

Examination of the Central Lincolnshire Local Plan 2018 – 2040 Hearing Statement.

Matter 12 – Green Spaces.

On behalf of Persimmon South Yorkshire

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1. Introduction.

- 1.1. This Hearing Statement has been produced by Pegasus Group on behalf of our client, Persimmon South Yorkshire. It focuses upon the Inspectors Matters, Issues and Questions which relate to our previous representations.
- 1.2. Our client wishes to ensure that the Central Lincolnshire Local Plan (CLLP) is prepared in a robust manner that passes the tests of soundness contained in paragraph 35 of the 2021 NPPF, namely that the plan is:
 - Positively Prepared;
 - Justified;
 - Effective; and
 - Consistent with national policy.
- 1.3. The CLLP also needs to be legally compliant and adhere to the Duty to Cooperate.
- 1.4. Our client submitted representations to previous stages of the Local Plan Review production including the Regulation 18 Draft Local Plan Consultation (June 2021) and Regulation 19 Proposed Submission Local Plan Consultation (March 2022). Despite the issues our client has identified with the CLLP, the amendments made to the plan do not reflect the comments which we have made. Accordingly, the Joint Strategic Planning Committee (hereafter referred to as the JSPC) have not overcome the issues identified and we therefore believe the CLLP is unsound.
- 1.5. Persimmon are one of the largest home builders in the country with an excellent track record of delivery. Our client has a direct interest in respect of their site at Land to the East of Station Road, North Hykeham (ref: NK/NHYK/009). Our previous representations identify why this site should have been selected for allocation.

2. Response to the Inspector's Matter 12 Issues and Questions.

- 2.1. We welcome the opportunity to comment on the Inspector's Matters, Issues and Questions (MIQs) and provide the following responses to selected questions. Our client reserves the right to respond to specific issues raised by the JSPC and other parties within the hearing session in so far as they relate to our previous representations.

Issue 1 – Green Wedges – Policy S63

Q1. Is Policy S63 sufficiently clear as to whether an area of land is a Green Wedge or not? Should these areas be listed in the policy?

- 2.2. Policy listing would improve certainty and clarity.

Q2. How were Green Wedges identified and assessed as part of this Local Plan? What factors were taken into account and where is this evidenced?

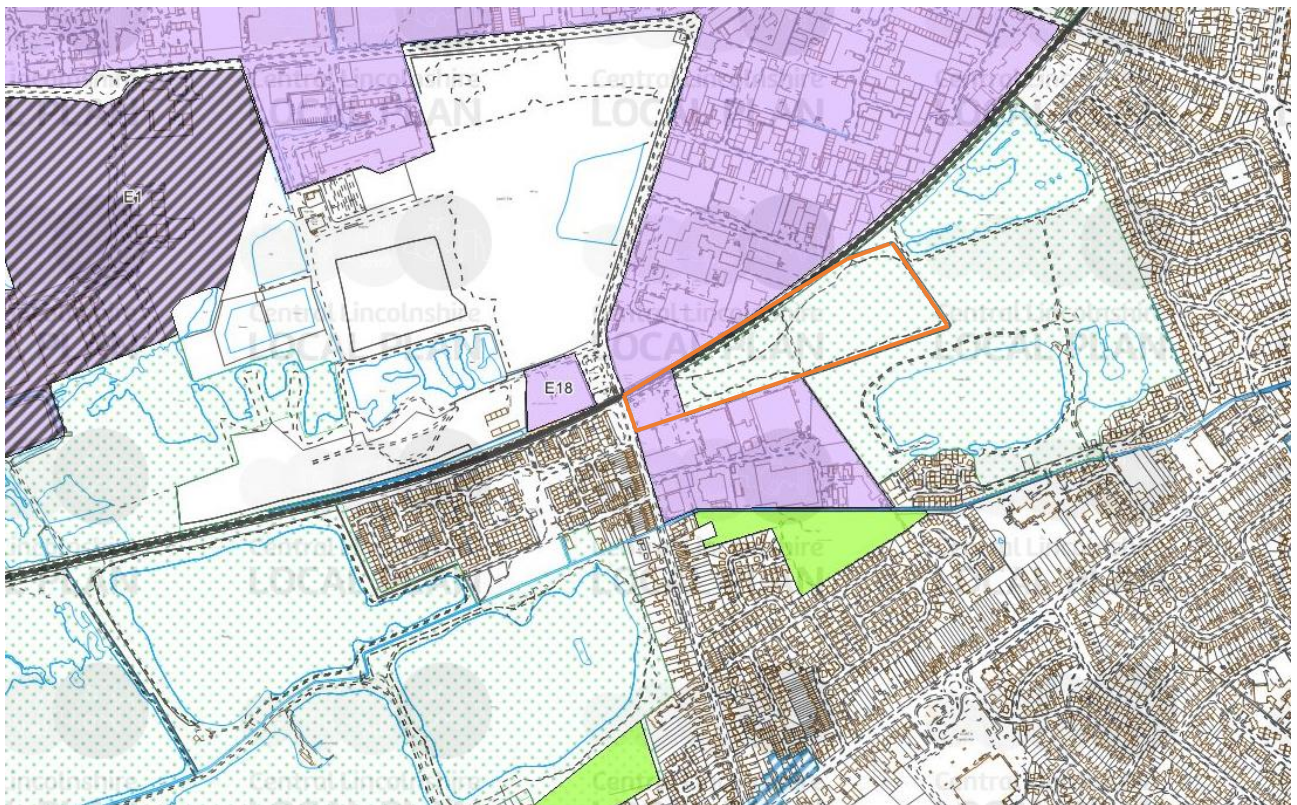
- 2.3. Our client has significant concerns at how Green Wedges have been identified and designated. These areas remain largely unchanged from the previous CLLP. There appears to have been limited consideration of development in the intervening period. Indeed, the primary evidence for Green Wedges was published in April 2016 (ref: ENV003). The Green Wedges Evidence Report (EVRO63) clearly identifies (paragraph 3.5) that no further analysis has been undertaken to inform the CLLP.
- 2.4. Our client has a direct interest in the Hykeham Pits Green Wedge. This area comprises two discrete areas on opposite sides of Station Road, separated by the road, employment and residential development. Our client has no issue with the area of Green Wedge to the west of Station Road, albeit it is noted that a minor amendment to the Green Wedge in this location has occurred to reflect an employment development that has taken place.
- 2.5. Our clients' main concerns relate to the appropriateness of this Green Wedge to the east of Station Road. This area is surrounded by built development which effectively severs it from the wider expanse of the Hykeham Pits Green Wedge. A detailed landscape and visual review of the site is included as an appendix to this statement. Our client's site is identified in figure 1.
- 2.6. Policy 62 identifies that the main aim and objectives for Green Wedges is to:
- Prevent the physical merging of settlements;
 - Create continuous links to the open countryside beyond urban areas;
 - Provide an accessible recreational resource; and
 - Conserve and enhance local wildlife to create wildlife corridors.
- 2.7. Our detailed consideration of the Hykeham Pits Green Wedge (appended to this hearing statement) concludes that the inclusion of our clients' interests in the Green Wedge designation is neither necessary nor valid in order for the Green Wedge to continue to

serve its current purpose. The performance of our client's site against the policy aims is considered below.

Prevent the physical merging of settlements

- 2.8. The whole site sits within North Hykeham and in the location of our client's site does not prevent it from merging with neighbouring settlements. The existing employment uses within the IEEA (E18) to the north and south combined with the former Lincoln castings development within the western part of our client's site and the new housing development to the west of Station Road already provide a long-established uninterrupted built frontage in this location. In this location the Green Wedge does not, therefore, prevent the physical merging of settlements.

Figure 1: Site location and Green Wedge (extract from CLLP Local Plan Maps)



Create continuous links to the open countryside beyond urban areas

- 2.9. The objective of this part of the Policy is to deliver a multi-functional 'green lung' and to offer communities a direct and continuous link to the open countryside beyond the urban area. The residential development to the west of Station Road, existing employment uses within E18 and former Lincoln Castings development to the west of our client's site effectively severs the Green Wedge to the east of Station Road from the open countryside. These continuous links are, therefore, not provided.
- 2.10. In addition, as discussed below access to the area is poor. If any part of the Green Wedge east of Station Road provides a role as a 'Green Lung', it is the Richmond Lakes, is not part

of our client's site. This is because this area is overlooked by adjacent residential properties and therefore does provide some role as part of their visual amenity. However, this still would not perform the wider aim set out within the policy and as such some form of other open space designated could be considered.

Provide an accessible recreational resource

- 2.11. Whilst the site is located adjacent to the public rights of way it is privately owned and thus inaccessible to the public which negates the site's potential as a recreational resource. It is understood that the Richmond Lakes is also privately owned and used for private fishing. Access to the area as a recreational resource is, therefore, poor.

Development of our client's site could provide additional recreational open space within this area and improve accessibility. These issues and improvements have been presented to the JSPC via several indicative masterplans. These can be found within our response to the Publication version of the CLLP.

Conserve and enhance local wildlife to create wildlife corridors

- 2.12. The objective of this part of the Policy is to support the Conservation and enhancement of local wildlife and to protect links between wildlife sites, in order to support wildlife corridors. The Green Wedge in the vicinity of the proposed development site does not however currently meet this purpose. Rather, the Green Wedge in which the proposed development is located has already been separated from the remainder of the Green Wedge to the west by the existing development which runs either side of Station Road, to such a degree that there is no direct connectivity between the two areas.
- 2.13. A Preliminary Ecological Assessment (PEA) was appended as part of our client's submission to the Publication version of the CLLP. This assessment provides a baseline position of the ecological conditions on site, identifying any ecologically significant effects associated with the proposed development and proposed compensation and enhancement measures which may be required.
- 2.14. The PEA identifies three Local Wildlife Sites (LWS) within close proximity to the site. These being the Hykeham Railway Line (East) LWS and Richmond Lake LWS, both of which abut the site and the North Hykeham Gravel Pit LWS which lies 220m to the South West. It is concluded that due to both the Richmond Lakes LWS and North Hykeham Gravel Pit LWS being encircled by well-defined tracks/ walking routes, capable of accommodating recreational use without impacting upon their features of interest they shall remain unaffected by any development of our client's site.
- 2.15. The Hykeham Railway Line (East) LWS is considered to have potential to be affected, for example by abutting development. However, this LWS also has potential to be enhanced/ extended, for example, by additional boundary planting, or the creation of new linkages through the Site.
- 2.16. In terms of other receptors of ecological importance, the site is bounded by hedgerows on its southern and eastern boundaries. Whilst these were identified to be species poor they are considered to act as habitat links and wildlife corridors. The PEA therefore recommends retention, enhancement and appropriate management.

- 2.17. Given the site currently comprises of areas of hardstanding and vacant grassland, the opportunity would in fact be there for the proposed development to result in an improvement to the situation for biodiversity at the site through appropriate new vegetation planting. The current Green Wedge policy effectively sterilises the site from such improvements being made.

Conclusion

- 2.18. The Council has failed to undertake an updated assessment of the identified Green Wedge designations against the described policy aims of these areas. Our detailed analysis, summarised above and included as an appendix to this hearing statement, identifies that the area of the Hykeham Pits Green Wedge to the east of Station Road fails to meet any of the identified policy aims.
- 2.19. This area is surrounded by built development and severed from the wider Hykeham Pits Green Wedge. It is, therefore, recommended that the Green Wedge designation is amended in this location.

Q3. Are the development requirements relating to the Green Wedges justified and effective?

- 2.20. No, the policy effectively excludes any form of development within the Green Wedge irrespective of the contribution that the area of land makes to the aims of the policy. This effectively sterilises sites such as our client's. Our client and our evidence strongly support the removal of their site from of the Green Wedge.
- 2.21. In the event that the Inspectors consider that the Green Wedge in this location is sound, we respectfully request amendments to the policy. These amendments should provide greater flexibility for development to occur which would enhance areas of Green Wedge, such as our client's, which are currently of poor value. Such an approach would enable evidence-based proposals to be brought forward and the benefits of such schemes considered in the decision-making process.



Appendix: Green Wedge – Landscape and Visual Review

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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