

Independent Examination of the Central Lincolnshire Local Plan



Hearing Statement: Matter 4

Hearing Days:
Thursday 10 November 2016 AM
Tuesday 29 November 2016 AM

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LP/MB/M4

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This paper sets out our comments in response to the questions to be discussed at the Local Plan Examination under Matter 4. Some of the questions appear to be **directed at the Local Planning Authorities. In those cases, we have answered 'no comment', although we reserve the right to respond to the Planning Authorities' statements and those of other respondents on the day.**

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

Issue 4a – Sustainable Urban Extensions

19) Policy LP28 is the overarching policy for all the SUEs in the Plan. In total an indicative 14,700 new dwellings are proposed over the plan period on 8 sites as follows:

- Western Growth Corridor, Lincoln
- South East Quadrant, Lincoln
- North East Quadrant, Lincoln
- South West Quadrant, Lincoln
- Gainsborough Northern Neighbourhood
- Gainsborough Southern Neighbourhood
- Sleaford South Quadrant
- Sleaford West Quadrant.

General Questions – Policy LP28

1. QUESTION 1

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

1.1. Sleaford Property Developments Ltd have worked closely with North Kesteven District Council and the Central Lincolnshire Local Plan Team in bringing forward the outline planning application for Sleaford South Quadrant. The site came forward through consideration of the Sleaford Masterplan exercise. The nature of Sleaford is such that there is a need for a range of key investments in infrastructure to bring forward the necessary level of growth. The constraints imposed by the railway lines and the existing infrastructure of the town mean the only options for delivering the required level of growth, together with the co-ordinated delivery of new primary and school capacity, highways improvements and upgrades to the water supply and disposal network, are dependent on large scale SUEs.

2. QUESTION 2

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

2.1. See 1.1. above for a view on the approach in Sleaford.

3. QUESTION 3

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

3.1. No comment.

4. QUESTION 4

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?

4.1. No comment.

5. QUESTION 5

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

5.1. No comment.

6. QUESTION 6

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?

6.1. In the case of Sleaford, 13/0498/OUT, greater confidence is given by the extant outline planning permission, which, together with the S106 agreement has clarified the expectations to be placed on the developer.

7. QUESTION 7

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

7.1. See 6.1 above. The constraints of Sleaford South have been quantified through the application process.

8. QUESTION 8

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

8.1. The Sleaford South SUE is subject to an extant planning permission. A number of the pre-commencement conditions have already been resolved and detailed proposals for the first phase of development are being prepared at the current time. Sleaford South is capable of being

delivered as envisaged by the Plan and development will begin in the near future.

9. QUESTION 9

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?

9.1. No comment.

10. QUESTION 10

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

10.1. No comment.

11. QUESTION 11

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?

11.1. The requirements for Sleaford South SUE have been quantified through the outline planning application process. The detailed requirements are set out in the decision notice 13/0498/OUT and the associated S106 agreement.

12. QUESTION 12

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?

12.1. The mechanisms for the delivery of infrastructure, such as schools and healthcare provision, is subject to change outside the planning system. Identifying the scale of need is the most appropriate step at this time. Being more specific at this stage may undermine delivery of the site and associated infrastructure over time. For instance, the NHS is reviewing its approach to providing care. Instead of relying on GP surgeries, different aspects of care such as mental health, may be provided at new **“hub” sites** serving a larger geographic area, which may free up other parts of the overall estate for other uses. Being unduly prescriptive may jeopardise future healthcare delivery models.

13. QUESTION 13

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?

13.1. The different approach is justified as this analysis is based on a recent planning permission. It would be appropriate for the policy wording to move away from specific building requirements, further to the comments in paragraph 12.1 above.

14. QUESTION 14

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?

14.1. No comment.

15. QUESTION 15

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?

15.1. From the point of view of the Sleaford South SUE a range of other facilities is being provided in the form of education and healthcare facilities, pub, open space and sports fields, which extends beyond **"retail"**. **LP24 should highlight the wider range of service requirements** that may in principle be required, although the specific requirements for each site will be dependent on local circumstances and should be clarified in the individual policies

16. QUESTION 16

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?

16.1. No comment.

17. QUESTION 17

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?

17.1. No comment.

18. QUESTION 18

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?

18.1. The transport effects of the Sleaford South SUE have been assessed through the application process, which was, in turn, informed by the Sleaford Masterplan and the Sleaford Transport Strategy. Mitigation has been specified in the plan based on this decision and analysis

19. QUESTION 19

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?

19.1. Sleaford South is outside Flood Zones 2 and 3 and the outline application included an appropriate drainage strategy. The Environment Agency did not object to the grant of planning permission.

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

20. QUESTION 20

The August 2016 Evidence Topic Paper 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...*".

20.1. No comment

21. QUESTION 21

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)?

21.1. No comment.

22. QUESTION 22

Is the site deliverable and developable in the plan period?

22.1. No comment.

23. QUESTION 23

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?

23.1. No comment.

24. QUESTION 24

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?

24.1. No comment.

25. QUESTION 25

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?

25.1. No comment.

26. QUESTION 26

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

26.1. No comment.

27. QUESTION 27

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?

27.1. No comment.

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

28. QUESTION 28

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?

28.1. No comment.

29. QUESTION 29

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?

29.1. No comment.

30. QUESTION 30

Why are the costs associated with access, heritage, environmental considerations, design criteria, utilities and community facilities '**TBC**' in the August 2016 Topic Paper⁷? On this basis what evidence is there to indicate the SUE is viable?

30.1. No comment.

31. QUESTION 31

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?

31.1. No comment.

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

32. QUESTION 32

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?

32.1. No comment.

33. QUESTION 33

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?

33.1. No comment

34. QUESTION 34

Paragraph 4.3 of the August 2016 Topic Paper 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?

34.1. No comment.

Issue 4e – South West Quadrant – Policies LP30 and LP478

35. QUESTION 35

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?

35.1. No comment.

36. QUESTION 36

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?

36.1. No comment.

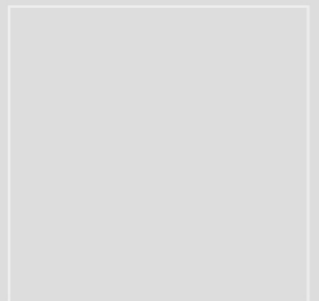
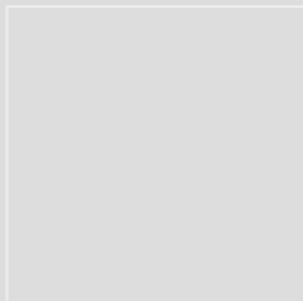
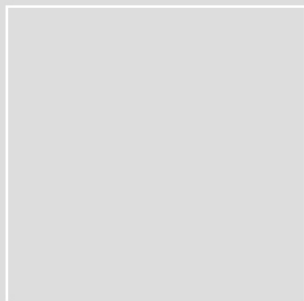
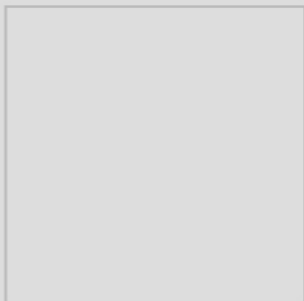
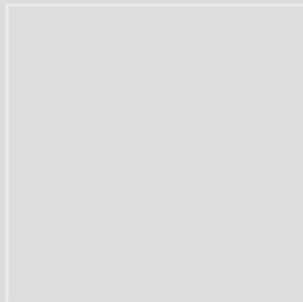
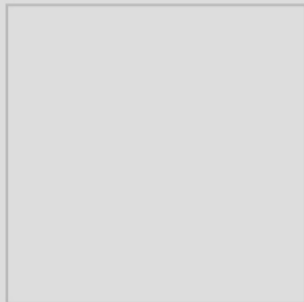
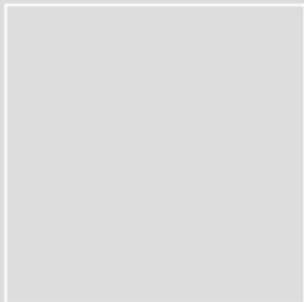
37. QUESTION 37

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 non-residential occupiers?

37.1. No comment.

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