

Matter 4 – Site Allocations Process and Methodology

Statement on behalf of Tom Barton Farms & Lockwood Estates

4th November 2022

1. This statement is made on behalf of Tom Barton Farms and Lockwood Estates, two parties with separate land interests in the West Lindsey area, but both represented by Chave Planning under one umbrella due to their similar concerns with the soundness of the Central Lincolnshire Local Plan.
2. Tom Barton Farms has promoted a site at Lea for the development of c137 dwellings, sheltered housing and a convenience store. This is site reference WL/LEA/002 in the Sustainability Appraisal.
3. Lockwood Estates has promoted a site at Ingham for the development of 10 dwellings and the provision of open space. This is site reference WL/ING/005 in the Sustainability Appraisal.
4. This statement follows on from representations made to the Regulation 19 Publication stage of the Local Plan by both parties. Responses to relevant matters in the Inspector's Matters & Issues Questions will be set out under headings of the questions below.

Issue 1 – Site Allocation Methodology

Q7. Was the site selection process robust? Was an appropriate selection of potential sites assessed, and were appropriate criteria taken into account?

5. No, the site selection process was not robust because it failed to take into account submitted information about sites and therefore did not assess them on a fair basis.
6. The assessment of Tom Barton Farms' site WL/LEA/002 in the Residential Allocations Evidence Report 2021 (EVR076-082) is very basic and does not appear to have taken into account site-specific information and assessment that has been undertaken for the site and was submitted

to the Central Lincolnshire Local Plan Team in December 2020. This report has failed to take into account That the site is proposed for 137 dwellings and not the 214 assessed in EVR076-082 and has ignored the following information submitted regarding the site:

- Landscape appraisal
- Masterplanning
- Ecological survey and mitigation
- Site-specific flood risk assessment

7. Furthermore, of critical importance is that assessment of the site has failed to take into account the very significant advantage in that the site is not just proposed for housing development, but also for a specialist sheltered housing / age restricted complex, a local convenience store and local community facilities. This would provide important facilities for the village and should be given significant weight in the site selection process.
8. Despite this having been raised in representations at Regulation 18 and 19 stages, the report has not been updated.
9. EVR076-082 also contains incorrect information about Lockwood Estates' site WL/ING/005, as follows:
 - The site's indicative capacity is given as 18, whereas my client is promoting the site for the development of only 10 dwellings.
 - It is said that the site contains a Site of Nature Conservation Interest (SNCI) – this is incorrect, there is no such designation.
 - The site is recorded as Agricultural Land - Grade 3 – this is incorrect – it is Grade 5.
 - The site is indicated to be a former bowling green – this is incorrect.
10. Furthermore, site-specific evidence submitted in respect of landscape, ecology and drainage seems to have been ignored. Again, these issues have been raised repeatedly at Regulation 18 and 19 stages and also in direct correspondence with the Central Lincolnshire Local Plan Team.

11. It is very disappointing that, despite my clients' positive and proactive engagement with the plan-making process, the work they have invested in to assess and present their sites has been ignored and sites have been assessed on an unfair basis, with mistakes not having been corrected. This results in a lack of robustness in the site selection process.



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