

Your Ref: H14-0065-26
Our Ref: 1662-1 MJB SB

17 September 2026

For the Attention of Mark Niland

Service Director
Planning and Strategic Infrastructure
South Holland District Council
Council Offices
Priory Road
Spalding PE11 2XE

Dear Sirs

KESTON FIELDS LIMITED

**APPLICATION REF: H14-0065-40 FOR 40 DWELLINGS ON LAND OFF FARNBOROUGH CLOSE,
PINCHBECK, LINCOLNSHIRE, PE11 5AF**

We wrote on 16 April 2026 highlighting various concerns about the method for calculating Education needs arising from the above development.

At that time, our concerns focused on;

- a) The increase in the Pupil Product Ratio (PPR) which is used to calculate the numbers of anticipated number of school age children that would live in the proposed houses, and
- b) The over ambitious assumption about the speed of delivery of new homes
- c) The failure to assess the existing capacity of the local schools and
- d) The failure to identify a location for spending money

Although a revised request for education contributions has eventually been received from LCC, it makes no reference to the points raised in our previous letter. We note that the requested sum has reduced because it now appears that the local primary schools will have capacity to accommodate the growth in student population. Although this reduction is welcome we are still concerned that the process does not meet the requirements of the CIL regulations in because;

- a) The increase in the PPR from the figure shown in the Local Plan has not been justified. Reference is still made to the work undertaken by Lincolnshire Research Observatory, which we understand, ceased operating before the Local Plan was adopted. The increase in the PPR has not been explained or justified. As noted in our original letter some of the PPRs have doubled from the figures specified in the adopted local plan. Unless the change in PPR can be justified the assessment should be based on the formula included in the Local Plan.
- b) The assessment still assumes the scheme will be “complete or well underway in 2028/9”, which, for the reasons set out in April, is deemed to be ambitious for this scheme. This is important because the school age population is, according to LCC’s own publications, expected to peak in 2029. After that time schools may be expected to have more capacity, reducing the need for developer contributions: and

Your Ref: H14-0065-26

Our Ref: 1662-1 MJB SB

17 September 2026

Service Director
Planning and Strategic Infrastructure

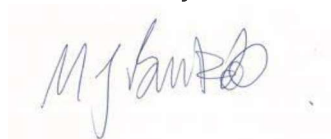
- c) The assessment still refers to primary and secondary planning areas, which do not appear to be defined consistently in any documents published by the County Council and does not mention specific schools where the funding may be directed. Failure to define the target school, or schools, would appear to make it impossible to monitor whether the money is being spent appropriately.

Although we welcome the reduction in fees there is an overriding concern that the request still does not meet the requirements of the CIL regulations. This is primarily a matter for South Holland District Council as the Local Planning Authority to consider whether requests for Developer Contributions meet the CIL regulations.

We request the response of the Local Planning Authority to the concerns raised both here and in our letter of April 2026.

Should additional information or further discussion be required please do not hesitate to contact me.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'M Braithwaite', is written over a light pink rectangular background.

Michael Braithwaite MRTPI