

# CENTRAL LINCOLNSHIRE LOCAL PLAN

## Schedule of Proposed Post-Submission Main Modifications

Representations on behalf of:

NG34 Plan - the Neighbourhood Plan for Sleaford and Kirkby la Thorpe

The following comments are made in relation to the Examiner's Proposed Modifications relevant to the Designated Neighbourhood Area for Sleaford and Kirkby la Thorpe

The Examiner is to be congratulated on his commendably thorough work on the Proposed Submission of the Central Lincolnshire Local Plan and on the considerable improvements his proposed modifications bring to the original document

REF No.	SECTION / PARA / POLICY	Comments on Suggested Main Modification
MM/2	LP2	<p>**** '... then the applicant should contact the applicable Council.'</p> <p>This appears to require some additional clarification e.g. "then the applicant should contact the applicable Parish or Town Council", [or, if the contact referred to is intended to mean the local planning authority, "... the applicable District Council"]</p> <p>The above suggestion would provide consistency with the preceding reference to 'requirement for support from the applicable Parish or Town Council'</p>
MM/3	3.3.2 - 3.3.3	<p>'... is higher than required to accommodate demographic need' '... <u>should not be seen as a ceiling</u> ...'</p> <p>There is a possible contradiction implied within the 2 statements above. If the figure is higher than the demographic need, on what basis should a figure not be seen as a ceiling, other than to accommodate 'windfalls' ?</p>
MM/4	LP3	<p>The proposed Modification substitutes the term "new jobs" for the original term "employment land"</p> <p>In the interests of clarity and consistency should the wording of the following points also be amended ? e.g.:</p> <p>"c. Sleaford - around 12% [4,435] of the total homes and <b>net new jobs</b> needed, delivered through, primarily a strategy of sustainable urban extensions" [Amendment would also be required to points a, b and d]</p> <p>The suggested amendments would conform to the 'Reason for Change' being that LP5 is the appropriate place to convert jobs to land, so logically there is no place within LP3 for any reference to 'employment land'</p>

REF No.	SECTION / PARA / POLICY	Comments on Suggested Main Modification [page 2]
MM/19	LP10	<p>The proposed Modification is fully supported</p> <p>It is however suggested that the revised text might include some clarification of the term “other appropriate local evidence” such as a recognition of the importance of evidence bases produced during the development of Neighbourhood Plans, these being predominantly obtained directly from the communities effected by new development</p>
MM/27	5.7.3	<p>Comment re: new paragraph 5.7.5</p> <p>This new paragraph appears to cover instances where a new road might pass through a Green Wedge There are instances within the CLLP where a compensatory mechanism is included. An example of this is that alternative land may be provided for Traveller and Travelling Showpeople Accommodation</p> <p>In the interests of consistency with other sections of the CLLP would it not be prudent to include some further clarification to new paragraph 5.7.5 ? e.g.:</p> <p>“Where development on a Green Wedge is permitted, should such development substantially alter it’s appearance, character and amenity, a suitable equivalent area should be made available to replace it”</p>
MM/57	LP44	<p>The proposed Modification removes references to the areas to be allocated to specific items of infrastructure</p> <p>Point 1] This raises a question as to whether LP44 is consistent with the requirements of LP10</p> <p>Policy LP10: Meeting Accommodation Needs includes ‘... to cater for the needs of less mobile occupants, including older people and disabled people, and to deliver dwellings which are capable of meeting <b>people’s</b> changing circumstances over their lifetime ...’ [note that <b>peoples’</b> as printed is incorrect]</p> <p>Using ‘vi. a care home site’ as an example, does removing any requirement for a quantity also remove any certainty of compliance with the requirements of LP10 ? The Proposed amendment may provide greater flexibility but in what way does it ensure provision consistent with the aims of LP10 ?</p> <p>Point 2] There is already a S.106 Agreement in place for this development, having been signed on 13th July 2015 Certain quantifiable areas which the Examiner now seeks to remove form part of that S.106 Agreement, e.g. Part C states that the Community Centre “shall not be less than 450m<sup>2</sup>” The Land Use Plan forms a part of the S.106 Agreement and this clearly specifies the amount of land to be allocated to specific uses, e.g. “Care Home 0.64ha”, “Health Centre [Doctor/Dentist] 450m<sup>2</sup>”</p> <p>It is difficult to see how giving “greater flexibility” provides justification for removing details of what already forms part of the existing S.106 Agreement, as surely such information is both informative and not subject to change throughout the life of the CLLP</p>

REF No.	SECTION / PARA / POLICY	Comments on Suggested Main Modification [page 3]
MM/58	LP44	<p>The proposed Modification relates to the mitigation of adverse transport impacts arising from the Sleaford South Quadrant SUE, but these only relate to roads in the near vicinity of this SUE</p> <p>As this development forms a significant part of the increase of around 40% in the number of houses in Sleaford, bullet [e] should be strengthened along the lines of:  “e. provide <b>adequate</b> transport mitigation measures <b>for the whole of the wider Sleaford area</b>, having particular regard to measures to mitigate any adverse transport impacts on Silk Willoughby, Quarrington, King Edward Street and Castle Causeway, the junction between London Road and Grantham Road and minor roads linking London Road to Grantham Road”</p>
MM/60	LP44	<p>The proposed Modification relates to a new roundabout on the A15 providing primary vehicular access for the development</p> <p>Section 6.2 Priority and Phasing for the Sleaford Masterplan stated:  “The northwest area represents the priority for early development, on the basis that it will facilitate employment land but also <b>a new western access into the town centre from the A15</b>”</p> <p>There appears to be a direct conflict between what was specified in the Sleaford Masterplan and more recent proposals for the Sleaford West Quadrant SUE</p>
MM/61	Sleaford Key Diagram [p99]	<p>Broad locations for future growth [LP54]’ should include the number of dwellings proposed e.g. 1,900 to show the level being considered</p> <p>‘Sleaford Link Road [LP47]’ should be removed from the Diagram</p> <p>Under “Opportunity Areas [LP45]” there needs to be an amendment from  “4. <b>Forma Advanta Seeds</b>” to “<b>Former Advanta Seeds</b>”</p>
MM/62	9.4.9	<p>It is stated that “the former Advanta Seeds site was not submitted for consideration as an allocation”</p> <p>LP4: Growth in Villages contains a ‘sequential test’ applying ‘priority’ to Brownfield sites over Greenfield sites</p> <p>There should surely be consistency throughout the CLLP in the way that sites are allocated, regardless of whether they are situated in Towns or Villages</p> <p>Arguably the former Advanta Seeds site, being a brownfield site, should have been allocated ahead of e.g. the Sleaford South Quadrant SUE which is prime agricultural land</p>

REF No.	SECTION / PARA / POLICY	Comments on Suggested Main Modification [page 4]
MM/64	LP47	<p>Prior to the Submission of the CLLP evidence was available to show that the Link Road would not provide any significant improvements to traffic flow through Sleaford, would not alleviate the town's traffic problems and was an extremely expensive option for negligible benefit</p> <p>In view of the fact that Traffic Modelling information was available subsequent to publication of the Draft and prior to the actual Submission, the Link Road should have been removed completely from the CLLP and should not now be safeguarded</p> <p>The Traffic Modelling clearly demonstrated that an alternative scheme [referred to as Option 6] for a Sleaford Southern Bypass running from the A15 across Grantham Road and Mareham Lane to meet the A17 near Kirkby la Thorpe offered significant beneficial improvements over any other Option under consideration</p> <p>This option provides significant advantages in opening up design and access possibilities for both the Sleaford South Quadrant SUE and the Bass Maltings development, and would also serve to mitigate some of the adverse impact of having a single primary access to the Sleaford West Quadrant SUE through a new roundabout on the A15</p> <p>The approximate route of the proposed Sleaford Southern Bypass has been presented as part of the Consultation on NG34 Plan and has met with universal public approval as being exactly what Sleaford needs. The only negative comments received were that NKDC and LCC are seen as unlikely to take adequate measures to provide the transport infrastructure which Sleaford actually needs to support the level of development proposed within the CLLP</p>
MM/76	Appendix D	<p>The proposed Modification clarifies from which legislation the definition is derived</p> <p>In the event of future legislative changes during the life of the CLLP would the definition need to be amended to reflect any changes or will the current definition apply throughout the life of the CLLP ?</p> <p>Is an additional line required if appropriate ?</p>
Appendix 1 - Revised Key Diagram for Sleaford [MM/61]		Details of corrections are given against MM/61 above

Representations prepared by Paul Coyne on behalf of NG34 Plan

05th March 2017



the Neighbourhood Plan for Sleaford and Kirkby la Thorpe