage including new housing allocations in your plan, we refer you to our published advice available on our website, “Housing Allocations in Local Plans” as this relates equally to neighbourhood planning. This can be found at

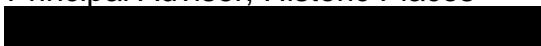
<<https://content.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans.pdf/>>

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me”.

Yours sincerely,

C. Fletcher.

Clive Fletcher
Principal Adviser, Historic Places



cc:



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Historic England



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

From: Guy Hird <[REDACTED]>
Sent: 04 September 2024 13:56
To: WL - Neighbourhood Plans
Subject: Dunholme Neighbourhood Plan - Review - Regulation 16 Submission Consultation

TD-6660-2023-PLN

Dear Sir/Madam

The Dunholme Neighbourhood Plan Review

Thank you for the opportunity to comment on the above Neighbourhood Plan it is partly within the Witham Third District Internal Drainage Board area and there are a number of watercourses within the area that the Board maintains, a map has previously been sent. Shape files of the Board's area and watercourses can be made available on request.

It is disappointing the previous comments from the Board dated 3rd January 2024 have not been included in the revision. Providing information to the public for the requirement to have Land Drainage Consent for any works within a watercourse is very important and it is a missed opportunity to not have it included in this Neighbourhood Plan.

Also it is important to protect maintenance access to authority maintained watercourses so it is again disappointing the reference to Policy 12 has been ignored.

Regards

Guy Hird
Planning and Consents Officer
Normal working days are Tuesday, Wednesday and alternate Thursdays.

We have Engineering vacancies: <https://witham3idb.gov.uk/notices-ads/>

enquiries@witham3idb.gov.uk
accounts@witham3idb.gov.uk
planning@witham3idb.gov.uk
consents@witham3idb.gov.uk

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

Witham House,
Meadow Lane
North Hykeham,
LINCOLN,
LN6 9QU (for sat nav use LN6 9TP)
[REDACTED]

Four independent statutory Land Drainage and Flood Risk Management Authorities working in partnership.

www.witham3idb.gov.uk

**** Disclaimer**** The information transmitted is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. Any review, retransmission, dissemination or other use, or taking of any action in reliance upon this information by persons or entities other than the intended recipient is prohibited. If you received this in error, please contact the sender and delete the material from your computer. Any correspondence with the sender will be subject to automatic monitoring. Please note that neither the Board or the sender accept any responsibility for viruses and it is your responsibility to scan attachments (if any).

STATEMENT DISCLAIMER: This e-mail and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. Therefore, if the reader of this message is not the intended

recipient, you are hereby notified that any dissemination, distribution or copying of this e-mail is strictly prohibited. If they have come to you in error you must take no action based on them, nor must you copy or show them to anyone; please reply to this e-mail and highlight the error. Any views or opinions expressed are those of the author and do not necessarily represent the views of Witham and Humber Drainage Boards unless otherwise explicitly stated. Whilst the Board does run anti-virus software, you are solely responsible for ensuring that any e-mail or attachment you receive is virus free and Witham and Humber Drainage Board disclaims any liability for any damage suffered as a consequence of receiving any virus. Witham and Humber Drainage Boards take your privacy seriously and only use your personal information to administer your account and to provide the products and services you have requested from us. The processing of personal data is governed by legislation relating to personal data which applies in the United Kingdom including the General Data Protection Regulation (the "GDPR") and other legislation relating to personal data and rights such as the Human Rights Act. Please consider your environmental responsibility before printing this e-mail



Sent by email only to: neighbourhoodplans@west-lindsey.gov.uk

2nd September 2024

RESPONSE TO: DUNHOLME NEIGHBOURHOOD PLAN REVIEW

The review contains key elements relating to the natural environment around Dunholme such as Green infrastructure and a river corridor. These could be further strengthened with the inclusion and connection to the Biodiversity Opportunity Mapping conducted by the Greater Lincolnshire Nature Partnership (GLNP) which will form a major component of the upcoming Landscape Nature Recovery Strategy (LNRS). The southeast portion of the Dunholme Plan Area (page 4) has been mapped as an opportunity area for habitat creation. This is likely to inform any future development and environment activities that may take place there. A more general approach may be to highlight the locations and extent of green infrastructure within the plan area upon which future ecological enhancement may take place to recover our depleted ecosystem services as a local level ensuring development can also work to recover the natural environment leaving it in a better state than before the development began.

Ecological and biodiversity related policies have become strengthened and given more weight in recent legislations and Lincolnshire Wildlife Trust would encourage this to also be reflected in Neighbourhood Plans as these allow for species and habitats of interest to be highlighted at the local level and given material consideration not afforded in national policy or Local Plans. Typically, we see Neighbourhood Plans with a set of environmental policies focussed on the ecology and habitats or species or particular relevance to that area. Such policies may include strict rules of the preservation of habitats at a particular location or general guidance in order to minimise development impacts on a protected/sensitive species. Without these, development may be able to proceed with little understanding or consideration for the local desires and requirements set out in the Plan.

The Lincolnshire Wildlife Trust hopes these comments are helpful at this stage and welcomes further discussion relating to the points covered.

Yours sincerely,

Ashley Reaney
Conservation Officer

Banovallum House
Manor House Street
Horncastle
LN9 5HF

01507 526667
info@lincstrust.co.uk
www.lincstrust.org.uk



*Lincolnshire Wildlife Trust
is a company limited by
guarantee registered in
England, no. 461863
and is registered as a
charity, no. 218895
VAT no. 613 9067 44*



Our Ref: MV/ 15B901605

17 September 2024



West Lindsey District Council
neighbourhoodplans@west-lindsey.gov.uk
via email only

Dear Sir / Madam

**Dunholme Neighbourhood Plan Review Regulation 16 Consultation
July – September 2024
Representations on behalf of National Gas Transmission**

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Gas Transmission

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

Proposed sites crossed or in close proximity to National Gas Transmission assets:

An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure.

National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Gas Transmission provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.

Distribution Networks

Information regarding the gas distribution network is available by contacting:
plantprotection@cadentgas.com

Further Advice

Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:



Matt Verlander, Director



Avison Young
Central Square
Forth Street
Newcastle upon Tyne
NE1 3PJ

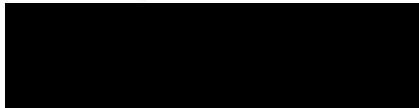
Kam Liddar, Asset Protection Lead



National Gas Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,



**Matt Verlander MRTPI
Director**



For and on behalf of Avison Young

National Gas Transmission is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Gas assets

High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Gas Transmission's approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines.

National Gas Transmission have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Gas Transmission's 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement.

National Gas Transmission's '*Guidelines when working near National Gas Transmission assets*' can be downloaded here: <https://www.nationalgas.com/document/82951/download>

How to contact National Gas Transmission

If you require any further information in relation to the above and/or if you would like to check if National Gas Transmission's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgas.uk@avisonyoung.com

Our Ref: MV/ 15B901605

17 September 2024



West Lindsey District Council
neighbourhoodplans@west-lindsey.gov.uk
via email only

Dear Sir / Madam

**Dunholme Neighbourhood Plan Review Regulation 16 Consultation
July – September 2024
Representations on behalf of National Grid Electricity Transmission**

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets:

An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure.

NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

NGET provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to NGET infrastructure.



Distribution Networks

Information regarding the electricity distribution network is available at the website below:

www.energynetworks.org.uk

Further Advice

Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Matt Verlander, Director

Tiffany Bate, Development Liaison Officer



Avison Young
Central Square South
Orchard Street
Newcastle upon Tyne
NE1 3AZ

National Grid Electricity Transmission
National Grid House
Warwick Technology Park
Gallows Hill
Warwick, CV34 6DA

If you require any further information in respect of this letter, then please contact us.

Yours faithfully,

A handwritten signature in grey ink, appearing to read "Matt Verlander".

**Matt Verlander MRTPI
Director**



For and on behalf of Avison Young

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.

Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.

NGET's *'Guidelines for Development near pylons and high voltage overhead power lines'* promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: <https://www.nationalgrid.com/document/130626/download>

The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.

NGET's statutory safety clearances are detailed in their *'Guidelines when working near National Grid Electricity Transmission assets'*, which can be downloaded here: www.nationalgrid.com/network-and-assets/working-near-our-assets

How to contact NGET

If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: <https://lsbud.co.uk/>

For local planning policy queries, please contact: nationalgrid.uk@avisonyoung.com

Our ref: NH/24/07304

FAO: Nev Brown

Thomas Hewitt
Transport Planning Technician
Apprentice

The Cube
199 Wharfside Street
Birmingham
B1 1RN

■ [REDACTED]

30th July 2024

Via email: [REDACTED]

Dear Sir or Madam,

Dunholme Neighbourhood Plan – Regulation 16 Consultation

Thank you for providing National Highways with the opportunity to consult on the Regulation 16 submission consultation Neighbourhood Plan for Dunholme.

National Highways (formally Highways England) has been appointed by the Secretary of State for Transport as a 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 responding to development plan consultations, we have regard to DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of plans and development management considerations. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

The SRN closest to the NDP area is the A trunk road, which is outside the boundary of the plan area.

We have considered the contents of the draft Neighbourhood Plan and as the plan does not introduce any new development sites or transport related policies that are likely to impact upon our network, we consider that the contents of the plan are for local determination, and we have no other comments to make.

If I can be of any further assistance on this matter, please do not hesitate in contacting me.

Yours sincerely,



Thomas Hewitt



Date: 20 September 2024
Our ref: 483468
Your ref: Dunholme Neighbourhood Plan



Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ
T 0300 060 3900

Mr Nev Brown
West Lindsey District Council

BY EMAIL ONLY

neighbourhoodplans@west-lindsey.gov.uk

Dear Mr Brown

Dunholme Neighbourhood Plan - Regulation 16 Consultation

Thank you for your consultation on the above dated 26 July 2024.

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 and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#) .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely
Sally Wintle
Consultations Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)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 from [the Association of Local Environmental Records Centres](#).

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)². 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](#)³.

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](#)⁴ website and also from the [LandIS website](#)⁵, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁶ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁷ 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 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.

¹ <http://magic.defra.gov.uk/>

² <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

³ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁴ <http://magic.defra.gov.uk/>

⁵ <http://www.landis.org.uk/index.cfm>

⁶ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

⁷ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁸), such as Sites of Special Scientific Interest or [Ancient woodland](#)⁹. 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](#)¹⁰) or protected species. To help you do this, Natural England has produced advice [here](#)¹¹ 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 112. For more information, see [Guide to assessing development proposals on agricultural land](#)¹².

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. 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 and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- 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 reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

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.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)¹³).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

⁸ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁹ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹⁰ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

¹¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹² <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

¹³ <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- 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).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

From: LINCS-SECTION106 (NHS LINCOLNSHIRE ICB - 71E) <[REDACTED]>
Sent: 08 August 2024 15:00
To: Nev Brown
Cc: LINCS-SECTION106 (NHS LINCOLNSHIRE ICB - 71E)
Subject: FW: Dunholme Neighbourhood Plan - Review - Regulation 16 Submission Consultation

CAUTION: External email, think before you click!

Good Afternoon

Thank you for informing us of the submission of Dunholme Neighbourhood Plan and supporting documents.

NHS Lincolnshire Integrated Care Board does not have any comments to make at this time.

Kind Regards
Patrycja

Patrycja Bienko
Section 106 Team
NHS Lincolnshire Integrated Care Board
Email: [REDACTED]

From: Nev Brown <Nev.Brown@west-lindsey.gov.uk>
Sent: Friday, July 26, 2024 4:08 PM
Subject: Dunholme Neighbourhood Plan - Review - Regulation 16 Submission Consultation

You don't often get email from nev.brown@west-lindsey.gov.uk. [Learn why this is important](#)

Dear Consultee,
Dunholme Parish Council has submitted its Neighbourhood Plan Review (the Plan) and supporting documents to West Lindsey District Council (WLDC) in accordance with Regulations 15 and 16 of the Neighbourhood Planning (General) Regulations 2012.
WLDC is now inviting comments on the submitted Plan and you are being notified as a consultee. The Plan and its supporting documents are available from:
<https://www.west-lindsey.gov.uk/planning-building-control/planning/neighbourhood-planning/all-neighbourhood-plans-west-lindsey/dunholme-neighbourhood-plan>

If you require assistance accessing the documents, please call WLDC's customer services on (01427) 676676.

The consultation period is until 20th September 2024.
All comments on the Plan should be made in writing and sent to:
Email: neighbourhoodplans@west-lindsey.gov.uk
Post: Neighbourhood Planning, Guildhall, Marshall's Yard, Gainsborough, Lincs, DN21 2NA.
When making your comments please indicate if you wish to be notified of WLDC's decision on the Plan under Regulation 19 of the Neighbourhood Planning (General) Regulations 2012.
If you would like to know more about how WLDC uses your data in respect of the Plan's consultation, 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

Regards

Nev Brown
Senior Neighbourhood Planning Policy Officer

DM 27 - 71

From: Nick Feltham
Sent: 29 July 2024 12:30
To: NK - Planning; Nev Brown
Subject: Dunholme Neighbourhood Plan - Review - Regulation 16 Submission Consultation

Morning Nev

I can confirm that North Kesteven District Council has no comments in relation to the DNP however comments may of course be forthcoming from the Central Lincolnshire Local Plans team.

Regards
Nick Feltham



Nick Feltham
Development Manager



Kesteven Street, Sleaford, NG34 7EF

Lots of our services are available at

www.n-kesteven.gov.uk

*You can apply for help, report a problem,
find your bin days and lots more,
all from our website.*



From: NK - Planning <Planning@n-kesteven.gov.uk>
Sent: Monday, July 29, 2024 9:18 AM



Subject: FW: Dunholme Neighbourhood Plan - Review - Regulation 16 Submission Consultation

Hi.

What would you like doing with this?

Thanks
Bev



Planning Administration Team

Tel: 01529 414155
Email: Planning@n-kesteven.gov.uk
www.n-kesteven.gov.uk
Kesteven Street, Sleaford, NG34 7EF

Lots of our services are available at

www.n-kesteven.gov.uk

*You can apply for help, report a problem,
find your bin days and lots more,
all from our website.*



From: Nev Brown <Nev.Brown@west-lindsey.gov.uk>
Sent: Friday, July 26, 2024 4:08 PM
Subject: Dunholme Neighbourhood Plan - Review - Regulation 16 Submission Consultation

Dear Consultee,
Dunholme Parish Council has submitted its Neighbourhood Plan Review (the Plan) and supporting documents to West Lindsey District Council (WLDC) in accordance with Regulations 15 and 16 of the Neighbourhood Planning (General) Regulations 2012.
WLDC is now inviting comments on the submitted Plan and you are being notified as a consultee. The Plan and its supporting documents are available from:
<https://www.west-lindsey.gov.uk/planning-building-control/planning/neighbourhood-planning/all-neighbourhood-plans-west-lindsey/dunholme-neighbourhood-plan>

Dunholme Neighbourhood Plan Review
West Lindsey District Council's comments

PART 1

WLDC's comments on the Reg 16 Submission version

(For WLDC's comments on the Reg 14 Pre-Submission version of the NP- see PART 2)

Policy 1 – General Housing Development in Dunholme

1. Need to say that proposals should be in accordance with Policy S4 of the Local Plan.
3. Delete... the word "also".

Policy 2 – Allocation of Land at Honeyholes Lane (NP03)

1. Need to state Local Plan site ref WL/DUNH/010
... and will be a design-led development.

The policy requires a mix of house types and size. Where is the justification for this?

Policy 3 – Allocation of Land to the South of Lincoln Road (Site NP01)

- b) Not sure what is meant by this.
- e) This site was put forward as part of the Local Plan review. One of the reasons why it wasn't allocated at the time was that the site was constrained by surface water flood risk.
- g) Is the Highways Authority happy with the access?

Policy 4 – Allocation of Land to the North of Lincoln Road (Site NP02)

Same comments as for Policy 3

Policy 5 – Allocation of Land to the West of Lincoln Road (Site NP04)

Same comments as for Policy 3

Policy 6 – Priority Site for Custom and Self-build Housing (Site NP08)

Policy welcomed.

Same comments as for Policy 3

Policy 10 Important Open Space

1 Important open spaces are already identified by the Local Plan. Suggest this plan recognises the sites as local green spaces instead. So, references to important open space and public open space in this plan/policy should be replaced with the term local green space.

Sites 1,4,5 and 7 are already identified as important open spaces in the Local Plan and are covered by its policy S65. This should be noted in the supporting text to policy 10.

j) and Map 3 Is the full extent of site 10 shown? From a Local Plan map it appears to be a bigger site extending both northwards and eastwards from that shown on Map 3.

How about identifying these areas as local green spaces too?

- The two balancing pond areas on Portus Lane
- Hedge/grassed area between Scothern Lane and Four Seasons Close
- Footpath link between Scothern Lane and Lincoln Road
- Grassed area between Mainwaring Close and main road
- Southerly part of important open space south of Beckhall (in Welton) identified by the Local Plan but lies within Dunholme neighbourhood plan area.
- Balancing pond area alongside Arrow Mews off Honeyholes Lane.
- Field/pasture east of Beck Lane

3. Volume or area?

Policy 13 – Community Facilities

2. Replace the referencelocal amenities with community facilities.

Policy 14 – Green Wedge

Add intro to policy, for example:

In the Green Wedge as identified on Map 7:

1. Development for.....

2. Other

Map 8: Heritage Assets

Clearer map needed.

PART 2

Dunholme Neighbourhood Plan

WLDC's comments on the Reg 14 Pre-Submission version Reg 14

General

Ensure that local plan references given in the NP are taken from the adopted version of that plan. Wording may have changed between the previous submission version of the plan and the final adopted one.

Policy 1 General housing development in Dunholme

1. It would benefit the policy if the identified housing allocations could be listed here.

Rather than saying that proposals would be supported iffilling a gap and as defined in the glossary need to say that they should be in accordance with Policy S4 of the Local Plan and that they meet the following criteria a) to g).....

2.and should be in accordance with Policy S4 of the Local Plan.

3. Instead state that any new residential development in the open countryside should also be in accordance with Local Plan Policy S5. No need in this context to refer to the NPPF.

Policy 2 allocation of land at Honeyholes Lane

1. This site is also allocated in the Local Plan ref WL/DUNH/010

The policy allocates the site for up to 63 new dwellings. The figure of 63 is taken from the Local Plan but is an indicative figure only and should not be seen as a target. It says the development of the site should be design led.

The policy considers that a development of 2, 3 and 4 bedroom dwellings will contribute positively towards Dunholme. Where is the evidence to support this particular range of housing?

a) Suggest reword.....that the development should reflect the principles identified in the character assessment.

g) and any public art

i) what about the site's southern boundary?

Policy 3 Allocation of land to the South of Lincoln Rd

In the policy there are several references to the word ...positive. For example: ..relates positively.. respond positively... positive use... contribute positively. What is meant by positive in a planning context?

a) Suggest reword.....that the development should reflect the principles identified in the character assessment.

b) Simplify wording.

f) Is the Highways Authority happy with the access?

Policy 4 Allocation of land to the north of Lincoln Rd

Same comments as for Policy 3

Policy 5 allocation of land to the West of Lincoln Rd

Same comments as for Policy 3

Policy 6 priority site for self-build housing

Policy welcomed.

Retitle to custom and self-build housing.

1. Reword first sentence to..Is identified as a priority site for the development of up to 10 custom and self-build dwellings.

Then same comments as for policy 3

Policy 7 Dunholme design code

g) requirement missing

Policy 8 mitigating and adapting to climate change

1.Add development should be in accordance with relevant policies in the Local Plan....

Policy 9 business and employment development

- a) remove reference to the local planning authority.

Policy 10 important open space

1 Important open spaces are already identified by the Local Plan. Suggest this plan recognises the sites as local green spaces instead. So, references to important open space and public open space in this plan/policy should be replaced with the term local green space.

Sites 1,4,5 and 7 are already identified as important open spaces in the Local Plan and are covered by its policy S65. This should be noted in the supporting text to policy 10.

j) and Map 3 Is the full extent of site 10 shown? From a local plan map it appears to be a bigger site extending both northwards and eastwards from that shown on Map 3..

How about identifying these areas as local green spaces too?

- The two balancing pond areas on Portus Lane
- Hedge/grassed area between Scothern Lane and Four Seasons Close
- Footpath link between Scothern Lane and Lincoln Road
- Grassed area between Mainwaring Close and main road
- Southerly part of important open space south of Beckhall (in Welton) identified by the Local Plan but lies within Dunholme neighbourhood plan area.
- Balancing pond area alongside Arrow Mews off Honeyholes Lane.
- Field/pasture east of Beck Lane

3 Volume or area?

Map 4 public rights of way

Difficult to identify public rights of way. Better quality map required.

Policy 11 green and blue infrastructure

Suggest reword to read..... Development proposals that contribute towards the protection, enhancement and provision of green infrastructure spaces and linkages will be supported. Encouragement will be given to proposals that further enhance:

Map 6 landscape character areas

Better quality map needed.

Policy 13 landscape character

2. This does not appear to be a land use policy. Unclear as to how it would actually be delivered given that previous development completed. It is more an aspiration. Either delete or suggest it be moved to policy 11 and becomes Part d.

Policy 14 community facilities

1. Suggest rewording. The following community facilities will be safeguarded for such purposes.

For consistency the referencing used for the community facilities should be the same on both map and in policy and in same order.

2. Replace the referencelocal amenities with community facilities.

Policy 15 green wedge

2. Suggest rewording of final part 2 to..... demonstrated that the proposal would be in accordance with policy S63 of the Local Plan.

Map 9 heritage assets

Clearer map needed.

Further comments

Policy 3 allocation of land to the South of Lincoln Rd site NP01

This site was put forward as part of the local plan review. One of the reasons why it wasn't allocated at the time was that the site was constrained by surface water flood risk.

12 important open space

Justification for why the important open spaces have been identified needs to be provided. A supporting important open space (local green space) assessment is required.

17 Heritage Assets

Justification for why non-designated heritage assets have been identified needs to be provided. A supporting assessment is required.

Dunholme Neighbourhood Plan Character Assessment

This needs to be updated. There needs to be a character assessment for the two large housing developments to the north of Honeyholes Lane and to the north of Lincoln Road respectively.

The former site includes the streets so far of Hampden Rd, Arrow Mews, and Chadwick Rd. The latter site so far includes the streets of Portus Lane, Dixon Place, Creasy Drive, and Braithwaite Mews.