



Our Ref: MA/A090006

01 March 2017

By Email Only

Central Lincolnshire Local Plan Team
c/o North Kesteven District Council
District Council Offices
Kesteven Street
Sleaford
NG34 7EF

Dear Sir/Madam,

CENTRAL LINCOLNSHIRE LOCAL PLAN EXAMINATION IN PUBLIC - REPRESENTATIONS TO THE SCHEDULED OF PROPOSED MAIN MODIFICATIONS

WYG Group act on behalf of the Church Commissioners for England (CCfE) and have made a number of appearances at the Examination in Public (EIP) for the Central Lincolnshire Local Plan (CLLP). CCfE have significant land interests in the area, and have made a number of submissions in support of the proposed strategic allocations around Lincoln.

CCfE have been provided with a copy of the Schedule of Proposed Post-Submission Main Modifications which is open for Public Consultation until 2 March 2017. CCfE wish to make the following comments, and these are set out below with reference to each of the relevance Reference Numbers within the Schedule.

Main Modifications Representations

Policy LP5 – Main Modification MM/12

CCfE support the amendments to this policy which complement the changes within Policy LP30. This supports a wider definition of employment generating uses, rather than limited solely to B Use Classes.

Policy LP13 – Main Modification MM/24

MM/40	LP13	Under sub heading 'Delivering Transport Related Infrastructure', amend as follows: "All development proposals should, where necessary, contribute..."
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This modification is consistent with oral comments made on behalf of CCfE at the Hearing Session on 8th December (Matter 8). This seeks to clarify that the development proposals would not need to address each of the transport objectives (e to q inc.) unless it was shown to be "necessary". CCfE therefore supports this modification.

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Policy LP30 – Main Modification MM/40

MM/40	LP30	LP30 – SWQ – 7 th Bullet: “Approximately 5ha of land for employment (B Use Classes) mixed use employment expanding...”
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This main modification (MM) seeks to specify the type of employment uses required for the South West Quarter (SWQ) Sustainable Urban Extension (SUE) to require land for employment within the B Use Classes. This is contrary to the other parts of the Policy, concerning the other SUEs, which recognise the variety of employment generating uses which could contribute to job creation within the SUEs.

The scheme is residential led, but will be supported by a wide range of employment generating uses, for example those contained in a local centre. It would be overly restrictive to limit any employment development to the B Use Classes. Other non-B Use Classes may have significant employment and other benefits to the community. We therefore consider the MM should be amended so that non-B Use Classes are not excluded.

CCfE therefore recommend that the modification be amended to the following:

MM/40	LP30	LP30 – SWQ – 7 th Bullet: “Approximately 5ha of land for employment generating uses (including those within the B Use Class) mixed use employment expanding...”
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Policy LP30 – Main Modification MM/43

MM/43	LP30	LP30 – SWQ – 9 th Bullet: Amend as follows: <ul style="list-style-type: none"> Undertake a A detailed odour assessment to demonstrate that there would be no adverse impact on potential future residents occupants of regularly occupied land and buildings, arising from the relationship with the South Hykeham WRC.
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The above modification provides a more detailed requirement of future developers of the SWQ to address potential odour impacts. This is due to the current proximity of the site to the adjacent small sewage works to the north of the site. CCfE recognise and accept that future development proposals for the SUE will need to ensure that the amenity of future residents (or other sensitive uses) will not be demonstrably and significantly affected by this relationship, by way of odour impacts.

However, CCfE consider the proposed MM to be unduly onerous, inflexible and likely to impact negatively on the potential to deliver housing on the site in an effective way. The proposed MM suggests that any future Odour Assessment must demonstrate “no adverse impact” to future occupants. This does not recognise that there may an ability to mitigate potential impacts and reduce the baseline odour impact of the WRC on future occupants of the SUE. It also suggests that “any” adverse impact would be considered unacceptable, whereas a minor adverse impact may well be considered acceptable within the context of the scheme and the planning balance of any application.

CCfE therefore recommend that the following amendment be made to the MM:

MM/43	LP30	LP30 – SWQ – 9 th Bullet: Amend as follows: <ul style="list-style-type: none"> Undertake a A detailed odour assessment to demonstrate that there would be no significant adverse impact on potential future
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		residents occupants of regularly occupied land and buildings, arising from the relationship with the South Hykeham WRC, which could not otherwise be suitably mitigated.
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Para. 10.2.1 – Main Modification MM/65

MM/65	LP30	Amend paragraph to as follows: "10.2.1 In the policies that follow the summary table, each site allocated for residential development has a figure in the column headed 'Indicative dwellings/ remaining capacity '. For sites with permission the figure is the total number of dwellings with planning permission on the site or, if the site is already under construction, ... (Cont.)
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CCfE supports the amendments to the wording of this text, to support the principle and application of indicative site capacities identified in the subsequent summary tables. This clarifies that the decision maker on subsequent applications will not be expected to apply limits to the development capacity of sites based on the indicative numbers within the Plan.

During the same discussion at the EIP, it was also stated that it would assist the decision make if **paragraph 10.2.1 was moved in the document** so that it **immediately preceded the summary site allocation tables in Policy 48** (i.e. after the housing trajectory). Therefore, if this can be specified within the MM/43 then this can be addressed at the same point.

Appendix D – Main Modification MM/76

MM/76	LP30	Amend definition of 'Affordable Housing' in Appendix D to: "Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. See NPPF for further details. Homes that do not meet the above definition of affordable housing, such as "low cost market" housing, may not be considered as affordable housing for planning purposes. <u>The above definition was derived from the definition set out in the NPPF published in 2012.</u>
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CCfE support an amendment to this policy which is reflective of current national policy in terms of the definition of affordable housing. However, national policy continues to evolve, including in relation to affordable housing and its definition. Therefore, this definition should acknowledge that the Council will apply the national definition of affordable housing as it exists at the decision making stage through the life of the Local Plan.

CCfE recommends that the text be further amended as follows:

MM/76	LP30	Amend definition of 'Affordable Housing' in Appendix D to: "Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market.
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		<p>Eligibility is determined with regard to local incomes and local house prices. See NPPF for further details.</p> <p>Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.</p> <p><u>The above definition was derived from the definition set out in the NPPF published in 2012. Any subsequent changes in the definition of affordable housing, through amendments to the NPPF, will be reflected in the approach taken to relevant planning applications through the life of the Plan”</u></p>
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We trust the above comments will be given due consideration through the Examination process. We would be happy to provide any further information or clarification in relation to these comments as necessary.

Yours faithfully



Nolan Tucker
Director
WYG Group Limited