
Independent Examination of the Central Lincolnshire Local Plan

**Response to Inspectors' Matters, Issues
and Questions for Examination**

**Matter 5: Residential Allocations and
Development in the Countryside**

Thonock and Somerby Estates



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1. Introduction

- 1.1. This Examination Statement has been submitted on behalf of Thonock and Somerby Estates (TSE) as part of the Examination in Public on the Central Lincolnshire Local Plan (CLLP) Submission Draft Document. The Statement highlights and where necessary, expands upon representations submitted by TSE at the Draft and Submission stages of the CLLP.
- 1.2. As the largest landowner in and around Gainsborough, TSE wish to be a pro-active participant in the Local Plan process and building on their established relationships with the Lincolnshire Planning Authorities, intend to play a full and active role in ensuring the wider planning strategy and framework for Gainsborough is deliverable in the timescales envisaged by the planning process.
- 1.3. The statement responds to the Inspectors' Matters, Issues and Questions, providing further detail and clarity on Matter 5 – Residential Allocations and Development in the Countryside.

2. Inspectors' Questions

Issue 5a – General Questions

- 2.1. Q6. The April 2016 Residential Allocations Evidence Report states that a site threshold of 25 dwellings was used to consider potential allocations as this allowed Officers to 'focus on sites that would make a significant contribution to housing supply'. Is this consistent with the PPG (3-010-20140306) which states that plan makers will need to assess a range of different site sizes and should consider all sites capable of delivering five or more dwellings? What impact does adopting a higher threshold have on the effectiveness of the Local Plan?**
- 2.1.1. The threshold of 25 dwellings does not take into account the role smaller settlements can play in making a meaningful contribution to housing supply. Many sites within or on the edge of smaller settlements are relatively unconstrained and straightforward to deliver in comparison with larger sites and collectively can make an important contribution to the pipeline and range of sites available for development within the area.
- 2.1.2. We have encouraged through the submission of previous representations, the consideration of sites with a smaller threshold for allocations, which are proportionally suitable to the settlement in question.

Issue 5c – Allocations in Main Towns (Gainsborough and Sleaford – Policy LP50) and Market Towns (Caistor and Market Rasen – Policy LP51)

- 2.2. Q9. Are the allocations in the Main Towns and Market Towns justified, effective and consistent with national policy?**
- 2.2.1. The NPPF sets out clear guidance in terms of plan making, stating that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development (Paragraph 151) and should plan positively for the development required in an area (Paragraph 157). In order to achieve these aims, it is crucial that a range of sites are allocated within the CLLP to meet the identified need.
- 2.2.2. The SUEs within Gainsborough are clearly central to achieving the growth required within the district and as such, rightly provide the focus for housing within the town over the next 15 years. However, given the Government's requirement to significantly boost the supply of housing and meet housing needs in full, it is imperative that a range of sustainable, yet unconstrained sites are allocated to ensure the short, medium and long term delivery of housing.
- 2.2.3. Important to this aim are infill sites within settlement limits that encourage the best use of land in highly sustainable locations, that unlike many constrained brownfield sites, can deliver unimpeded growth in the short term.

- 2.2.4. TSE have submitted two planning applications for infill sites in Gainsborough at land off The Avenue and land at Horsley Road which are being progressed at present.
- 2.2.5. The development of land off The Avenue (see **Appendix 1**) would, in conjunction with the adjacent residential sites at CL4691 (Former Castle Hills Community College Site), contribute to the identified housing need within Gainsborough without any adverse impacts on the wider area. Land to the west of the site (known as the former Castle Hills Community College site) is allocated for residential development within the Draft Local Plan. A planning application made by Lincolnshire County Council on this land has been approved (subject to the completion of a legal agreement) for 130 homes. Access off The Avenue to this site has already been agreed between TSE and the County Council who are responsible for progressing the application to the rear through a Deed of Easement which is annotated on the Submission Draft Proposals Map.
- 2.2.6. The development of land off Horsley Road (see **Appendix 2**) would provide an extension to the existing residential area on Horsley Road, in a sustainable location, within the settlement limits of Gainsborough. The site would provide existing and new residents with a pedestrian route to the riverside for recreational purposes, in addition to the provision of open space on site, further enhancing the recreational and open space offer within the immediate area. The development of the site meets many of the aims set out for Gainsborough Riverside set out within the emerging Local Plan which seeks to exploit and make the best use of its riverfront location and sites as part of its overall plans to regenerate and redevelop the town.
- 2.2.7. The above sites should be recognised as an important contributing factor to the planned supply of housing. TSE believes additional infill sites such as these should be included within the suite of allocations for Gainsborough, in addition to the SUEs and brownfield regeneration sites, with the recognition that the proposed figure of growth for Gainsborough is only a minimum figure.

Issue 5e – Allocations in Medium and Small Villages – Policy LP53

- 2.3. **Q14. Are the allocations in the Medium and Small Villages justified, effective and consistent with national policy?**
- 2.3.1. TSE supports the allocation of 12% growth (4,435 dwellings) for other settlements listed in the settlement hierarchy. Growth is required in the smaller villages lower down the settlement hierarchy to help enhance and maintain the vitality of rural communities. This is required by the NPPF and supports the wider growth aspirations of the Local Plan.
- 2.3.2. TSE supports the Market Towns, Large Villages, Medium Villages and Small Villages as concepts given the importance of ensuring that smaller settlements remain viable through increased populations.

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- 2.3.3. In terms of Medium Villages, we support the levels of growth outlined for these settlements and the acknowledgement that such growth can take place on the edge of these settlements. We support the inclusion of Blyton within the list of settlements. We would however caution against being overly prescriptive in terms of housing numbers within the villages and ensure a degree of flexibility is maintained in order that otherwise valuable development can be realised.
- 2.3.4. In terms of Small Villages, we support the inclusion of this category of settlement and the direction of some growth to it. As development thresholds decrease substantially between medium and small villages we consider that Corringham should be reallocated as Medium Village given the range of services and facilities available, including shops, a school, public house, employment uses, petrol station and public transport links to Gainsborough.
- 2.3.5. As with medium villages, we would caution growth should not be overly prescriptive as it is entirely possible that beneficial development could come forward which is in excess of the pre-determined threshold.
- 2.3.6. For these reasons and to ensure consistency with the NPPF, we request that additional flexibility is built into this policy.
- 2.4. Q15. Should the plan take a more comprehensive approach to providing allocations (say under 25 dwellings) in Medium and Small villages commensurate with their size, role, function and accessibility to services?**
- 2.4.1. Yes, it is considered allocations for smaller sites should be encouraged as collectively, such sites can make a meaningful contribution to the overall housing supply.
- 2.4.2. The principle that settlements are permitted a proportion of growth is supported in theory however, as stated above, we would encourage the CLLP to build in flexibility within this policy to ensure that additional growth can take place subject to compliance with other policy requirements. This is in line with the view that flexibility should be included in the overall housing numbers as the planned number of dwellings should only be a minimum.

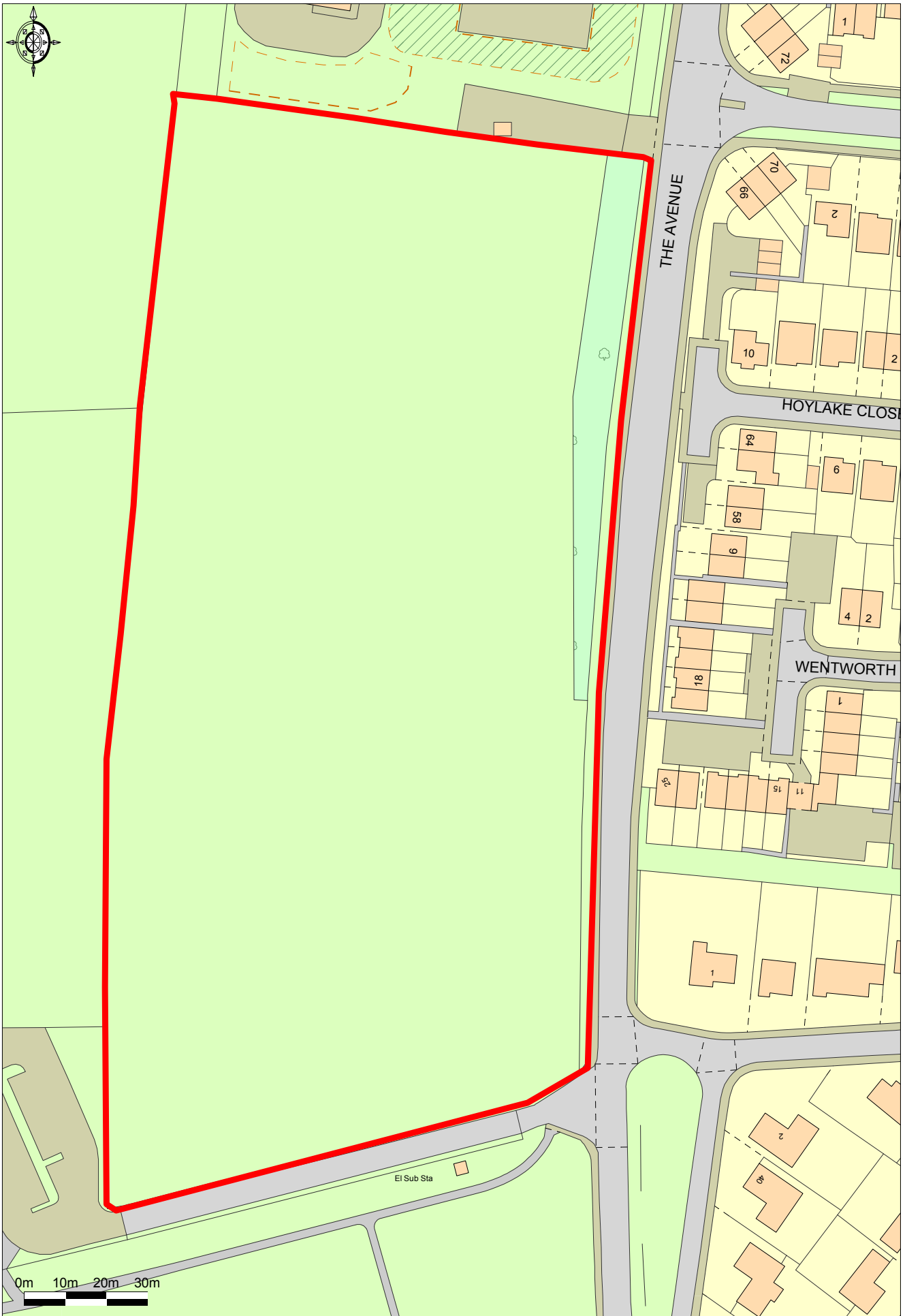


3. Conclusions

- 3.1. It is considered that in order to ensure consistency with the NPPF, the CLLP should include allocations below the threshold of 25 dwellings, and specifically include allocations within the Large, Medium and Small Villages in order to provide a range of sites to meet the housing need.
- 3.2. To ensure the plan is justified, Corringham should be re-designated as a Medium Village so that growth is not restricted to those levels applicable to Small Villages.
- 3.3. Policies should not be too prescriptive for development within such villages with in built flexibility to ensure consistency with the NPPF.

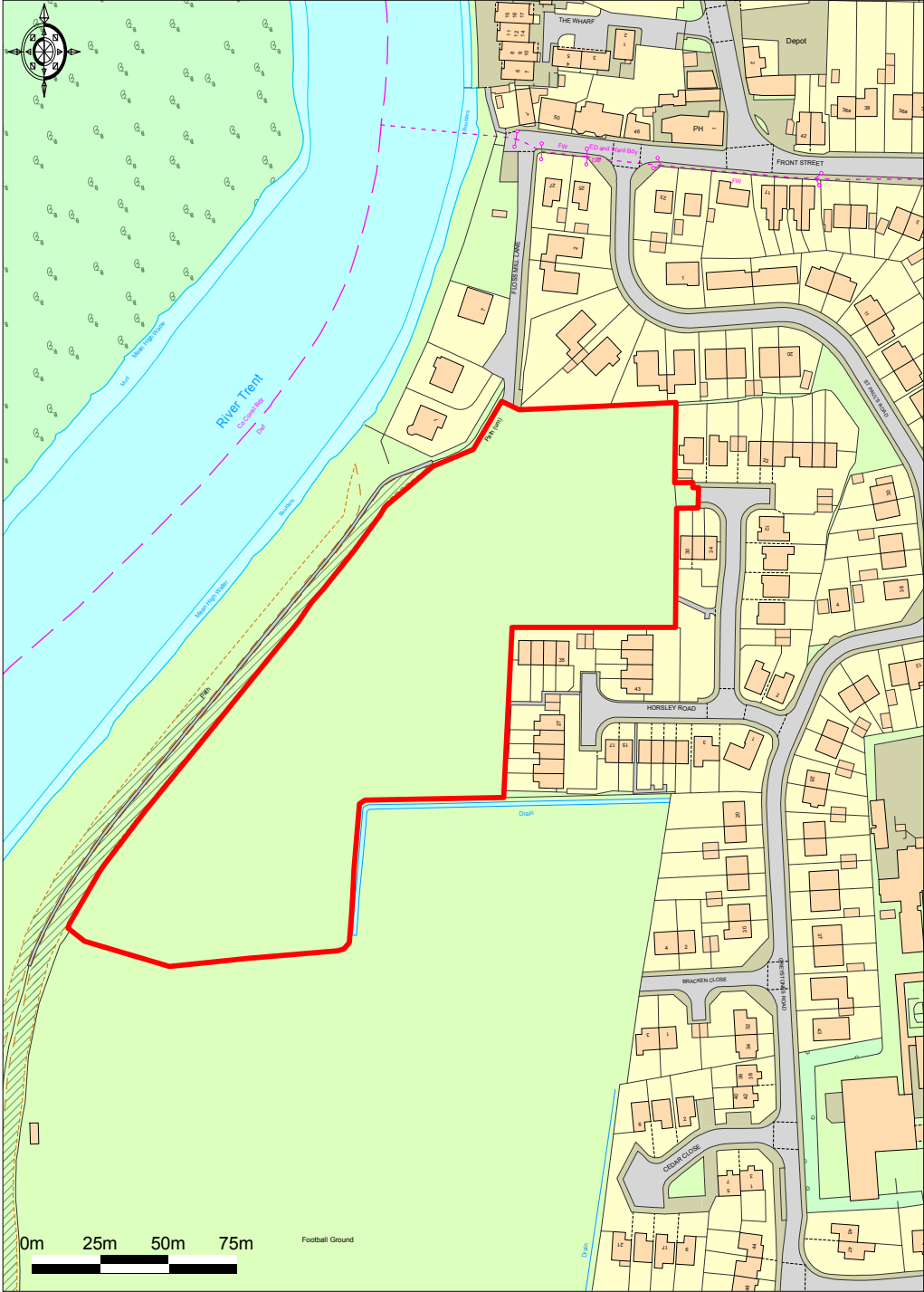


Appendix 1 – Site Plan Land off The Avenue, Gainsborough





Appendix 2 – Site Plan Land off Horsley Road, Gainsborough



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