Submission to Central Lincolnshire Local Plan

Date: 3 March 2017

Main Modifications Comment: Sleaford Town Council

Overview

This submission, by STC, seeks to address issues to help ensure that the Central Lincolnshire Local Plan provides the residents of Sleaford, and the wider community where appropriate, the facilities and infrastructure required. **Annex A** is merely our working sheet leading to the conclusions and issues herein. **Annex B** represents the "Planning Application" Scope of a Town Council.

We have sought advice from Consultants including **Globe, Peacock and Smith (and The Drove Landowners Partnership)**. We also acknowledge the work done by Bryan Hall on the proposed Mixed Use Development Sleaford West Sustainable Urban Extension. The CIL Examiner meeting in Lincoln on February 28th suggested the views of these Consultants have not been taken into account.

STC wish to work as closely as possible with the Principal Authority (NKDC) and the LCC. As Statutory Consultees in the Planning Process the role out of the schemes suggested in the Plan will involve the setting of standards and investment to ensure successful outcomes.

Clearly the roll out time of the developments envisaged will require co-operation from Residents and also the funding, in a timely manner, to achieve the objectives envisaged within the Central Lincolnshire Plan.

The population of Sleaford has steadily increased over the last few years without any meaningful changes to transport infrastructure. Transport provision, and links provided by trains and buses, do not appear to have not taken account of this increase.

The issues identified below, relating to Sleaford, are specifically contained within Pages 34 to 38. However other modifications could apply to Sleaford, and Town Councillors wish to draw attention to them.

Concerns however have also been raised about water supplies, health facilities and work opportunities.

Finally, whilst specific MMs have been named there may be others but lack of clarity in the Main Modification Document and earlier one make this difficult.

Central Lincolnshire Plan (and related aspects of CIL)

Our concerns, after having also made submissions, to the Officers engaged in the CIL review, are as follows. These concerns have been highlighted against the MM referrals.

Affordable Housing:

Description: reasons for anomalies with other housing & other areas (e.g. Lincoln) unclear.

25% 20% 15% (Affordable%)

Lincoln SUE : £5: £20: £30
Sleaford SUE: £0: £0: £15

Site by Site implementation

There is a need for investment in a wider infrastructure – simultaneously with site builds. Other issues include:

- a. Bus Routes: only if available on time
- b. Walking/Cycling unsuitable for many (age/weather/facilities)
- c. Confusing S106/CIL availability and when?
- d. Lack of clarity of Health, Education availability and if this lack will restrict development as facility provision is guaranteed.
- e. <u>Transport Strategy</u> and will need implementing with SWUE and SUE (up to 11 options to consider). Also confusing statements relating to "Planning permission "of Link Road onto Boston Road when Advanta Seeds talks between Tesco and Town Council continue.
- f. Business Development (SWUE and ?) see below

Conservation Areas: Town Centre & Others

The definition & Character need clarifying: MM14, MM24, MM28, MM29 and LP26 (design & Amenities) Also below MM54. However this has wider implications.

The Town needs to define and protect where possible: Protecting Conservation Areas should be extended to preserve the 'character' of the area/town whether it is in a Conservation Area or not.

The Main Modifications refer for the most part to preserving the character of our villages, the countryside, Lincoln (MM14), Important Open Spaces (MM28+29).

However, there is reference to 'contributing positively to the local character, landscape and townscape.' in LP26 (Design and Amenity): but not apparently specific to Sleaford. Can this be added?

Why do villages, the countryside and Lincoln warrant a separate mention, whereas us and Gainsborough do not have a specific reference to this!

MM54: What is defined as Conservation Area? Comments seem spurious.

Sleaford West Q SUE: MM60

The changes appear retrograde: Integration with a Sleaford Transport Strategy is a vital component. Since this amendment was introduced there are proposals to develop Carr Grammar and the High School adjacent to the A15 outlet of this development.

Secondary Access What actually does this mean? Residents have expressed concern.

Sleaford South SUE MM57

Appears not to have industrial development? Is there a conflict of design and assurances re MM59

Potential Areas of Concern in the document

Spatial Strategy and Settlement Hierarchy MM2

Enhance their role (including Sleaford): our view is that this proposal, in conjunction with the CIL rates offered, will not support this objective.

Town Councils MM10

Why deletion of support from TC?

Workspace: MM15 & LP5

The statement "Evidence of Marketing is not in itself justification for reduction in Workspace."

The reasoning appears unclear: why is this paragraph removed?

Guidelines on Green Space: Brownfield precedence need to be addressed.

The Manual of Streets Best practices envisaged here are a desired, and safety first, outcome.

Water availability: There are concerns over River Slea levels and water supply:

Impacts on other amenities?

Conclusions

Our concerns, which the Sleaford Town Council requests the Central Lincolnshire Plan to address, are given above.

Whilst detailed planning decisions will be addressed as Planning Applications are submitted, our concern is that piecemeal approach will allow for severe future problems as the Town develops.

Only with a coherent and equitable level of investment and facilities, comparable with the rest of the Lincolnshire area and beyond, can this be avoided. Timely S106 and CIL and other sources of finance must achieve this as required! Such finance and infrastructure investment must include Sleaford Town Centre to address

Currently domestic water in Sleaford is provided by aquifers and at peak times of the year is insufficient resulting, for example, upon significant impact on the River Slea. That is a concern. So too is the availability of medical services (which also is a national concern) on time.

The population of Sleaford has steadily increased over the last few years without any meaningful changes to transport infrastructure.

Transport provision and links provided by trains and buses have not taken account this increase. The lack of a renewed current plan for roads around Sleaford is already having significant impacts upon the town with increased congestion and environmental impacts. The A15 and A17 need to be enhanced: and the provision of a southerly link road essential to support current and proposed expansion in and around Sleaford.

Finally Design and heritage factors should apply to Sleaford as with other areas.

Annex A

Overall: Comment has, where possible, been restricted to those aspects where changes are proposed. Except where there is potential conflict with wider issues. Additionally there are issues relating to the availability of CIL and Infrastructure required (e.g. Traffic based on Traffic Modelling exercises)

1. Affordable Housing: Description: reasons for anomalies with other housing & other areas (e.g. Lincoln) unclear.

	<u>25%</u>	20%	15% Affordable
Lincoln SUE:	£5	£20	£30
Sleaford SUE:	£0	£0	£15

- 2. Site by Site implementation: need for overview and investment in wider infrastructure simultaneously with site builds.
 - a. Bus Routes: only if available on time
 - b. Walking/Cycling unsuitable for many (age/weather/facilities)
 - c. Confusing S106/CIL availability and when?
 - d. Lack of clarity of Health, Education availability and if this lack will restrict development as facility provision is guaranteed.
 - e. <u>Transport Strategy</u> and will need implementing with SWUE and SUE (up to 10 options to consider). Also confusing statements relating to "Planning permission "of Link Road onto Boston Road when Advanta Seeds talks between Tesco and Town Council continue.
 - f. <u>Business Development (SWUE and ?) see below</u>
- 3. Conservation Areas: Town Centre & Others enforcement proposals?
 - a. Definition & Character need clarifying. MM14, MM24, MM28, 29 and LP26 (design & Amenities) Also below MM54.
- 4. MM54: What is defined as Conservation Area? Comments seem spurious.
- 5. MM60: Retrograde: "Crossing Out". Does not clarify; Secondary Access? Lack of Precision
- 6. Issues: Water availability: River Slea levels: Impacts on other amenities?
- 7. MM57: South SUE appears not to have industrial development? Why? Conflict of design and assurances compared to MM59

- 8. See MM2: Main Towns: enhance their role: this proposal in conjunction with the CIL rates offered will not support this objective.
- 9. MM10: why deletion of support from TC?
- 10. MM15/Evidence of Marketing is not in itself justification for reduction in Workspace. Why is this paragraph removed?
- 11. Green Space: Brownfield precedence: Manual of Streets a desired outcome.

Annex B

STC Planning Role

Valid & Material Considerations

Loss of Light/Overlooking: Loss of Privacy Visual Amenity (but not loss of privacy)

Adequacy of Parking/Loading/Turning

Highway Safety: Traffic Generation

Noise and Disturbance (from continuing use)

Hazardous Materials/Smells

Loss of Trees

Effect on Listed Buildings (and additionally in Conservation area)/Layout & Density of Buildings

Design & Appearance & Materials

Landscaping: Listed Views: Road Access Local, Regional and National Planning

Disabled Persons Access Compensation & Awards

Proposals in the Development Plan: Previous Planning Decisions

Biodiversity and Nature Conservation! Archaeology

Maybe but not normally Valid

Loss of View

Impact of Construction Work

Restrictive Covenants

Ownership Dispute (Rights of Way)

Fence Lines/Boundaries

Personal & Moral (the Applicant)