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Planning, Design and Access Statement

Employment and Residential Development

Lincs Gateway, Spalding

December 2018

Landscape Strategy, full details to be agreed in relation to a pending condition.

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1 Introduction

1.1 This statement accompanies an application for planning permission, made on behalf of Ashwood Homes, for 43 houses on land immediately to the west of the Lincs Gateway site, Spalding.

1.2 Lincs Gateway benefits from outline planning permission. It is also identified as a proposed allocation within the emerging South-East Lincolnshire Local Plan, as a prestige employment site. It provides a unique opportunity to diversify the employment base of the local area, draw jobs and skilled workers in to the area, and reduce the brain-drain to other areas.

1.3 Ashwood Homes have invested well in excess of £1m in the site, including extending services and constructing roads, and in addition they have constructed the first office building, all within the southern part of the site. As a mark of their confidence in the new development, Ashwood Homes have relocated their offices to Lincs Gateway.

1.4 Work now needs to begin on building out the northern section of the project, which will provide the main area of the business park. There is a substantial amount of interest in the market in this project, but not on a speculative basis; it is necessary to provide new accommodation within the site. If this is provided, Ashwood Homes are confident that it could be fully let within a relatively short time. However, the up-front cost of constructing these buildings, delivering the high-quality landscaped campus within which they are proposed to sit, and providing the necessary services, is prohibitive on its own. There is a risk that, without further sources of funding, the main northern section of the business park will be delayed for several years. This would delay the economic benefits that it could provide, and this would represent a significant missed opportunity for the local area.

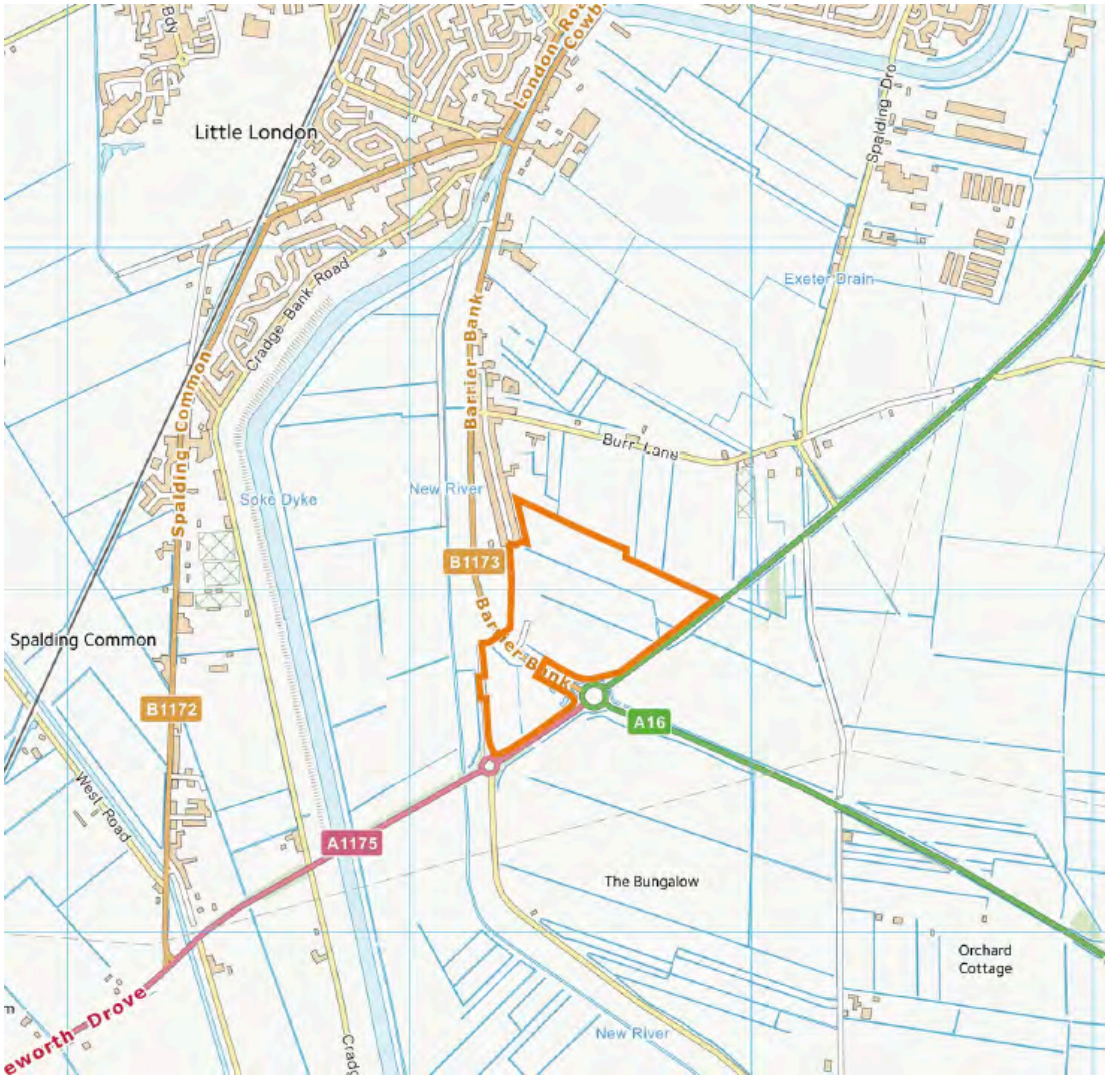
1.5 This application proposes the first few commercial buildings within the northern part of the site, which would be in B1 and B8 uses. They would provide high quality office accommodation, as well as the potential for research and development, light industrial or storage facilities. In addition, the application proposes 45 houses, which would provide the funding required to enable the construction of these commercial buildings.

1.6 We believe that the proposed development would not only be very positive for the local area, but it would also comply with all relevant policy considerations. It would benefit from the presumption in favour of sustainable development, and we believe that panning permission should be granted.

2 Context for the Application

Lincs Gateway Business Park

2.1 The site for Lincs Gateway business park is located on the southern edge of Spalding, just over a mile south of the town centre. It is bounded by the A16 and A1175 to the south and the B1173 and Barrier Bank to the west, with residential development on Fen End Lane to the northwest, and otherwise by agricultural land. To the east of the site is a bridleway, which would be unaltered by the proposed development. The new pitches of Holbeach Rugby Club lie a short distance to the east.



Lincs Gateway business park's location, at the "gateway" to Spalding, where the A16 from Peterborough and the A1175 from the A1(M) meet

2.2 The site for the business park itself is divided by the B1173, which was routed through it as part of the wider A1073 Spalding to Eye improvement scheme, in

2011. A highway access leading into the northern part of the site was constructed at the same time as the new road. The old Barrier Bank Road was closed at the point it passes the site when the new road was constructed, but a remnant of this older road provides one of two access points to the southern part of the business park site.

2.3 The northern part of the business park site, which lies to the north of the B1173, is around 18 Ha in area. The southern section of the business park site is around 4 Ha in area.

2.4 The business park's location at the southern edge of the town, and on the two main highway routes from Peterborough in the south and Stamford and the A1 in the west, makes it an ideal "gateway" location for Spalding. This was accepted by the Council when granting outline planning permission. The report written at the time by Officers for the Planning Committee commented as follows:

> **'The site is considered a gateway location due to its location on the A16 and A1175 which means that the majority of road traffic approaching from the south and west is likely to pass it and be the first development that many travellers to Spalding will encounter. Its visibility and accessibility would be critical to attracting footloose businesses.'**

2.5 The business park site was previously in a combination of uses, which still have a bearing on its current appearance. The northern area has historically been largely in agricultural use, although part of it was previously occupied by a building in B8 use. This building was destroyed by a fire in 2006, and has since been demolished. The site retains some elements of hard standing, and is in part previously developed land. Earth bunds within the site were constructed for the purpose of attenuating noise from the B8 use, and protecting the amenity of housing on Fen End Lane. Historic maps indicate that this part of the site has also previously accommodated farm buildings.

2.6 Outline planning permission was granted for the business park in relation to application 16-0009-14. The Council have since granted a further outline consent, reference H16-0025-15. The description of the approved development in both instances was as follows:

> **'Proposed business park, hotel, public house/restaurant, conference and function centre, petrol filling station, restaurant/café with ancillary retail together with associated landscaping, access, highways, parking, drainage, utilities and services and infrastructure works.'**



The new petrol filling station, within Site Section B, which also contains retail and café / restaurant facilities

2.7 The broad approach proposed by the outline permission was for the business park to contain a number of uses. Whilst the majority of its area would be dedicated to traditional 'B class' employment uses, such as offices, industrial development and distribution centres, the site would also contain some other uses which would help to attract businesses to the site. A hotel and associated pub/restaurant formed an important part of this wider offer, and this is now in place. In addition a petrol filling station, which also offers convenience shopping and café / restaurants is also now operating. A conference and events centre is also proposed, and this will now be provided within the northern part of the site, following the Council's approval of an application which amended the original outline permission (H16-1217-17). These uses were considered necessary in order to address deficits which were identified in the range of facilities for businesses within Spalding, particularly the need for additional good quality hotel space, and a larger and more versatile conference facility. They are intended to help arrest an existing trend, whereby business was found to be leaking to other areas, where these facilities were of a higher standard, and more plentiful.

2.8 Ashwood Homes have located their offices within the southern part of the site, Section B. Parts of this building are also let to other tenants, and it forms the first part of the business park proper.

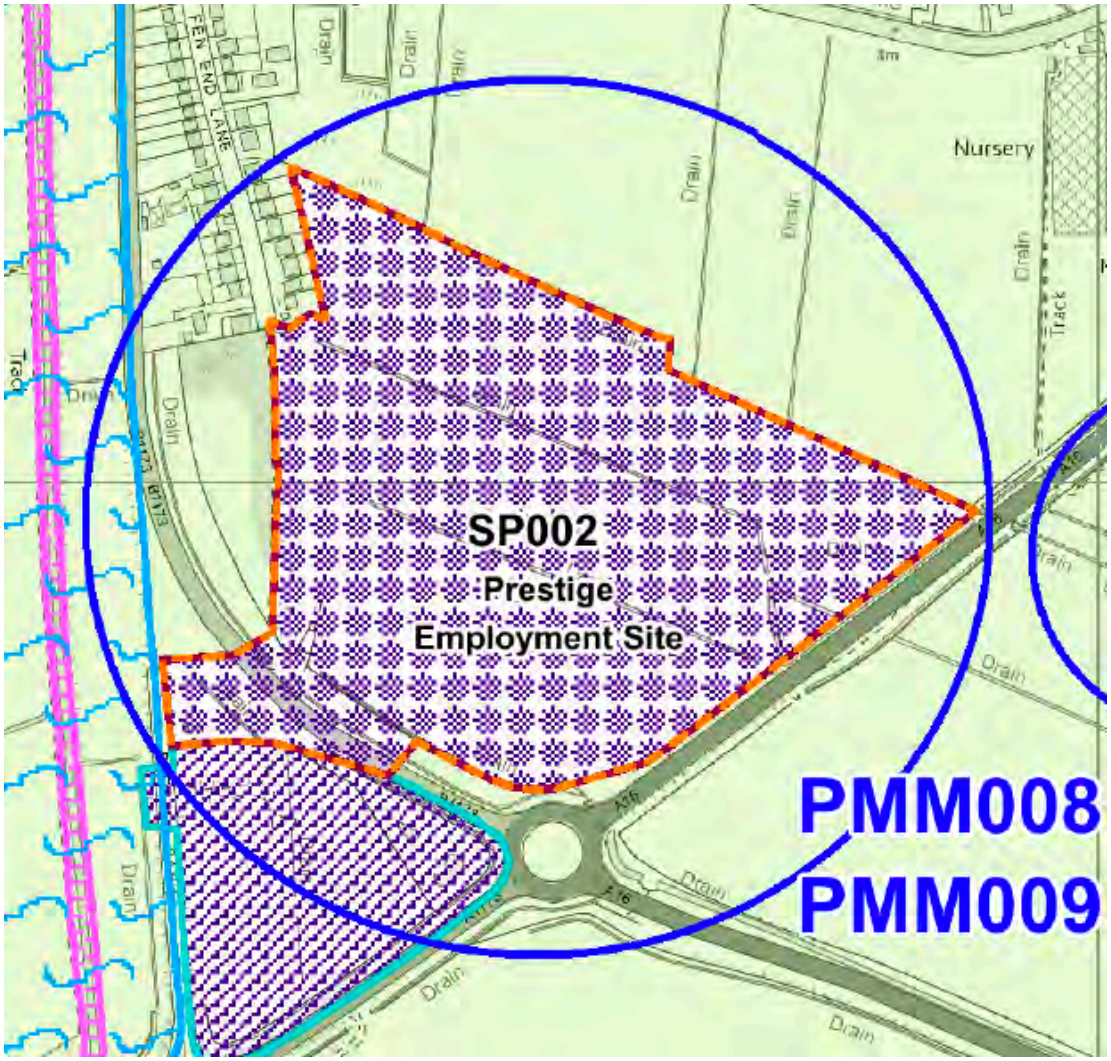


Ashwood Homes' offices, within Site Section B

2.9 In addition to granting outline planning permission, the Council have identified Lincs Gateway business park as a proposed **'prestige employment site'**, and it is proposed as an allocation within their emerging Local Plan. This identifies the southern part of the site as an **'existing mixed use employment site'**, and the northern part of the site as a **'proposed mixed use employment site'**; this is shown in the extract from the Policies Map below. The distinction between the two parts of the site relates to the fact that development is now well advanced on the southern part of the application site, but it is yet to begin within the northern area.

2.10 Draft Policy 7 of the emerging Local Plan allows for various uses within the site, reflecting the existing outline consent. These are B1 (office, research and development, and light industrial), B2 (general indusrial), B8 (storage and distribution), A3 (food and drink), A4 (drinking establishments) and C1 (hotels).

2.11 A new policy was proposed in modifications to the emerging Local Plan, put forward in summer 2018, relating to prestige employment sites. The policy sets out various principles for these sites, including that they should be **'well-designed schemes that deliver high quality development'**, and should incorporate **'landscaping schemes that contribute to a high quality development and where appropriate, mitigate the impacts of the prestige site with neighbouring developments and the open countryside'**.



Extract from the Policies Map for the emerging South-East Lincs Local Plan

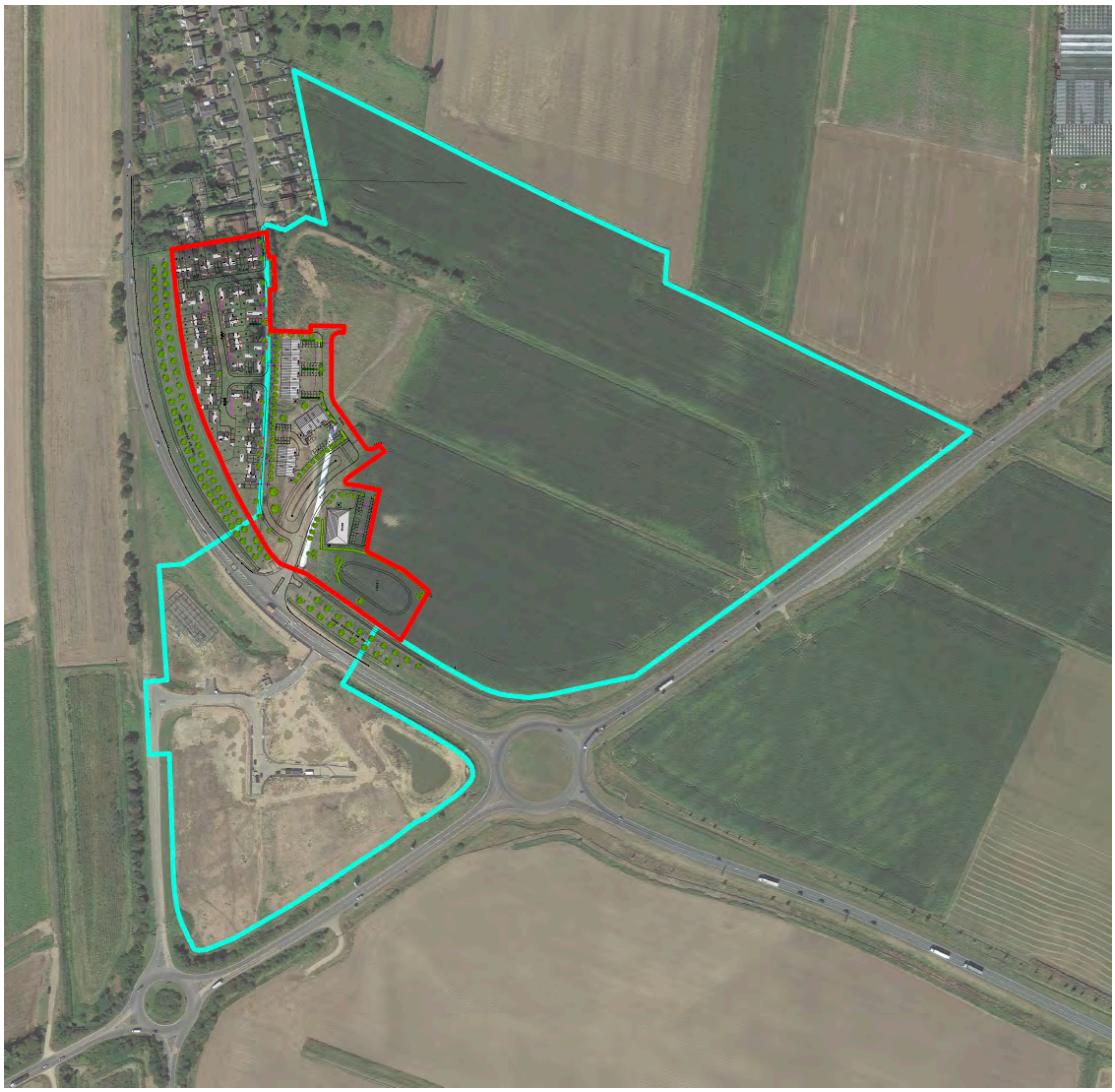
The Application Site

2.12 This planning application relates to only a part of the Lincs Gateway site. The application site contains part of the north-western area of the site, and a further area of land which lies outside of the business park area. It proposes employment uses within the business park area, and residential development on an unused area of land outside of the business park, to the west. This unused area is simply left as open grassland. It lies between a bridleway and the highway verge of the B1173 Cowbit Road.

2.13 The bridleway (identified on the Lincolnshire Definitive Map as Spal/894/1) would remain essentially unaffected by the proposed development. Its route would not be altered, and nor would its width. It would be incorporated into the proposed development. The bridleway provides a useful direct walking route to and from Spalding.

2.14 To the north of the application site is housing on Fen End Lane. Homes at the southern end of the lane present their flank walls to the application site. Their

southern boundary is characterised by mature landscape planting, which would provide visual separation between them and the new housing.



The application site (outlined in red), and proposed development, in the context of the wider Lincs Gateway business park (outlined in light blue)

2.15 The application site was previously agricultural land, but it has not been used for this purpose for a few years. It was left as an island following the grant of planning permission for B8 storage / distribution buildings on the land to the immediate east, in 2005 (application H16-1032-05). Whilst these buildings no longer exist, the most recent having long since been destroyed by fire, the earth bunds which were built to enclose them and mitigate noise do remain. These bunds would in part be removed by the proposed development.

Local Context

2.16 Spalding is accessible from the site via foot or bicycle on the bridleway that passes through the site, making travel without recourse to the motor car a viable alternative.

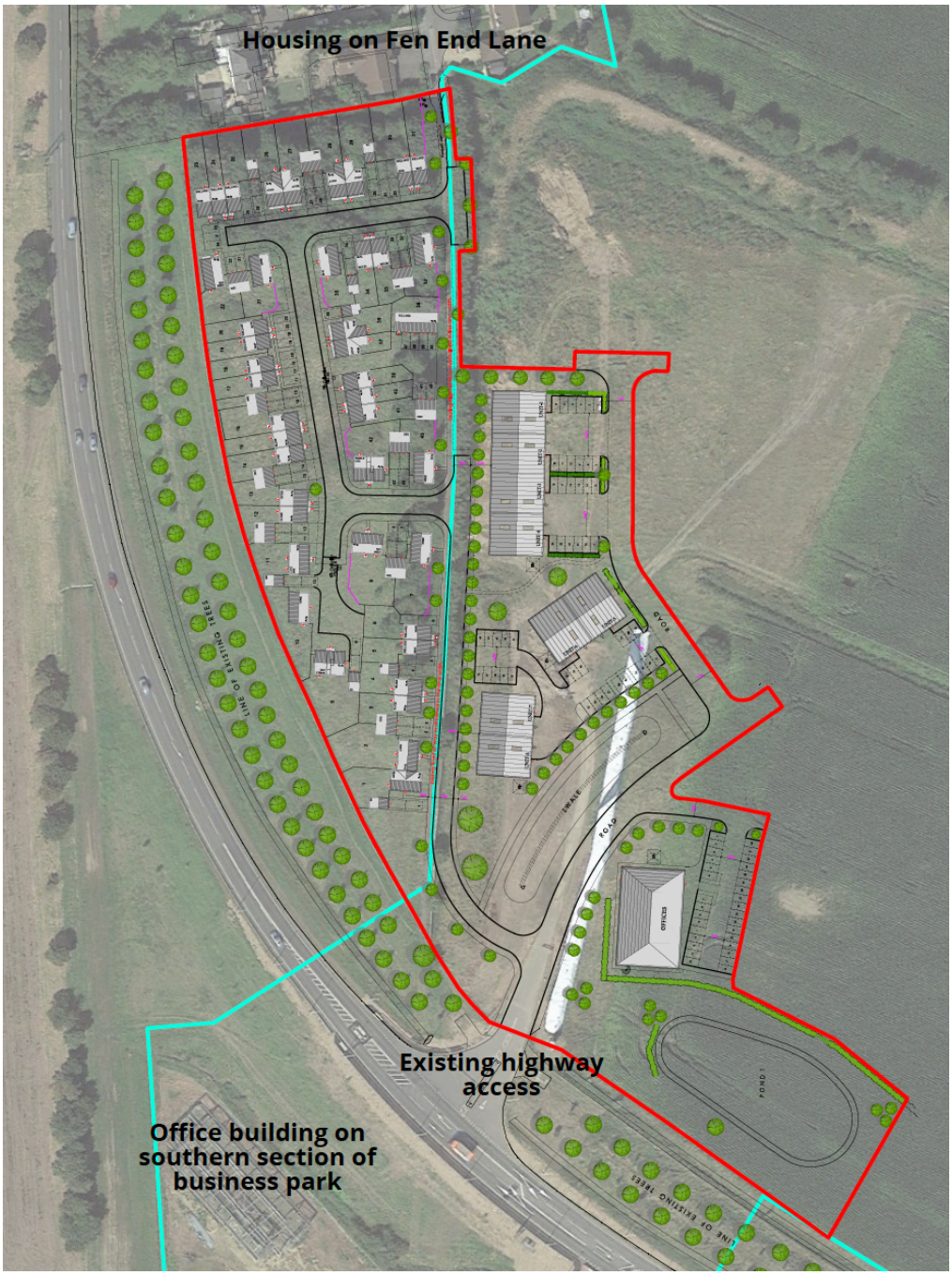
2.17 Within Spalding there are a good range of schools, shops and services, enabling residents most of their needs within the immediate locality. The size of the town and its excellent range of services have seen it identified as a Sub-Regional Centre in the adopted and emerging Local Plans, and it is the primary focus for new development within the District.

2.18 From Spalding, there are rail links to Lincoln and Peterborough. From the latter, fast trains connect to London and stations to Newcastle Upon Tyne.

2.19 Residents would also benefit from the convenience shopping, and food outlets available at the petrol station, and the pub / restaurant, on the southern part of the Lincs Gateway development, allowing them to meet many of their daily needs without requiring a car. Residents will also benefit from the growing number of nearby employment opportunities as the Lincs Gateway site is built out.

3 The Proposed Development

3.1 This full planning application proposes the provision of 43 houses, an office building, and 8 small business units. The commercial development would be located within the business park area, which already has outline planning permission, and is proposed to be allocated as a prestige employment site within the emerging Local Plan. The housing would be outside this area, on a vacant piece of land, and it would not have any material effect on the business park.



The proposed development (red outline), in the context of Lincs Gateway (blue outline)

3.2 The business park area is bounded on its western side by a bridleway. The housing would be to the west of this, and the proposed commercial development to the east. The bridleway itself would not be materially affected, and it would be incorporated into the proposed residential development. Its route and width would remain unaffected.

3.3 Ashwood Homes have been marketing the business park for a few years now. It has become clear during that time that there is a high level of demand for good quality commercial buildings. However, the rental levels which these commercial uses could sustain would be insufficient to fund the construction of new buildings, as well as the high-quality landscaped campus and provision of services and infrastructure. There is a need for seed funding to help get the business park started on the northern part of the site. This need is demonstrated by the Viability Appraisal which has been prepared by Ashwood Homes, and accompanies this application. This shows that the proposed residential development is the minimum required to fund the provision of the commercial buildings.

3.4 The proposed residential development would comprise 12 x 2-bedroom houses, 29 x 3-bedroom houses, and 2 x 4-bedroom houses. This would provide a suitable range of accommodation, which would help to meet the needs of local people.

3.5 The proposed commercial buildings would include a single large office building, with a total floor area of 1,026 sq m. The small business units would each have a floor area of 240 sq. m. they would have a flexible B1 and B8 use. This would allow them to be used for any purpose covered by the B1 use class, which includes offices, research and development facilities and light industrial. They could also include a B8 storage and distribution use. The purpose in giving these units a flexible permission is to ensure that they will be easy to let, and that they will have minimal vacant periods in future years.

3.6 Most importantly, we believe that the proposed development would make a significant contribution towards the establishment of the Lincs Gateway business park. It would begin the process of providing a high-quality landscaped frontage, and a visual presence. It would also pay for the provision of a full range of services within the northern part of the site, which would substantially reduce the cost of providing further business accommodation on adjacent plots in the future.

4 Planning Policy Review

4.1 Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise[1]. The development plan for South Holland District comprises the saved policies of the South Holland Local Plan (2006) and the Lincolnshire Minerals and Waste Plan. In addition, the policies of the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG) constitute important material considerations.

National Planning Policy Framework (July 2018)

4.2 Paragraph 7 states that it is the **'purpose of the planning system is to contribute to the achievement of sustainable development'**.

4.3 Paragraph 8 identifies three overarching objectives to sustainable development: economic, social and environmental, which give rise to three roles for the planning system. The social objective includes a requirement to **'support strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations'**. The environmental objective encourages **'minimising waste and pollution'**, and **'adapting to climate change, including moving to a low-carbon economy'**.

4.4 The fundamental precept of the NPPF is a **'presumption in favour of sustainable development'**. Paragraph 11 states that for decision-taking, this means:

> **'c) approving development proposals that accord with an up-to-date development plan without delay; or**
>
> **d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date granting permission unless:**
>
> **i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or**
>
> **ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies of this Framework taken as a whole.'**

[1] See Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990.

4.5 Footnote 6 clarifies that the policies referred to in d(i) are only those in the NPPF, and not those in development plans. It also clarifies that these are policies relating to various matters including designated wildlife sites, landscapes or Green Belt. the only one of the restrictions mentioned here which relates to the application site is areas at risk of flooding. This is discussed further in Section 5 below.

4.6 Footnote 7 clarifies that relevant policies will be considered out of date where the local planning authority is unable to demonstrate a 5-year supply of deliverable housing sites, or where the Housing Delivery Test is failed. Paragraph 59 notes that it is the Government's objective to significantly boost the supply of homes.

4.7 Paragraph 67 requires local planning authorities to identify a supply of specific deliverable sites for the immediate 5-year period. Paragraph 73 requires local planning authorities to **'identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement'**, plus an appropriate buffer to improve the prospect of achieving the planned supply. This is discussed further in Section 5.

4.8 Paragraph 38 states that **'local planning authorities should approach decisions on proposed development in a positive and creative way'**, and that they **'should seek to approve applications for sustainable development wherever possible'**.

4.9 Paragraph 59 states that **'to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay'**.

4.10 Section 6 of the NPPF relates to 'building a strong, competitive economy'. It contains the following requirements:

> **'80 Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future…'**
>
> **81 Planning policies should:**
>
> **a) Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;**

b) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and

c) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.'

4.11 Paragraph 213 states that **'due weight'** should be given to Local Plan policies **'according to their degree of consistency with this Framework'**.

South Holland Local Plan (2006)

4.12 We set out here the Local Plan policies which we believe are most relevant to the application proposals.

4.13 Policy SG1, General Sustainable Development, states that:

> **'Planning permission for development will be granted where the Council is satisfied that the proposal is consistent with the principles of sustainable development'**.

4.14 In addition, this policy requires new development to comply with three criteria, and these are set out below, alongside the application's response.

Policy SG1 Requirement		**Application Response**
1)	The quality of life for residents is unimpaired or enhanced.	The application proposals would not impair residents' quality of life. The proposed design ensures that there would be no detrimental impact on residents of Fen End Lane. This is discussed further in Section 5.
2)	Reasonable measures have been taken to conserve energy and natural resources.	The proposals would comply with all national requirements for energy efficiency and the use of natural resources.
3)	South Holland's essential character and main environmental assets are not damaged.	The proposals would not result in any unacceptable harm to the District's essential character. The proposed development would be partially screened by existing boundary planting. It forms part of the wider Lincs Gateway site, and would sit next to existing residential development. There would be no material change to the character of the local landscape. There would also be no damage to the District's main environmental assets.

4.15 Policy SG2, Distribution of Development, also sets out criteria with which new development must comply, and these are again set out below, alongside the application's response.

Policy SG2 Requirement		Application Response
1)	Adopt a sequential approach which gives priority to the use of previously developed land and buildings within defined settlement limits, then to greenfield land within defined settlement limits and finally to land adjacent to defined settlement limits.	The application site is greenfield land relating to the main town of Spalding, where is itself the primary focus for development within the District, as the Sub-Regional Centre. The land proposed for commercial development already has outline planning permission for that use. The area proposed for residential development is vacant land without any other useful function. Most importantly, housing is proposed in this location in order to support the provision of commercial development within the business park.
2)	Make efficient use of land.	We believe that the proposed development would makes an efficient use of land. It would provide 43 dwellings, at a net density of around 38 dwellings per hectare. The commercial development would also make an efficient use of land.
3)	Ensure that, wherever possible, development is served by a choice of transport modes including existing public transport or by improvements to public transport infrastructure linked directly to the development and the existing highway network.	The application site is only a half hour walk or a ten-minute cycle from the centre of Spalding, with its good range of shops and services. As discussed in Section 5, below, it is hoped that housing development on this site will contribute to the economic case for a bus stop linking Lincs Gateway to the town centre.
4)	Ensure that the development is acceptable in terms of traffic generation and road safety in the surrounding area.	The proposed development would make use of the new Lincs Gateway access point from the B1173. This access was constructed by the Highway Authority to modern standards, and it has a high capacity. It would be able to accommodate traffic from the application site, and the business park, as discussed in Section 7.

4.16 Policy SG3 identifies Spalding as the 'Main Town', at the top of the settlement hierarchy, and the preferred destination for new development within the District.

4.17 Policy SG4, Development in the Countryside, concerns development proposals which are located beyond defined settlement limits. It states:

'Planning permission will only be granted for development in the open countryside which is essential in the proposed location and cannot reasonably be accommodated within defined settlement limits. Development proposals that would result in an unacceptable impact upon the landscape character of an area, either individually or cumulatively, will only be permitted where:

1. **the need for the development in that location outweighs its impact; and**

2. **no other site or solution exists to accommodate the proposed development.'**

4.18 Policy SG7, Energy Efficiency, requires new developments to achieve maximum efficiency through site design and orientation. The proposed development would provide energy efficient new homes and commercial buildings, which would meet the essential requirements of this policy.

4.19 Policy SG11, Sustainable Urban Drainage Systems (SuDS), concerns the application of surface water drainage measures, where appropriate and relevant. The application proposals include the use of SuDS, and the requirements of this policy would be met. Policy SG12 concerns foul sewerage. The proposed development will be connected to the main sewerage network, the preferred option of SG12. These matters are considered further within the Flood Risk Assessment by ARP and Drainage Strategy by Millward, which accompanies this application.

4.20 Policy SG13 constrains polluting and contaminating development. The application proposals will be neither polluting nor contaminating.

4.21 Policy SG14 seeks to protect the character and appearance of the local area through design and layout. As the drawings which accompany this application illustrate, the site can comfortably accommodate the proposed development, whilst maintaining a good standard of amenity for both new and existing residents. This matter is further discussed in Section 6, below.

4.22 Policy SG15 requires safe and convenient access to the site for pedestrians, cyclists, disabled people and motor vehicles. Pedestrians and cyclists will have access to the site from the vehicular entry point, via pavements, which will continue throughout the site. These pavements will also be built to modern standards, and would, for instance, be wide enough to accommodate wheelchairs. Dropped kerbs and tactile can be provided for wheelchair access, and these matters will be determined at the detailed design stage. Pedestrians and cyclists will also be able to access the site from the bridleway, which enters the site from the north, and connects it with central Spalding.

4.23 Policy SG16 requires car and cycle parking to be provided to acceptable levels. We understand that the District Council, are currently working to the standards published by Lincolnshire County Council, albeit they have been withdrawn. The application proposals have been designed to meet these requirements, and this

is considered further in Section 7. Gardens and garages will also be of sufficient size to incorporate secure cycle storage.

4.24 Policy SG17 states that planning permission will be granted for development which would not cause material harm to residential amenity. It requires various issues to be taken into account, which are set out below alongside the application's response.

Policy SG17 Requirement	**Application's Response**
The extent of any overlooking or loss of privacy.	The proposed development would not result in any unacceptable overlooking or loss of privacy. This is discussed further in Section 6.
The extent of any overbearing or overshadowing effect.	The proposed development would not result in any unacceptable overbearing or overshadowing; this is also considered further in Section 6.
Potential noise nuisance including that associated with vehicular activity.	There would be negligible additional noise for residents of Fen End Lane, as demonstrated by the report by Spectrum Acoustics which accompanies this application this matter is also considered further in Section 5.
The levels of smell, emissions and pollutants.	The proposed development would not create any unacceptable levels of odour, emissions or pollution. The use classes proposed (B1 and B8) would not result in any such effect. This is also discussed further in Section 5.

4.25 Policy SG18 requires major developments to incorporate a landscaping strategy. The proposed development has been designed to comply with the strategy which was set out in relation to the business park in relation to the previous outline application. this is discussed further in Section 6.

4.26 Policy H8 requires affordable housing to be provided at the rate of 33% of new units. We are aware that the Council are now only seeking 25% affordable housing , in line with the evidence which accompanies the emerging Local Plan. However, Policy H8 also allows for a lower provision to be made, where this is necessary in order to ensure the proposed development would be financially viable. Where this is the case, the application must be accompanied by evidence which demonstrates **'affordable housing at the level normally expected would impair the viability of the scheme and that the level proposed is the most that is achievable'**. This application is accompanied by a Viability Assessment by Ashwood homes which meets the requirements of this policy.

4.27 Policy EC3, Existing Employment Areas / Premises, states that:

'Proposals for new development, redevelopment and changes of use for employment uses within existing employment curtilages and / or proposals for the expansion of existing employment undertakings will be permitted provided they are acceptable in terms of environmental impact, the level of traffic movement and intrusion into the open countryside.'

Emerging South-East Lincolnshire Local Plan

4.28 The emerging South-East Lincolnshire Local Plan will in time replace the current adopted South Holland Local Plan. It will cover the areas of both South Holland District and Boston Borough. The emerging Plan has been examined and main modifications published, following the initial rounds of the examination hearings.

4.29 As we have noted in Section 2 the emerging Plan identifies the Lincs Gateway business park as a mixed use employment area, and a prestige employment site. It is a site which is important to the strategy for the provision of employment within South Holland and the wider area over the Plan period.

5 Material Planning Considerations

Lincs Gateway

The Need for the Business Park

5.1 South Holland District Council granted planning permission for the business park on the basis that it would offer something different in terms of employment within the area. It was also recognised that the diversity of types of employment which are envisaged would help to diversify and grow the local economy, and that this could lead to both economic and social benefits.

5.2 The site's key attribute is its location, and its visibility to traffic arriving in Spalding – hence the name. It is the first part of the town visible to traffic heading north from Peterborough and east from Stamford and the A1. The proposed development was always intended to provide a high-quality gateway to the town, with a distinctive landscaped frontage. Behind that is to be a landscaped campus-style park, accommodating a range of employment uses.

5.3 The rationale for the business park was developed by economic consultants SQW, who had previously worked for Lincolnshire County Council on the Lincolnshire Business Accommodation Study in 2009. They are renowned and independent consultants, who have more recently undertaken projects which include supporting the National Infrastructure Commission in their final report on the Cambridge - Milton Keynes - Oxford Arc. Their report for the planning application, Economic Case for the Proposed Lincs Gateway Business Park, Spalding, concluded as follows:

- The proposals for Lincs Gateway would meet a need for new business accommodation in the area, which could not be met on alternative sites.
- Without site a such as this, it would be difficult to attract new jobs to the town, and to diversify the range of jobs available. Lincs Gateway would provide accommodation of a type and quality which cannot be provided elsewhere in Spalding and the surrounding area.
- Without Lincs Gateway, it is also likely that the town would lose jobs to competing centres, such as Peterborough and Stamford, due to a lack of suitable accommodation.
- A need was identified for supporting facilities for business, including good quality hotel accommodation, a pub and a conference centre. It was also found that there would be a particular benefit in providing this type of supporting development in close proximity to the business park, as it would help to attract end users who previously tended to travel to Peterborough for hotel and conference facilities; in this way it would reduce the leakage of business opportunities out of the District to other areas.

- Lincs Gateway would provide new opportunities for skilled workers, which do not currently exist in great numbers within this area. This was seen as something which could help retain young people in the area, bucking the trend whereby those with the best skills and education tended to move elsewhere in search of better prospects.

5.4 The SQW report concluded as follows:

> **'These benefits are closely related to the 'Gateway' location and the proposed quality of development. There is potential to create a strong visual presence at the site, with good accessibility into Spalding, across to Peterborough and further afield. As with any such scheme, there are inherent risks, but opportunities will be created for new investment and economic growth in Spalding, especially in the medium term and beyond, which are otherwise unlikely to be realised.'**

5.5 The Council accepted these arguments when granting outline planning permission. They particularly welcomed the potential which the site would provide to generate new jobs, help retain jobs within the area, and diversify the economy. They also recognised that the site's gateway location was justified. The Council's support has continued, with their identification of the site within the draft Local Plan.

5.6 A previous consultation draft of the Local Plan embraced the site's potential, identifying it as a Prestige Employment Site, and noting that it had been identified because of its **'strategic economic importance, attractiveness to the market, and... ability to accommodate business clusters and high-value employment which could stimulate economic growth, diversify the local economy and help reduce unemployment particularly in the area's deprived wards'**[2].

Future Proposals for the Business Park

5.7 Detailed proposals are being prepared for the business park, and will be the subject of a future planning applications. In developing the northern part of the site, it is most cost-effective to begin close to the existing highway access, and build out across the site. The Proposed Site Plan reflects this, showing not only the proposed commercial buildings, but also the indicative form of further development which will spread out across the site's main road frontage. It is envisaged that these buildings would most likely be in B1(a) office use, whilst other types of employment accommodation will also be provided within the site under future proposals.

5.8 New office accommodation would be likely to serve the needs of various end users. Given the interest in the site to date, it is envisaged that the end users for offices within the site will comprise a mixture of tenants looking for relatively

[2] *South East Lincolnshire Local Plan, Draft for Publication*, paragraph 4.1.8 (January 2016).

large premises, and an element of serviced offices for small and medium-sized companies and individuals.

5.9 Following the first phase of development, it is envisaged that a larger office building would be provided, which would also incorporate a conference and function centre.

The Need for Enabling Development

5.10 There have been many expressions of interest in the business park, from a range of parties. This has included interest in offices, storage / distribution and industrial units, and for accommodation of a variety of sizes. The principal difficulty in taking the site forward lies in the cost of establishing the first development on the northern part of the site. It is necessary to construct new roads and install services to service the development, as well as providing high quality landscaping. At this stage, the greatest interest is in taking on premises which have already been built. However, the application proposals would also help to enable the future provision of serviced building plots for potential end users.

5.11 The provision of funding from residential enabling development would significantly speed up the delivery of employment development within the business park. It would allow Ashwood Homes to offer both serviced land parcels and built accommodation to the market, greatly increasing the range of potential end users. This would in turn help to establish the northern part of the site as an existing employment location, which it is anticipated could lead to a snowball effect, whereby it becomes progressively more attractive to the market as it becomes more established.

5.12 The risk of delaying the delivery of the business park is both that the benefits it can bring will themselves be delayed, and also that opportunities to capture and retain businesses within the area would be missed. Competing areas would potentially be able to retain a larger share of the potential market for new business premises and the types of employment which Lincs Gateway aims to capture. Once companies have made the decision to locate elsewhere, it is far less likely that they would then relocate to Spalding. In addition, the benefits that the Lincs Gateway business park can bring to the area will take some time to be delivered, and to have their full economic and social effects.

5.13 Delaying the delivery of the Business Park now may also mean that the objectives of the emerging Local Plan may not be fully realised within the Plan period. This includes Strategic Priority 4, which includes a requirement to **'strengthen the economic base of South East Lincolnshire to meet the needs of existing businesses'**, and to **'attract new businesses and sources of local employment'**. It is clear that the Lincs Gateway business park would make a valuable contribution towards meeting these objectives.

The Proposed Employment Development

5.14 The proposed employment development is intended to be the first part of the development of the wider business park. It would begin the provision of the landscaped frontage which has been a key part of the proposals from their inception. This would include a balancing pond, and landscape planting, with a generous belt of land at the site's prominent road frontage, to provide the setting within which new office buildings would be seen.

5.15 The application proposals would also provide a range of accommodation, which could meet the needs of several different end users. The office building could provide accommodation either to one large company, a couple of medium-sized ones, or many small businesses. The latter may take the form of a serviced office building, of which there is a very limited supply in the local area. This type of accommodation can be particularly valuable to small and start-up businesses. This type of business can in turn help to provide diversity in the local economy, and can help enable dynamic future growth. Without suitable accommodation many such businesses may be forced to relocated to other areas, or would not be attracted to the Spalding area.

5.16 The small business units have been designed with the intention that they would be sufficiently flexible to allow them to accommodate a range of different potential uses. These could include a light industrial use, with a workshop space on the ground floor and ancillary office accommodation. They could also accommodate a research and development use, where small on-site design and production facilities would be required, in addition to ancillary offices. Similarly, they could potentially be converted into an office use. All of these uses would come under the heading of a B1 use. They are also well suited to a B8 storage and distribution use, which would make use of their generous internal space.

5.17 Planning permission is sought for both a B1 and a B8 use. This would allow the individual business units to be used for different purposes, and for their uses to change over time. As we have already noted, this is intended to ensure that the units can be let quickly, and to reduce the possibility that they will become vacant in the future.

The Need for Housing

The Deliverable Supply of Housing Land

5.18 There is a substantial need for housing within South Holland District. It is common ground between the Council and the Applicant that the Council is unable to identify a 5-year supply of deliverable housing land, plus the appropriate buffer in accordance with the requirement of paragraph 73 of the NPPF. Whilst this remains the case, we do not consider it necessary to provide detailed evidence in this regard. However, should the Council's position on this matter change, we reserve the right to comment further, as we may consider is necessary.

5.19 We do note however that the way the 5-year supply of deliverable housing land is measured has changed with the publication in July 2018 of the new NPPF. This changed the definition of a **'deliverable'** site, i.e. a site which can be considered to make a contribution towards the 5-year supply of housing land. The NPPF 2012 defines this word in footnote 11, as follows:

> **'To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.'**

5.20 The NPPF 2018 defines deliverable in its glossary, as follows:

> **'To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.'**

5.21 This definition requires a different approach to the assessment of sites than the approach which emerged from case law under NPPF 2012, most notably In *St Modwen Developments Limited -and (1) Secretary of State for Communities and Local Government Defendants (2) East Riding of Yorkshire Council* - [2017] EWCA Civ 1643; a case that has been the subject of deliberation by both the High Court and the Court of Appeal. In the original judgment on **'the approach to "deliverable" sites'**, Ouseley J. said:

> **'51. In my judgment, the Inspector made no error of interpretation of the NPPF at all. The NPPF and the assessment of housing land supply are concerned with "deliverability", which is an assessment of the likelihood that housing will be delivered in the five year period on that site. The assessment of housing land supply does not require certainty that the housing sites will actually be developed within that period. The planning process cannot deal in such certainties. The problem of uncertainty is managed by assessing "deliverability" over a five year period, re-assessed as the five year period rolls forward. The Inspector was**

simply recognising that there is that difference, and her focus had to be on deliverability, which was not disproved by showing that there were uncertainties. All this was very much a matter of degree for her.

52. There are many reasons why the difference may exist: the assumed production rates off large sites may be too high for the market, though that does not seem to have been an issue here; the building industry's infrastructure, skilled labour, finance, and materials, may not be geared up to the assumed rate; and the market may not wish to build or buy houses at the assumed rate of delivery; mortgage funds may not be available for those who would wish to buy. As Mr [Paul] Tucker [Q.C.] pointed out, the local planning authority can only do so much that is to maintain a five year supply of deliverable housing land. The market, comprising house builders, finance and purchasers, has to do the rest. I reject this aspect of ground 1; the Inspector made no error of law.'

5.22 Under the previous definition of delivery there was, according to the above interpretation, no requirement that sites would actually deliver any completions within the 5 year period. In the appeal court judgment, Lord Justice Lindblom explained the position further:

'35. That is the context in which this issue in the appeal has to be considered. It lends an air of inconsequence, even unreality, to the argument put forward. But in any case, as was submitted both by Mr Richard Honey for the Secretary of State and by Mr Tucker for the Council, the argument itself is mistaken. Its fatal defect lies in its misreading of the policy in paragraph 47 of the NPPF. It misses the essential distinction between the concept of deliverability, in the sense in which it is used in the policy, and the concept of an "expected rate of delivery". These two concepts are not synonymous, or incompatible. Deliverability is not the same thing as delivery. The fact that a particular site is capable of being delivered within five years does not mean that it necessarily will be. For various financial and commercial reasons, the landowner or housebuilder may choose to hold the site back. Local planning authorities do not control the housing market. NPPF policy recognizes that...

38. The first part of the definition in footnote 11 – amplified in paragraphs 3-029, 3-031 and 3-033 of the PPG – contains four elements: first, that the sites in question should be "available now"; second, that they should "offer a suitable location for development now"; third, that they should be "achievable with a realistic prospect that housing will be delivered on the site within five years"; and fourth, that "development of the site is viable" (my emphasis). Each of these considerations goes to a site's capability of being delivered within five years:

not to the certainty, or – as Mr Young submitted – the probability, that it actually will be. The second part of the definition refers to "[sites] with planning permission". This clearly implies that, to be considered deliverable and included within the five-year supply, a site does not necessarily have to have planning permission already granted for housing development on it. The use of the words "realistic prospect" in the footnote 11 definition mirrors the use of the same words in the second bullet point in paragraph 47 in connection with the requirement for a 20% buffer to be added where there has been "a record of persistent under delivery of housing". Sites may be included in the five-year supply if the likelihood of housing being delivered on them within the five-year period is no greater than a "realistic prospect" – the third element of the definition in footnote 11 (my emphasis). This does not mean that for a site properly to be regarded as "deliverable" it must necessarily be certain or probable that housing will in fact be delivered upon it, or delivered to the fullest extent possible, within five years. As Lord Gill said in paragraph 78 of his judgment in Suffolk Coastal District Council, when referring to the policies in paragraph 47 of the NPPF, the insistence on the provision of "deliverable" sites sufficient to provide five years' worth of housing reflects the futility of local planning authorities relying on sites with "no realistic prospect of being developed within the five-year period".'

5.23 The previous definition made clear that there was no requirement for any certainty or even probability that a site would deliver dwellings, all that had to be demonstrated was a **'reasonable prospect'**, which was a modest test.

5.24 The new definition is materially different and contains a much more robust test of deliverability. It identifies that certain types of site should be assumed to be deliverable. These are:

a) Sites which are not major sites (under 10 dwellings); or
b) Sites with detailed planning permission – unless clear evidence indicates otherwise.

5.25 The new definition also identifies further types of sites that maybe considered deliverable if there is **clear evidence** that housing completions **will begin** on site within five years. These sites are:

a) Sites with outline planning permission;
b) Sites with permission in principle;
c) Sites that are allocated in the development plan; or
d) Sites identified on a brownfield register.

5.26 For the above sites to be included as deliverable within the five-year period, it requires the Council to produce clear evidence that housing completions will begin on the site within five years. This is a significantly different test to that in

NPPF 2012, which does not require the Council to demonstrate that completions are likely or are probable within the next five years. The test in NPPF 2018 is now to clearly demonstrate completions will actually occur. Such an interpretation is fully consistent with the Government's objective of significantly boosting the supply of homes, as opposed to boosting the supply of land allocated for housing. It should also be noted that sites, such as those identified in the SHLAA or proposed allocations in emerging Local plans, are not included in the definition of deliverable sites for the purposes of NPPF 2018, including the calculation of the five-year land supply.

5.27 In light of this, we believe that the Council will struggle to defend appeals which relate to whether it can demonstrate a 5-year housing land supply. A very large part of the Council's identified housing land supply relates to sites which are either allocations proposed by the emerging Local Plan, or which have outline planning permission. As such, we believe it is clear that there is not currently a full 5-year supply of deliverable housing land within the District.

Housing Delivery Test

5.28 The Government introduced a new housing delivery test within the NPPF 2018. This considers the amount of housing which has been built over the preceding 3-year period, in comparison with the level of housing required. Whilst the Government has not yet published the results of this test (as the NPPF suggested they would in November 2018), the results can nevertheless be calculated. The level of delivery for South Holland has been calculated at 70.7%[3] of the level required. This indicates a substantial under-supply in the provision of housing. In this context, it is particularly important that the level of housing provided should be boosted, by permitting the provision of additional housing.

Affordability

5.29 The deficit in the supply of housing is longstanding, and this has adversely affected the affordability of housing. The table below[4] sets out the ratio of lower-quartile house prices to lower-quartile incomes, which reflects the actual affordability of housing in an area, for those most in need of suitable homes.

5.30 This table demonstrates that housing has been becoming significantly less affordable in South Holland District over the last 20 years, and this trend appears to be accelerating. It shows that people on lower quartile incomes would need to raise a mortgage of nearly 8 times a typical lower quartile salary in order to buy a house. As such, housing is clearly unaffordable to those on lower incomes, and this situation is becoming worse. This in itself demonstrates the continuing need for as much housing as possible, in order to reverse this trend and make housing more easily accessible for all; the only way of addressing the affordability of housing in the long term is to increase supply, to better meet demand.

[3] https://www.planningresource.co.uk/article/1519164/councils-set-face-sanctions-housing-delivery-test

[4] Information taken from '*Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2017*', Office for National Statistics (26th April 2018).

5.31 The table shows a dip following the recession which began in 2008. This does not imply that the affordability of housing improved, only that its price dropped. This was in response to a lack of demand, due to people being unable to access credit for mortgages. The underlying need and demand for housing did not dissipate in this time and it has helped to fuel a rise in recent years to a level which is comparable to the situation prior to the recession. This rise is itself an indication of an imbalance between supply and demand. It is now higher in South Holland than the national average, indicating that the imbalance is particularly acute here.

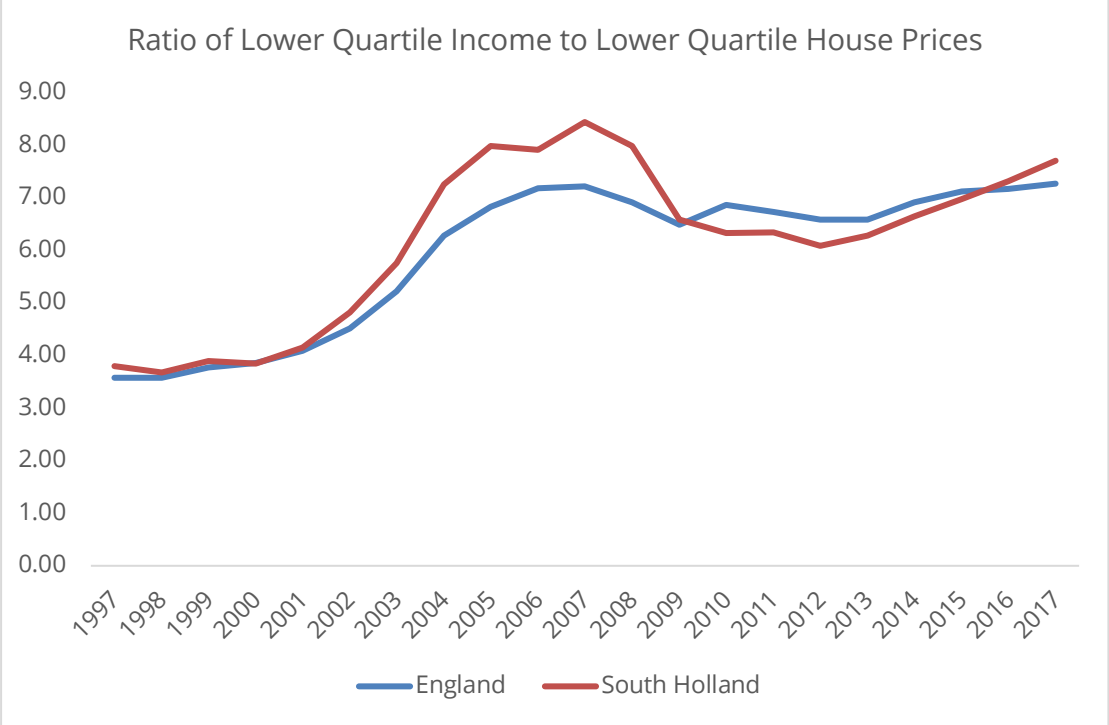


Table showing the relative affordability of housing in South Holland when compared with the national average

5.32 In this context, the housing which would be provided by the application proposals is very valuable. It is only where the supply of housing is increased that affordability can be stabilised in the long-term.

Relationship Between Residential and Commercial Areas

5.33 We believe that all of the uses proposed by this application would be suitable in the area proposed. The B1 use class is by definition appropriate within residential areas, and so for instance light industrial uses are those which would not cause noise and disturbance to the housing. Similarly, a storage use is not by its nature noisy. The greatest source of potential noise is likely to come from vehicles and fork-lifts manoeuvring. These and any other potential sources of noise have been considered in the report by Spectrum Acoustics which accompanies this application. This demonstrates that the proposed development would not cause any unacceptable impact on the nearby residential properties through noise generated on the site.

5.34 The report by Spectrum Acoustic also demonstrates that any noise generated by future commercial development on the business park can be mitigated and brought to an acceptable level, and that it would not harm the amenity of the new or existing residents.

5.35 It is also a material consideration that the Council have already concluded that it is acceptable to grant planning permission for the business park, despite the proximity of housing on Fen End Lane. The new housing proposed would have no greater limiting effect on the development of the remainder of the business park than this existing housing. It has already been accepted that future reserved matters applications for development on the business park would need to be accompanied by an assessment of the effect of that noise on the housing on Fen End Lane. Such a report would need to factor in the proximity of both this existing housing and the further new housing which is now proposed. The original planning permission contained the following conditions in this respect:

'15 As part of any reserved matters application for a building for use within Class B2 or B8 details of the exact use shall be provided and an acoustic survey shall be carried out in accordance with BS4142 (as amended) together with details of any necessary mitigation measures and sound insulation of the building and a report shall be submitted to the local planning authority assessing the impact of noise upon existing dwellings abutting the employment site and fronting Fen End Lane. Noise from the use of the buildings shall not exceed the pre-construction background noise levels, when measured at any residential boundary not within the applicants' control, by more than 5 dB(A) when measured as a 15 minute LAeq. Any such measures shall be approved in writing and all works shall be carried out in accordance with the approved scheme(s) and shall be undertaken prior to the use commencing and the mitigation measures shall thereafter be retained.

Reason: To safeguard the amenities of nearby residents. This Condition is imposed in accordance with Policy SG17 of the South Holland Local Plan 2006.

16 Noise from fixed plant and machinery shall not exceed the background noise level by more than 5 dB(A) when measured as a 15 minute LAeq at any residential boundary not within the applicants' control.

Reason: To safeguard the amenities of nearby residents. This Condition is imposed in accordance with Policy SG17 of the South Holland Local Plan 2006.

17 No buildings shall be erected or any other form of development shall take place within 40 metres of the boundary of any residential property in Fen End Lane.

Reason: To safeguard the amenities of nearby residents. This Condition is imposed in accordance with Policy SG17 of the South Holland Local Plan 2006.'

5.36 We believe that these conditions will not only protect the amenity of the residents of Fen End Lane, but also the residents within the new houses proposed. We also note that no mention is made of the need for an assessment of noise generated by the B1 use class, which further demonstrates that this use is acceptable within close proximity to residential properties.

5.37 Similarly, the B1 use class would preclude any use which would generate odour or pollutants which would be unacceptable in close proximity to residential development. A B8 use would also not generate any such effect. As such, the proposed development would be acceptable within its context.

Environmental Sustainability

Potential Biodiversity Gains

5.38 The application proposals provide an opportunity to enhance the environmental sustainability of the application site. This land is currently partly in use as intensively managed agricultural land. The vacant part of the site is largely left to grassland, but is regularly cut to ensure it does not become unkempt. The site does not provide any valuable habitat for local wildlife.

5.39 The application proposals represent an opportunity to provide a net gain in biodiversity within the site. They would provide substantial new areas of landscape planting throughout the site, but particularly at its frontage; these would be in native species, and would replace trees lost in order to accommodate the proposed housing. At the site's frontage would be a new balancing pond, which would help to provide a further different type of habitat. In addition, the development could be enhanced with the provision of other measures such as bird and bat boxes. We anticipate that any such enhancements could be secured through the use of a planning condition.

Sustainable Transport

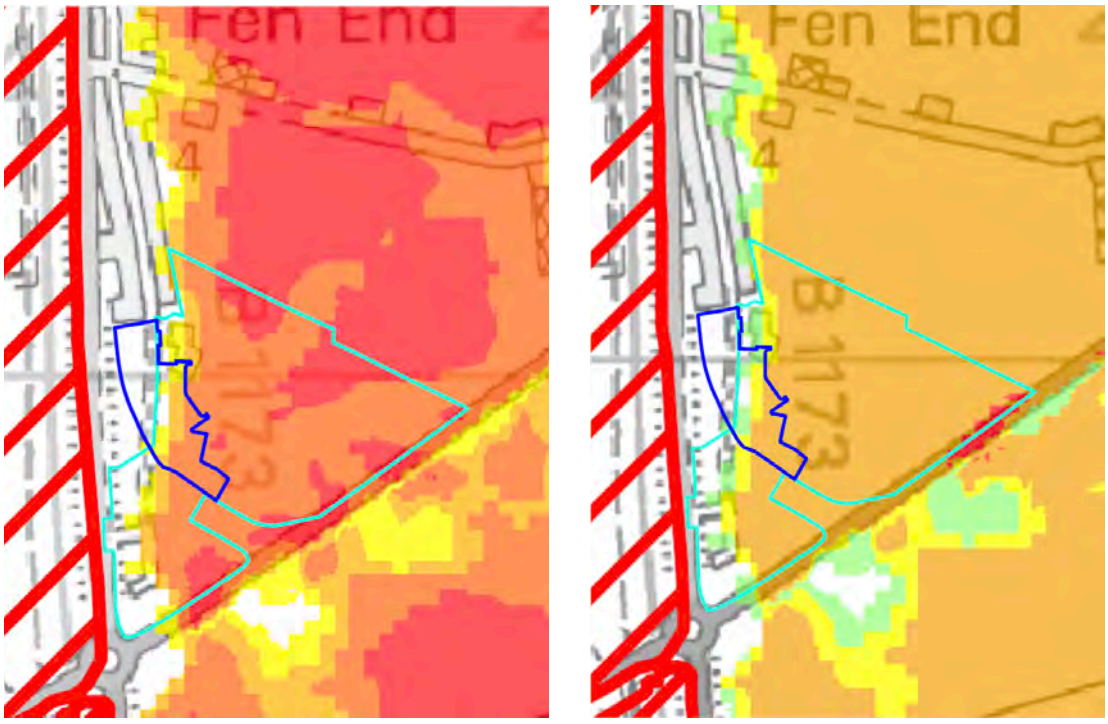
5.40 The provision of residential development next to Lincs Gateway business park would help to provide greater demand for sustainable transport from the site. It has always been envisaged that when the business park is fully developed, it could attract a new bus service. At that stage it is anticipated that the business park as a whole could provide employment for around 2,000 – 2,500 people. These people would create a demand for peak-hour trips to and from the site. Residential development would provide a different pattern of trips, which are more likely to be spread out throughout the day, and which will also be in the opposite direction, for instances heading towards the town centre rather than away from it. These additional trips could significantly improve the business case for a future bus connection to the site.

5.41 The provision of housing within close proximity to employment also provides the opportunity for people to live and work within a small area, where they would not need to drive to work. This would be the most sustainable form of transport, The proximity of convenience shopping, cafés and a pub / restaurant within the southern part of the Lincs Gateway site would further reduce the need for people to drive to meet their everyday needs.

Flood Risk

5.42 The application site lies within Flood Zone 3, as defined on the Environment Agency's Flood Map for Planning. As such, it is necessary to consider the sequential and exception tests in order to determine that the proposed development is acceptable in principle. However, we note that the application site is not unique in lying within Flood Zone 3, in accordance with the Environment Agency's Flood Map for Planning. The same is also true of the majority of the town, and much of the wider District.

5.43 It is necessary to consider the risk of flooding occurring on the site, as shown within the Council's Strategic Flood Risk Assessment 2017 (SFRA). This shows that the part of the application site on which housing is proposed is in fact at a lesser risk of flooding than many other areas, as can be seen in the extracts from the SFRA mapping for the year 2115, shown below:



SFRA mapping showing flood depth (left) and hazard (right) for the year 2115

5.44 We have superimposed outlines of the application area boundary (dark blue) and wider Lincs Gateway site (light blue) on the above extracts from the SFRA mapping. The area proposed for housing is on the left of the image, in the triangle of land within the dark blue line and outside the light blue line. On both maps, this area is not coloured. This indicates that it is not considered to be at risk of flooding. The SFRA mapping is more detailed than that of the Environment

Agency's Flood Map for planning. As such, we believe that this is a suitable location for residential development, with regard to flood risk.

5.45 The matter of the sequential test has already been considered for the Lincs Gateway business park. At the time of the original outline application, it was argued that the fact that the business park had to be located here meant that it could not realistically be accommodated elsewhere. The Council accepted this argument in granting planning permission. Furthermore, the Council's proposal to allocate this land for employment use in the emerging Local Plan follows a further exercise, which has again concluded that the proposed business park passes the sequential test.

5.46 As the residential part of the site is not at risk of flooding, it is not necessary to consider the exceptions test further in that regard. With regard to the business park, the Council also concluded that it passed this test when considering the original outline planning permission. Nevertheless, this matter is also considered in the Flood Risk Assessment by ARP, which accompanies this application.

The Presumption in Favour of Sustainable Development

5.47 The presumption in favour of sustainable development is set out at paragraph 11 of the NPPF. With regard to part (c) of that paragraph, it is clear that the development plan is not up to date, in as far as it relates to this application. This is partly due to the age of its policies, and the fact that they are based on out of date national policy. The development plan's policies are also specifically considered out of date due to the substantial shortfall in the supply of deliverable housing land.

5.48 With regard to footnote 6 policies, a previous ruling of the High Court[5] has clarified that these matters should be considered first, and if the relevant policy tests are met (as they are in this case), the presumption can be applied. We have noted above that the proposed development would comply with the relevant policy considerations relating to flood risk.

5.49 In this context, part (d) of paragraph 11 must be applied. This states that permission should be granted unless there are either policies within the NPPF which indicate development should be restricted (footnote 6 policies), or **'any adverse impact of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework as a whole'**.

5.50 We believe it is clear that there are no policies within the NPPF which imply that permission should be refused in this case. As such, the presumption in favour of sustainable development applies to this application. We respectfully request that the application should be approved without delay.

[5] Secretary of State vs Forest of Dean Council and Gladman Developments Ltd [2016] EWHC 421 (Admin).

6 Design

Pre-Application Discussions

6.1 The applicant has discussed these proposals with the Council's Head of Planning, who has provided encouragement, on the assumption that the proposed residential development can be shown to be necessary to support the provision of employment on the northern part of the business park. We believe that this statement, and the accompanying Viability Assessment by Ashwood Homes, establish this is indeed the case.

Use

6.2 The proposed development would include new housing in C3 residential use within the western part of the site. Within the eastern part of the site, which relates to the Lincs Gateway business park, B1 accommodation would be provided, in a large new office building, and individual business units which could be used for a range of uses, which could also accommodate B8 storage and development. Further details are set out in Sections 3 and 5 above.

Amount

6.3 The proposed development would include 43 houses, which would be in a range of sizes comprising 12 x 2-bedroom houses, 29 x 3-bedroom houses, and 2 x 4-bedroom houses.

6.4 The proposed commercial buildings would include a single large office building, with a total floor area of 1,026 sq. m. The industry standard employment density for offices providing professional services is 1 job per 12 sq. m[6]. This implies that the proposed office space could provide around 86 jobs.

6.5 8 small business units are proposed, each of which would have an internal floor area of 240 sq. m. The number of jobs these units may accommodate will depend on their uses. The same employment density matrix suggests that research and development use would provide 1 job per 40 – 60 sq. m. A light industrial use would provide 1 job per 47 sq. m. A storage / distribution use would provide 1 job per 70 sq. m. These density ranges suggest the 8 units could together provide in the region of 27 to 48 jobs.

[6] See the *Employment Density Guide, 3rd Edition*, Homes and Communities Agency (November 2015).

Layout

6.6 The site would be laid out in two sections, divided by the central line formed by the existing bridleway. This bridleway would not be materially affected by the development, as its route and width would not be altered.



The proposed site layout

6.7 To the east of the bridleway would be the employment development, within Lincs Gateway business park. To the west would be the residential development. The two uses would have a suitable separation distance between them, the character of which would be enhanced by new landscape planting.

6.8 Both elements of the development would be accessed from spur roads, which would themselves lead off the existing highway access to the business park.

6.9 The layout of the proposals has been carefully considered, to ensure it would preserve the principles set out at the point of the original outline planning permission. These include the need for a spacious, landscaped campus, and space for generous new landscape planting.

6.10 The proposed layout, shown above, also shows an indication of the way this would be continued within the site in the future. This includes further office accommodation along the frontage of the Lincs Gateway site. However, this additional accommodation remains indicative at this stage, and only the development within the red line application boundary is actually proposed by this application.

6.11 The new housing would have a suitable relationship with the existing housing on Fen End Lane. The new housing would sit perpendicular to the existing housing, facing towards the flank elevation of the two properties immediately north of the application site. This type of relationship is common to many new build developments within the District. It would not lead to any unacceptable overlooking or overbearing impact, and would not materially affect the amenity of the existing residents.

Scale

6.12 The proposed development has been designed to be of a suitable scale for its context. Housing would be 2-storeys in height, of a form which is common to the District, and similar in scale to much of the housing on Fen End Lane.

6.13 The office building at the site's frontage would be the largest of the new buildings. This is required to be of a generous size, in order to give it a suitable presence in wider views. It would be an appropriate addition to the site, as the first element of the frontage development at Lincs Gateway. This frontage is important to making appropriate use of the site's gateway location.

6.14 The sale of the small business units is to a large extent dictated by their function. They would have high-bay doors, to allow them to accommodate large items, which may be required if they were to be used for a B8 storage use, or B1 light industrial or R&D uses. They would also have a large internal space, which would assist these uses. Meanwhile there would be a two-storey element, to allow for an efficient use of internal space, and to provide the necessary office, toilet and kitchen facilities. They would not be out of scale or proportion with the proposed housing; in addition, they would be set some distance apart, and behind new landscape planting.

Appearance

6.15 The housing would be of an attractive appearance. It would use materials which are common to the local area, such as red brick and weatherboarding. These houses would be entirely in keeping with the character of the area, which includes relatively modern housing on Fen End Lane.




Examples of the proposed housing; the Ribble (left) and Holland (right)

6.16 The offices at the site's frontage would use an attractive red brick, and a composite cladding which would give it a rendered appearance. It would provide an appropriate face to Lincs Gateway, being an office building of the necessary scale, surrounded by the landscape planting which would be important to the site's appearance.

6.17 As with their scale, the appearance of the small business units would be dictated to a large degree by their function, with the high-bay doors in their front elevations. Nevertheless, they would not be unattractive buildings, and they would be constructed of good quality materials, including an attractive facing brick and similar cladding to the offices, with the appearance of a rendered finish.

Landscaping

6.18 As we have noted, landscaping will provide an important element of the proposals for Lincs Gateway. It will help to give the business park a premium appearance, through the generous landscaped space at its road frontage and entrance, and the landscaped campus within the site. The application proposals seek to begin the implementation of the landscape principles which were set out in relation to the original outline application. These were set out in the Landscape Strategy Drawing for that application[7]. It is clear from a comparison of those initial proposals and the current application that Ashwood Homes remain committed to the delivery of the original landscape-led vision for Lincs Gateway.

6.19 As we have already noted, it is anticipated that full details of the proposed landscaping will be provided in relation to a planning condition.

[7] Drawing CSa/2187/113, produced by CSa Environmental (January 2014).

7 Access

Highway and Pedestrian Access

7.1 The proposed development would be served by the existing highway access. This was constructed by Lincolnshire County Council, at the time that they constructed the B1173, in around 2012. This access has a high design capacity, which could accommodate the proposed business park. This was confirmed at the point at which the original outline planning permission was granted. The Transport Assessment by WSP, which accompanied that original application, concluded as follows:

> **'The above assessment has shown that the traffic associated with all the development scenarios can be successfully accommodated on the road network and that the impacts would be non-material. The junctions assessed would operate well within capacity in both the Illustrative Masterplan and Sensitivity 1 scenarios and the predicted increase in HGVs in the Sensitivity 2 scenario would have no detrimental impact on the strategic highway network. The proposed site access junction off B1173 includes right turn lanes which can accommodate the predicted minimal right turn queues without blocking main line traffic. The right turn lanes also have sufficient stacking capacity for the predicted HGVs.'** [8]

7.2 Lincolnshire County Council Highways Department raised no objection to the proposed development, and they did not disagree with the conclusions of the Transport Assessment.

7.3 The addition of 43 new dwellings to this access would not materially affect its operation, even on completion of the business park. Residential properties would generate a far lower volume of traffic in peak hours that business uses. They would also generate traffic throughout the day, rather than mainly during the surges associated with employment uses.

7.4 We therefore believe that the proposed development would comply with paragraph 109 of the NPPF, which states that **'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe'**. Quite clearly this would not be the case in relation to these proposals.

[8] *Transport Assessment*, WSP (December 2013), paragraph 10.9.1.

Car Parking

7.5 The proposed development has been designed to provide a suitable amount of car parking. There are no current parking standards, but the former Lincolnshire County Council standards have been used as a guide.

7.6 For offices, these standards require 1 space per 30 sq. m. floor area. The proposed office would have a floor area of 1,026 sq. m., which equates to a requirement for 34 spaces; 32 spaces are proposed.

7.7 The small business units would require approximately 1 space per 65 sq. m. floor area, on the basis that they would equate to something like an industrial use (this is the closest use within the parking standards). That would translate into a need for around 4 spaces per unit. The proposed level of provision is for an average of 6 spaces per unit, which is intended to reflect the fact that their use is flexible.

7.8 With regard to residential development, the parking standards simply suggest a maximum on average of 2 spaces for dwellings with 3 or fewer bedrooms – a 3 spaces for dwellings with 4 or more bedrooms. The proposed development would broadly accord with these standards.

Cycle Parking

7.9 Cycle parking facilities can be provided to accompany the commercial development. It is anticipated that this can be addressed by a planning condition.

7.10 The majority of the proposed houses would be provided with a garage, which would be an ideal place for the storage of bicycles. All houses would also be provided with a garden which would be of sufficient size to accommodate a shed, which could also be used for cycle storage.

Inclusive Access

7.11 The proposed development would comply with building regulations, including the requirements of Part M with regard to matters such as level threshold access. The office building would be equipped with a lift and disabled toilets, ensuring that wheelchair users would not be disadvantaged.

8 Conclusions

8.1 This full planning application seeks to accelerate the development of the Lincs Gateway business park. It would provide the initial employment development on the main, northern part of the site. This would comprise a large office building, capable of providing around 86 jobs, and some small business units with a flexible B1 and B8 use, capable of providing in the region of a further 27 to 48 jobs, depending on the use they are put to. The application would also result in the extension of services to this part of the site, making it far easier and more affordable for future development to be provided, in the serviced plots which would be created on adjacent land. The proposals would also begin the provision of the high-quality landscaping which has from the outset been intended as a key feature for this site.

8.2 The application proposals for employment development would accord with the Council's emerging Local Plan, which identifies the site as a prestige employment site. They would also be consistent with the existing outline planning permission which already exists for the business park.

8.3 Providing jobs more swiftly at Lincs Gateway can have major beneficial effects on the local economy. It can help to diversify the economy, and retain business and talent within the local area. There is, however, a danger than if this application were to be refused, it may take several years before development may happen, which would substantially delay the local benefits it could bring.

8.4 Outside the area which is already proposed for employment use is a piece of vacant land. This land is proposed for an area of residential development, which would provide the funding required to enable the construction of the new business development. This housing would also make a valuable contribution towards the current shortfall in the supply of housing land within the District.

8.5 The site is within a suitable location for housing. It is not at risk of flooding, unlike much of the housing which is currently, or is proposed to be, allocated for residential development in this area. It is also within close proximity to convenience shopping opportunities, and cafes and a pub / restaurant. In addition, it is on the edge of Spalding, which is the primary focus for development within the District.

8.6 The application proposals benefit from the presumption in favour of sustainable development. This implies that they should be approved unless there would be adverse impacts which would significantly and demonstrably outweigh the benefits they would bring. We do not believe that there would be any such adverse impacts. We accordingly request that planning permission should be granted without delay.

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