

Central Lincolnshire Local Plan 2012-2036 Examination

MATTER 4 – SUEs

Central Lincolnshire Joint Strategic Planning Committee
Hearing Statement

October 2016



Matter 4 – Sustainable Urban Extensions(LP28, LP30, LP39, LP44, LP48)

Issue 4a – Sustainable Urban Extensions

Q1. What was the process for identifying the SUEs, their size, location and distribution throughout Central Lincolnshire? How were they chosen?

The primary explanation is set out at Appendix 6 (p545), of the IIA (E001C), though E016 (for Gainsborough) and E017 (for Lincoln) also offer higher level strategic evidence. In terms of determining the precise boundaries, scale and details for each SUE, this was a matter of detailed discussion with the promoters of each location, in order to set a practical and deliverable set of SUE allocations. Please note that the aforementioned Appendix 6 was, in draft form, published as a separate document at the Further Draft stage, but it was felt, in its final form, more appropriate to subsequently include it within the IIA.

Q2. What was the rationale behind the reliance upon SUEs rather than smaller site allocations in order to meet the OAN?

It is not accepted that there is indeed a '*reliance on SUEs rather than smaller site allocations*'. Rather, the plan contains a wide variety of site sizes, from 25 to 6,000 dwellings, as well as a large volume of sites, with over 140 allocated sites (or around 150 sites if the suggested modification sites are also added), and many more smaller sites (less than 25) will also come forward through the flexible nature of the plan. In terms of quantity of homes, the SUEs are expected to deliver 14,700 dwellings out of the 36,960 required.

Thus, SUEs account for only 5% of allocated sites and only 40% of all dwellings. It is not accepted that the plan has, therefore, a 'reliance' on SUEs.

Indeed, nearby Charnwood Local Plan (Nov 2015) has over 50% (7,035) of total dwellings (14,000) accounted for on just 3 SUEs, an approach found sound by the Inspector. The Central Lincolnshire Local Plan places considerably less reliance on SUEs than this recent and local example.

Overall, it is entirely appropriate for the plan to have a combination of site sizes, including some of SUE scale. Para 52 of NPPF explicitly states this.

Q3. Were alternative locations for growth and SUEs considered and tested as part of the Local Plan preparation? Where is this set out?

Yes. See Appendix 6 (p545), of the IIA (E001C).

Q4. How was the mix of uses and number of dwellings / amount of employment land decided? What is the reason for requiring employment land within each of the SUEs (42ha in total) given the overall employment land need is only 23ha and Policy LP5 seeks to allocate 111ha of strategic employment sites? Should the SUE policies include a greater degree of flexibility regarding employment uses?

In some cases, the requirement for a particular SUE replicates the principles of a consented scheme. For the other SUEs, the requirements are a result of lengthy discussions over many years with the promoters of each SUE, to reach a position whereby an agreed set of principles are supported by key parties (the committee, the applicable district Ipa and the promoter). The exception is perhaps the South-West Quadrant SUE, which has only been progressed as an option

over perhaps the last 12 months, though in that time period considerable progress and agreement has been reached with the key parties. As can be seen by the Topic Papers (E014A2 – E014H2), the content of the SUE policies are almost 100% supported by the applicable promoter.

The rationale for requiring employment land within the SUEs is set out from mid way down page 15 of the document '*LP5 Delivering Prosperity and Jobs - Evidence Report*' (PS.EVR5).

In terms of increased flexibility, whilst the employment land figure quoted for each SUE has been agreed with the applicable promoter, it is accepted by virtue of Policy LP30, taken literally, three of the four SUEs would have to provide exactly x hectares of employment land, with x being different in each applicable case, as set out in the policy. To give greater flexibility, the word 'approximately' could be added, so that it reads 'approximately x hectares of employment...' (or similar words) for each applicable SUE. This is already the case for the SWQ SUE, and would therefore bring both flexibility and consistency across all policy wording for SUEs. It would also be consistent with the phrase 'approximately y dwellings' which is consistently used in the applicable SUE policies. A modification is suggested (modification Main/SC/40) to reflect this matter.

Q5. Why does the amount of employment land vary from one SUE to another? How were the overall amounts decided?

The amount of employment land for each SUE reflects either the amount already agreed by way of a consent for the SUE, or an amount as agreed with the promoter of the SUE, following lengthy discussions with such promoters over a number of years. By stipulating an amount in the LP gives greater certainty for all parties, and future decision makers, as to *approximately* (note: see also Q4 response) what level of employment land is expected to come forward on the site.

Q6. The SUE policies require 'employment use' to be provided (e.g. Policy LP30 – Lincoln Western Growth Corridor). What is meant by employment use? Does it mean land that is ready to be developed? Is the plan clear enough about what a developer is expected to provide?

Whilst the phrase 'employment land' is used for the Sleaford and Gainsborough SUEs (in policies LP39 and LP44), it is accepted that this is not then consistently used for the Lincoln SUEs. To be consistent, and give greater clarity, it is suggested that the wording of the Lincoln SUEs is amended to refer to 'land' rather than (as at present) the word 'use'. Suggested Modification (modification Main/SC/40) makes that change. There is no need to be more prescriptive as to precisely what is required, as this will be a matter for the Broad Concept Plan and future planning applications to determine.

Q7. Are the constraints of each SUE clearly set out in the Local Plan?

Whilst all the specific *constraints* are not set out in the Local Plan, the *policy requirements* to mitigate or address all significant constraints are. In terms of setting out the specific constraints, issues and risks for each SUE, please see the applicable SUE Topic Paper (E014A2 – E014H2). Listing all the constraints in the Local Plan is not considered necessary, could become dated and contrary to the spirit of the NPPF which seeks clear, concise, flexible and strategic Local Plans.

Q8. Taking into account physical and planning constraints, infrastructure and land ownership, are all of the SUE's capable of being delivered in a manner envisaged by the Plan? Are they all viable?

Yes, and Yes. See the applicable SUE Topic Papers (E014A2 – E014H2) which confirms they are deliverable and viable.

Q9. What contingency arrangements are in place should one or more of the SUEs fails to come forward in the manner envisaged? Should the plan include a policy to ensure that sufficient housing land is delivered if monitoring identifies that any of the SUEs may not be deliverable/developable or would be significantly delayed? If so, what action would be appropriate and how and when would it be triggered?

The Committee (and promoters of each SUE, as joint signatories of the SUE Topic Papers, E014A2 – E014H2) firmly believe the SUEs are not only deliverable, but a cautious approach taken to the trajectory of delivery. However, by way of contingency:

- LP54 Part A allows four of the SUEs to be delivered quicker than anticipated, bringing forward dwellings from beyond the plan period, which could make up for any ‘losses’ made on any of the other SUEs which is not delivering.
- LP2 is a flexible policy, with a very conservative allowance for windfall accounted for in terms of meeting the plan’s housing target.
- LP57 allows, in principle, for MOD land to come forward for residential purposes, but no allowance has been made for this in the in terms of meeting the plan’s housing target.

Overall, the Committee believes it should be the overall delivery of housing which should be monitored closely, not just those of SUEs (as suggested by the question), and that action should be taken if the overall delivery of housing does not perform as anticipated, which, ultimately, could be the triggering of a Local Plan review. To include a specific policy which ‘triggered’ release of additional land if the SUEs did not deliver as expected, could have the unintended consequences of releasing land when, overall (on all sites), the delivery of housing has been good and on track.

The Committee is not, therefore, suggesting any modifications in response to this question.

Q10. Why does Policy LP28a require proposals to demonstrate availability and deliverability – is that not a prerequisite for allocation?

The Committee is confident that, in principle, the SUEs are available and deliverable. However, LP28a is necessary so that the actual scheme submitted (whether as a Broad Concept Plan (BCP) or planning application) also demonstrates that continues to be the case, to give decision makers greater certainty that it will actually happen on the ground. It is not an unreasonable request, and replicates wording in the post NPPF adopted Fenland Local Plan (April 2014) Policy LP7(n):

<http://www.fenland.gov.uk/CHttpHandler.ashx?id=12064&p=0>

Q11. Are the infrastructure requirements of each SUE clearly set out in the Local Plan? Is it clear what developers are expected to provide to overcome constraints and to provide infrastructure?

Yes. A combination of Policies LP28, LP30, LP39 and LP44, as well as wider policies in the Local Plan, set out clearly the infrastructure expectations.

Q12. How will the necessary infrastructure be provided on each SUE, such as schools and healthcare provision? How does this relate to the phasing of development? Should this be set out in the Plan?

The 'headline' provisions required are set out in the Local Plan. The detailed provisions, including any phasing, is more appropriate to agree at the BCP and/or planning application stage. Being too prescriptive in the Local Plan would lack flexibility and could stall development.

Q13. Is it clear what developers will be expected to provide in terms of schools and healthcare provision - for example Policy LP30 (Lincoln Western Growth Corridor) requires a new primary school on site. Is it clear what the developer is being required to provide in terms of a site and buildings? On the other hand, the Sleaford South Quadrant (Policy LP44) refers to buildings and their specific sizes. Is the different approach justified?

The varying levels of specificity are a result of the relative progress of the scheme. For Local Plan purposes, it is considered sufficiently detailed, leaving scope for details to be agreed via BCP and/or planning application. Being too prescriptive in the Local Plan for all SUEs would lack flexibility and could stall development.

Q14. What is the rationale for the overall approach to incorporating gypsy and traveller sites on SUEs under Policy LP28? Is this justified? How will these sites be delivered?

LP28: Sustainable Urban Extensions – Evidence Report (PS.EVR28) briefly sets out the rationale. It is entirely justified for SUEs to make a contribution to G&T provision, in the same way such sites contribute to all other forms of housing (market, affordable, accessible, small, large, etc).

This approach has been found sound elsewhere, including:

- Charnwood Local Plan (Nov 2015) – see for example, policy CS5 (for the principle) and CS19 (for a site specific example)

http://www.charnwood.gov.uk/files/documents/adopted_core_strategy1/Charnwood%20Local%20Plan%202011%20-%202028%20Core%20Strategy%20Adopted%20November%202015.pdf

The Inspector (in the Inspector's Report, Sept 2015, para 94), explicitly states: *"Bringing forward sites for Gypsy, Traveller and Travelling Showpeople accommodation as part of the strategic housing proposals would enable them to be well related to the main urban areas, to benefit from good access to services and facilities and to be delivered as part of a comprehensively planned development."*

https://www.charnwood.gov.uk/files/documents/inspectors_report/Inspector%27s%20Report%20-%20Final.pdf

- Teignbridge Local Plan (May 2014) - see policy NA1, for example, which requires 24 pitches on a SUE <https://www.teignbridge.gov.uk/CHttpHandler.ashx?id=41652&p=0>.

The Inspector (in the Inspector's Report, April 2014, para 41) stated that *"Policies WE6, WE6a, NA1 and SWE1 provide a suitable framework for adequate [Gypsy and Traveller pitch] provision, principally through the requirements for new pitches within the area of two major housing allocations, as well as a site at WE6A which now has planning permission. Looking at the viability of these two allocations overall, I see no reason to question the deliverability of pitches in locations that meet the relevant criteria of Policy WE6 concerning the sustainability of the sites in economic, social and environmental terms."*

<http://www.teignbridge.gov.uk/CHttpHandler.ashx?id=40644&p=0>

The Committee entirely agree with the approach in these Local Plans, and the endorsements given by the Inspectors. However, to give greater flexibility than the above too adopted examples, Policy LP28 enables 'off-site' provision to be provided, through the land owner securing a site elsewhere and, through a legal agreement, enable deliverable pitches to come forward. Precise mechanisms for delivery of a Gypsy and Traveller site will be determined on a case by case basis, but the Committee can see no reason why this should be more difficult than, for example, securing the provision of affordable housing through a legal agreement.

Q15. Should Policy LP28 refer to other services and facilities typically required by residents on a day-to-day basis, rather than just 'retail'? Will this be effective in achieving a balanced and mixed community and the aims and objectives of the policy? Is it clear what developers are being required to provide?

Where particularly important to the delivery of a specific SUE, wider services and facilities are covered in the specific SUE policies LP30, LP39 and LP44. In addition, the generic policies in the rest of the plan will also be applied to the SUEs, particularly if a facility is not expressly set out in the specific SUE policies. For example, LP15 (Community Facilities) (especially the last part of this policy) and LP24 (Creation of New Open Space, Sports and Recreation Facilities).

Q16. Will it be clear to developers how much open space, recreation, leisure and community facilities will be required, and/or what is expected of new district, local and neighbourhood centres?

The policies (LP28, LP30, LP39 and LP44, as well as wider Local Plan policies) are sufficiently clear, but allow flexibility for subsequent preparation of BCPs or planning applications. Being too prescriptive in the Local Plan would lack flexibility and could stall development.

Q17. Is the use of a 'broad concept plan' specific enough, or should Policy LP28 refer to the need for phased masterplans? Should the policy require that the masterplanning exercise identifies at what stage the relevant employment uses, transport connections, community facilities, retail, leisure, open spaces, education and recreational uses etc. should be provided? Will the policy be effective in this regard?

The approach of requiring a Broad Concept Plan is one previously endorsed, such as for the post-NPPF Fenland Local Plan (2014), Policy LP7, which has the identical words to Policy LP28 as follows "Development of an urban extension (i.e. the broad or specific locations for growth identified in Policies LP8-11) must be planned and implemented in a coordinated way, through an agreed overarching broad concept plan, that is linked to the timely delivery of key infrastructure." <http://www.fenland.gov.uk/CHttpHandler.ashx?id=12064&p=0>

BCPs are an appropriate mechanism to enable the key elements of a SUE to be agreed in principle, and will 'provide the template for future proposals within the site' (to use a phrase as stated by the Inspector in her Report into the Fenland Local Plan, para 104 - <http://www.fenland.gov.uk/CHttpHandler.ashx?id=9895&p=0>)

Preparation of a detailed and costly masterplan would delay progress of a SUE, with no certainty that even the basic principles would be agreed by the LPA. A BCP overcomes this.

The policy also explicitly states that phasing may be agreed.

Q18. Have the transport effects of each SUE been adequately assessed? Can they be developed without significant adverse effects? Is any mitigation required, and if so, is this made clear in the plan?

Yes, the transport effects have been adequately assessed, albeit to varying degrees depending on the progress of a particular scheme. There is no known significant transport adverse effect which cannot be overcome by mitigation and detailed planning, and the plan is clear where fundamental requirements are necessary for a particular SUE.

Q19. Are any of the SUEs in Flood Zones 2 or 3? Are the allocations consistent with paragraph 100 of the Framework which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change? Where is this set out?

Some of the SUEs do contain some land in Flood Zones 2 or 3. Full details are set out in section 3.1 of each applicable SUE Topic Paper (E014A2 – E014H2).

The sequential approach is set out in Central Lincolnshire Local Plan Site Allocations Sequential Test (E033A), within which the SUEs are included.

In addition, Appendix 6 (p554), of the IIA (E001C), includes commentary on flood risk / climate change for each SUE (and alternative locations for a SUE), as part of the sustainability appraisal process. See, for example, IIA objectives 11 and 12, and the commentary for each candidate SUE against these two objectives. The Committee is confident that a robust approach to considering flood risk has been taken, and that the allocation of sites has appropriately addressed national policy in this regard.

Issue 4b – Western Growth Corridor – Policies LP30 and LP48

Q20. The August 2016 Evidence Topic Paper⁵ summary table describes the detailed viability assessment as ‘Ongoing 2016’. What does this refer to? When will it be complete? Why is it necessary when paragraph 4.4 of the Topic Paper confirms that the “...site is viable and deliverable...”

The WGC SUE is viable and deliverable and based on the extensive work done already as part of the planning application preparation. This position is not expected to change. The WGC site proposals continue to be developed and refined on an ongoing basis in response to the results emerging from the remaining detailed work such as the transport assessment, water management strategy and ecological assessment in the lead up to the submission of the planning application (summer 2017). As the WGC scheme emerges there is a need to ensure that any changes to the WGC scheme are assessed to ensure they do not impact negatively on the viability of the scheme hence, work on detailed viability can be described as ongoing. However, for clarity the Committee confirm that the WGC SUE is viable and deliverable.

Q21. The Committee’s response to the Inspectors’ Initial Questions states that applications have been, and will be, submitted for European, National, Regional and Local Funds to assist in enabling the earlier provision of housing and commercial development. What is the current position with regard to this funding? What implications do the possible outcomes have on the delivery of the SUE (for example in the event that no funding is forthcoming)?

As stated previously in the response to the Inspectors Initial Questions, we can confirm that the WGC SUE is viable and deliverable without any external sources of funding for all phases of development. The external funding applications have been made on the basis that should they be successful, they would enable accelerated delivery of housing and employment on the WGC SUE to take place. For example, if funding is obtained to deliver the Beevor Street link over the railway in to the city centre earlier than planned, this would enable employment and additional housing to come forward much earlier than if that external funding was not secured.

Based on a worst case scenario that none of the funding applications are successful we can confirm that the WGC SUE will be deliverable within the plan period including all required transport and access links. This is based on the fact that the site specific viability appraisal which has been undertaken (and which as previously stated in the response to the Inspectors Initial Questions included a funding grant of nil) demonstrates that the WGC SUE is viable and deliverable in its own right.

Q22. Is the site deliverable and developable in the plan period?

[Preliminary Note: Acknowledgment of error in Western Growth Corridor Topic Paper (ref E014B2)

In the Summary Table immediately prior to Para 1, Start on Site date is given as spring 2017. This was a typographical error and should read spring 2018. This has no impact on housing trajectory.]

Yes, we can confirm that the site is deliverable and developable within the plan period. This is based on work undertaken by the lead WGC SUE promoter (City of Lincoln Council acting in its landowning capacity) which is outlined in para 4.4 of the updated WGC Topic Paper (August 2016), (Ref E014B2).

In terms of the WGC site being developed within the plan period, as detailed in para 4.1 of the updated WGC Topic Paper (August 2016), (Ref E014B2), the expected delivery trajectory and phasing proposals demonstrates that the full 3,200 dwellings are expected to be delivered within

the plan period. Expanding on the phasing proposals, up to 500 units will come forward in Phase 1 as explained at para 4.4 of the updated WGC Topic Paper (August 2016), (Ref E014B2). Phases 2, 3 and 4 as detailed in para 4.1 of the updated WGC Topic Paper (August 2016), (Ref E014B2) are scheduled to come forward from 2023 onwards.

Q23. The August 2016 Evidence Topic Paper refers to a phased development, with the infrastructure relating to community facilities and services, health, education and Gypsy and Traveller accommodation in the later phases. Should this approach be set out in the plan to provide sufficient certainty to developers and local communities?

The 'headline' infrastructure provisions required are set out in the Local Plan. In further detail, as explained in para's 2.1 and 2.2 of the updated WGC Topic Paper (August 2016), (Ref E014B2), the WGC will deliver mixed-use development with a complete range of services and infrastructure. Phase 1 of the WGC includes provision of a local centre which will incorporate community facilities including education, retail and health facilities. Further detailed provision including Gypsy and Traveller provision is more appropriate to agree at the BCP and/or planning application stage.

Q24. Representations from Highways England identify concern that the level of growth proposed across the Lincoln SUEs "...could place significant pressure on the A46 trunk road, particularly at the A46 Hykeham Roundabout". Have the effects of the SUE on the A46 been considered in light of Highway England's representations to the Local Plan? How will the effects of development be mitigated in this regard?

The WGC SUE (along with others in the Local Plan) will include a detailed site specific Transport Assessment that will examine the impact of the development on the highway network, including the impact on the A46. This work is currently being finalised with a number of transport scenarios being tested and modelled including the impact of the WGC SUE on the A46 specifically. It is understood that following their initial representations Highways England have now confirmed to Lincolnshire County Council that appropriate mitigation for the WGC SUE will be able to be delivered.

At a more strategic level, Lincolnshire County Council's Local Planning Tool (LLPT) and their Lower Tier Report (**E044A**) indicates that based on the delivery of a number of highway schemes (including Lincoln Eastern Bypass, Lincoln East-West Link) the impacts on the A46 of proposed development in Central Lincolnshire can be mitigated.

Q25. Has an assessment been carried out to determine whether or not heat recovery from the North Hykeham Energy from Waste plant is feasible? Is the policy effective as currently worded?

Lincolnshire County Council working in partnership with the City of Lincoln Council and North Kesteven District Council have been successful in securing funding from the Heat Network Development Unit to assess opportunities for establishing a District Heating system using heat from the Energy from Waste Plant. Part of the funding has been used to carry out a high level Energy Mapping and Masterplanning Study which was completed in March 2016 and concluded that WGC provides a "natural opportunity for district heating" (Element Energy, Energy Mapping and Masterplanning in Greater Lincoln, Stage 2 Report, March 2016). Further work is being progressed on this matter but on this initial work carried out it is felt the policy wording is effective as currently worded.

Q26. Are 'comprehensive solutions' available to reclaim and remediate the former tip? How does this affect viability?

Yes. A detailed assessment has been undertaken on options to remediate the former tip and the overall cost of this work has been included in the viability work undertaken for the WGC SUE. The Committee can confirm that WGC SUE is viable with tip remediation costs included.

Q27. Is the park and ride area justified? Will it be clear to developers what they are required to provide and when? For example, how large should the park and ride be?

Yes. It should be noted that wording in Policy LP30 states that for all four of the Lincoln area SUE's and not just WGC should provide "*consideration of the need for a park and ride*". Given the significant levels of growth proposed within the Local Plan and associated increase in traffic generated, there is a need to encourage and promote sustainable modes of travel as supported in para's 34 and 35 of the NPPF. This approach is outlined in Policy LP13 (Accessibility and Transport) and Policy LP36 (Access and Movement within the Lincoln Area) in the Local Plan.

The policy wording relating to Park and Ride is sufficiently flexible to allow developers the scope to factor in park and ride and assess the need for it when undertaking their transport assessment work for the individual SUEs as part of wider package of transport mitigation measures that will be required.

Issue 4c – South East Quadrant - Policies LP30 and LP48

Q28. What is the current progress and timescale for completion of the Lincoln Eastern Bypass? Is there an upper limit on the number of dwellings that can be completed until the bypass is completed?

Planning permission for the Lincoln Eastern Bypass (LEB) has been secured and a technical start on site made. The appointment of the main contractor and start on site of the main works is estimated late 2016/early 2017, with a two year programme and completion late 2018 or early 2019. Whilst the LEB is essential for sustainable growth, housing development (subject to detailed traffic assessments) can come forward in advance of the completion of the LEB. Highways are aware of the 450 application proposals and traffic impact will be assessed as part of the detailed application. However with the timescale for LEB delivery and the development trajectory of SEQ, it is not considered that there is an issue about SEQ delivery being prevented due to existing highway capacity.

Q29. What is the justification for Policy LP30 specifying that the Local Centre has to be 'small'? How would this be assessed as part of a development proposal? Is the Policy effective in this regard?

The use of the word small was to draw a distinction that this local centre should be smaller than the main centre located further north, identified in the concept plan. The 'small' local centre is to compliment, rather than compete with the existing facilities in Bracebridge Heath. Proposals for the centres will be developed and assessed with the applicant during the detailed application process.

However, it is accepted that the word 'small' is unnecessary and could lead to confusion as to its meaning. A suggested modification (modification Main/SC/41) is therefore made:

Amend 10th bullet under *South East Quadrant SUE (SEQ) – Land at Canwick Heath* subheading of Policy LP30 as follows:

“Development of a ~~small~~ Local Centre towards the...”

Q30. Why are the costs associated with access, heritage, environmental considerations, design criteria, utilities and community facilities 'TBC' in the August 2016 Topic Paper? On this basis what evidence is there to indicate the SUE is viable?

The August 2016 topic paper costings reflect the current situation with the progression of SEQ and further costs will be added to future iterations of the Topic Paper. The Viability Evidence Report (E011A) sets out the overall viability of the Local Plan and the Sustainable Urban Extensions.

Chapter 6 of the report sets out the residual land value approach taken by the study and the component assumptions that are used (including build costs, threshold land value, finance etc.) in arriving at viability. Some of these assumptions are applicable to a range of development types, sizes and locations, but where they differ specifically in relation to SUEs they are identified; sales values are set out at paragraph 6.3.7, land values at paragraph 6.3.18, opening up costs at 6.3.22, Section 106 contributions at 6.3.36. The findings are summarised at table 6.9 on page 45. Further detailed sensitivity testing is set out at Appendix F.

Q31. The August 2016 Topic Paper also states that the costs to open the site up are assumed' – what evidence are these assumptions based on? It is reliable and justified?

The assumed site opening up costs are identified in the Viability Evidence Report (**E011A**) – see page 38, paragraph 6.3.22, which sets out the cautious approach taken, and modelled opening up costs at £10,000 per dwelling or £350,000 per net hectare following consideration of information provided by site owners and their agents and consented urban extension viability assessments.

Issue 4d – North East Quadrant - Policies LP30 and LP48

Q32. What is the current status regarding the outline planning application submitted on the site? Has this now been granted planning permission following completion of the Section 106 Agreement? If so, when are reserved matters submissions expected?

The Outline Planning Application (ref. 132932) was approved by West Lindsey's Planning Committee on 16th December 2015, subject to agreement of suitable sums for infrastructure and affordable housing and the signing of the s106. The formal decision notice was issued on 6th May 2016 following the signing of Section 106 Agreement. The site owners have advised West Lindsey that reserved matters application can be expected in early 2017.

Q33. How does the outline planning application relate to the remainder of the SUE and its delivery? (i.e. the relationship between the land in West Lindsey and Lincoln City) Will this have an effect on the overall delivery and masterplanning of the SUE?

A land use masterplan is in place for the wider site, including an indicative layout for the remainder of the SUE. Phase 1 of the SUE (land in West Lindsey) has been masterplanned to ensure Phases 2 and onwards (land in the City of Lincoln) are integrated to ensure the whole site comes forward as one overall SUE.

Q34. Paragraph 4.3 of the August 2016 Topic Paper8 states that the affordable housing provision will be 10% for Phase 1 with a 'target' for 20% on later phases. Does this need to be reflected in the Local Plan if the 20% listed under Policy LP11 is not achievable? Why is a lower percentage justified?

Phase 1, which relates to the consented element, has been agreed at 10% following the detailed viability appraisal for that site, and taking account of considerable s106 contributions (over £2m on top of the affordable housing contribution) being agreed.

The 'target' of 20% for latter phase(s) simply reflects the policy requirement set out in LP11.

Issue 4e – South West Quadrant - Policies LP30 and LP48

Q35. What is the current status concerning the first part of Phase 1 of the Southern Bypass? How is this going to be funded / delivered? How does it affect the viability and deliverability of the site?

At present LSB has preferred route status, following two public consultation exercises and an LCC executive decision. LCC submitted a bid to DfT for scheme development costs which is currently under consideration by the Department. An announcement is expected as part of the Autumn Statement. If this bid is successful design work will start in 17/18.

Q36. Unlike the other Lincoln SUEs (which refer to specific types of schools) Policy LP30 states only that ‘appropriate’ levels of education provision will be provided on site with scale ‘to be determined’. Is this precise enough? What is expected of developers in this regard? Does it give the community sufficient certainty regarding what will be delivered?

The August 2016 Topic Paper provides further clarity on the education requirement, though the lack of specificity in the policy reflects the fact that this SUE is least progressed than all other SUEs, and as such a more general statement on education provision is more appropriate.

Q37. Policy LP30 requires a detailed odour assessment ‘to demonstrate no adverse impact on future residents’. Has consideration been given to the proximity of the South Hykeham Water Recycling Centre? What happens if an odour assessment finds adverse impacts? Could they be satisfactorily mitigated without compromising the delivery of the planned development? To be effective does Policy LP30 need to refer to any necessary mitigation through the design, layout and masterplanning process? What about nonresidential occupiers?

Impacts of the South Hykeham Water Recycling Centre will be assessed as part of the ongoing master planning of the SUE. Given the geographical scale of the SUE and the flexibility of land uses, it is not anticipated it will adversely impact on delivery or broad scale of development envisaged, for either residential or non-residential proposed development.

Issue 4f – Gainsborough Southern Neighbourhood SUE – Policies LP39 and LP48

Q38. What is the current position regarding outline planning permission?

The current outline planning permission (Ref. No. 125020) was granted on the 5th July 2011 and authorises 2,500 new homes with associated employment land and other uses including retail. The permission remains valid until the 4th July 2023.

Q39. What is the justification behind the provision of 2,000m² of Class A1 retail in Policy LP39? Is this gross or net? How does it relate to the mix of uses in the outline planning permission?

The purpose behind the proposed retail element is to provide a day to day convenience retail offer to meet the needs of the future residents of the SUE. Condition 22 attached to planning permission limits the retail floorspace to between 1,000 sqm and 2,100 sq m of gross retail floorspace (Use Class A1). There is also a maximum unit size of 1,000 sqm. The planning permission and LP39 are reconciled in this regard.

Q40. To be effective should the policy reflect the mix of uses that have been approved?

Policy LP39 provides specific requirements for the Gainsborough Southern SUE if the existing permission is not implemented. The requirements in Policy LP39 for Gainsborough Southern SUE is generally reflective of the permission granted for the entirety of the Southern SUE.

Q41. Why does Policy LP39 not make provision for Class B8 uses?

The thinking at the time of permission was that B8 uses might detract from the quality of the residential environment, as B8 uses will generally generate more significant heavy vehicular movement, such as HGV. In addition, the Eastern SUE and land at Somerby Park was always envisaged for this type of employment use.

Q42. Is the allocation compatible with the site forming part of an Area of Great Landscape Value? Were options considered which would avoid such areas, and if so, why were they rejected?

The proposal's impact on the Area of Great Landscape Value has been assessed during the assessment of the planning permission.

The settlement of Gainsborough is bounded by areas designated as 'Area of Great Landscape Value' to the East, villages of Morton and Lea to the North and South and the River Trent to the West. Appendix 6 (p 567 onwards) of the IIA (E001C) offers analysis on the different segment of Gainsborough being explored as potential SUE location, however, they were rejected due to various reasons, one of which being flood risk.

Issue 4g – Gainsborough Northern Neighbourhood SUE - Policies LP39 and LP48

Q43. Why, compared to the southern SUE, must delivery of the employment land come forward alongside or before residential completions? Is this justified? How will this affect the delivery of housing?

In the latest pre-application discussions held between WLDC, Savills and the landowner it is agreed that it would not be beneficial to pursue this approach and that doing so could jeopardise the ability to expedite housing delivery on this site. These discussions (ongoing and last discussed in late September 2016) are now at a very advanced stage with an application imminent and do not include the need to bring employment development forward in advance of or in parallel with the residential growth.

It is therefore suggested that a modification (modification Main/SC/42) be made to entirely remove this requirement from the policy. Current employment requirements are directed to Somerby Park and / or can be brought forward by way of an operator specific planning application on other parts of the SUE.

Amend first bullet point under the sub-heading Gainsborough Northern Neighbourhood SUE as follows:

~~“Approximately 7ha of employment land for Class B1/B2/B8, with delivery phased before or alongside dwelling completions. Employment premises provided must...”~~

Q44. What are ‘appropriate contributions’ towards secondary education provision? Does the Policy need to be more precise? Is it effective?

It is considered that the policy wording needs to be flexible and cannot be prescriptive until there is certainty about timing and quantum of the future development. Education contribution may vary based on the need in the area at the time. In addition, the policy wording needs to be flexible enough to allow for both situations if the permission is granted before or after the Community Infrastructure Levy is adopted (as secondary education is an item sought on the Regulation 123 list).

Q45. What is the current status regarding the planning application ‘expected Summer 2016’?

The specification of the outline planning application has been agreed. The application will be for 750 residential units in total, for part of the SUE site, with all matters reserved save for means of access. The application will be accompanied by an Environmental Statement. The 750 units match the expected delivery of units on the SUE as whole during the plan period, as confirmed by the policy wording.

It is now anticipated that the outline planning application will be submitted in late 2016.

Q46. Is the allocation compatible with the site forming part of an Area of Great Landscape Value? Were options considered which would avoid such areas, and if so, why were they rejected?

The settlement of Gainsborough is bounded by areas designated as ‘Area of Great Landscape Value’ to the East, villages of Morton and Lea to the North and South and the River Trent to the

West. Appendix 6 (p 567 onwards) of the IIA (E001C) offers analysis on the different segment of Gainsborough being explored as potential SUE location, however, they were rejected due to various reasons, one of which being flood risk.

The design of the proposal will need to consider Policy LP39 and incorporate '*open space and "green corridors" to integrate the development with the surrounding countryside and woodland*'. Future proposals will also need to consider Policy LP17 – Landscape, Townscape and Views.

The current masterplan proposed is informed by a Landscape Character and Visual Impact Appraisal (prepared by Nicolas Pearson Associates) and seeks to position the residential development in the least sensitive area and minimise impact by the retention of the existing framework of boundary vegetation.

Issue 4h – Sleaford South Quadrant SUE – Policies LP44 and LP48

Q47. What is the current position regarding outline planning permission? Have any reserved matters submissions been made?

Some pre commencement conditions have been discharged and North Kesteven District Council are in pre application discussion for an initial 38 units.

Q48. What is the justification for the precise floorspace requirements in Policy LP44? Are the figures gross or net?

The precise floor spaces in Policy LP44 are transposed from the planning permission. They are gross figures and are based on discussions held with stakeholders.

Q49. The August 2016 Topic Paper⁹ sets out different affordable housing thresholds for different phases. Why is this? What is it based on? Should it be set out in the Local Plan?

The varying affordable housing thresholds were negotiated with the promoter and supported by a viability assessment undertaken by DTZ consultants. The phased increased delivery was negotiated to balance and facilitate the development coming forward with the need to maximise affordable housing provision over the duration of the SUE's development.

They should not be set out in the Local Plan, because theoretically a revised application could be submitted at any point, and, should this happen, it should not be rigidly constrained by detailed agreements made for the current consent.

Issue 4i – Sleaford West Quadrant SUE - Policies LP44 and LP48

Q50. What is the rationale for only providing employment uses falling in Class B1? Have other uses been considered, would they be appropriate or suitable and contribute towards the Vision of the Plan?

B1 employment uses are required on this site, having regard for spatial planning considerations. B1 has a more comfortable relationship with adjacent residential uses and also the prominence of the SUE means that high quality employment uses are desirable in this location.

B2 / B8 uses can be delivered elsewhere in Sleaford on existing employment sites.

Q51. How have the access arrangements been determined? What evidence underpins taking the primary access from the A15? Who will provide this? Is it viable and deliverable?

The pre application and masterplanning process identified the location of the primary access, and which was the subject of local public consultation. In addition, an Outline Planning Application for the development of the SUE is currently under consideration by the District Planning Authority, and which includes a viability assessment indicating that it is viable, allowing for the cost of the access.

Q52. The August 2016 Topic Paper¹⁰ states that a detailed viability appraisal is ‘underway’. When is this likely to be completed? What evidence is there that the site is viable and deliverable?

The first draft of the viability report was issued in September 2016 and is subject to ongoing negotiation timed alongside the intention to consider the application for decision in late 2016. The emerging report identifies that the SUE remains viable and deliverable.

Q53. The August 2016 Topic Paper also indicates that affordable housing on site will be ‘up to 35%’. What is this based on? How does it relate to the Local Plan through Policy LP11?

Up to 35% affordable housing is based on existing 2007 North Kesteven Local Plan policy, and reflects the fact that this SUE will potentially gain consent under the 2007 Local Plan (not the Central Lincolnshire Local Plan) and gain consent prior to a CIL mechanism being in place.

Q54. What is the justification for the specific infrastructure requirements? For example, Policy LP44 states that the local centre should be 1ha, a healthcare facility of 0.5ha and a minimum of ‘mainly’ B1 use classes. What is this based on? Why is it different to the other SUEs?

The specific infrastructure requirements in the Policy are a reflection of the advanced nature of discussion and progression of the SUE with an agreed masterplan that has been exposed to public and stakeholder consultation. The level of detail reflects the progression of this SUE to application. The reason for mainly B1 uses is set out in the response to Q50.