

## Appendix C

### Statutory Consultee Responses



Mr K Manning  
City of Lincoln Council  
City Hall  
Beaumont Fee  
Lincoln  
LN1 1DF

Direct Dial: 0121 625 6870

Our ref: P01063410

3 May 2019

Dear Mr Manning

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**WESTERN GROWTH CORRIDOR, SKELLINGTHORPE ROAD, LINCOLN,  
LINCOLNSHIRE  
Application No. 2019/0294/RG3**

Thank you for your letter of 15 April 2019 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

#### **Summary**

We have been clear in pre-application advice that Historic England considers that the Western Growth Corridor presents a unique opportunity to create a great place making the most of what is special about Lincoln and its heritage, including on the proposed site, whilst meeting challenges to ensure that the impact of the scheme on that heritage is avoided, mitigated or minimised.

As submitted the scheme has limited impact upon the landscape setting of Skellingthorpe Duck Decoy a Scheduled Monument, should revisions alter this we will treat the matter in more detail in future correspondence but for present purposes we will focus upon the rural setting of Lincoln itself as an historic city including views to and from Lincoln Cathedral and the upper city (with multiple designations) and impacts upon the Swanpool Roman pottery production industry an undesignated site of national archaeological importance.

We have delivered detailed pre-application advice across all the matters treated below, however as submitted there remain areas where the planning submission is not compliant with the National Planning Policy Framework.

These issues fall into two categories; firstly, concerns where there is an insufficiency of detail necessary for the planning authority to minimise conflict between conservation of the significance of heritage assets and elements of the development or to be confident



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that proportionate mitigation can be delivered, and secondly concerns as to non-compliance with the NPPF's requirements as regards non-designated archaeological remains of demonstrably equivalent importance to a scheduled monument and the required justification of wholly exceptional circumstances in which substantial harm is necessary to deliver substantial public benefits that outweigh that harm or loss, given also that great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).

At present we trust that the concerns we raise can be readily addressed by the applicant through submission of additional information, and details, if notwithstanding our advice here (and in pre-application correspondence) necessary material is not submitted by the applicant and you are minded to determine the application then please regard this letter as our objection to the grant of planning consent on heritage grounds.

### **Historic England Advice**

#### **The City of Lincoln, Lincoln Cathedral, Lincoln Castle and the historic hillside**

Lincoln cathedral is listed Grade I which means it is one of a small proportion (about 3%) of listed buildings which are of exceptional architectural and historic interest. It is known internationally as one of the world's most magnificent buildings. A key part of the cathedral's significance, located as it is on the north escarpment of the long Jurassic limestone ridge (the 'Lincoln Edge') high above the Witham gap and lower city, is that it dominates the skyline, city and nearby landscape, and can be seen for miles across the surrounding countryside. This domination was intentional and meant to glorify God and signify the importance of the Church. There are clear and uninterrupted views of the cathedral from the west and south-west, including from the proposed development site. In these views the cathedral and historic hillside are seen across a rural foreground which is part of its historic setting. These views form part of the strategic views of the cathedral which reveal its dominance within its setting and its fundamental contribution to Lincoln as a historic cathedral city.

The townscape as a whole on the north escarpment is one the most important historic townscapes in the Midlands. It is a key part of the Cathedral and City Centre conservation area. Views of the historic hillside on the north escarpment including the designated heritage assets on the hillside, are an important part of the setting of the Cathedral and City Centre conservation area. Views of Lincoln castle (a scheduled monument), as a fortified structure and symbol of the power of royalty, are also an important part of its significance.

Views from the cathedral and the historic hillside are also an important part of the significance of the cathedral and a number of the nearby/associated heritage assets including Lincoln castle and the Cathedral and City Centre conservation area. These views reveal the rural setting of historic Lincoln with clear views out to the countryside to the west and south-west (including the proposed development site), to the east



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along the Witham valley and to the south across the lower city to the rural horizon on the south escarpment. The closeness of the city centre to open rural spaces to the east and west, including the proposed site, makes a key contribution to the close relationship of the rural setting of Lincoln with the historic hillside and historic lower city which is an important part of the character of Lincoln and its significance. The rural character of the site of the proposed development includes the rectilinear pattern of fields and watercourses from 19<sup>th</sup> century enclosure and wetland drainage, as well as wonderful views of the cathedral on the north escarpment. The existing hedges create a series of horizontal features across views from the historic hillside which contribute to the rural setting of Lincoln.

The site of the proposed development adjoins the Swanpool conservation area, a residential area built in the 1920s with houses in the Arts and Crafts style. A much larger residential development was intended at the time but not built.

Clearly the character of the site will change radically as a result of the proposed new development. We advise that the change of character from the 19<sup>th</sup> century enclosed and drained rural landscape to built development, in large areas, will harm the significance and setting of the cathedral, castle and Cathedral and City Centre conservation area through the erosion of their existing rural setting. However as previously advised, as a longstanding allocation in previous and current local plans Historic England does not object in principle to the allocation of this site for development. We also consider that aspects of the proposed scheme would significantly reduce the impact, or have the potential to do so, as advised below.

One crucial issue will be to ensure that the northern boundary of the development will have the character of a green edge, thereby avoiding a hard urban edge. This would help ensure that aspects of the rural character of important views in this direction from the upper city are retained as much as possible, thereby helping to preserve this important aspect of the rural setting of the city, castle and cathedral. We are encouraged by the inclusion of green edges included in the 'Character and Placemaking Framework Plan'. We advise that the form of the green edges, including height of planting, and development adjacent to the green edges is fully defined in the Design Code. There is the potential for less dense development along the northern boundaries, in amongst trees and green spaces, to provide high quality dwellings which take advantage of the wonderful views of the cathedral and uphill Lincoln. We also advise that the local centre also avoids a hard urban edge and this is defined in the Design Code. We recommend that photomontages including the proposed development are provided for views 3, 4, and 5 to assess the extent of the mitigation proposed.

We welcome the retention of many hedge lines and tree lines within the development which has the potential to help preserve some of the rural character of views from uphill Lincoln views by retaining the succession of green 'horizons' (hedges or tree lines) seen in them, as well as screening some of the development. This would also retain much of the structure of the 19<sup>th</sup> century field pattern which has historically informed the later 19<sup>th</sup> and 20<sup>th</sup> century character of housing in Lincoln. The height of



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general residential development of up to 12m would be high in this context, especially on raised ground. A ridge height of 9m may well be more appropriate. We recommend that further information, including the height above existing ground level of the raised platforms and the photomontages mentioned above, is provided to understand the extent of mitigation proposed.

The retention of the existing water courses is welcomed which reflects the historical development and context of both the site and Lincoln. We also welcome the creation of view corridors within the development towards the cathedral which would help create a unique sense of place.

As previously advised, the extension eastwards of the fields and green spaces of the site close towards the city centre contributes strongly to the setting of the cathedral and historic city by making evident the rural setting of the city. We therefore advise that the extent westwards of the proposed commercial and leisure village should be justified. The proposed stadium would have the potential to be an intrusive feature in views towards, and from, uphill Lincoln and the cathedral. We recommend that further information on the form and scale of the stadium is provided.

As a longstanding allocation in previous and current plans Historic England does not object in principle to the allocation of this site for development. We have advised on policy related to the Western Growth Corridor which forms part of the Local Plan submitted to the planning inspectorate including:

'Proposals for the WGC area, as identified on the Policies Map, should provide:

- A distinctive place to live that has its own identity and respects its local surroundings including key views and vistas of and from Lincoln Cathedral and the historic core of the City and the setting of Decoy Farm scheduled monument and Hartsholme Registered Park.'

**The issues set out above are principally related to paragraphs 189 and 190 of the NPPF 2019 in respect of the sufficiency of information submitted and the ability of the Local Planning Authority take a view on the minimisation of conflict between aspects of the development and the conservation of the historic environment. The best vehicles to address the above issues would be:-**

- A) A set of specific and high quality photomontage representations to appropriate technical standards**
- B) A more detailed and focussed design code.**

#### **The Swanpool Roman Pottery production site**

The Swanpool Pottery industry is important not just for understandings of how Romano-British ceramic production was organised and how it evolved over time, but also as a key to understanding all the sites on which its pots are found. By understanding the dates and sequences of production our knowledge nationally of the whole period will be improved. What makes the site both exceptional and potentially unique in the UK is that this is not a fragment of the production process such as a single kiln but rather the whole production landscape with the variety and development of process and wares over time and the ancillary facilities that went with ceramic



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production. This is a fantastic opportunity to place Lincoln centre stage in terms of archaeological discoveries and to tell a story of strong contemporary relevance about materials technology and the adaptation of an industry to changing market pressures and opportunities.

The Swanpool pottery production site would pass the test of national archaeological importance for designation as a scheduled monument. However, we consider the NPPF is the preferable mechanism to manage development of the site on the basis that the equivalent archaeological assessment and mitigation to what might otherwise be ensured through Scheduled Monument Consent is secured: recognising also that the site is allocated for housing within the adopted local plan.

The site was known from the 1940's, and subject to various small scale investigations and a programme of field walking in the previous proposed scheme for site (but this material was un-analysed until the current scheme was brought forwards). The site was further subject to geophysical survey and trial trenching culminating in the archaeological documentation submitted with the current application which provides a sound and holistic archaeological assessment and mitigation strategy, proportionate to the importance of the site (NPPF 189, 190 and 199). The scheme as proposed would result in substantial harm to the significance of the Swanpool Potteries through the total loss of this ancient monument and the Swanpool Roman Potteries are as acknowledged in the submitted Planning Statement as of national importance.

As set out in NPPF 2019 footnote 63 where a site is of demonstrably equivalent importance to a scheduled monument then the policies for designated heritage assets should be applied. These policies (NPPF 2019 para's 193, 194) require clear and convincing justification for all harm to the designated (or demonstrably equivalent) asset and for that harm to be set against public benefits with great weight given to the conservation of the asset's significance (and the more important the asset, the greater the weight should be). Additionally for Scheduled Monument [and as set out in footnote 63 demonstrably equivalent] assets substantial harm should be wholly exceptional.

Where [NPPF 2019 para 195] a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. As set out in NPPF 2019 paragraph 199 the ability to record remains does not in itself constitute a justification for their loss, the justification must be present in terms of the public good and then mitigation addressed as a subordinate but necessary issue. In its current submitted form the application fails to follow the NPPF 2019 in the above matters and in the submitted planning statement offers an argument based upon sufficiently of mitigation through recording, analysis, archiving and dissemination of archaeological results.

As we articulated in our extended pre-application advice letter of 1<sup>st</sup> June 2017: [updates in square brackets].

"..... As Government's Expert Advisor on the historic [environment] it is Historic England's view that the remains of the Romano-British pottery production



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industry at Swanpool, Lincoln are an archaeological site of national importance (hence of an importance where we could recommend designation as a Scheduled Monument to the Secretary of State (under the 1979 Ancient Monuments and Archaeological Areas Act S1 (as amended) and with regard to the DCMS October 2013 policy statement 'Scheduled Monuments & nationally important but non-scheduled monuments'). This is hence a site of demonstrably equivalent importance to a scheduled monument in the terms of National Planning Policy Framework para. 139 [NPPF 2019 Footnote 63]. Having looked at the available evidence, notably the geophysical and field-walking surveys, and based on our previous knowledge of the significance of the Swanpool ceramic industry we consider that the pottery production site, including the large group of kilns, has national importance and would be likely to be scheduled on the grounds of rarity, survival, exceptional archaeological potential and documentation should the site be assessed for scheduling.

However, we consider the NPPF is the preferable mechanism to manage development of the site on the basis that the equivalent archaeological assessment and mitigation to what might otherwise be ensured through Scheduled Monument Consent is secured: recognising also that the site is allocated for housing within the adopted local plan. Measures and commitments should be in place such that the planning process will in this case deliver equivalent mitigation to that which would be ensured through the Scheduled Monument Consent process in line with the DCMS October 2013 Policy Statement 'Scheduled Monuments & nationally important but non-scheduled monuments' where Government stated that the Secretary of State has regard to the fact that some monuments can be effectively protected by regulating potentially harmful activities through the planning system.

In terms of the planning process this means your authority should treat the site under the paragraphs of the NPPF that address designated heritage assets, including paragraphs 132, 133 and 134 [NPPF 2019 para's 193, 194, 195] and that specifically substantial harm or loss should be regarded as wholly exceptional and must pass the tests in para. 133 [NPPF 2019 para. 195]. We draw your particular attention to paragraph 141 of the NPPF [NPPF 2019 para 199 and footnote 64] with regard to the appropriate mitigation of archaeological impacts and paragraphs 128 and 129 [NPPF 2019 para's 189 and 190] with regard to the sufficiency of information and understanding required in support of an application and on the part of the Local Planning Authority.

Work across the kiln complex and associated features will need to be conducted to a common Overall Written Scheme of Investigation to deliver an effective understanding of the development and breadth of the industry at Swanpool that is not compromised by divergent methods and resources being deployed across the complex.



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It is critically important that the appropriate archaeological mitigation of the development impacts upon the Swanpool Pottery Industry site and other archaeological remains within the SUE area is robustly defined and costed such that sufficient resources are in place regardless of whether mitigation was delivered in advance of the allocation of areas to individual developers or after. The mechanism for the delivery of mitigation should in no way determine its quality or sufficiency. We recognise that archaeological costs will be substantial and the archaeological work required will be time consuming and spatially extensive. Early and appropriate engagement with these matters is therefore vital.

A large part of the significance of the Romano-British pottery production site by Swanpool lies in the survival of the industry virtually in its entirety from extraction through production and waste with, it is likely, the ancillary accommodation and structures which supported the kilns. The site will contain evidence of the development of the industry's products and techniques over time. The typological understanding of how pottery products changed over time is central to the analysis of archaeological sites; it allows archaeologists to write and engage with the public about dating and connections between people through trade, power and culture. Kiln sites are the source of the material and the only places where we can see the full range of material produced together and how those pots changed over decades and centuries of production. In studying pottery at consumption sites we get a picture complicated by the life span of pots and uncertainty of origin and date (since for example more conservative or avant garde designs or coarser and finer wares might be produced in parallel). A full kiln complex, properly excavated allows thorough stratigraphic analysis to support a scientific dating framework which sharpens our understanding of the pots at a national level. If only parts of the site were dug and the rest lost or left in the ground it would both produce dislocated and fragmentary data, failing to effectively recover the public interest in understanding the past (see NPPF para.141 [NPPF 2019 para 199 & footnote 64]. Therefore excavating only a sample of the kiln group would not provide sufficient mitigation as their significance rests in large part on the ability to understand an industry in its near entirety over time and spatially with its waste products extraction and associated facilities. A sample of the site will not allow adequate understanding of its significance as a whole. Hence where serious loss to the monument's significance is to be contemplated as a result of development (on a wholly exceptional basis of overriding public benefits which will need to be demonstrated), the only appropriate measure of mitigation would be full excavation of all the kilns and the associated features within the development area. ...."

**To assist you authority in seeking additional information, here are our**



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**comments in respect of the Roman pottery complex as numbered points :-**

- 1) The proposed archaeological mitigation strategy is a robust piece of work setting out a generally proportionate and wholly necessary scope of work to address the current known significance of the ancient monument it would fail to be proportionate were it to be reduced in scope.
- 2) The application must be supported by an NPPF 2019 compliant clear and convincing justification, a setting out of the public goods and a demonstration of their necessity at this site to deliver those benefits (showing them to outweigh the public benefit of retaining the ancient monument with great weight applied to the conservation of its significance).
- 3) As set out in our pre-application advice the application should be submitted by a robust cost estimate for the archaeological programme of mitigation and a clear statement from the applicant that this mitigation is deliverable within their overall viability model for the development as submitted. A sufficient contingency should also be included to address both uncertainty within those areas assessed through trial trenching and in those parts in accessible during pre-submission investigations.
- 4) Evaluation has yet to be carried out in certain areas which could not be accessed pre-submission, such work should be programmed for the earliest opportunity post any grant of consent in particular to manage the risk of the discovery of human remains and address findings in an archaeological scheme of works, Burials Act Licensing, project costings etc.
- 5) This matters because the clear and convincing justification for the wholly exceptional loss of an ancient monument demonstrably of equivalent importance to a Scheduled Monument (ie of national archaeological importance) has to be demonstrated as does the necessity.
- 6) Once having overcome the justification requirement, the mitigation (para 199) must then be proportionate to the importance of the asset to be lost - the scheme of archaeological works submitted is proportionate but any filleting of this scheme to offset other budget pressures now or at some future delivery point would render the scheme of mitigation disproportionate to the importance of the asset suffering loss of significance. Given that it may be some years before the Roman Pottery site is to be developed the LPA should ensure that through binding agreements the public can be assured that mitigation will be delivered in full, and that steps are taken to ensure that any future viability deficit cannot become concentrated in the phase of the development containing the Roman Pottery site.
- 7) Even where the justification for loss can be demonstrated; if mitigation to the necessary and proportionate submitted standard cannot be delivered then the loss should not occur.
- 8) As there may be a significant time period between any consent being granted and the execution of works in the area of the Roman Potteries it is vital that the ability of the developer to deliver the submitted scheme of mitigation is not



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- inhibited by loss to the significance of the asset over the intervening period.
- 9) We note that the treatment of finds from ploughsoil contexts will be subject to additional detailing but would take this opportunity to highlight that the composition of ceramic remains in ploughsoil contexts is likely to differ from and be complementary to those found in sealed kiln fills, this is because ploughsoil assemblages are likely to derive from former standing waste heaps representing all phases of activity whereas kiln fills are likely to form a smaller opportunistic sequence of deposition at the points where individual kilns were taken out of use. Fragment size and condition at surface is likely to differ from that a base of plough soil where larger sherds more localised to their former context locations are likely to survive and this should be born in mind in detailing the scheme of archaeological work.
  - 10) We remain keen to support through our own resources a programme of research based thermo-luminescence dating complementary to that C14 work necessary to the developer funded programme of dating, we welcome the positive commitments in the submitted scheme of archaeological mitigation to coordinate working so as to make this possible, we may choose to fund additional C14 dates to support the refinement of OSL.
  - 11) More clarity is necessary as regards the archaeological assessment and mitigation of remains in the triangular wet ecological area marked on the submitted plans at the western side of the pottery complex and as to the extent of earthmoving and excavation proposed in this area.

Given the very positive engagement that has been achieved through pre-application discussion (which is reflected in the sound and proportionate proposals for archaeological mitigation) it would be extremely regrettable if we were compelled to object to this scheme on the basis of its non-compliance with the NPPF.

We refer you also to the expert advice of the City Conservation Officer and City Archaeologist

### Recommendation

Historic England has **concerns** regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 189, 190, 193, 194, 195 and 199 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine planning



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applications in accordance with the development plan unless material considerations indicate otherwise.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of **objection**, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely



**Tim Allen**

Team Leader (Development Advice)  
E-mail: [tim.allen@HistoricEngland.org.uk](mailto:tim.allen@HistoricEngland.org.uk)

CC Sarah Harrison, City Conservation Officer  
Alastair MacIntosh, City Archaeologist



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Date: 08 May 2019  
Our ref: 280147  
Your ref: 2019/0294/RG3



Mr K Manning  
Planning Manager  
Development Team  
Lincoln City Council

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

**BY EMAIL ONLY**

T 0300 060 3900

Dear Mr Manning

**Planning consultation:** Hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise:- In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8ha of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; Areas of formal and informal public open space; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over and Beevor Street, and a new public footpath bridge over Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road.

**Location:** Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire

Thank you for your consultation on the above dated 15 April 2019 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

#### **SUMMARY OF NATURAL ENGLAND'S ADVICE**

##### **NO OBJECTION**

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on designated sites and has no objection.

Natural England's further advice on designated sites and advice on other natural environment issues is set out below.

##### **Swanholme Lakes Site of Special Scientific Interest (SSSI)**

Based on the plans submitted, Natural England considers that the proposed development will not damage or destroy the interest features for which the site has been notified and has no objection.

The proposed development is unlikely to have any hydrological impacts upon the SSSI, as the SSSI is on higher ground and both surface and ground water flows will be towards the Catchwater Drain

which passes along the southern edge of the development. On this basis Natural England would agree that scoping out the SSSI at this stage is appropriate as suggested in the environmental statement (page 124, table 6.3).

In terms of other possible negative impacts on the SSSI, there is concern that the land around Swamholme Lakes is becoming progressively urbanised. Hartsholme Country Park provides some buffering and some potential linkage via a green corridor to less urbanised land. Therefore the strengthening and enhancement of the existing green corridor from the SSSI, via Hartsholme Country Park, towards Ballast Holes and beyond, would avoid undermining the sustainability of the semi-natural habitats within the SSSI through further habitat fragmentation and isolation. The importance of maintaining connectivity of natural habitats is discussed further in the section below.

### **Green Infrastructure and Biodiversity Enhancement**

Natural England considers that the development of the Western Growth corridor could provide important opportunities to make positive gains for biodiversity and green infrastructure, both on the site itself and to make links throughout the City. We have had a number of meetings to discuss the proposals with the City Council, the applicants and other stakeholders as the proposals for the site have been progressed.

We generally welcome the commitment to blue and green infrastructure within the proposal. In particular we are pleased to note, from the illustrative masterplan, the specific areas for biodiversity and green infrastructure. The creation of the Waterside Enhancement Area for the Catchwater Drain will provide an ecological stepping stone between Hartsholme Park and Swanpool together with the areas of common land to the north of the site. The additional planting of suitable species around the Swanpool and Boultham Mere will complement the existing habitats. The ecology area based on the borrow pits will also provide an opportunity to create wetland habitats beside the Skellingthorpe Main Drain which would integrate into the proposed Sustainable Urban Drainage Schemes (SUDs).

We understand from the submitted documents that the detail of the biodiversity enhancement areas, design of the SUDs areas and planting details will be submitted in due course. Nevertheless we would wish to ensure that further gains for nature are secured within the proposal and connectivity of both ecological networks and green infrastructure is strengthened in the reserved matters application.

We therefore advise that to maximise the benefits for both wildlife and people that detailed plans for Green Infrastructure and Ecological enhancements should be submitted. We advise that these plans should particularly include the following:

- Stronger GI and ecological networks throughout the whole of the site and into the surrounding countryside and City.
- Biodiversity enhancement planting around the formal playing field areas to ensure linkages of natural and semi-natural habitats across the site from north to south.
- Greater provision and access to green infrastructure and recreational sites within the north-west housing sector.
- Enhancement of hedgerows throughout the site (we note the aim for 2:1 planting of hedgerows within the Ecology chapter of the Environment Statement)
- Detailed plans of the proposed wetland area beside the Catchwater Drain including planting regimes and public access facilities such as broad walks.
- Further detail of planting proposed in the buffer areas surrounding the Swanpool Nature Area.
- Details of the proposed phased approach of the extraction of the borrow pits, including water level regimes, so that habitat creation can be progressed in parcels once extraction is completed.
- Detailed design of SUDs and their linkages to blue and green infrastructure corridors.
- Details of the future long term management of all ecological and green infrastructure areas.
- Details of other ecological enhancement features such as green roofs and walls and bird/bat boxes.
- Detailed phasing plans to show mitigation work done in advance of any construction work.

- Walking routes both within the site and linking to surrounding areas and routes suitable for dog walking.

We recommend that you refer to the Central Lincolnshire Green Infrastructure Study (2011) which identifies the application as being with a strategic green corridor with opportunities for local and strategic GI links. The GI Study is specifically mentioned within Policy LP20 of the Central Lincolnshire Local Plan and is a material consideration when determining this planning application. In order for this application to meet the requirements of the GI Study, the benefits listed above should be delivered through this development.

In order to secure a comprehensive scheme of green infrastructure and biodiversity enhancements, Natural England would advise the attaching of a suitably worded planning condition which would allow further detail to be addressed through a subsequent full application or reserved matters.

Additional evidence and case studies on green infrastructure, including the economic benefits of GI can be found on the Natural England [Green Infrastructure web pages](#).

Natural England would be pleased to offer further advice on enhancing the green infrastructure within this site and draws attention to our Discretionary Advice Service in the paragraph below.

### **Net Gain**

Biodiversity net gain is a demonstrable gain in biodiversity assets as a result of a development project that may or may not cause biodiversity loss, but where the final output is an overall net gain. Net gain outcomes can be achieved both on and/or off the development site and should be embedded into the development process at the earliest stages.

The government has recently announced that it will mandate net gains for biodiversity on new developments in England to deliver an overall increase in biodiversity. Furthermore net gain is referenced in the new NPPF, and is included within the government's 25 year plan "A Green Future". It would therefore be very welcome if the applicants followed the net gain approach and took the opportunity within this proposal to be an exemplar development which can demonstrate a net gain in biodiversity.

Given that in Table 6.12 Summary of Residual Effects on Ecological Assets, shows that some adverse impacts are likely to remain we suggest that the use of the net gain metric may be a useful way of approaching these impacts and result in a further positive net gain for biodiversity.

Metrics exist for calculating the amount of biodiversity required to achieve net gain. The most commonly used are variants of the Defra metric which calculates the biodiversity units required to achieve biodiversity net gain. The advantage of using a recognised metric to deliver net gain is that it provides a clear, transparent and evidence-based approach to assessing a project's biodiversity impacts that can assist with "de-risking" a development through the planning process and contribute to wider place-making.

Natural England would be happy to advise further on this approach and there is further information available on the Defra website:

<https://www.gov.uk/government/publications/technical-paper-the-metric-for-the-biodiversity-offsetting-pilot-in-england>

### **Protected Species**

Following the principles of our [standing advice](#)<sup>1</sup> Natural England has held pre-application discussions with the applicant, as outlined in the Environment Statement (table 6.2), in order to limit adverse impacts upon terrestrial ecology. We acknowledge that detailed ecological surveys have been carried out which cover the application site and adjoining areas. We also note that mitigation measures for protected species have been included within the Environmental Statement. We will welcome the additional detailed mitigation strategies (including GCN, reptiles, water voles and bats)

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<https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

that will be submitted as part of the CEMP.

We refer your authority to our standing advice to understand the impact of this development on protected species with specific advice provided within the detailed [species sheets](#).

### **Best and Most Versatile Agricultural Land or Minerals and Waste reclamation Soils and Land Quality**

Although we consider that this proposal falls outside the scope of the Development Management Procedure Order (as amended) consultation arrangements, Natural England draws your Authority's attention to the following land quality and soil considerations:

1. Based on the information provided with the planning application, it appears that the proposed development comprises approximately 238.5ha of agricultural land, including 157.6 ha classified as 'best and most versatile' (Grades 1, 2 and 3a land in the Agricultural Land Classification (ALC) system).
2. The proposal will consist of 100ha of residential and 20ha of commercial development plus related infrastructure, whilst the remainder of the area will be for open space and green infrastructure.
3. Government policy is set out in paragraph 170 and 171 of the National Planning Policy Framework which states that:  
*'Planning policies and decisions should contribute to and enhance the natural and local environment by:  
recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.'*  
and  
*Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework<sup>2</sup>; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries.*

In order to safeguard soil resources as part of the overall sustainability of the development, it is important that the soil is able to retain as many of its many important functions and services (ecosystem services) as possible through careful soil management.

4. Consequently, we advise that if the development proceeds, the developer uses an appropriately experienced soil specialist to advise on and supervise soil handling, including identifying when soils are dry enough to be handled and how to make best use of the different soils on site. Further guidance is available in Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#) (including accompanying [Toolbox Talks](#)) and we recommend that this is followed.

### **Discretionary Advice Service**

If the developer requires further advice on natural environment, Natural England advises that the applicant/developer consults Natural England directly, so that they have the opportunity to express an interest in using DAS.

The first step is for the developer to fill out a simple form, so we can register their interest, and make sure they have the right adviser for their case. Please visit our website: (<http://www.naturalengland.org.uk/ourwork/planningdevelopment/spatialplanning/das/default.aspx>) for more information and a downloadable request form [here](#).

### **Other advice**

Further general advice on the consideration of other natural environment issues is provided at Annex A.

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<sup>2</sup> Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me on 02080268500

Yours sincerely

Roslyn Deeming  
Senior Adviser  
Planning for a Better Environment Team  
East Midlands Area

## Annexe A – Additional Advice

Natural England offers the following additional advice:

### Landscape

Paragraph 170 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments.

Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute Guidelines for Landscape and Visual Impact Assessment](#) for further guidance.

### Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#). Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#), and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

### Protected Species

Natural England has produced [standing advice](#)<sup>3</sup> to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

### Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and 174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found [here](#)<sup>4</sup>. Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

<sup>3</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>4</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>



### **Ancient woodland, ancient and veteran trees**

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

### **Environmental enhancement**

Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

### **Access and Recreation**

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

### **Rights of Way, Access land, Coastal access and National Trails**

Paragraphs 98 and 170 of the NPPF highlights the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way, coastal access routes and coastal margin in the vicinity of the development and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails, including the England Coast Path. The National Trails website [www.nationaltrail.co.uk](http://www.nationaltrail.co.uk) provides information including contact details for the National Trail Officer.

**Biodiversity duty**

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).

**From:** Deeming, Roslyn <[Roslyn.Deeming@naturalengland.org.uk](mailto:Roslyn.Deeming@naturalengland.org.uk)>

**Sent:** 05 October 2020 18:02

**To:** Cousins, Simon (City of Lincoln Council) <[Simon.Cousins@lincoln.gov.uk](mailto:Simon.Cousins@lincoln.gov.uk)>

**Subject:** 2019/0294/RG3 REVISIONS Western Growth Corridor Skellingthorpe Road Lincoln Lincolnshire

Dear Simon

**2019/0294/RG3 REVISIONS Hybrid application for urban extension including outline for 3200 dwellings, local centre, employment, B1 & B2 uses etc. & full app for football stadium, public open space, footpaths etc. Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire**

Thank you for your consultation on the above dated 17<sup>th</sup> September 2020 which was received by Natural England on the same date.

Natural England has reviewed the revised plans and additional documents and confirms that we have no additional comments to make further to our previous response of 8<sup>th</sup> May 2019 (our ref: 280147).

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me on the number below.

Yours sincerely

Roslyn Deeming

Roslyn Deeming  
Senior Adviser  
Area Delivery Team  
East Midlands Area  
Ceres House  
2, Searby Road  
Lincoln  
LN2 4DT  
02080268500  
07901670161  
[roslyn.deeming@naturalengland.org.uk](mailto:roslyn.deeming@naturalengland.org.uk)  
[www.gov.uk/natural-england](http://www.gov.uk/natural-england).



City of Lincoln Council  
Development Control  
City Hall Beaumont Fee  
Lincoln  
LN1 1DF

**Our ref:** AN/2019/128925/01-L01

**Your ref:** 2019/0294/RG3

**Date:** 10 May 2019

## **FAO Lana Meddings**

Dear Lana

**Hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise:**

**- in outline: housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8ha of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; areas of formal and informal public open space; a network of public footpaths and cycleways, associated engineering works to inform development platform and drainage system; new transport bridge link over and Beevor Street, and a new public footpath bridge over Tritton Road;**

**- in full: details for means of access into the site from Skellingthorpe Road and Tritton Road.**

**Western Growth Corridor, Skellingthorpe Road, Lincoln**

Thank you for consulting us on the above application, on 15 April 2019.

We have reviewed the submitted details, in particular:

- Skewbridge and Swanpool Landfills Remediation Strategy, July 2017
- Lincoln Western Growth Corridor Reclamation Strategy, August 2017
- Detailed Flood Risk Assessment and Water Management Strategy, March 2019
- Preliminary Water Framework Directive Assessment, December 2018

### **Environment Agency position**

We have no objection to the application subject to the imposition of conditions on any planning permission granted, as detailed below.

We have included a number of pre-commencement conditions. We acknowledge that it may be possible to commence certain elements of the development of the site prior to discharge of these conditions and would therefore be happy to discuss alternative wording with you prior to determination of the application.

Ceres House, Searby Road, Lincoln, LN2 4DW  
Customer services line: 03708 506 506  
Email: [LNplanning@environment-agency.gov.uk](mailto:LNplanning@environment-agency.gov.uk)  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

Calls to 03 numbers cost no more than national rate calls to 01 or 02 numbers and count towards any inclusive minutes in the same way. This applies to calls from any type of line including mobile.

As you are aware the discharge of planning conditions rests with your Authority. It is, therefore, essential that you are satisfied that the proposed draft conditions meet the requirements of the Planning Practice Guidance (Use of planning conditions section, paragraph 004). Please notify us immediately if you are unable to apply our suggested conditions, as we may need to tailor our advice accordingly.

#### **1. Land contamination and protection of the water environment**

The previous use of part of the proposed development site as a landfill site presents a risk of contamination that could be mobilised during construction to pollute controlled waters. Controlled waters are particularly sensitive in this location because part of the proposed development site is located upon a secondary aquifer A and is adjacent to surface waters including the Main Drain and the Catchwater Drain.

The application refers to the presence of hazardous substances from the landfill site within the development site leaching into the Main Drain.

We have been working with City of Lincoln Council for several years and have provided advice on numerous reports including the Remediation Strategy dated July 2017 by AECOM. We will continue to provide advice and liaise with the Council. We understand that there is further work to be done to monitor and assess risk posed to surface waters from past use of part of the site as a landfill. This work will include refining the Remedial Strategy based on a series of trials to test the practicability, effectiveness and durability of the chosen remediation work.

The submitted Remediation Strategy demonstrates that it will be possible to manage the risks posed to controlled waters by this development. Further detailed information will however be required before built development is undertaken. We believe that it would place an unreasonable burden on the developer to ask for more detailed information prior to the granting of planning permission but respect that this is a decision for the local planning authority.

In addition, the previous use of part of the site as a landfill presents a risk of contamination that could be mobilised by surface water infiltration from sustainable drainage systems or soakaways. This could pollute controlled waters.

In light of the above, the proposed development will be acceptable if planning conditions are included as set out below. All work should be carried out by a competent person in line with paragraph 178 of the National Planning Policy Framework (NPPF).

Without these conditions we would object to the proposal in line with paragraph 170 of the NPPF because it could not be guaranteed that the development would not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

#### **Condition 1**

For each phase of development, no development shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the local planning authority. This strategy will include the following components:

1. A preliminary risk assessment which has identified:
  - all previous uses

- potential contaminants associated with those uses
  - a conceptual model of the site indicating sources, pathways and receptors
  - potentially unacceptable risks arising from contamination at the site
2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.
  3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
  4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

**Reason**

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with paragraph 170 of the National Planning Policy Framework; and to comply with Policies LP16 and LP30 of the Central Lincolnshire Local Plan, 2017.

**Condition 2**

Prior to each phase of development being brought into use, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

**Reason**

To ensure that the site does not pose any further risk to human health or the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 170 of the National Planning Policy Framework.

**Condition 3**

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the local planning authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the local planning authority. The remediation strategy shall be implemented as approved.

**Reason**

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 170 of the National Planning Policy Framework.

#### **Condition 4**

No drainage systems for the infiltration of surface water to the ground are permitted other than with the written consent of the local planning authority. Any proposals for such systems must be supported by an assessment of the risks to controlled waters. The development shall be carried out in accordance with the approved details.

#### **Reason**

To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants. This is in line with paragraph 170 of the National Planning Policy Framework.

#### **Advice for the applicant**

We recommend that developers should:

- Follow the risk management framework provided in [CLR11, Model Procedures for the Management of Land Contamination](#), when dealing with land affected by contamination
- Refer to our [Guiding principles for land contamination](#) for the type of information that we require in order to assess risks to controlled waters from the site – the local authority can advise on risk to other receptors, such as human health
- Consider using the [National Quality Mark Scheme for Land Contamination Management](#) which involves the use of competent persons to ensure that land contamination risks are appropriately managed
- Refer to the [contaminated land](#) pages on gov.uk for more information

The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/ or land development works is waste or has ceased to be waste. Under the Code of Practice:

- excavated materials that are recovered via a treatment operation can be re-used on-site providing they are treated to a standard such that they fit for purpose and unlikely to cause pollution
- treated materials can be transferred between sites as part of a hub and cluster project
- some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommend that developers should refer to:

- the [position statement](#) on the Definition of Waste: Development Industry Code of Practice
- The [waste management](#) page on gov.uk

Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991

- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12 month period, the developer will need to register with us as a hazardous waste producer. Refer to the [hazardous waste](#) pages on gov.uk for more information.

The treatment of contaminated soil and/or contaminated waters requires an environmental permit. These permits can be either 'site based permits' or 'mobile plant permits'. We recommend early contact is made with our National Permitting Service to discuss permitting requirements and timescales.

Discharge of treated water to surface waters or groundwater will require an environmental permit; we recommend early liaison with our National Permitting Service to discuss permitting requirements and timescales. Please contact the Environment Agency for further information on how to screen hazardous substances using the H1 screening tool.

## **2. Flood risk**

The site has areas within Flood Zones 1, 2 and 3 (low, medium and high probabilities of flooding respectively). As noted in the Planning Statement, '...through the Local Plan Examination...the allocation of the Western Growth Corridor site was confirmed to be sound within the context of NPPF Policy on flood risk'.

We are satisfied with the proposals as set out in the Flood Risk Assessment (FRA). In essence a development platform of 4.7mAOD will ensure residential properties are above the potential flood level. Through modelling, a design has been developed that will not increase flood risk to third parties.

The outline details of the wetlands are acceptable, though we will need to check and agree the final details at a later stage.

The bridge over the Boutham Catchwater Drain will require an environmental permit from us.

We would like to point out a lack of clarity regarding vehicular egress to dry land from the eastern platform and commercial area as, whilst the drawings indicate a possible (emergency) vehicular route to Hartsholme Drive, the FRA refers to pedestrian access / egress only here.

We have found a number of minor factual errors in the FRA but are satisfied that these do not affect the outcome or conclusions of the FRA. Details can be provided if required.

Please note that our advice covers the risk of flooding from fluvial sources only.

**Condition 5**

The development shall be carried out in accordance with the submitted Flood Risk Assessment (produced by AECOM Ltd, ref 60472603, dated March 2019) and the following mitigation measures it details:

- The development platform level shall be set no lower than 4.7m above Ordnance Datum (AOD).
- Compensatory storage (wetland areas) shall be provided

These mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the scheme's timing/phasing arrangements. The measures detailed above shall be retained and maintained thereafter throughout the lifetime of the development.

**Reason**

To reduce the risk of flooding to the proposed development and future occupants and to prevent the increased risk of flooding elsewhere by ensuring that compensatory storage of flood water is provided; and to comply with Policy LP14 of the Central Lincolnshire Local Plan, 2017.

**Condition 6**

The development hereby permitted shall not be commenced until such time as final details, such as sizes and depths, of compensatory storage (wetland areas) have been submitted to, and approved in writing by, the local planning authority.

**Reason**

To prevent any increased risk of flooding elsewhere by ensuring that adequate compensatory storage of flood water is provided.

**Advice for the applicant - environmental permit**

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

**3. Foul sewage disposal**

Section 6.8 and Appendix J of the Flood Risk Assessment and Water Management Strategy set out the liaison that has taken place between the applicant and Anglian Water (AW).



AW has confirmed there is currently capacity at Canwick Water Recycling Centre (WRC) to accommodate the discharge from the development when considered in isolation; however, this will need to be reviewed should other sites come forward first. The data available to us shows that the WRC has maintained dry-weather-flow (DWF) compliance since 2014 but has been over 80% of its permitted DWF between 2015 and 2018.

It is recognised that there is insufficient capacity in the network leading to the WRC, which would lead to surcharging and flooding if upgrade works are not carried out. The applicant is working with AW to identify appropriate upgrades and investment.

**Condition 7**

No building works which comprise the erection of a building requiring to be served by water services shall be undertaken in connection with any phase of the development hereby permitted until full details of a scheme, including phasing, for the provision of mains foul sewage infrastructure on and off site has been submitted to and approved in writing by the Local Planning Authority. No dwelling shall be occupied until the works have been carried out in accordance with the approved scheme.

**Reason**

To prevent flooding and detriment to public amenity through provision of suitable water infrastructure.

In order to satisfy the above condition, an adequate scheme will need to be submitted demonstrating that there is (or will be prior to occupation) sufficient infrastructure capacity for the connection, conveyance, treatment and disposal of the quantity and quality of water arising from the proposed phase of development.

**4. Preliminary Water Framework Directive (WFD) Assessment/biodiversity**

We are satisfied that the WFD Assessment includes appropriate evidence, conclusions and proposals for this outline stage in the planning process, although it does refer to policies from the 1998 Local Plan, which was superseded by the Central Lincolnshire Local Plan, adopted in 2017.

We support the proposed inclusion of blue/green infrastructure as part of the scheme to help maximise bio-diversity opportunities from the development, and look forward to reviewing the final proposals at the reserved matters stage. Developments at the site should seek to deliver a net gain in biodiversity and geodiversity, in accordance with Policy LP21 of the adopted Local Plan.

Good water quality is linked to healthy, well-functioning ecosystems. A failure to step up river restoration and enhancements risks cancelling out upgrades in wastewater treatment and compromising the achievement of Good Ecological Status.

It is important to remember that SuDS should have a focus not just for sustainable urban design, but also for designing blue and green infrastructure and controlling flood risk.

Taking advantage of the open land in parks, open recreational green areas, road corridors, and private gardens can help maintain and even enhance biodiversity in the area, if managed correctly. When opportunities are sought out and correctly implemented, wildlife, waterbodies and flora can thrive in towns.

We support the recommendation in Section 8 of the document that a Construction Environmental Management Plan (CEMP) is prepared prior to the construction of the Cont/d..

proposed development.

**Condition 8**

The development hereby permitted shall not be commenced until such time as a Construction Environmental Management Plan including a Water Management Plan describing measures to prevent water pollution and physical impacts to water bodies during construction works has been submitted to, and approved in writing by, the local planning authority. The approved Plan shall be adhered to throughout the construction period.

**Reason**

To prevent water pollution and physical impacts to water bodies during construction works

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

**Nicola Farr**  
**Sustainable Places - Planning Advisor**

Direct dial 02030 255023  
Direct e-mail [nicola.farr@environment-agency.gov.uk](mailto:nicola.farr@environment-agency.gov.uk)



City of Lincoln Council  
Development Control  
City Hall Beaumont Fee  
Lincoln  
LN1 1DF

**Our ref:** AN/2019/128925/02-L01  
**Your ref:** 2019/0294/RG3  
**Date:** 02 October 2020

**FAO Simon Cousins**

Dear Simon

**Hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise:-In outline - housing development of up to 3,200 dwellings; local centre comprising community, retail (E, F.2 and pub or drinking establishment/takeaway and sui generis uses), employment (E) uses and parking; a primary school; up to 8ha of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (E and F.1 and F.2), a hotel (C1) food and drink outlets (E and sui generis) and a new community stadium for Lincoln City Football Club; areas of formal and informal public open space; a network of public footpaths and cycleways, associated engineering works to inform development platform and drainage system; new transport bridge link over to Beevor Street, and a new public footpath bridge over Tritton Road. In full - details for means of access into the site from Skellingthorpe Road and Tritton Road (revised description) Western Growth Corridor, Skellingthorpe Road, Lincoln**

Thank you for re-consulting us on the above application on 17 September 2020 following the submission of additional information and revision of the description.

**Environment Agency position**

We have reviewed the Amended Planning Statement dated Sept 2020 and confirm that this raises no concerns. The key information relating to our remit (principally flood risk and land contamination) is the same as previously seen.

We therefore have no objection and our position remains as set out in our consultation response of 10 May 2019.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

Ceres House, Searby Road, Lincoln, LN2 4DW  
Customer services line: 03708 508 506  
Email: [LNplanning@environment-agency.gov.uk](mailto:LNplanning@environment-agency.gov.uk)  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)  
Cont/d..

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City of Lincoln Council  
Development Control  
City Hall Beaumont Fee  
Lincoln  
LN1 1DF

Our ref: AN/2019/128925/03-L01  
Your ref: 2019/0294/RG3  
Date: 20 May 2021

**FAO Simon Cousins**

Dear Simon

**Hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise:-in outline - housing development of up to 3,200 dwellings; local centre comprising community, retail (E, F.2 and pub or drinking establishment/takeaway and sui generis uses), employment (E) uses and parking; a primary school; up to 8ha of land (including key infrastructure) for up to 40,000sq.m of E and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (E and F.1 and F.2), a hotel (C1) food and drink outlets (E and sui generis) and a new community stadium for Lincoln City Football Club; areas of formal and informal public openspace; a network of public footpaths and cycleways; associated engineering works to inform development platform and drainage system; new transport bridge link over to Beever Street, and a new public footpath bridge over Tritton Road. In full - details for means of access into the site from Skellingthorpe Road and Tritton Road (revised description)  
Western Growth Corridor, Skellingthorpe Road, Lincoln**

Thank you for re-consulting us on the above application, on 12 May 2021.

I have noted the minor amendment to the description.

The document uploaded to your website in May 2021 relates to highways issues, so the Environment Agency has no comments to make on this.

There are also some documents uploaded on 13 January 2021 that post-date our last response of October 2020, including some labelled as appendices, several of which we have been unable to download. I would appreciate it if you could confirm whether any of these documents are relevant to the Environment Agency and if so provide us with copies.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely

Ceres House, Searby Road, Lincoln, LN2 4DW  
Customer services line: 03708 506 506  
Email: [LNplanning@environment-agency.gov.uk](mailto:LNplanning@environment-agency.gov.uk)  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)  
Cont/d..

Calls to 03 numbers cost no more than national rate calls to 01 or 02 numbers and count towards any inclusive minutes in the same way. This applies to calls from any type of line including mobile.



Guildhall  
Marshall's Yard  
Gainsborough  
Lincolnshire DN21 2NA

Telephone 01427 676676  
Web [www.west-lindsey.gov.uk](http://www.west-lindsey.gov.uk)

Your contact for this matter is:

Jonathan Cadd  
[jonathan.cadd@west-lindsey.gov.uk](mailto:jonathan.cadd@west-lindsey.gov.uk)  
01427 676676

21<sup>st</sup> May 2019

Directorate of Communities & Environment  
City of Lincoln Council  
City Hall  
Beaumont Fee  
Lincoln  
LN1 1DF

Dear Sir/Madam

**YOUR APPLICATION REFERENCE: 2019/0294/RG3**

**APPLICATION REFERENCE NO: 139332**

**PROPOSAL: Local Authority Consultation for a hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor.**

**LOCATION: Western Growth Corridor Sustainable Urban Extension Lincoln**

Thank you for consulting us with respect for the outlined planning application for the sustainable urban extension known as the Western Growth Corridor. This letter represents the formal view of West Lindsey District Council.

Policy LP2 of the Local Plan provides the spatial strategy for Central Lincolnshire with Lincoln positioned at the top, no. 1, of the hierarchy for sustainable development. The policy notes that the sites allocated in the plan on the edge of the Lincoln urban area will be the principal focus for development in Central Lincolnshire including housing, retail, leisure culture and other employment development. Policy LP3 notes that the Lincoln strategy area will be the main focus for around 64% of the total number of housing and employment land needed through a combined strategy of (and in priority order):

- i) Urban regeneration
- ii) Sustainable urban extensions to Lincoln and:
- iii) Growth at urban extensions which serve Lincoln.

As noted the development would be part of the a Sustainable Urban Extension growth agenda (policy LP28) and falls within, but would not completely fill the allocation site known as the West Growth Corridor designated under policy LP30 which would provide for approximately 3200 dwellings, 20 ha of land (mixed employment) to support wider Lincoln area and inward investment of a strategic nature. Similarly policy LP5 supports the provision of 20ha of employment land within Lincoln Western Growth Corridor.

The proposed development would provide a significant proportion of dwellings (2600) to meet Central Lincolnshire's housing and employment land (12ha) that will benefit Central Lincolnshire as a whole and this is welcomed and would be supported by this Council subject to the proposal not precluding further development within the allocation to meet the remaining 600 dwelling allocation and 8ha of employment land.

The Council notes that policy LP30 seeks development with a direct route for public transport linking Skellingthorpe Road with the city centre via Beavor Street with a connection to the A46 if required. It is noted that no connection is proposed to the A46 in this development and this design is promoted to limit the impact on traffic flows upon the A46. It is requested that the local highway authority and Highways England consultation responses as part of this application are followed to ensure that this proposal would not create congestion or reduce safety upon the A46 which could impact upon principle roads utilised by settlements within West Lindsey, in particular the at the junction with the A57, A15 and A46. It is also requested that improvements to the highway network, particularly to the A46 are implemented in a timely manner in accordance with policy LP30.

In a similar manner it is noted that the scheme includes a detailed flood risk assessment with significant areas of land set aside for flood mitigation and protection. We note the positive response from the Environment Agency with respect to flood mitigation and request that their conditions and comments are considered along with those of the Lead Local Flood Authority to ensure there are no potential detrimental impacts on land and settlements up stream within the district of West Lindsey.

Finally, it is noted that the proposal seeks to provide an off-site contribution to provide the required gypsy and traveller pitches. West Lindsey requests that before such a contribution is accepted all options are considered and discounted for on-site provision and that a specific alternative site within the City of Lincoln boundary has been identified as being suitable and available with an appropriate legal agreement in place to provide such a site. This would ensure that sufficient spaces are available with a suitable spatial spread of sites across Central Lincolnshire to meet the needs of the gypsy and traveller community in accordance with policies LP30 and LP56.

In conclusion, West Lindsey Council welcomes and supports this proposal to bring forward a key part of the spatial growth strategy advocated within the Central Lincolnshire Local Plan development subject to detailed issues outlined being considered accordingly.

Yours faithfully



Mark Sturgess  
Executive Director of Operations

If you require this letter in another format e.g. large print, please contact Customer Services on 01427 676676, by email [customer.relations@west-lindsey.gov.uk](mailto:customer.relations@west-lindsey.gov.uk) or by asking any of the Customer Services staff.

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[www.west-lindsey.gov.uk/planning-privacy](http://www.west-lindsey.gov.uk/planning-privacy)

Planning Services Feedback

We value your opinion on our service, as your comments will help us to make improvements. Please visit our website where you may either make your comments online or download our feedback form to fill in and post back: [www.west-lindsey.gov.uk/planning](http://www.west-lindsey.gov.uk/planning)

Simon Cousins  
City of Lincoln Council  
City Hall  
Beaumont Fee  
Lincoln  
LN1 2DF

By email only

Your contact for this matter is:

Martin Evans  
[martin.evans@west-lindsey.gov.uk](mailto:martin.evans@west-lindsey.gov.uk)  
01427 676647

4/11/2020

Your reference: 2019/0294/RG3

Dear Simon Cousins

**APPLICATION REFERENCE NO: 141706**

**PROPOSAL: Local Authority Consultation for a hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor - reconsultation of 139332 revised description**

**LOCATION: Western Growth Corridor Sustainable Urban Extension Lincoln**

Thank you for your reconsultation letter dated 23<sup>rd</sup> September 2020 (your reference 2019/0294/RG3).

Having considered the amended and additional information, West Lindsey District Council has no further comment to make beyond those already provided in its response dated 21<sup>st</sup> May 2019.

Yours faithfully

Martin Evans  
On behalf of West Lindsey District Council

If you require this letter in another format e.g. large print, please contact Customer Services on 01427 676676, by email [customer.services@west-lindsey.gov.uk](mailto:customer.services@west-lindsey.gov.uk) or by asking any of the Customer Services staff.

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[www.west-lindsey.gov.uk/planning-privacy](http://www.west-lindsey.gov.uk/planning-privacy)

Planning Services Feedback



## Developments Affecting Trunk Roads and Special Roads

### Highways England Planning Response (HEPR 16-01)

#### Formal Recommendation to an Application for Planning Permission

From: Catherine Brookes (Divisional Director)  
Operations Directorate  
Midlands Region  
Highways England  
[planningm@highwaysengland.co.uk](mailto:planningm@highwaysengland.co.uk)

To: City of Lincoln Council – FAO Lana Meddings

CC: [transportplanning@dft.gsi.gov.uk](mailto:transportplanning@dft.gsi.gov.uk)  
[growthandplanning@highwaysengland.co.uk](mailto:growthandplanning@highwaysengland.co.uk)

Council's Reference: **2019/0294/RG3**

Referring to the planning application referenced above, consultation dated 15 April 2019, for the **hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise: In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8ha of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; areas of formal and informal public openspace; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over to Beevor Street, and a new public footpath bridge over to Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road**, located at Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire, notice is hereby given that Highways England's formal recommendation is that we:

a) ~~offer no objection;~~



- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is not relevant to this application. <sup>1</sup>

This represents Highways England's formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via [transportplanning@df.t.gsi.gov.uk](mailto:transportplanning@df.t.gsi.gov.uk).

<b>Signature:</b> 	<b>Date:</b> 22 May 2019
<b>Name:</b> Scarlett Griffiths	<b>Position:</b> Spatial Planning and Economic Development Manager
<b>Highways England:</b> Highways England   The Cube   199 Wharfside Street   Birmingham   B1 1RN	
<a href="mailto:Scarlett.Griffiths@highwaysengland.co.uk">Scarlett.Griffiths@highwaysengland.co.uk</a>	

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<sup>1</sup> Where relevant, further information will be provided within Annex A.

## Annex A    **Highways England recommended further assessment required**

HIGHWAYS ENGLAND (“we”) has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regard to planning application 2019/0294/RG3 and has been prepared by Scarlett Griffiths.

Highways England was first consulted on the Western Growth Corridor (WGC) proposal in 2017, during pre-application stage. Since then, we have been in ongoing discussion with the applicant, providing advice on the transport assessment work to be undertaken in support of the proposal. We have now reviewed the information submitted as part of the application and provided our comments below.

### Sustainable Development

Having reviewed the Transport Assessment (TA) dated 14 March 2019, we consider the proposed provisions would help limit the overall number of vehicular trips generated by the proposal. However, we note that the A46 Trunk Road is a significant barrier for trips to and from the development, including access to National Cycle Network (NCN) Route 64. There is no clear detail within the TA on how the development will provide facilities to support these trips by sustainable modes. This should be clarified.

Reference is made to upgrading a route along the catchwater drain which passes underneath the A46 to the east of Skellingthorpe roundabout; at present there is insufficient headroom under this structure for walking or cycling. It may be possible to alter the ground levels to resolve this, however further evidence to demonstrate the suitability of such proposals along with relevant structural approvals is required.

The current provisions to cross the A46 at Skellingthorpe Roundabout are limited and subject of concerns regarding their safety. Highways England is currently investigating the feasibility of providing upgrades at this location. There may be scope for a supporting contribution from the proposed development to any such upgrades of walking and cycling facilities, which should be further investigated.

Nevertheless, the proposal should include for provision of at least one suitable and viable pedestrian and cycle link connecting the site to facilities on the north side of the A46, to ensure the sustainability of the site for all users, to protect the safe operation of the SRN and to further mitigate the traffic generated by the WGC.

### Modelling Approach

The TA states that the traffic impact of the proposed development has been assessed using the Greater Lincoln Transport Model (GLTM). In addition, Highways England's VISSIM model for the A46 corridor has been used to undertake modelling assessment in relation to the A46 junctions, while using outputs from the GLTM. During the pre-application stage, Highways England has undertaken checks of the Local Model Validation Report (LMVR) of the GLTM and considered the model being well developed, calibrated and validated on the A46 area of interest. Therefore, the proposed approach is considered acceptable.

### Assessment Years

According to Department for Transport (DfT) *Circular 02/2013*, the impact of the proposed development on the SRN should be assessed for the opening year and ten years after the date of registration of a planning application or end of the relevant Local Plan, whichever is the greater. During the pre-application stage it was agreed that opening year 2021 and review year 2036 (end of Lincolnshire Local Plan) should be assessed. However, there is no mention of opening year assessment in the TA. We advise the applicant to confirm the proposed opening year for the development noting that, if this is still 2021, then an up to date delivery programme should be provided, to allow us understanding whether this assumption can still be considered acceptable.

As commented in pre-application stage, the applicant should conduct the opening year assessment, both with and without the proposed development, with all committed developments and any of their associated mitigation schemes included.

### Development Trip Generation

The trip generation for the WGC (shown in Table 4-1 of the TA) has been checked against pre-application discussions and is considered overall acceptable. We note that the trip generation of the commercial use has been discounted of trips generated by the retail element. As we expect that the retail trips for such small retail floorspace within a similar development would either be pass-by or internal trips, we consider this assumption unlikely to have a significant impact on the A46 junctions. However, any assumption for secondary trips should be clearly justified in the TA.

### Development Trip Distribution

As previously agreed, the trip distribution for the WGC has been derived using the gravity model approach. The trip distribution diagrams presented in Appendix 6 of the TA relate the 2036 Option A, i.e. With Development and Without A46 Link scenario. It is our understanding that Table 4.3 of the TA refers to the same scenario. Please note that trip distribution used in the opening year assessment should be derived for 2021, provided that this assessment year is confirmed.

### Committed Development

During pre-application stage, Highways England reviewed the TA Forecasting Report (document ref: 70042015-001 TAFR) dated 15 December 2017 and considered the committed developments and schemes included in the GLTM acceptable.

### Highway Impact Assessment

As previously noted, we would expect the applicant to undertake an opening year assessment for the A46 junctions using Highways England's VISSIM model of the A46 corridor. Although the TA refers to a VISSIM modelling work undertaken in support of the proposal, it is unclear which year has been assessed.

It is our understanding that a previously identified mitigation scheme to the A46 / B1378 Skellingthorpe Road roundabout (2016 Mouchel scheme shown in figure 5-4 of the TA) is proposed to be implemented as part of Phase 1a of the WGC. However, this should be confirmed. We note that the scheme has been coded into the VISSIM model for both Do Minimum and Option A scenarios. It should be noted that, if the scheme is proposed to be implemented as part of the proposal, then this should not be modelled in the Do Minimum scenario.

We request the applicant undertaken assessments for Do Nothing, Do Minimum and Option A (With Development and Without A46 Link) scenarios for both opening year and review year and provide the VISSIM model files for review.

### A46 / B1378 Skellingthorpe Road Roundabout Mitigation

Please note that any works proposed which affect Highways England's asset shall be designed in full compliance with the DMRB. To reassure Highways England that the proposal has been designed in accordance to current standards, a more detailed drawing of the proposed scheme should be provided for our review.

From a high-level review of Figure 5-4, the proposals do not appear to be deliverable within the existing highway boundary. The kerb line on Lincoln Road appears to be outside of the assumed boundary. It is also unclear whether the widening on three out of four arms leave sufficient space within the boundary to accommodate necessary drainage, lighting, vehicle restraint, earthwork, footpaths and signing provisions.

Also, please note that any works within Highways England's boundary will be subject to Road Safety Audit (RSA) and Walking, Cycling and Horse-Riding Assessment and Review (WCHAR). Prior to planning being granted, a Stage 1 RSA and WCHAR need to be undertaken for the proposed changes and submitted for review in accordance with DMRB HD 19/15 and HD 42/17 respectively. Highways England's road safety team should be invited to be part of the audit team.

We note that Personal Injury Collision (PIC) data was obtained using the Crashmap database for the period between 01/01/2012 and 31/12/2016. As data for recent years

are available, we advise the applicant to revise the assessment using data from the latest years 5 and provide the results for our review.

#### Stadium Traffic Impact

Appendix 5 to the TA presents a draft Stadium Traffic Management Plan. In order to ensure that the A46 continues to serve its purpose as part of the SRN, we request a detailed Stadium Traffic Management Plan to be submitted to the LPA in consultation with Highways England. This can be resolved through a planning condition.

#### Construction Traffic Management Plan

In order for us to fully understand the impact of the development on the A46 Trunk Road, further information should be provided with regards to construction traffic and its routing to and from the site. We consider that this point can be addressed through the submission of a Construction Traffic Management Plan (CTMP) prior to construction. This can be dealt with through a planning condition.

**In light of the above, Highways England recommends that planning permission not be granted for a period of three months from the date of this notice, pending additional information being submitted.**



**Developments Affecting Trunk Roads and Special Roads**  
**Highways England Planning Response (HEPR 16-01)**  
**Formal Recommendation to an Application for Planning Permission**

From: Catherine Brookes (Divisional Director)  
Operations Directorate  
Midlands Region  
Highways England  
[planningm@highwaysengland.co.uk](mailto:planningm@highwaysengland.co.uk)

To: **City of Lincoln Council – FAO Lana Meddings**

CC: [transportplanning@dft.gsi.gov.uk](mailto:transportplanning@dft.gsi.gov.uk)  
[growthandplanning@highwaysengland.co.uk](mailto:growthandplanning@highwaysengland.co.uk)

Council's Reference: **2019/0294/RG3**

Referring to the planning application referenced above, consultation dated 15 April 2019, for the **hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise: In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8ha of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; areas of formal and informal public openspace; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over to Beevor Street, and a new public footpath bridge over to Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road**, located at Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire, notice is hereby given that Highways England's formal recommendation is that we:



a) ~~offer no objection;~~

- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);
- d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).

Highways Act Section 175B is not relevant to this application. <sup>1</sup>

This represents Highways England's formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via [transportplanning@dft.gsi.gov.uk](mailto:transportplanning@dft.gsi.gov.uk).

<b>Signature:</b> 	<b>Date:</b> 22 August 2019
<b>Name:</b> Scarlett Griffiths	<b>Position:</b> Spatial Planning and Economic Development Manager
<b>Highways England:</b> Highways England   The Cube   199 Wharfside Street   Birmingham   B1 1RN 	

<sup>1</sup> Where relevant, further information will be provided within Annex A.

## **Annex A Highways England recommended further assessment required**

HIGHWAYS ENGLAND (“we”) has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regard to planning application 2019/0294/RG3 and has been prepared by Scarlett Griffiths.

Highways England was first consulted on the Western Growth Corridor (WGC) proposal in 2017, during pre-application stage. Since then, we have been in ongoing discussion with the applicant, providing advice on the transport assessment work to be undertaken in support of the proposal.

In April 2019, we were formally consulted on the planning application for the proposal where we commented that there were outstanding highway matters that were required to be addressed by the applicant. These outstanding matters have been detailed in our formal response dated May 2019.

Since May 2019, we now received some traffic modelling information from the applicant’s transport consultant which aims to address some of the issues identified in our formal response in May 2019. Highways England is currently in the process of reviewing this information and intend to provide the applicant’s transport consultant with comments in due course.

**In light of the above, Highways England recommends that planning permission not be granted for a period of three months from the date of this notice, pending additional information being submitted.**





**Developments Affecting Trunk Roads and Special Roads**  
**Highways England Planning Response (HEPR 16-01)**  
**Formal Recommendation to an Application for Planning Permission**

From: Catherine Brookes (Divisional Director)  
Operations Directorate  
Midlands Region  
Highways England  
[planningm@highwaysengland.co.uk](mailto:planningm@highwaysengland.co.uk)

To: **City of Lincoln Council – FAO: Lana Meddings**

CC: [transportplanning@dft.gsi.gov.uk](mailto:transportplanning@dft.gsi.gov.uk)  
[growthandplanning@highwaysengland.co.uk](mailto:growthandplanning@highwaysengland.co.uk)

Council's Reference: **2019/0294/RG3**

Referring to the planning application referenced above, consultation dated 15 April 2019, for the **hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise: In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8ha of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; areas of formal and informal public openspace; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over to Beevor Street, and a new public footpath bridge over to Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road**, located at Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire, notice is hereby given that Highways England's formal recommendation is that we:

a) ~~offer no objection;~~

- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);
- d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).

Highways Act Section 175B is not relevant to this application. <sup>1</sup>

This represents Highways England's formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via [transportplanning@dft.gsi.gov.uk](mailto:transportplanning@dft.gsi.gov.uk).

<b>Signature:</b> 	<b>Date:</b> 22 November 2019
<b>Name:</b> Scarlett Griffiths	<b>Position:</b> Spatial Planning and Economic Development Manager
<b>Highways England:</b> Highways England   The Cube   199 Wharfside Street   Birmingham   B1 1RN <a href="mailto:Scarlett.Griffiths@highwaysengland.co.uk">Scarlett.Griffiths@highwaysengland.co.uk</a>	

<sup>1</sup> Where relevant, further information will be provided within Annex A.

## **Annex A Highways England recommended further assessment required**

HIGHWAYS ENGLAND (“we”) has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regard to planning application 2019/0294/RG3 and has been prepared by Scarlett Griffiths.

As you would be aware, Highways England was first consulted on the Western Growth Corridor (WGC) proposal in 2017, during pre-application stage. Since then, we have been in ongoing discussion with the applicant, providing advice on the transport assessment work to be undertaken in support of the proposal.

In April 2019, we were formally consulted on the planning application for the proposal where we commented that there were outstanding highway matters that were required to be addressed by the applicant. These outstanding matters have been detailed in our formal response dated May 2019.

Since May 2019, we have received some traffic modelling and design information from the applicant’s transport consultant which aims to address some of the issues identified in our formal response in May 2019.

Having reviewed the information submitted recently to us, we consider the traffic modelling outputs to be suitable. However, the following issues relating to the Skellingthorpe Roundabout improvements and Walking, Cycling and Horse-riding Assessment need to be addressed.

### **Skellingthorpe Roundabout improvement**

1. The design drawing for the proposed improvement works at A46/ Lincoln Road/ Skellingthorpe Road roundabout submitted requires land outside the highway boundary which is fundamentally required. While we appreciate the suggestion from the applicant’s transport consultant that this land can be dedicated as highway land, the ownership of the land needs to be clarified at this stage. If the land is not in applicant’s control (or they have not secured purchase rights), we cannot recommend a condition for the delivery of the proposed scheme as it cannot be guaranteed as deliverable.
2. The design drawing for the proposed improvement works at A46/ Lincoln Road/ Skellingthorpe Road roundabout indicate a proposed reduction of turning radii

without proposing an increase in lane widths towards junction approaches. As such, vehicle tracking should be provided to demonstrate that the design vehicle can still safely track around the junction. This can be provided as part of the stage 1 RSA package for expedience.

3. The north part of the circulatory of A46/ Lincoln Road/ Skellingthorpe Road roundabout is a pinch point within the design drawing submitted, having to carry three lanes without any widening proposed over the current two-lane width. However there appears to be ample space to address this, presuming the land outside of the current highway boundary can be secured.
4. The updated design layout for A46/ Lincoln Road/ Skellingthorpe Road roundabout includes a short section of reverse curve between the A46 northbound entry and Lincoln Road, although there appears to be sufficient space to design this out at a later stage.
5. The signal-controlled crossing point to the north of the junction appears to be proposed for pedestrians only, which is contrary to the findings of the WCHA. Further local evidence from our own studies shows that there is notable demand for cycle use at this point. Also, an existing shared use path is available across the junction on the south side. The crossing should therefore meet the requirements for a toucan crossing to cater for all users as it is not practicable (or desirable) to prevent cyclists from using it.
6. Clarity needs to be provided as to why the proposed improvement works at A46/ Lincoln Road/ Skellingthorpe Road roundabout proposes a controlled crossing to the north side of the junction given that the main through pathways are on the south side of Skellingthorpe Road / Lincoln Road. For a crossing point to be useful and effective, we consider that it should be provided on the south side of the junction as there appears to be no fundamental issues with fitting this in. As above, this should also be a toucan as per the existing shared use facilities.

#### Walking, Cycling and Horse-riding Assessment

1. The report titled 'Walking, Cycling & Horse-Riding Assessment & Review (WCHAR)' should be renamed as 'Walking, Cycling and Horse-riding Assessment Report', as the Assessment and Review reports are separate reports produced at different stages of the scheme development. The Review report will need to be prepared alongside the detailed design in due course. There are a number of references to 'WCHAR' or similar in the report submitted which needs to be updated accordingly.
2. Section 4.9 in the report states that consultations have been made to the local authority, Sustrans, local bus operators and Highways England. However, response from Sustrans is only included in the section. Summary of responses from other stakeholders should also be included in the report. It is not mentioned in the report if other key stakeholders including the local schools and Active Lincolnshire were contacted.

3. In Section 4.10, no mention is made of the public footpath (evident on OS mapping) running from Skellingthorpe Roundabout to the east across the Cross Holts woodland and crossing the A46 immediately east of the junction.
4. Section 4.10.6 refers about the lack of pedestrian demand by citing site visit observations. However, results extracted from a pedestrian and cycle survey recently conducted by Highways England in Skellingthorpe roundabout shows a regular demand for crossing, despite the A46 trunk road acting as a barrier. Further these volumes persist even in inclement weather. These results could be provided to the applicant which should be taken into account.
5. Section 4.12.1 states '*Consultation with local user groups and the wider public is only required for large schemes*'. While it is appreciated that HD 42/17 does not require public consultation on small schemes, the development itself has no doubt undertaken public consultation. It would be useful to explore whether any of the responses to this development proposal included comments on the study area in relation to walking, cycling and horse-riding.
6. Sections 5.1.4 and 5.1.7 gives reference to high vehicle speeds observed during the off-peak periods. The basis for this assertion should be evidenced in the relevant section of the report.
7. In Section 5.1.7 reference should be made to the two cycle collisions (which is high compared to other similar junctions).

**Informative note to the applicant:**

For the Road Safety Audit (RSA) of the proposed scheme at A46 Skellingthorpe roundabout, Highways England's road safety team should be invited to provide a member for the RSA. They can be contacted at [Area7SafetyTeam@highwaysengland.co.uk](mailto:Area7SafetyTeam@highwaysengland.co.uk).

**In light of the above, Highways England recommends that planning permission not be approved for a period of three months from the date of this notice, pending additional information being submitted.**



**Developments Affecting Trunk Roads and Special Roads**  
**Highways England Planning Response (HEPR 16-01)**  
**Formal Recommendation to an Application for Planning Permission**

From: Catherine Brookes (Divisional Director)  
Operations Directorate  
Midlands Region  
Highways England  
[REDACTED]

To: **City of Lincoln Council – FAO: Lana Meddings**

CC: [REDACTED]

Council's Reference: **2019/0294/RG3**

Referring to the planning application referenced above, consultation dated 15 April 2019, for the **hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise: In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8ha of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; areas of formal and informal public openspace; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over to Beevor Street, and a new public footpath bridge over to Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road**, located at Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire, notice is hereby given that Highways England's formal recommendation is that we:

a) ~~offer no objection;~~

- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);
- d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).

Highways Act Section 175B is not relevant to this application. <sup>1</sup>

This represents Highways England's formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via [transportplanning@dft.gsi.gov.uk](mailto:transportplanning@dft.gsi.gov.uk).

<b>Signature:</b> 	<b>Date:</b> 21 February 2020
<b>Name:</b> Scarlett Griffiths	<b>Position:</b> Spatial Planning and Economic Development Manager
<b>Highways England:</b> Highways England   The Cube   199 Wharfside Street   Birmingham   B1 1RN	
	

<sup>1</sup> Where relevant, further information will be provided within Annex A.

## **Annex A Highways England recommended further assessment required**

HIGHWAYS ENGLAND (“we”) has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regard to planning application 2019/0294/RG3 and has been prepared by Scarlett Griffiths.

Highways England was first consulted on the Western Growth Corridor (WGC) proposal in 2017, during pre-application stage. Since then, we have been in ongoing discussion with the applicant, providing advice on the transport assessment work to be undertaken in support of the proposal.

When formally consulted on the planning application for the proposal in April 2019, we issued a holding recommendation due to outstanding highway matters that were required to be addressed by the applicant. The holding recommendation was further extended several times, the latest being November 2019, due to outstanding issues having been identified with regard to the proposed improvements at Skellingthorpe Roundabout and Walking, Cycling and Horse-riding Assessment (WCHAR).

The applicant recently submitted additional information (Technical Note 7 – Response to Highways England and WCHAR) aiming to address the outstanding issues detailed in our previous response. This new information is currently under consideration.

**In light of the above, we recommend that planning permission not be granted for a further period of three months from the date of this notice, pending review of the submitted information.**





**Developments Affecting Trunk Roads and Special Roads**  
**Highways England Planning Response (HEPR 16-01)**  
**Formal Recommendation to an Application for Planning Permission**

From: Catherine Brooks (Divisional Director),  
Operations Directorate  
Midlands Region  
Highways England.  
[planningm@highwaysengland.co.uk](mailto:planningm@highwaysengland.co.uk)

To: Lincoln City Council – FAO Lana Meddings

CC: [transportplanning@dft.gsi.gov.uk](mailto:transportplanning@dft.gsi.gov.uk)  
[growthandplanning@highwaysengland.co.uk](mailto:growthandplanning@highwaysengland.co.uk)

Council's Reference: 2019/0294/RG3

Referring to the planning application referenced above, consultation dated 15 April 2019, for hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise: In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8ha of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; areas of formal and informal public openspace; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over to Beevor Street, and a new public footpath bridge over to Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road, located at Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire, notice is hereby given that Highways England's formal recommendation is that we:

- a) offer no objection;
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~

c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);

~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is not relevant to this application.

This represents Highways England's formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2015, via [transportplanning@dft.gsi.gov.uk](mailto:transportplanning@dft.gsi.gov.uk).

<b>Signature:</b> 	<b>Date:</b> 21 May 2020
<b>Name:</b> Martin Seldon	<b>Position:</b> Spatial Planner
<b>Highways England:</b> Highways England   The Cube   199 Wharfside Street   Birmingham   B1 1RN	
<a href="mailto:Martin.Seldon@highwaysengland.co.uk">Martin.Seldon@highwaysengland.co.uk</a>	

**Developments Affecting Trunk Roads and Special Roads**  
**Highways England Planning Response (HEPR 16-01)**  
**Formal Recommendation to an Application for Planning Permission**

From: Catherine Brooks (Divisional Director),  
Operations Directorate  
Midlands Region  
Highways England.  
[planningm@highwaysengland.co.uk](mailto:planningm@highwaysengland.co.uk)

To: Lincoln City Council – FAO Lana Meddings

CC: [transportplanning@df.tgs.gov.uk](mailto:transportplanning@df.tgs.gov.uk)  
[growthandplanning@highwaysengland.co.uk](mailto:growthandplanning@highwaysengland.co.uk)

Council's Reference: 2019/0294/RG3

Referring to the planning application referenced above, consultation dated 15 April 2019, for hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise: In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8ha of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; areas of formal and informal public openspace; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over to Beevor Street, and a new public footpath bridge over to Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road, located at Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire, notice is hereby given that Highways England's formal recommendation is that we:

~~a) offer no objection;~~

~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~

- c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);
- d) ~~recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is not relevant to this application.

This represents Highways England's formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2015, via [transportplanning@dft.qsi.gov.uk](mailto:transportplanning@dft.qsi.gov.uk).

<b>Signature:</b> 	<b>Date:</b> 22 May 2020
<b>Name:</b> Martin Seldon	<b>Position:</b> Spatial Planner
<b>Highways England:</b> Highways England   The Cube   199 Wharfside Street   Birmingham   B1 1RN	
<a href="mailto:Martin.Seldon@highwaysengland.co.uk">Martin.Seldon@highwaysengland.co.uk</a>	



## Developments Affecting Trunk Roads and Special Roads

### Highways England Planning Response (HEPR 16-01)

#### Formal Recommendation to an Application for Planning Permission

From: Catherine Brookes (Divisional Director)  
Operations Directorate  
Midlands Region  
Highways England  
[planningm@highwaysengland.co.uk](mailto:planningm@highwaysengland.co.uk)

To: City of Lincoln Council – FAO: Lana Meddings

CC: [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk)  
[growthandplanning@highwaysengland.co.uk](mailto:growthandplanning@highwaysengland.co.uk)

Council's Reference: 2019/0294/RG3

Referring to the planning application referenced above, consultation dated 15 April 2019, for the hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise: In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8ha of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; areas of formal and informal public openspace; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over to Beevor Street, and a new public footpath bridge over to Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road, located at Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire, notice is hereby given that Highways England's formal recommendation is that we:

a) offer no objection;

- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is not relevant to this application. <sup>1</sup>

This represents Highways England's formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via [transportplanning@df.gov.uk](mailto:transportplanning@df.gov.uk).

<b>Signature:</b> 	<b>Date:</b> 18 November 2020
<b>Name:</b> Martin Seldon	<b>Position:</b> Assistant Spatial Planner
<b>Highways England:</b> Highways England   The Cube   199 Wharfside Street   Birmingham   B1 1RN <a href="mailto:Martin.Seldon@highwaysengland.co.uk">Martin.Seldon@highwaysengland.co.uk</a>	

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**Annex A Highways England recommended further assessment required**

HIGHWAYS ENGLAND ("we") has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regard to planning application 2019/0294/RG3 and has been prepared by Martin Seldon.

Highways England was first consulted on the Western Growth Corridor (WGC) proposal in 2017, during pre-application stage. Since then, we have been in ongoing discussions with the applicant, providing advice on the transport assessment work to be undertaken in support of the proposal.

When formally consulted on the planning application for the proposal in April 2019, we issued a holding recommendation due to outstanding highway matters that were required to be addressed by the applicant. The holding recommendation was further extended several times, the latest being August 2020 as there were outstanding matters relating to the RSA and modelling work.

Since the latest response was issued, the applicant has prepared a revised transport assessment. We have continued to engage with the applicant to resolve outstanding matters relating to the delivery and mitigation of the A46 / Skellingthorpe Road improvements, the GLTM Saturn model assessment data, trip generation and distribution used in the new proposal, and the RSA1. These discussions are still ongoing.

**In light of the above, Highways England recommends that planning permission not be approved for a further period of three months from the date of this notice, pending additional information being submitted.**



## Developments Affecting Trunk Roads and Special Roads

### Highways England Planning Response (HEPR 16-01)

#### Formal Recommendation to an Application for Planning Permission

From: Adrian Oulds (Acting Regional Director)  
Operations Directorate  
Midlands Region  
Highways England  
[planningm@highwaysengland.co.uk](mailto:planningm@highwaysengland.co.uk)

To: City of Lincoln Council – FAO: Lana Meddings

CC: [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk)  
[growthandplanning@highwaysengland.co.uk](mailto:growthandplanning@highwaysengland.co.uk)

Council's Reference: 2019/0294/RG3

Referring to the planning application referenced above, consultation dated 15 April 2019, for the hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise: In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8ha of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; areas of formal and informal public open space; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over to Beevor Street, and a new public footpath bridge over to Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road, located at Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire, notice is hereby given that Highways England's formal recommendation is that we:

a) offer no objection;



- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is not relevant to this application. <sup>1</sup>

This represents Highways England's formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via [transportplanning@df.gov.uk](mailto:transportplanning@df.gov.uk).

<b>Signature:</b> 	<b>Date:</b> 17 February 2021
<b>Name:</b> Martin Seldon	<b>Position:</b> Assistant Spatial Planner
<b>Highways England:</b> Highways England   The Cube   199 Wharfside Street   Birmingham   B1 1RN <a href="mailto:Martin.Seldon@highwaysengland.co.uk">Martin.Seldon@highwaysengland.co.uk</a>	

Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations with regard to planning application 2019/0294/RG3 and has been prepared by Martin Seldon, Assistant Spatial Planner for Highways England.

Highways England was first consulted on the Western Growth Corridor (WGC) proposal in 2017, during pre-application stage. Since then, we have been in ongoing discussions with the applicant, providing advice on the transport assessment work to be undertaken in support of the proposal.

When formally consulted on the planning application for the proposal in April 2019, we issued a holding recommendation due to outstanding highway matters that were required to be addressed by the applicant. The holding recommendation was further extended several times, the latest being November 2020. The applicant had prepared a revised transport assessment. We had continued to engage with the applicant to resolve outstanding matters relating to the delivery and mitigation of the A46 / Skellingthorpe Road improvements, the GLTM Saturn model assessment data, trip generation and distribution used in the new proposal, and the RSA1.

Since the latest response was issued, we have continued to engage with the applicant to resolve outstanding matters.

In November 2020, the applicant was informed that the mitigation would need to be carried out under a S278 Agreement.

As a result of changes to the proposed masterplan and phasing of the development we reviewed the updated modelling work. It was noted that in relation to the A46 junctions the impact was either expected to be materially different to what had previously been proposed or that based on what had been provided we were unable to ascertain the likely traffic impact.

In January 2021, we reviewed the GLTM modelling report for the revised assessments. We requested that we be provided with the development and infrastructure uncertainty log for the version of GLTM used to undertake the runs so the assumptions can be checked. As select link analysis, flow difference plots, or traffic

reassignment plots had not been included in the report we also asked that these be provided.

In February 2021, we were provided with further information from Connect Consultants. We reviewed the uncertainty log and considered it to be acceptable. However, we recommended that as the impacts extend past the A46/Whisby Road roundabout, when similar plots are provided for the opening year assessment (2021) that the network south of A46/Whisby Road roundabout should be included.

Furthermore, whilst Technical Note 11 Rev – Response to HE and accompanying flow diagrams have been provided, there remained further outstanding matters that had not been addressed.

Highways England is currently in the process of reviewing Technical Note 11, flow diagrams and Stage 1 Road Safety Audit. Discussions regarding outstanding matters are still ongoing.

**In light of the above, Highways England recommends that planning permission not be granted for a further period of three months from the date of this response, to provide the applicant time to submit additional information.**



## Developments Affecting Trunk Roads and Special Roads

### Highways England Planning Response (HEPR 16-01)

### Formal Recommendation to an Application for Planning Permission

From: Adrian Oulds (Acting Regional Director)  
Operations Directorate  
Midlands Region  
Highways England  
[planningm@highwaysengland.co.uk](mailto:planningm@highwaysengland.co.uk)

To: City of Lincoln Council – FAO: Simon Cousins

CC: [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk)  
[growthandplanning@highwaysengland.co.uk](mailto:growthandplanning@highwaysengland.co.uk)

Council's Reference: 2019/0294/RG3

Referring to the planning application referenced above, consultation dated 15 April 2019, for the hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise: In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8ha of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; areas of formal and informal public open space; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over to Beevor Street, and a new public footpath bridge over to Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road, located at Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire, notice is hereby given that Highways England's formal recommendation is that we:

a) offer no objection;

- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is not relevant to this application. <sup>1</sup>

This represents Highways England's formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk).

<b>Signature:</b> 	<b>Date:</b> 14 May 2021
<b>Name:</b> Martin Seldon <b>Position:</b> Assistant Spatial Planner  <b>Highways England:</b> Highways England   The Cube   199 Wharfside Street   Birmingham   B1 1RN  <a href="mailto:Martin.Seldon@highwaysengland.co.uk">Martin.Seldon@highwaysengland.co.uk</a>	

## Annex A Highways England recommended further assessment required

HIGHWAYS ENGLAND ("we") has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations concerning planning application 2019/0294/RG3 and has been prepared by Martin Seldon.

This response has been prepared as our existing holding recommendation from February 2021 is due to expire, and no further supporting information has been submitted by the applicant. Therefore, our previous comments remain relevant.

Highways England was first consulted on the Western Growth Corridor (WGC) proposal in 2017, during the pre-application stage. Since then, we have been in ongoing discussions with the applicant, providing advice on the transport assessment work to be undertaken in support of the proposal.

When formally consulted on the planning application for the proposal in April 2019, we issued a holding recommendation due to outstanding highway matters that were required to be addressed by the applicant. The holding recommendation was further extended several times, the latest being February 2021.

Since the latest response was issued, we have continued to engage with the applicant to resolve outstanding matters related to the delivery and mitigation of the A46 / Skellingthorpe Road improvements, the GLTM Saturn model assessment data, trip generation and distribution used in the new proposal, and the Road Safety Audit (RSA).

As a result of changes to the proposed masterplan and phasing of the development, the applicant prepared a revised transport assessment. We reviewed the updated modelling work. It was noted that concerning the A46 junctions the impact was either expected to be materially different to what had previously been proposed or that based on what had been provided we were unable to ascertain the likely traffic impact.

Later in November 2020, we informed the applicant that the mitigation would need to be carried out under an S278 Agreement.

In January 2021, we reviewed the GLTM modelling report for the revised assessments. We requested that we be provided with the development and

infrastructure uncertainty log for the version of GLTM used to undertake the runs so the assumptions could be checked. As select link analysis, flow difference plots, or traffic reassignment plots had not been included in the report we also asked that these be provided.

In February 2021, we were provided with further information from Connect Consultants, the applicant's transport consultants. We reviewed the uncertainty log and considered it to be acceptable. However, we recommended that as the impacts extend past the A46 / Whisby Road roundabout when similar plots are provided for the opening year assessment (2021) that the network south of A46 / Whisby Road roundabout should be included.

More recently, we have completed the review of Technical Note 11 Rev – Response to Highways England and accompanying flow diagrams. Further discussions have taken place with the applicant on next steps to address outstanding matters on traffic flows, trigger point testing and modelling scoping. We await receipt of updated information on these issues. In addition, the RSA Stage 1 process is still to be concluded.

**In light of the above, Highways England recommends that planning permission not be granted for a further period of three months from the date of this response, to provide the applicant time to submit additional information.**



## Developments Affecting Trunk Roads and Special Roads

### Highways England Planning Response (HEPR 16-01)

### Formal Recommendation to an Application for Planning Permission

From: Andrew Jinks (Regional Director)  
Operations Directorate  
Midlands Region  
Highways England  
[planningm@highwaysengland.co.uk](mailto:planningm@highwaysengland.co.uk)

To: **City of Lincoln Council – FAO: Simon Cousins**

CC: [transportplanning@df.gov.uk](mailto:transportplanning@df.gov.uk)  
[growthandplanning@highwaysengland.co.uk](mailto:growthandplanning@highwaysengland.co.uk)

Council's Reference: **2019/0294/RG3**

Referring to the planning application referenced above, consultation dated 15 April 2019, for the **hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise: In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8ha of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; areas of formal and informal public open space; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over to Beevor Street, and a new public footpath bridge over to Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road**, located at Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire, notice is hereby given that Highways England's formal recommendation is that we:

a) offer no objection;



- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – Highways England recommended Planning Conditions);~~
- c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is not relevant to this application. <sup>1</sup>

This represents Highways England's formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should you disagree with this recommendation you should consult the Secretary of State for Transport, as per the Town and Country Planning (Development Affecting Trunk Roads) Direction 2018, via [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk).

<b>Signature:</b> 	<b>Date:</b> 16 August 2021
<b>Name:</b> Martin Seldon	<b>Position:</b> Assistant Spatial Planner
<b>Highways England:</b> Highways England   The Cube   199 Wharfside Street   Birmingham   B1 1RN <a href="mailto:Martin.Seldon@highwaysengland.co.uk">Martin.Seldon@highwaysengland.co.uk</a>	

## Annex A    **Highways England recommended further assessment required**

HIGHWAYS ENGLAND (“we”) has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations concerning planning application 2019/0294/RG3 and has been prepared by Martin Seldon.

Highways England was first consulted on the Western Growth Corridor (WGC) proposal in 2017, during the pre-application stage. Since then, we have been in ongoing discussions with the applicant, providing advice on the transport work to be undertaken in support of the proposal.

When formally consulted on the planning application for the proposal in April 2019, we issued a holding recommendation due to outstanding highway matters that were required to be addressed by the applicant. Subsequently, changes to the proposed masterplan and phasing of the development required the applicant to prepare a revised Transport Assessment (TA). We reviewed the updated TA and due to outstanding matters, the holding recommendation has been extended several times, the latest being May 2021.

In November 2020, we informed the applicant that the mitigation would need to be carried out under an S278 Agreement.

In January 2021, we reviewed the GLTM modelling report for the revised assessments. We requested that the development and infrastructure uncertainty log be provided for our review. We also asked that select link analysis, flow difference plots, or traffic reassignment plots be provided. These have been provided and considered to be acceptable.

In August 2021, we reviewed the updated VISSIM modelling provided by the applicant. To satisfy outstanding queries AECOM undertook an independent assessment. From AECOM’s review, it was considered that the modelling work was satisfactory. We have recommended the applicant to summarize all the modelling evidence in a Technical Note to serve as transport evidence.

We have recently received *Technical Note 11 Rev A* date 2 August 2021, from the applicant’s transport consultants which AECOM is in the process of reviewing.

Since the most recent response was issued, we have continued to engage with the applicant to resolve outstanding matters related to trigger point testing, for the delivery and mitigation of the A46 / Skellingthorpe Road improvements and the associated Road Safety Audit (RSA).

**In light of the above, Highways England recommends that planning permission not be granted for a further period of three months from the date of this response, to provide the applicant time to submit additional information.**



## National Highways Planning Response (NHPR 21-09) Formal Recommendation to an Application for Planning Permission

From: Andrew Jinks (Regional Director)  
Operations Directorate  
Midlands Region  
National Highways  
[PlanningM@highwaysengland.co.uk](mailto:PlanningM@highwaysengland.co.uk)

To: City of Lincoln Council FAO Simon Cousins

CC: [transportplanning@df.gov.uk](mailto:transportplanning@df.gov.uk)  
[spatialplanning@highwaysengland.co.uk](mailto:spatialplanning@highwaysengland.co.uk)

**Council's Reference:** 2019/0294/RG3

**Location:** Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire

**Proposal:** Hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise: In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8ha of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; areas of formal and informal public open space; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over to Beevor Street, and a new public footpath bridge over to Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road.

**National Highways Ref:** 84497

Referring to the consultation on a planning application dated 15 April 2019 referenced above, in the vicinity of the A46 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- a) ~~offer no objection (see reasons at Annex A);~~
- b) ~~recommend that conditions should be attached to any planning permission that may be granted (see Annex A - National Highways recommended Planning Conditions & reasons);~~


c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);

~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.<sup>1</sup>

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk) and may not determine the application until the consultation process is complete.

<b>Signature:</b> 	<b>Date:</b> 15 November 2021
<b>Name:</b> Martin Seldon	<b>Position:</b> Assistant Spatial Planner
<b>National Highways</b> National Highways   The Cube   199 Wharfside Street   Birmingham   B1 1RN	

## **Annex A National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

National Highways was first consulted on the Western Growth Corridor (WGC) proposal in 2017, during the pre-application stage. Since then, we have been in ongoing discussions with the applicant, providing advice on the transport work to be undertaken in support of the proposal.

When formally consulted on the planning application for the proposal in April 2019, we issued a holding recommendation due to outstanding highway matters that were required to be addressed by the applicant. Subsequently, changes to the proposed masterplan and phasing of the development required the applicant to prepare a revised Transport Assessment (TA). We reviewed the updated TA and due to outstanding matters, the holding recommendation has been extended several times, the latest being August 2021.

In November 2020, we informed the applicant that the mitigation would need to be carried out under an S278 Agreement.

In January 2021, we reviewed the GLTM modelling report for the revised assessments. We requested that the development and infrastructure uncertainty log be provided for our review. We also asked that select link analysis, flow difference plots, or traffic reassignment plots be provided. These have been provided and considered to be acceptable.

In August 2021, we reviewed the updated VISSIM modelling provided by the applicant. To satisfy outstanding queries AECOM undertook an independent assessment. From AECOM's review, it was considered that the modelling work was satisfactory. We have recommended the applicant to summarize all the modelling evidence in a Technical Note (TN) to serve as transport evidence. The applicant has updated the transport evidence in *Technical Note 11 Rev B* dated 23 August 2021

Since the most recent holding recommendation was issued, we have continued to progress outstanding matters related to trigger point testing, for the delivery and mitigation of the A46 / Skellingthorpe Road improvements and Stage 1 Road Safety Audit (RSA).

The applicant has demonstrated that 600 dwellings can be occupied before the improvement works at Skellingthorpe roundabout are required. We confirmed that a trigger point of 600 dwellings is acceptable.

The applicant had queried whether the trigger point could be increased to 1,000 dwellings. The methodology and assessment for a trigger point testing of 1,000 has not been agreed and therefore it remains outstanding. We would welcome the applicant to address this issue at a later stage under Section 73 to amend the planning condition, should the applicant require to progress this matter.

A potential safety issue was identified following the review of Technical Note 11 Rev B due to a likely queuing back at the exit arms of the Skellingthorpe Roundabout. Therefore, before the Stage 1 RSA process can be signed off, it is required the applicant undertakes a Safety Risk Assessment (GG 104) to identify potential safety impacts on the SRN.

**In light of the above, National Highways recommends that planning permission not be granted for a further period of three months from the date of this response, to provide the applicant time to submit additional information.**



## National Highways Planning Response (NHPR 21-09) Formal Recommendation to an Application for Planning Permission

From: Andrew Jinks (Regional Director)  
Operations Directorate  
Midlands Region  
National Highways  
[PlanningM@highwaysengland.co.uk](mailto:PlanningM@highwaysengland.co.uk)

To: City of Lincoln Council FAO Simon Cousins

CC: [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk)  
[spatialplanning@highwaysengland.co.uk](mailto:spatialplanning@highwaysengland.co.uk)

**Council's Reference:** 2019/0294/RG3

**Location:** Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire

**Proposal:** Hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise: In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8ha of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; areas of formal and informal public open space; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over to Beever Street, and a new public footpath bridge over to Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road.

**National Highways Ref:** 84497

Referring to the consultation on a planning application dated 15 April 2019 referenced above, in the vicinity of the A46 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);




~~e) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~

~~d) recommend that the application be refused (see reasons at Annex A)~~

Highways Act 1980 Section 175B is not relevant to this application.<sup>1</sup>

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via [transportplanning@dft.gov.uk](mailto:transportplanning@dft.gov.uk) and may not determine the application until the consultation process is complete.

<b>Signature:</b> 	<b>Date:</b> 26 November 2021
<b>Name:</b> Martin Seldon	<b>Position:</b> Assistant Spatial Planner
<b>National Highways</b> National Highways   The Cube   199 Wharfside Street   Birmingham   B1 1RN	

## **Annex A National Highways' assessment of the proposed development**

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

This response represents our formal recommendations concerning planning application 2019/0294/RG3 and has been prepared by Martin Seldon.

National Highways was first consulted on the Western Growth Corridor (WGC) proposal in 2017, during the pre-application stage. Since then, we have been in ongoing discussions with the applicant, providing advice on the transport work to be undertaken in support of the proposal.

When formally consulted on the planning application for the proposal in April 2019, we issued a holding recommendation due to outstanding highway matters that were required to be addressed by the applicant. Subsequently, changes to the proposed masterplan and phasing of the development required the applicant to prepare a revised Transport Assessment (TA). In October 2020 we reviewed the updated TA and due to outstanding issues related to contributions, the GLTM Saturn model assessment, trip generation and distribution used in the new proposal, trigger point assessment and Road Safety Audit, the holding recommendation has been extended several times, the latest being November 2021.

### **Explanation**

With regards to the highways works, National Highways had previously agreed that a roundabout improvement at the A46 / Skellingthorpe Road roundabout would be delivered as a scheme rather than accepting financial contributions. The revised TA, although it had retained the scheme improvements, proposed to provide a financial contribution rather than to deliver the scheme. We have clarified our position on this matter in an email dated 29 November 2020 informing the applicant that developers are required to mitigate the impact of proposals on the SRN and therefore the mitigation would need to be carried out under an S278 Agreement.

The revised TA also proposed that Mitigation Package C, namely A46 / Skellingthorpe Road roundabout improvements, be delivered prior to the occupation of 1,000 dwellings. The applicant had provided a trigger point assessment for 600 dwellings instead. Should a trigger point of 1,000 dwellings be required the applicant could submit a S73 application to amend the condition and it would be subject to the required transport evidence.

With regards to the transport impact assessment presented by the applicant in the revised TA, we undertook an independent review of the Vissim models. This review concluded that in terms of travel times, queues, and turn delays the impact from the development is minimal.

The applicant carried out a trigger point testing for 600 dwellings. Following our review of the information provided, we are content the applicant has satisfactorily demonstrated that 600 dwellings can be occupied before improvement works at A46 / Skellingthorpe Road roundabout are required.

Following the review of Technical Note 11 Rev B which contained further modelling work, a potential safety issue was identified due to a likely queuing back at the exit arms of the Skellingthorpe Roundabout. National Highways requested the applicant to carry out a Safety Risk Assessment (GG 104) to look at this matter more closely and identify any potential safety impacts on the SRN. We have reviewed the Safety Risk Assessment prepared by the applicant and can conclude that it is acceptable and soundly prepared.

### **Summary**

Given our most recent comments and review of the information presented by the applicant, we have concluded that the applicant has addressed all outstanding matters. The applicant should therefore implement the proposed improvements at the A46 / Skellingthorpe Road roundabout identified in Connect Consultants drawing 18133-010, dated July 2020 (as contained within the Stage 1 RSA and dated August 2020) prior to occupation of the 601<sup>st</sup> dwelling of the Western Growth Corridor development.

### **Recommendations**

In light of the comments above, we recommend that the following conditions are attached to any grant of planning permission:

**Condition 1:** The scheme of works as shown on drawing 18133-010 dated July 2020 hereby approved shall be implemented in accordance with the approved details prior to the occupation of the 601<sup>st</sup> dwelling (by the completion of Phase 1 as described in the HG1264-48B Phasing Plan Schedule document dated 2 April 2019 referring to plans HG1264-45, 46 and 47) hereby approved as part of this consent.

The scheme shall comply with the design requirements and procedures of the Design Manual for Roads and Bridges (DMRB), including those relating to road safety and non-motorised user audits, as required by National Highways. The approved schemes shall be implemented and completed in full, in accordance with the approved details, prior to the first occupation of the development.

If Departures from Standards associated with the proposal are identified during the detailed design stage, these will need to be agreed with Department for Transport (DfT) prior to entering agreement under Section 278 of the Highways Act 1980.

**Condition 2:** Prior to commencement of construction works, a Construction Traffic Management Plan (CTMP) for the proposed development (including proposed mitigation schemes on the highway network) shall be submitted to and approved in writing by the Local Planning Authority in consultation with National Highways. The approved plan shall be adhered to throughout the construction period.

**Reason for conditions**

To ensure that the A46 / Lincoln Road / B1378 Skellingthorpe Road Roundabout continues to serve its purpose as part of a national system of routes for through traffic in accordance with Section 10 (2) of the Highways Act 1980 by minimising disruption on the SRN resulting from traffic entering and emerging from the application site and in the interests of road safety.

**Informative note to the applicant**

The highway mitigation works associated with this consent involves works within the public highway, which is land over which you have no control. National Highways therefore requires you to enter into a suitable legal Section 278 agreement to cover the design check, construction and supervision of the works. Contact should be made with the National Highways Section 278 Service Delivery Manager David Steventon to discuss these matters on [david.steventon@highwaysengland.co.uk](mailto:david.steventon@highwaysengland.co.uk).

The applicant should be made aware that any works undertaken to National Highways network are carried out under the Network Occupancy Management policy, in accordance with National Highways procedures, which currently requires notification/booking 3 months prior to the proposed start date. Exemptions to these bookings can be made, but only if valid reasons can be given to prove they will not affect journey time reliability and safety. The contact email for these matters is [Area7networkoccupancy@highwaysengland.co.uk](mailto:Area7networkoccupancy@highwaysengland.co.uk).

Taylor, Louise (City of Lincoln Council)

From: campaigning@woodlandtrust.org.uk

Sent: 30 May 2019 11:16

To: Technical Team (City of Lincoln Council)

Cc: campaigning@woodlandtrust.org.uk

Subject: FAO Lana Meddings - Woodland Trust comments on application 2019/0294/RG3

Dear Lana,

Thank you for the opportunity to provide comment on the above application.

The Woodland Trust notes within the documentation provided that there are veteran trees identified on the application site. However there has been no arboricultural impact assessment submitted, so it is difficult to determine if any ancient or veteran trees will be affected by the proposed development. As such, the Trust would like to lodge a holding objection until this information has been provided.

We hope our comments are of use to you, if you would like to discuss further please do get in touch.

Kind regards,

Nicole Hillier

**Nicole Hillier**

## Campaigner - Ancient Woodland

Telephone: 03437705438

Email: [NicoleHillier@woodlandtrust.org.uk](mailto:NicoleHillier@woodlandtrust.org.uk)

Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL

0330 333 3300

[www.woodlandtrust.org.uk](http://www.woodlandtrust.org.uk)

Hi Lana,

Thank you for your patience in our response, it is much appreciated.

I have now had the opportunity to assess the information provided by the applicants in detail, and would like to raise the following comments:

- We acknowledge that the applicants have now provided the veteran and potential veteran trees on site with root protection areas (RPA) in line with Natural England's Standing Advice (15 times the stem diameter), however it appears that the RPA's for a number of the trees identified (T178, T282, T354 and T406) appear to have been capped at 15m. Could the applicants please confirm if this is the case?

The root protection areas are shown as proposed. However, these will be subject to a planning condition which details all root protection, including RPA's, to be agreed prior to development commencing so they are not fixed at this point if the Trust feels they are not adequate.

- We note within the diagrams provided that a number of trees appear to be adjacent/within a blue or green area. We would appreciate clarity on what these areas refer to, in order to assess if potential development is proposed which is likely to result in impact.

These areas are swales (green areas) or linear drains (blue areas) but as explained previously are only shown indicatively at this point as part of the wider Masterplan. As such, they are subject to detailed design to be submitted to and approved by the LPA as part of a Condition however we will ensure they are appropriately protected during development.

- In order to protect T354 highlighted below, we would recommend that all proposed drainage works are located outside of the root protection area to ensure root damage does not occur during construction works.

As above.

Kind regards,

Nicole

Nicole Hillier

Campaigner - Woods under Threat

Email: [campaigning@woodlandtrust.org.uk](mailto:campaigning@woodlandtrust.org.uk)

Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL

0330 333 3300

[woodlandtrust.org.uk](http://woodlandtrust.org.uk)

Hi Lana,

Thank you for seeking clarification on our points raised below.

We ask that the veteran trees capped at 15m are afforded full un-encroached Root Protection Areas (RPA) in line with Natural England's Standing Advice, and that where veteran trees are adjacent to swales or linear drains, no development occurs within the RPA to ensure no damage to the tree roots will occur.

Kind regards,

Nicole

Nicole Hillier

Campaigner - Woods under Threat

Email: [campaigning@woodlandtrust.org.uk](mailto:campaigning@woodlandtrust.org.uk)

Woodland Trust, Kempton Way, Grantham, Lincolnshire, NG31 6LL  
0330 333 3300  
[woodlandtrust.org.uk](http://woodlandtrust.org.uk)

**FAO – Development Team**

**Ref – 2019/0294/RG3**

**Proposal – Hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor**

**Location – Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire**

Thank you for your letter of 15 April 2019 providing Network Rail with an opportunity to comment on the abovementioned application.

We are aware that discussions between Network Rail and the Local Authority have been taking place in relation to this proposed scheme. The agreements include the closure and diversion of Oak Farm and Coulson Road level crossings which we support and the introduction of road bridges over the railway to improve access to Lincoln City Centre. Subject to the continuation of these discussions and the subsequent licences, land ownership, easement and asset protection agreements being entered into, Network Rail has no objections to this scheme.

Going forward, we require sight of the relevant S106 Heads Of Terms in order that we may understand how and when the proposed changes and improvements to railway assets outlined above will be secured through the planning process. The phasing of the development in relation to the closure of the crossings will be particularly important.

Kind regards

**Matt Leighton**

Town Planning Technician | Property

Network Rail

George Stephenson House | Toft Green | York | YO1 6JT

[www.networkrail.co.uk/property](http://www.networkrail.co.uk/property)

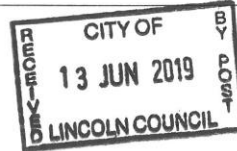


**Diversity and Inclusion Champion**

SKELLINGTHORPE PARISH COUNCIL



City of Lincoln Planning Department  
City Hall  
Lincoln  
LN1 1BN



11<sup>th</sup> June 2019

Dear Sirs

Proposed Western Growth Corridor 2019/0294/RG3

Please find enclosed letter from Skellingthorpe Parish Council Chair Cllr R A Walshaw, with comments on Planning Application 2019/0294/RG3. The Parish Council wishes for these comments to be taken into account on this application.

Yours faithfully

Parish Clerks  
Skellingthorpe Parish Council



## SKELLINGTHORPE PARISH COUNCIL



### SKELLINGTHORPE PARISH COUNCIL

Proposed Western Growth Corridor (WGC) – for the City of Lincoln Council

Planning Application Ref No 2019/0294/RG3

As you are aware, Skellingthorpe is the nearest and biggest Rural Village to the proposed Western Growth Corridor. Being the elected Parish Council, we do have a duty to act on behalf of our village. Ergo, we wish to lodge the following comments, observations and recommendations to the above planning application, as follows.

We do believe in progress and developments needed to provide modern day living standards, not only housing, commercial, industrial all needed but, adequate infrastructure which includes all utilities and allowing for expansion.

As with all previous councils here in Skellingthorpe, our main concern is Transport and the logistics behind it. Over the years we have, with the support of our District Councillors, been promised that our concern would be looked at, to see what can be done to alleviate the problem we have. To cut a long story short, nothing has been done and the matter of congestion is only getting worse. It is not only the A46 By-Pass, but it is both Skellingthorpe Road and Doddington Road. Many of our villagers who must commute each day to get to work, use Lincoln Road and Doddington Road out of the village. And unfortunately for them, nightmare time is 'rush hour time', it does not end there as it is clear more traffic is on these roads' day after day.

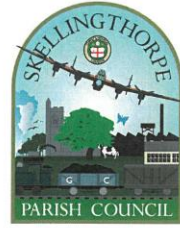
Our concern is that the building of some 300 plus new dwellings (Phase One) will come before the proposed road link between Birchwood Avenue and Tritton Road is constructed and opened. This link would according to your Consultant's Modelling, reduce the amount of traffic using the A46. So, add 300 new houses onto what is already approved in Skellingthorpe, totals over 700 new houses. Using data this would equate to approx. 1400 more cars. The existing roads as they are now will not be able to cope.

It does go without doubt that a new road link coming off Birchwood Avenue/Skellingthorpe Road to Tritton, with a new road bridge over the busy rail network, will make it easier getting into the City. What guarantees do we have that this link will take precedence over others?

In Skellingthorpe we are fortunate to have the Sustran National Bicycle main route 64 going through our village, what we don't have is a safe bicycle/pedestrian cross over or under-pass to connect both parts of Skellingthorpe Road on either side of the A46. This would also give the opportunity to link into the Western Growth Developments without the use of motorised vehicles.

Cont/...

## SKELLINGTHORPE PARISH COUNCIL



As you know Lincolnshire County Council are promoting Being Active in Lincolnshire, so a well thought out plan for footpath links/networks stretching out from the WGC into the nearby rural areas will help encourage this.

Skellingthorpe is the village home to over 3300 people of equal gender, 50% being between 18 to 64 years old and 900+ being 65 and over.

As a village, ourselves being the Parish Council, together with the committees from both the Community and Youth Centres, strive to provide and maintain public facilities for the use of the village, unfortunately some facilities prove too expensive, for example indoor sports and leisure. It is not jealousy when we see other local authority's refurbishing or building these facilities, neither is it envy when nationals build their fitness centres in our district, but what would be welcomed is a modern purpose built recreational/fitness building within walking/cycling distance of Skellingthorpe.

This also goes for Health and Medical Centres which seem to be opening and expanding within our area. As we all know our current Doctor's Surgery 'The Glebe' has applied to the Lincs West CCG to close our branch and are asking for patients living here in Skellingthorpe, to travel to their main surgery in Saxilby some 5 miles away. Or the alternative for them to change doctors. A new Health and Medical Centre nearer the A46 together with a dedicated bus service to and from Skellingthorpe and local villages in the district would be most welcomed, we are sure of that.

Another concern of ours is the 'flood risk' of WGC. According to the Environment Agency the application site is within a Flood Zone 3 and a full 'Flood Risk Assessment' should be carried out together with the Method of Preventing Flooding. What guarantees, promises do we have, to prevent flood water reaching Skellingthorpe, not only over land but existing sewer and drainage pipes becoming full and overflowing into nearby areas. After all, in general we are low lying at only averaging 6.00m AOD.

We are a forward-looking Parish Council, not out to stop all developments, but, making sure they do not interfere, change or put pressure on our residents 'quality of life'.

Working together with local government from low tier to high does produce amicable outcomes which is beneficial to all parties and more importantly the public.

Andrew Walshaw



## SKELLINGTHORPE PARISH COUNCIL



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City of Lincoln Council  
Directorate of Communities and Environment  
City Hall  
Beaumont Fee  
Lincoln  
LN1 1DF

4<sup>th</sup> June 2021

For the Attention of Simon Cousins

Dear Sirs,

**Planning Application 2019/0294/RG3 – Proposed Development of the Western Growth Corridor, Skellingthorpe Road Lincoln.**

Our Parish Council have viewed the recently submitted further information for the above planning application and would like to make the following comments.

Skellingthorpe Parish Council remain as **objectors** to this application as previously outlined in our letter dated 28<sup>th</sup> September 2020.

The main concern remains as stated before and that is **Traffic**. Over the years Skellingthorpe has seen the increase in the amount of traffic using highways within proximity of our village. In particular the Lincoln By-pass the A46, this has become a major bottleneck not only for vehicles using this By-pass but also for people wishing to drive into Lincoln from Skellingthorpe using Lincoln Road and Skellingthorpe Road. During the informal presentation given by officers from the City of Lincoln Planning and Lindum's consultants to our Parish Council, it was said that according to 'models' there would be no significant increase in traffic caused by the Western Growth Development, at that time we did not accept that conclusion and still do not accept it.

It is proposed that the only means of access into Lincoln from the south-east would be for public transport/cyclists only, all other vehicles which obviously will include private cars, delivery vehicles and the possibility of construction traffic if permission is granted, will be onto a new link to Skellingthorpe Road, so it is logical to expect traffic not wanting to go into Lincoln will use the A46.

**SKELLINGTHORPE PARISH COUNCIL**



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As stated in our previous correspondence this is an ideal opportunity to include for a safer eco-friendly connection into Lincoln from what is known as "Witham Valley Country park", Skellingthorpe being part of it.

We are however pleased to see that Highways England has asked for a further 3 months so that they can assess this development in more detail and possible affects onto our local roads.

To this end Skellingthorpe Parish Council Object to the above planning application.

Yours faithfully

Clerks to Skellingthorpe Parish Council



NHS England & NHS Improvement (Midlands)  
Primary Care Contracting



Lincolnshire West  
Clinical Commissioning Group

## The Primary Care plan for the Western Growth Corridor.

Planning Reference: 2019/0294

### Predicted patient movement

As many of the individuals who move to a dwelling within the Western Growth Corridor (WGC) will have a choice from several GP practices to register with, individuals may decide to not register with their closest GP Practice. Factors such as transport, accessibility, bus routes and current registered practice are all likely to have an effect. The introduction of (Primary Care Network's (PCN's)) will also have an impact on how patients access medical services.

Taking these considerations into account, it is difficult to predict where patients will seek primary medical care and in turn where the s106 contribution will be most required. As the WGC dwellings start to be occupied, NHS England & NHS Improvement will be able to track patient registration numbers at the practices surrounding the development and formulate a more accurate model for patient flow that can be used to ensure the funding is utilised in the most appropriate way.

### Needs assessment

When considering the level of population increase practices can safely absorb without changes to their infrastructure or ways of work, two factors must be considered- the practices premises utilisation and staff levels/skill mix.

Although staffing is not a consideration of s106 funding application provisions, it does have a significant impact on how GP practices are able to offer services and be flexible and adapt to increases in their patient list size. As such, any discussions on a practice's capacity assumes that, as a minimum, the practice can maintain their current staff levels.

Discussions have been held with the 3 practices considered most likely to be affected by the WGC development in an attempt forecast how large an increase in patient list they could accommodate in their current state and for how long.

#### **Boultham Park Medical Practice:**

The number of patients registered with Boultham Park Medical Practice has steadily increased over recent years and it is anticipated that this trend will continue.

The current premises have a small amount of capacity for growth, however this would only accommodate the routine predicted increase in population size of the area. The practice is

not in a position to be able to absorb a sudden and significant increase in their list size that the WGC development would generate without investment in their premise infrastructure.

#### **Birchwood Medical Practice:**

The practice is already working at full capacity. They have confirmed that they would not be able to accommodate the increase in patient from the WGC development without increasing their facilities.

#### **Portland Medical Practice**

Although Portland Medical Practice is unlikely to see an increase in patient numbers until the latter phases of the development due to their practice boundary, they were still asked to provide information on their capacity. The practice has confirmed that they have a small amount of scope to accept additional patients, however this is only likely to support routine predicted patient growth. To be able to accommodate patients from the later phases of the WGC, they would need to extend their existing premises.

#### **Contribution**

The table below shows the formula used in the calculation to determine the required health care contribution:

	Average list size per GP	Requirement m <sup>2</sup>	£ per m <sup>2</sup>	Total cost	£ per person
GP team	1,800	170	2,300	£391,000	217
GP furnishings	1,800			£20,000	12
					229
Contingency requirements at 20%					46
Total per resident					275
Total per dwelling (resident x 2.3)					632.50

By applying average list sizes to these groups and identifying the required area and furnishings, a total cost of £275 per patient is determined. This figure is multiplied by 2.3 (the average number of persons per dwelling for City of Lincoln according to the 2011 Consensus) to provide a funding per dwelling of £632.50. Therefore, **the contribution being requested for the WGC development is £2,024,000.00 (£632.50 x 3,200 dwellings.)** Please note that the expectation is that this figure will be index linked and that this calculation is based on the prediction of 3,200 dwellings being developed, should the number of dwellings change the value of funding being sought will be affected.

The above calculation is based on 'standard' residential dwellings. Should the applicant build a facility catered towards retirement communities or assisted living (for example: over 55 complexes, care homes, nursing homes, etc.), as provisionally discussed during WGC planning meetings, the figure being sought would be subject to change. This is to take into account the fact that individuals who reside in these facilities are statistically more likely to access

medical services, so a workload factor is routinely utilised in calculations for planning applications relating to such developments to reflect this. The funding sought for single occupancy rooms in these types of facilities would be £393.25 and £786.50 for double occupancy rooms.

### **Utilisation of funding**

The GPFV programme and the introduction of PCN's is changing how people will access primary care services. This will include clinical skill mixing, working at scale and the utilisation of technology. PCN's are driving a reform in the way patients access health care and a key part of this is utilising health professionals such as Clinical Pharmacists, Physiotherapists, Physician Associates, etc. to manage the needs of the local population. Alongside this investment in technology will change the way patients choose to access health care in the future and through the NHS Long Term Plan there are ambitions to develop digital technology including the introduction of online consultations and video consultations.

However, due to the size of this development, there will also need to be considerable infrastructure investment in local GP surgeries. After consideration of the likely patient flow, existing practice circumstances and the developing PCN's, 2 practices have been identified at this time as requiring investment. These are Boutham Park Medical Practice and Birchwood Medical Practice. In addition to these 2 practices, there may be a requirement for funding from the latter stages of the development to be used at Portland Medical Practice.

#### **Boutham Park Medical Practice:**

To be able to accommodate the additional patients that are likely to register with them, Boutham Park Medical Practice would need to increase their floor space. They are currently exploring options for this, including extending their building or converting a neighbouring building into additional clinical space.

#### **Birchwood Medical Practice:**

To be able to provide an effective service for the patients residing in the WGC, the practice has confirmed they would need to create additional consulting rooms and ancillary administration space. This would be achieved through an extension and reconfiguration of their existing practice.

#### **Portland Medical Practice:**

The GP partners at Portland Medical Practice have assessed their current capacity and believe that to be able to meet the likely increase in patient demand, they would need additional consultation rooms, treatment rooms and administrative space. This would require an extension to their ground floor and reconfiguration of the space on their second floor.

### **Funding schedule**

After reviewing the practices responses regarding their capacity to accommodate patients from the WGC development, it is suggested that the release for s106 funding for healthcare be made at the trigger points specified in the table below. This will ensure the practices are not placed under undue pressure and that the required infrastructure works are completed in time to accommodate the next stepped increase in patient numbers.

The funding being requested for each phase would be pro-rated, based on the number of dwellings being built for the phase. This would be calculated using the following formula:

*Number of dwellings for the phase x Cost per dwelling = Total funding required for the phase*

Phase	Trigger point		Money required for phase *
	1	2	
1	Within 2 years of commencement of the development, payment of 50% of the funds for the phase	Within 4 years of commencement of the development, payment of remaining funds for the phase	762 x £632.50 = £481,965
2	At 25% completion of the dwellings for Phase 2, or 11 years after commencement of the development (whichever is soonest), payment of 50% of the funding for the phase	Upon completion of the dwellings for Phase 2, or 13 years after commencement of the development (whichever is soonest), payment of the balance of funding for the phase	1147 x £632.50 = £725,477.50
3	At 25% completion of the dwellings for Phase 3, or 16 years after commencement of the development (whichever is soonest), payment of 50% of the funding for the phase	Upon completion of the dwellings for Phase 3, or 18 years after commencement of the development (whichever is soonest), payment of the balance of funding for the phase	857 x £632.50 = £542,052.50
4	At 25% completion of the dwellings for Phase 4, or 19 years after commencement of the development (whichever is soonest), payment of 50% of the funding for the phase	Upon completion of the dwellings for Phase 4, or 23 years after commencement of the development (whichever is soonest), payment of the balance of funding for the phase	432 x £632.50 = £273,240

\* Please note that is value was calculated using the number of dwellings currently predicted for the phase. Should the number of dwellings increase or decrease, the monetary value would be amended accordingly. The value of £632.50 is based on the dwellings being 'standard' dwellings and not care facilities, dwellings for the over 55, etc. If this was to change, the value used would require amending. Furthermore, the expectation is that the appropriate indexation rate and any late payment penalties would also be paid on top of this value.



To ensure that there is sufficient time to spend the s106 funds in the most appropriate way, a repayment period of 10 years from receipt of the final payment transfer (for the entire development) to the relevant NHS body will be required.

### Conclusion

The s106 funding being sought from the development (bearing in mind the points discussed in the above document) is £2,024,000.

It is felt that the most appropriate way to utilise this funding to ensure access to primary medical services for patients from the WGC will be through the development of technology and the expansion of existing local GP practices. However, some flexibility will be required in the exact nature of the projects to ensure that where and how the funding is spent reflects patient flow and the needs of the population as the WGC progresses.



LINCOLNSHIRE POLICE

Police Headquarters  
PO Box 999  
Lincoln,  
LN5 7PH  
Tel: 01522 558292  
email  
john.manuel@lincs.pnn.police.uk

Your Ref: 2019/0294/RG3

24th April 2019

Director of Communities & Environment  
Simon Walters MBA, ACIS, MCMI  
City Hall, Beaumont Fee  
Lincoln, LN1 1DF

**In Outline: RG3 Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire**

**Hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise:- In Outline – Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8HA of land (including key infrastructure) for up to 40,000 sq. m of B1 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; Areas of formal and informal public open-space; a network of public footpaths and cycle-ways associated engineering works to inform development platform and drainage system; new transport bridge link over Beevor Street, and a new public footpath bridge over Tritton Road. In Full – details for means of access into the site from Skellingthorpe Road and Tritton Road.**

Thank you for your correspondence and the opportunity to comment on the proposed scheme.

Lincolnshire Police have no objections to this outline application.

**It is fully appreciated that this outline application is only seeking to establish the principle of development and that the finer detail of design will be submitted at a later date. However, the applicant needs to consider the following advice when drawing up a more detailed proposal:**

It is disappointing that with such a major development proposal and with approximate 177 documents making up this outline application there is no clear or explicit indication by the developers in respect of what measures and considerations they would include to address issues of Crime and Disorder.

I would ask that the developers indicate how they intend to demonstrate the application of the principles of Crime Prevention and the reduction of anti-social behaviour within the context of overall planning and design of this development.

I would recommend that the developers liaise and consult with this office and the Designing out Crime Officer (DOCO) for Lincolnshire Police as part of the overall design process. A good source document for developers is 'Secured by Design Homes 2019' and the

Commercial Developments 2019 (Version 2) which can be accessed along with other useful design guides at [www.securedbydesign.com](http://www.securedbydesign.com).

I have studied the online plans and would request that you consider the following points that if adhered to would help reduce the opportunity for crime and increase the safety and sustainability of the development.

The benefits of long term community cohesion and sustainability are both evident and self-evident and there is compelling evidence that crime is one of the principal factors why people who can, will want to move away from their current neighbourhood. If a neighbourhood or development it is not fulfilling their social and environmental needs particularly those relating to the fact and fear of crime and anti-social behaviour, those who can will seek to move and undervalue the benefits of long term community cohesion and environmental sustainability of any development.

### **Layout & Design Plan.**

There can be significant benefits and advantages over some road and pedestrian layouts than others whereby pattern can frustrate the searching behaviour of criminals and reduce the capacity for an offender to remain anonymous. Whilst it is fully appreciated that through routes will be included in such a large layout, design considerations should ensure the security and safety of the development.

*"Developments that promote intuitive wayfinding and enhance the passive surveillance of the street by residents within their homes and high levels of street activity of the right kind are desirable as they have been proven to help deter crime". (Secured by Design New Homes 2019).*

An unconnected cul-de-sac style of layout has been proven to help reduce crime and anti-social behaviour and furthermore enhance the sustainability and social cohesion of the community.

### **Footpaths & Cycle-ways**

Any pathways that are not necessary should be avoided; equally pathways to the rear of any property should likewise be avoided.

Routes for pedestrians, cyclists and vehicles should be integrated, well lit, devoid of hiding places and where possible straight with no hidden recesses and overlooked by surrounding properties.

I would further recommend that footpaths are at least 3m wide and unhindered by shrubbery and / or foliage, generally straight with no hidden recesses, has a regular maintenance programme and levels of responsibility attributed. Good natural surveillance (lighting where appropriate) should be prevalent as part of the layout and should any pathway be shared with a cycle-way further consultation should be taken with this office.

It is important to consider any potential overlap and interaction between pedestrians and cyclists, and avoid where possible such conflict with physical demarcation and clear boundaries. It is essential to ensure that clear and unambiguous signage is placed that identifies safe and secure passage for both pedestrians and cyclists.

Potential gathering places should be well considered in terms of facilities and location to avoid anti-social behaviour and nuisance to residents. It is important that this criterion is applied equally to all footpaths and connecting pedestrian and cycle routes.

## **Pedestrian and Vehicle Bridges**

Whilst it is appreciated that the design and detail of the three proposed bridges (two vehicular and one pedestrian) has yet to be decided I would recommend that significant consideration is made at the design stage to ensure that pedestrian access over the parapet on all these bridges is prevented or substantially restricted.

## **Housing Development**

Building Regulations (October 1<sup>st</sup> 2015) provides that for the first time all new homes will be included within Approved Document Q: Security – Dwellings (ADQ).

Approved document Q applies to all new dwellings including those resulting from change of use, such as commercial premises, warehouse and barns undergoing conversions into dwellings. It also applies within Conservation Areas.

This will include doors at the entrance to dwellings, including all doors to flats or apartments, communal doors to multi-occupancy developments and garage doors where there is a direct access to the premises. Where bespoke timber doors are proposed, there is a technical specification in Appendix B of the document that must be met.

Windows: in respect of ground floor, basement and other easily accessible locations.

- 1) Properties should be orientated to face streets and public areas. Windows of routinely occupied rooms (e.g. lounge/living room/kitchen) should be positioned to provide effective overlooking of the frontage and contribute to natural surveillance.
- 2) To encourage greater use and reduce the fear of crime, all footpath networks should be directly overlooked by housing.
- 3) It is important that space is clearly defined to delineate public, semi-private or private space. Avoid space which is unassigned. All space should become the clear responsibility of someone.

When it is unclear whether space is public or private it is difficult to determine what is acceptable behaviour. Uncertainty of ownership can reduce responsibility and increase the likelihood of crime and anti-social behaviour going unchallenged.

- 4) Front gardens on all through roads should effectively be defined using low walls, railings or planting in order to effectively create defensible space to the housing. Boundaries between each property should be clearly defined.
- 5) Gable ends of properties should not directly adjoin public areas, as this often leads to nuisance for the residents. The provision of good gable end surveillance by way of windows can mitigate against this risk. Where gable end properties abut pathways or open public spaces the inclusion of windows from naturally active rooms can by design do much to provide surveillance of these areas.
- 6) The profile of the entrance into the site (entrance gate and raised carriageway crossing) displays a presence which will give the impression that the facility and its grounds are 'private'.
- 7) Front doors should be located where they can be seen from the street and neighbouring houses. They must not be located in deep recesses or behind other obstacles that would provide cover for criminal activity.

- 8) The rear gardens of properties, where possible, should lock into each other, reducing the potential for an offender to gain access to the back of properties without being witnessed.
- 9) Effective division between front and rear gardens needs to be provided e.g., 1.8m high fencing and lockable gates.
- 10) It is strongly advised that if there are any rear access (service) alleyways incorporated, they must be gated at their entrances. The gates must not be easy to climb over or easily removed from their hinges and they must have a key operated lock. Alleyways giving access to rear gardens are frequently exploited by burglars and can become a focus for anti-social behaviour.
- 11) If properties have driveways to the side of the dwellings themselves, windows should be incorporated in the side elevation at landing or first floor level to allow residents to overlook their vehicles.
- 12) Appropriate street lighting should be provided around the site. Good lighting will deter intruders and reduce the fear of crime. Lighting should comply with British Standard 5489 -2013.
- 13) The proposed tree planting should be developed in tandem with any street lighting in order to avoid the scenario of tree canopies obscuring lighting. Street lighting should be provided which complies with British Standard 5489– 1:2013.
- 14) One of the most effective ways to prevent property crime is to make the property itself as secure as possible. With this in mind, it is highly recommended that all vulnerable ground floor windows and doors be security- tested to comply with British Standard PAS.24:2016 (Secured by Design Standards). *See note above.*
- 15) I would recommend that each dwelling be provided with lighting to illuminate all external doors, car parking and garage areas. Ideally lighting should be switched using a photo electric cell (dusk to dawn) with a manual override.
- 16) In respect of landscaping, it is important that in vulnerable locations, such as entrances, parking areas and footpaths, low planting should not exceed 1000mm in height, and tree canopies should not fall lower than 2m from the ground. This is in order to allow people to see their surroundings better, make a rational choice of routes and eliminate hiding places.
- 17) Car parking should ideally be located within curtilage (boundary) of the property at the front. If properties have driveways to the side of the dwellings themselves, windows should be incorporated in the side elevation at landing or first floor level to allow residents to overlook their own vehicles. Consideration towards provision of suitable parking for visitors should be an element of this proposal as a failure to consider such a facility may lead to inconsiderate and inappropriate parking within the development.

### **Parking Courtyards**

Recent research conducted by Professor Rachael Armitage (Huddersfield University) on behalf of the Design Council/CABE, Home Office and Secured by Design, has clearly shown that rear parking courts are vulnerable to crime. They have higher levels of vehicle crime and criminal damage than other types of parking, and also facilitate offender access to the rear of properties. Residents do not tend to use their allocated spaces within these

courts, preferring to park on street, regardless of whether the street was designed for on street parking.

Other research states: "The recent fashion for placing parking spaces behind buildings has led to many schemes around the country being blighted by cars parked to the front of the house where there is no space designed to accommodate them. It is an inefficient use of land, as a large proportion is used for roads and parking areas; the internal routes result in reduced garden sizes; there is loss of security and privacy to the rear of the home; and, with parking to the rear of the house, residents may be less likely to use their front doors with a consequent loss of activity in the street.

### **Communal Areas (Public Open Spaces) Play Areas (if to be considered)**

Where a communal recreational area may be created development it is important that adequate mechanisms and resources are in place to ensure its satisfactory future management. Recreational / play areas should be age appropriate and benefit from good natural surveillance from surrounding properties with appropriate lighting.

If a play-area (toddler) is to be included this should be so designed that it can be secured at night-time to help prevent any misuse such as damage or graffiti. The type and nature of any fencing should be specific to this area but should be to a minimum of 1200mm which can often discourage casual entry.

I would recommend that 'air lock' style access points (at least two) with grated flooring to prevent animal access and the resultant fouling that may occur. Such gating systems will also reduce the risk of younger children exiting onto the adjacent roadways.

One of the attributes of safe, sustainable places is 'Ownership' - places that promote a sense of ownership, respect, territorial responsibility and community. Ownership is particularly relevant to this outline planning application in respect of social inclusion, particularly when you consider that as much as 40% of the housing proposed could be low cost/affordable homes. It is important to highlight that low cost/affordable housing must be pepper-potted throughout the development rather than concentrated in one area or isolated from the general housing market. Social inclusion promotes a sense of ownership, respect and territorial responsibility within the community.

### ***"Rear servicing can undermine the security of dwellings by allowing strangers access to the rear of dwellings."***

The defensive character of the development should not be compromised through **excessive** permeability caused by the inclusion of too many unnecessary segregated footpaths which allows the criminal legitimate access to the rear or side boundaries of dwellings or footpath links. Better places to Live by Design, the Companion Guide to PPG3, Secure by Design, Manual for Streets all promote pedestrian, cycle and vehicular permeability through residential areas by designing roads on a network basis rather than using footpaths.

### **Primary School**

A sensible and practical level of security, which will not adversely affect the efficient running of the schooling, is essential to a successful teaching and learning environment.

New Schools 2014 [www.securedbydesign.com](http://www.securedbydesign.com)

### **Community Stadium – Lincoln City Football Club**

It is appreciated that at this time the ground capacity, design and overall safety features of this development is undecided. At an appropriate time therefore ideally at the earliest possible time consultation is required with Lincolnshire Police by way of the Counter Terrorist Security Advisor (CTSA) to ensure that the design and build meets the relevant security provisions of what is likely to be a deemed a 'Crowded Place'.

### **Commercial Developments**

*Commercial Developments 2015* [www.securedbydesign.com](http://www.securedbydesign.com)

Crime prevention advice is given free without the intention of creating a contract. Neither the Home Office nor the Police Service takes any legal responsibility for the advice given. However, if the advice is implemented it will reduce the opportunity for crimes to be committed.

Yours sincerely

A solid black rectangular box used to redact the signature of Mr. John Manuel.

Mr John Manuel MA BA (Hons) PGCE PGCPD Dip Bus.  
Force Designing Out Crime Officer (DOCO)

Your Ref: 2019/0294/RG3

24<sup>th</sup> September 2019

Director of Communities & Environment  
Simon Walters MBA, ACIS, MCMl  
City Hall, Beaumont Fee  
Lincoln, LN1 1DF

**Town and Country Planning Act 1990  
Re-consultation on Planning Permission**

**Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire,**

**Hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise:- In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (E, F.2 and Pub or drinking establishment/Takeaway as Sui Generis uses), employment (E) uses and parking; a primary school; up to 8HA of land (including key infrastructure) for up to 40,000sq.m of E and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (E and F.1 and F.2), a hotel (C1) food and drink outlets (E and Sui Generis) and a new community stadium for Lincoln City Football Club; Areas of formal and informal public open space; a network of public footpaths and cycle-ways associated engineering works to inform development platform and drainage system; new transport bridge link over to Beevor Street, and a new public footpath bridge over to Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road (revised description).**

Thank you for your correspondence and the opportunity to comment on the proposed scheme.

Lincolnshire Police have no objections to this hybrid application.

For clarity I have included some of the relevant comments made on a previous submission for this application as they remain valid moving forward with such a large and comprehensive development.

There is significant evidence that failure to fully consider the wider implications of the impact of crime and disorder and how it should be address may have an impact on the longer term sustainability of such a development.

It is disappointing that with such a major development proposal and with approximate 177 documents making up this outline application there is no clear or explicit indication by the



developers in respect of what measures and considerations they would include to address issues of Crime and Disorder addressed.

I appreciate that as full planning applications are submitted over time that some of these considerations and issues might be

I would ask that the developers indicate how they intend to demonstrate the application of the principles of Crime Prevention and the reduction of anti-social behaviour within the context of overall planning and design of this development.

I would recommend that the developers liaise and consult with this office and the Designing out Crime Officer (DOCO) for Lincolnshire Police as part of the overall design process. A good source document for developers is 'Secured by Design Homes 2019' and the Commercial Developments 2019 (Version 2) which can be accessed along with other useful design guides at [www.securedbydesign.com](http://www.securedbydesign.com).

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(lighting where appropriate) should be prevalent as part of the layout and should any pathway be shared with a cycle-way further consultation should be taken with this office.

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pathways or open public spaces the inclusion of windows from naturally active rooms can by design do much to provide surveillance of these areas.

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- 8) The rear gardens of properties, where possible, should lock into each other, reducing the potential for an offender to gain access to the back of properties without being witnessed.
- 9) Effective division between front and rear gardens needs to be provided e.g., 1.8m high fencing and lockable gates.
- 10) It is strongly advised that if there are any rear access (service) alleyways incorporated, they must be gated at their entrances. The gates must not be easy to climb over or easily removed from their hinges and they must have a key operated lock. Alleyways giving access to rear gardens are frequently exploited by burglars and can become a focus for anti-social behaviour.
- 11) If properties have driveways to the side of the dwellings themselves, windows should be incorporated in the side elevation at landing or first floor level to allow residents to overlook their vehicles.
- 12) Appropriate street lighting should be provided around the site. Good lighting will deter intruders and reduce the fear of crime. Lighting should comply with British Standard 5489 -2013.
- 13) The proposed tree planting should be developed in tandem with any street lighting in order to avoid the scenario of tree canopies obscuring lighting. Street lighting should be provided which complies with British Standard 5489- 1:2013.
- 14) One of the most effective ways to prevent property crime is to make the property itself as secure as possible. With this in mind, it is highly recommended that all vulnerable ground floor windows and doors be security- tested to comply with British Standard PAS.24:2016 (Secured by Design Standards). *See note above.*
- 15) I would recommend that each dwelling be provided with lighting to illuminate all external doors, car parking and garage areas. Ideally lighting should be switched using a photo electric cell (dusk to dawn) with a manual override.
- 16) In respect of landscaping, it is important that in vulnerable locations, such as entrances, parking areas and footpaths, low planting should not exceed 1000mm in height, and tree canopies should not fall lower than 2m from the ground. This is in order to allow people to see their surroundings better, make a rational choice of routes and eliminate hiding places.
- 17) Car parking should ideally be located within curtilage (boundary) of the property at the front. If properties have driveways to the side of the dwellings themselves, windows should be incorporated in the side elevation at landing or first floor level to allow residents to overlook their own vehicles. Consideration towards provision of suitable parking for visitors should be an element of this proposal as a failure to

consider such a facility may lead to inconsiderate and inappropriate parking within the development.

### **Parking Courtyards**

Recent research conducted by Professor Rachael Armitage (Huddersfield University) on behalf of the Design Council/CABE, Home Office and Secured by Design, has clearly shown that rear parking courts are vulnerable to crime. They have higher levels of vehicle crime and criminal damage than other types of parking, and also facilitate offender access to the rear of properties. Residents do not tend to use their allocated spaces within these courts, preferring to park on street, regardless of whether the street was designed for on street parking.

Other research states: "The recent fashion for placing parking spaces behind buildings has led to many schemes around the country being blighted by cars parked to the front of the house where there is no space designed to accommodate them. It is an inefficient use of land, as a large proportion is used for roads and parking areas; the internal routes result in reduced garden sizes; there is loss of security and privacy to the rear of the home; and, with parking to the rear of the house, residents may be less likely to use their front doors with a consequent loss of activity in the street.

### **Communal Areas (Public Open Spaces) Play Areas (if to be considered)**

Where a communal recreational area may be created development it is important that adequate mechanisms and resources are in place to ensure its satisfactory future management. Recreational / play areas should be age appropriate and benefit from good natural surveillance from surrounding properties with appropriate lighting.

If a play-area (toddler) is to be included this should be so designed that it can be secured at night-time to help prevent any misuse such as damage or graffiti. The type and nature of any fencing should be specific to this area but should be to a minimum of 1200mm which can often discourage casual entry.

I would recommend that 'air lock' style access points (at least two) with grated flooring to prevent animal access and the resultant fouling that may occur. Such gating systems will also reduce the risk of younger children exiting onto the adjacent roadways.

One of the attributes of safe, sustainable places is 'Ownership' - places that promote a sense of ownership, respect, territorial responsibility and community. Ownership is particularly relevant to this outline planning application in respect of social inclusion, particularly when you consider that as much as 40% of the housing proposed could be low cost/affordable homes. It is important to highlight that low cost/affordable housing must be pepper-potted throughout the development rather than concentrated in one area or isolated from the general housing market. Social inclusion promotes a sense of ownership, respect and territorial responsibility within the community.

***"Rear servicing can undermine the security of dwellings by allowing strangers access to the rear of dwellings."***

The defensive character of the development should not be compromised through excessive permeability caused by the inclusion of too many unnecessary segregated footpaths which allows the criminal legitimate access to the rear or side boundaries of dwellings or footpath links. Better places to Live by Design, the Companion Guide to PPG3, Secure by Design, Manual for Streets all promote pedestrian, cycle and vehicular permeability through residential areas by designing roads on a network basis rather than using footpaths.

### Primary School

A sensible and practical level of security, which will not adversely affect the efficient running of the schooling, is essential to a successful teaching and learning environment.

New Schools 2014 [www.securedbydesign.com](http://www.securedbydesign.com)

### Community Stadium – Lincoln City Football Club

It is appreciated that at this time the ground capacity, design and overall safety features of this development is undecided. At an appropriate time therefore ideally at the earliest possible time consultation is required with Lincolnshire Police by way of the Counter Terrorist Security Advisor (CTSA) to ensure that the design and build meets the relevant security provisions of what is likely to be a deemed a 'Crowded Place'.

### Commercial Developments

Commercial Developments 2015 [www.securedbydesign.com](http://www.securedbydesign.com)

Crime prevention advice is given free without the intention of creating a contract. Neither the Home Office nor the Police Service takes any legal responsibility for the advice given. However, if the advice is implemented it will reduce the opportunity for crimes to be committed.

Yours sincerely

*John Manuel*

Mr John Manuel MA BA (Hons) PGCE PGCFR Dip Bus.  
Force Designing Out Crime Officer (DOCO)



## LINCOLNSHIRE POLICE

Police Headquarters

PO Box 999

Lincoln,

LN5 7PH

Tel: 01522 558292

email

[john.manuel@lincs.pnn.police.uk](mailto:john.manuel@lincs.pnn.police.uk)

Your Ref: 2019/0294/RG3

17<sup>th</sup> May 2021

### Development & Environmental Services

City Hall, Beaumont Fee

Lincoln, LN1 1DF

## **Town and Country Planning Act 1990**

### **Re-consultation on Planning Permission**

**Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire,**

**Hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise:- In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (E, F.2 and Pub or drinking establishment/Takeaway as Sui Generis uses), employment (E) uses and parking; a primary school; up to 8HA of land (including key infrastructure) for up to 40,000sq.m of E and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (E and F.1 and F.2), a hotel (C1) food and drink outlets (E and Sui Generis) and a new community stadium for Lincoln City Football Club; Areas of formal and informal public open space; a network of public footpaths and cycle-ways associated engineering works to inform development platform and drainage system; new transport bridge link over to Beevor Street, and a new public footpath bridge over to Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road (revised description).**

Thank you for your correspondence and the opportunity to comment on the proposed scheme.

Lincolnshire Police have no objections to this resubmission and hybrid application.

There is significant evidence that failure to fully consider the wider implications of the impact of crime and disorder and how it should be address may have an impact on the longer-term sustainability of such a development.

It is disappointing that with such a major development proposal and with approximate 177+ documents making up this outline application there is no clear or explicit indication by the developers in respect of what measures and considerations they would include to address issues of Crime and Disorder.

I appreciate that as full planning applications are submitted over time that some of these considerations and issues might be addressed, however early planning and the adoption of clear principles of design in respect of crime and disorder can elicit considerable savings in costs and potential delays.

I would ask that the developers indicate how they intend to demonstrate the application of the principles of Crime Prevention and the reduction of anti-social behaviour within the context of overall planning and design of this development.

The opportunity to design, develop and fully integrate safe pedestrian, cycle routes and pathways should not be missed and I would refer the applicant and developers to the comments that have been made by Lincolnshire Police in previous responses to this submission.

I would recommend that the developers liaise and consult with this office and the Designing out Crime Officer (DOCO) for Lincolnshire Police as part of the overall design process. A good source document for developers is 'Secured by Design Homes 2019' and the Commercial Developments 2019 (Version 2) which can be accessed along with other useful design guides at [www.securedbydesign.com](http://www.securedbydesign.com) .

*Commercial Developments 2015* [www.securedbydesign.com](http://www.securedbydesign.com)

Crime prevention advice is given free without the intention of creating a contract. Neither the Home Office nor the Police Service takes any legal responsibility for the advice given. However, if the advice is implemented it will reduce the opportunity for crimes to be committed.

Yours sincerely

*John Manuel*

Mr John Manuel MA BA (Hons) PGCE PGCPD Dip Bus.

Force Designing Out Crime Officer (DOCO)

Development Management Team  
City of Lincoln Council  
City Hall  
Beaumont Fee

Lincoln LN1 1DE

03 May 2019

**Re: Comment on Western Growth Corridor planning application**

Dear Sir or Madam

Thank you for the opportunity to comment on the planning application submitted for the development of the Western Growth Corridor. Please find the Greater Lincolnshire Nature Partnership's (GLNP) response below.

The GLNP is a partnership of 49 organisations working to achieve more for nature. Each of these organisations may comment individually on the planning application for the Western Growth Corridor.

The GLNP supports the wetland habitat creation described in the planning application for its benefits to nature and biodiversity. Ideally any habitat creation should be implemented as early as possible, taking into account the time it takes for natural habitats to reach maturity.

The GLNP also supports the inclusion of open green space within the planned development for its benefit to health and wellbeing. It is important that this space is accessible to all and that steps are taken to overcome any physical and psychological barriers which could impede this. Particular effort should be taken to ensure that there is suitable connectivity between residential areas and open green space.

All open green spaces present opportunities for biodiversity and the natural environment. Semi-natural features should be included wherever possible to make the most of these opportunities and improve connectivity between habitats feeding into the creation of Nature Recovery Networks as proposed in the Government's *A Green Future: Our 25 year plan to improve the environment*.

The Environmental Statement concludes that the effect of the development on nature and biodiversity will be moderate adverse to negligible. The GLNP notes that opportunities should be taken to secure net gain as required by the National Planning Policy Framework (paragraphs 174b and 175d), the conclusions of the Environmental Statement suggest that this has not been done.

Kind regards

Luke Bamforth

Policy Officer





Michael Hurtley  
Assistant Development Officer  
City of Lincoln Council

**Planning application for the development of the Western Growth Corridor site.  
(Reference 2019/0294/RG3)**

15 May 2019

Dear Mr Hurtley,

The Lincolnshire Wildlife Trust is a registered wildlife conservation charity with over 28,000 members which manages 99 nature reserves totalling approximately 3,800 hectares. LWT covers the historic county of Lincolnshire from the Humber to the Wash and is one of a national family of 47 Wildlife Trusts, with the vision of: *"Lincolnshire and the neighbouring sea and estuaries to be rich in wildlife for the benefit of all."* Our Engagement with the planning system includes forward planning (e.g. commenting on Local Authority Local Plans) and development control work (e.g. commenting on individual planning applications where relevant to LWT land, conservation designations and conservation initiatives). As an adjacent land manager, LWT has been involved in correspondence and workshops with The City of Lincoln Council concerning the most appropriate development of the Western Growth Corridor for the benefit of wildlife and people.

### Summary of Lincolnshire Wildlife Trust's Comment

**Based on the details provided by: Environmental Statement with appendices (April 2019 ref. 60472603); Phase 1 Habitat survey (Drawing no. 60472603/WGC/6.2 Rev A); Illustrative Masterplan Drawing nos. SP-01, 2 and 3 Rev W; Green and Blue Infrastructure plan (Drawing no. 36 Rev A); Planning Statement (April 2019 ref. HG1264); the Lincolnshire Wildlife Trust has no objection to the proposed development. We do however have a number of concerns and we make a number of recommendations below.**

### Key policy considerations

We wish to place key emphasis on creating and enhancing 'Nature Recovery Networks' as proposed in the Government's 25 year Environment Plan and the principle of **biodiversity net gain** as required by the National Planning Policy Framework (paragraphs 170d and 175d.)

We note that the Environmental Statement Non-Technical Summary (April 2019) concludes that, the **overall effect on ecology and nature conservation** from the proposed development would be **"between moderate adverse to negligible, with minor benefits** arising including the potential provision of new habitats." This is given the assumptions made in the Environmental Statement which include the retention of all boundary vegetation and trees and takes into account all recommended mitigation both during construction and operational phases of the proposed development. We wish to highlight that this is **not in keeping with the principle of biodiversity net gain** and we would urge the Applicant (City of Lincoln Council in collaboration with Lindum Western Growth Community Ltd.) to be more ambitious in working towards this aim. We put forward our recommendations below which we hope are helpful in this regard.

Banovallum House  
Manor House Street  
Horncastle  
Lincolnshire  
LN9 5HF

Tel: 01507 526667  
Fax: 01507 525732

info@lincstrust.co.uk  
www.lincstrust.org.uk



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England, no. 461863  
and is registered as a  
charity, no. 218895  
VAT no. 613 9067 44

# Lincolnshire Wildlife Trust



Our response also focuses on Policies **LP29** and **LP30** of the adopted Local Plan for Central Lincolnshire, We would highlight the importance of the paragraphs (b) and (h) within **LP29**: “...***maintaining and enhancing a strategic green infrastructure network around and into the City***” and “***Take opportunities to deliver improvements to the wider Green Infrastructure network with reference to the Lincolnshire Green Infrastructure Study and Biodiversity Action Plan.***” We support the statement within **Policy LP30** which that the Western Growth Corridor SUE aims to create a place that “*respects its local surroundings*” and will offer “***improved linkages, enhancement and support of green wedges and other green infrastructure*** .” Furthermore, we make reference to **sections 5.5 – 5.9** and **policies LP20-24** in the **Central Lincolnshire Local Plan** with regard to the establishment and enhancement of green and blue infrastructure networks that offer multiple functionality for wildlife and people; biodiversity conservation and enhancement; and the maintenance of the undeveloped and accessible character of green wedges.

We consider the **Central Lincolnshire Green Infrastructure Study** (pp 139-142 Section 4.19 ‘**Zone 18: South Lincoln Urban Area**’) especially pertinent to the WGC Master Plan. Most notably the valuing of mature trees, native hedgerows and species-rich grass verges; the protection of green wedges and their incorporation and enhancement as part of new development; the accessibility of natural green space; the increased physical connectivity between key areas of semi-natural open space; and the management of high flood risk areas as multi-functional, green/blue corridors for wildlife and public access.

## Previous communication

We acknowledge the summary of Consultation in Table 6.2.

## Scoping in/out of designated sites

With regard to Swanholme Lakes Site of Special Scientific Interest (SSSI) & Local Nature Reserve (LNR), LWT concurs with comments provided by Natural England (8<sup>th</sup> May ref. 2019/0294/RG3). We acknowledge that ground water modelling has demonstrated that ground water flows northwards from the proposed development site away from the SSSI and so there are no hydrological links or potential pollution pathway. We therefore agree that scoping out the SSSI at this stage is appropriate although we would call for the enhancement of ecological connectivity to the site without attracting higher public footfall.

We notice that both Boultham Park LWS and Main Drain Tritton Road LWS have been omitted from Table 6.4 Non-Statutory Designated Sites although these are both situated within 1km. Although we appreciate that Boultham Park LWS is disconnected from the proposed development site by conurbation, we would nevertheless want to see consideration of its hydrological connection and potential risks to the notable habitat listed in the LWS citation. It is unclear from the Environmental Statement whether Main Drain Tritton Road LWS has been considered together with Boultham Main Drain LWS. As Main Drain Tritton Road LWS is both adjoining and downstream of the commercial development in the north-eastern corner we see potential for negative impact on this section of watercourse and would want to see considerations made explicit in supporting documentation. We agree with the scoping considerations for all other designated sites.

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Horncastle  
Lincolnshire  
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Fax: 01507 525732

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### Potential impacts on Boultham Mere LWS (LWT nature reserve)

We would contest the assessment in the Environmental Statement that indirect impacts on the breeding/roosting/foraging/over-wintering bird assemblage of Boultham Mere LWS would not be significant during construction. We see no detailed assessment of potential negative effects from noise pollution resulting from the construction or operation of the proposed sports stadium and commercial area on Boultham Mere LWS. The reserve is not assessed as a sensitive noise receptor site. Instead, the assumption is made that vegetation fringing the reserve and Skellingthorpe Main Drain would provide an adequate screen from disturbance. At this stage we would call for flexibility in the Masterplan layout within the Commercial Area concerning the location of the sports stadium and any other elements which may constitute sources of the highest noise levels. We would hope that such sources of noise and potential disturbance could be located as far as possible from Boultham Mere LWS and practicable mitigation measures implemented without necessitating major changes to the proposed layout. We have similar concerns regarding light pollution from the Commercial Development and Stadium and would want all reasonable measures put in place to mitigate negative effects on bats, invertebrates and roosting birds on the reserve.

We would also disagree with the assessment that no significant disturbance to nesting birds would result from increased visitor pressure. We note the rationale for this assessment which states that the nature reserve is "currently promoted for use by the public and that dogs are not allowed to enter the site." LWT does not actively advertise access to the reserve and we are currently in negotiations with the local IDB to restrict access due to its highly sensitive condition. We do not agree that current measures would be sufficient to mitigate negative effects from increased visitor pressure resulting from the proposed development. Should the development proceed as proposed, LWT would review public access to Boultham Mere. We do support the creation of accessible and attractive public open spaces close to the residential areas within the site and we agree that this would help to minimise additional pressures on nearby designated sites.

LWT regards Boultham Mere as an **important sanctuary area** which provides a source of wildlife for surrounding sites. For example, small numbers of bittern are known to overwinter regularly on this site. As the landowner, **we reserve the right to lock the reserve** entrance at the bridge owned by the IDB. We would therefore hope that any expectation of enhanced or increased access would be managed through appropriate use of **signage and desire lines** that would not encourage or channel footfall towards the reserve. Instead, we would seek to maintain access for low footfall, specialist interest and management machinery only.

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### Biodiversity impacts and opportunities

We recognise the following key biodiversity impacts and opportunities resulting from the proposed development based on the Environmental Statement. In each case we make/support recommendations for mitigation and enhancement towards achieving overall biodiversity net gain.

We would highlight the ecological importance of the **Boultham Main Drain LWS** (also known as Skellingthorpe Main Drain) along the northern boundary of the site and **Catchwater Drain, Lincoln LWS** in the south of the site. These constitute significant east-west ecological connectivity through the site and provide habitat for water vole and habitat of the highest importance locally for foraging and commuting bats. We also note that Catchwater Drain LWS has been found to support relatively good diversity for aquatic invertebrates. We note that “habitat would be lost from the downstream end of the Catchwater Drain LWS as part of channel upgrading required for the Proposed Development” (Env.Statement para 6.6.4). In order to work towards biodiversity net gain, we would therefore insist that both marginal and in-channel habitat were enhanced following any channel upgrading works and that this would be made a condition of planning permission together with ongoing appropriate habitat management as part of a LEMP. Furthermore, we would call for habitat enhancement along both of these LWS watercourses, over and above reinstatement of just disturbed areas. Habitat corridor widths and buffers should be maximised as far as possible in order to reduce nesting bird disturbance. Vegetation management of these features should be specified within a LEMP.

We support pollution prevention and working buffer control measures recommended to be implemented as part of a CEMP to safeguard Catchwater Drain LWS and Boultham Main Drain LWS during construction phases (Env. Statement para 6.6.11). We also support capping of the landfill site to better protect Boultham Main Drain LWS from pollution events. We recognise too that good quality SUDS design would lower risk of indirect negative operational effects on Boultham Main Drain LWS and Catchwater Drain LWS. We believe that full consideration should be given to potential impacts on the **water quality of the Upper Witham** via the Catchwater Drain and Boultham Main Drain. The Master Plan should positively encourage opportunities for water quality improvement in rivers and other watercourses in accordance with the Water Framework Directive.

We note that the Environmental Statement (para 6.6.3) highlights significant adverse effect at the District level from **loss of Mormon Field LWS**. We would insist on the **creation and ongoing appropriate management of species –rich grazing marsh/flood meadow** grassland to compensate for this loss. We would call for a substantially larger area of this habitat to be incorporated into the central green wedge of the site than the c.19.5 ha of semi-improved grassland of county value that would be lost. We see conversion from arable land to species-rich flood meadow as a key opportunity for biodiversity net gain which would be in keeping with the landscape character of the area as defined by the National Character Assessment.

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A further key biodiversity enhancement opportunity is associated with the creation and management of the two **borrow pit areas** which should be detailed in the LEMP. We insist that the profiles and lining of these waterbodies be designed for maximal biodiversity benefit including **gradual drawdown zones** and **maximal shallows** with irregular, long shorelines to **maximise marginal habitat** and potentially with small islands. LWT recommends that their design and management should emulate that of Boultham Mere which we recommend offers both a local reference site and potential donor site for propagules during vegetation establishment as well as a source of associated wildlife which would colonise over time.

We support the recommended habitat enhancement work within **Swan Pool LWS** (Env. Statement para 6.6.6 ) and see this as a way to enhance habitat throughout the Swanpool complex for what appears to be currently a small GCN population. We consider the proposed mitigation to Swanpool LWS as reasonable (in Env. Statement table 6.8) and agree with the assessment made. We also support recommendations that due to the importance and sensitivity of existing on-site wetland features such as Swan Pool LWS, these should not be included in the SUDs system for the commercial area. We agree that sustainable urban drainage systems (SUDS) would constitute an essential feature across the site which should be implemented with maximised biodiversity benefit in mind. New wetland habitat creation as part of a **multi-functional SUDS network** will benefit a range of species and enhance the semi-natural value of public greenspace. We support the concept of great crested newt habitat creation on higher ground above the flood plain including new breeding ponds.

With regard to **trees, hedgerows and scrub mosaics** we would make the following comments. We support the idea of establishing and enhancing **woodland (edge) links across the site** from Hartsholme to Decoy Wood and the A46 based around the drains and housing. We note the **assumptions** in the Environmental Statement that "areas of vegetation along the boundary of the site would be retained and that all trees with confirmed or suitable bat roost features would be retained. We would want the LEMP to clarify what vegetation is to be retained and would want to see every effort made to retain all trees and hedgerows where possible. We accept the hedgerow mitigation measures described in Env. Statement para 6.6.63. We support the planting of hedgerows to **mitigate severance of key connecting hedgerow features** and hedgerow design to facilitate bat commuting. We also support proposed farmland enhancement with scrub mosaic to the west of Swanpool LWS to **offset breeding bird habitat loss** on former landfill site. We are concerned by the **loss of reptile habitat** in Area 3 as shown in the Reptile Constraints Map and we would look to relocation and suitable habitat enhancement and extension of Area 6 and new areas to mitigate this loss.

We support the the creation of accessible and attractive public open spaces close to the residential areas within the site and agree that this would help to minimise **additional pressures from public access on nearby sites** designated for ecological value. We therefore support public access measures described in Env. Statement paras 6.6.108-9. We support the recommendations that the ecological mitigation areas would be fenced and signed to inform the public about the importance of the habitat to ground nesting birds, and to encourage the keeping of dogs on leads in the nesting bird season, to minimise the risk of disturbance.

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Manor House Street  
Horncastle  
Lincolnshire  
LN9 5HF

Tel: 01507 526667  
Fax: 01507 525732

info@lincstrust.co.uk  
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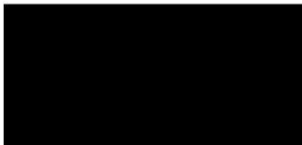
We see an improved layout in the current Masterplan illustrations compared to previous versions with regard to **north-south habitat connectivity**. Previously, the central, southern area of the site appeared to contain sports pitches which would have a blocking effect for wildlife connectivity. These pitches now appear to be located to the east of Swanpool which is an improvement. We do still have concerns that a '**pinch-point**' still occurs in the area designated for allotments and primary school playing fields. We would hope that the potential for widening the north-south green wedge could be maximised in order to connect habitat on a landscape scale through the city. Boundaries to neighbouring land use in this area should be restricted to native, biodiverse vegetation to facilitate corridor function and reduce risk from invasive species.

We understand from the supporting documentation provided that **details of the proposed SUDS and enhanced/new ecological areas** shown on the Masterplan illustrations are forthcoming. We would nevertheless insist at this stage that full details of habitat enhancement and **mitigation features** would be incorporated into subsequent stages of the planning application including planting schedules, and management plans as part of a LEMP. This should incorporate details of phasing e.g. of wetland, scrub mosaic and grassland creation so that continuity of habitat provision can be appreciated during periods of temporary negative impacts.

We would insist on environmentally sustainable practice and the prioritisation of seed and plants of **local provenance**. We would strongly advocate the avoidance of non-native plants outside of built-up / residential areas and would insist on native vegetation for boundaries to built-up areas. We support turf translocation for species conservation from grassland areas which will be lost unavoidably and we support appropriate sowing of seed collected from local, designated sites by relevant permission. Ideally we would advocate the use of low intensity **conservation grazing** for the maintenance and enhancement of the green wedge which could be combined with hay-making/biomass harvesting with **minimal agricultural inputs**.

The Lincolnshire Wildlife Trust welcomes enquiries to discuss any of the points made in this comment or details in the supporting documentation relevant to biodiversity risks and opportunities.

Yours sincerely,



Mark Schofield  
Conservation Officer

Banovallum House  
Manor House Street  
Horncastle  
Lincolnshire  
LN9 5HF

Tel: 01507 526667  
Fax: 01507 525732

[info@lincstrust.co.uk](mailto:info@lincstrust.co.uk)  
[www.lincstrust.org.uk](http://www.lincstrust.org.uk)



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UD-4618-2019-PLN

UD-128-2013-PLN

UD-2928-2016-FIN

Dear Sir/Madam

REFERENCE: 2019/0294/RG3

DEVELOPMENT: HYBRID PLANNING APPLICATION FOR THE SUSTAINABLE URBAN EXTENSION OF LINCOLN ON THE SITE OF THE WESTERN GROWTH CORRIDOR TO COMPRISE:-IN OUTLINE - HOUSING DEVELOPMENT OF UP TO 3,200 DWELLINGS; LOCAL CENTRE COMPRISING COMMUNITY, RETAIL (A1 TO A5), EMPLOYMENT (B1) USES AND PARKING; A PRIMARY SCHOOL; UP TO 8HA OF LAND (INCLUDING KEY INFRASTRUCTURE) FOR UP TO 40,000SQ.M OF B1 AND B2 DEVELOPMENT; UP TO 12HA OF LAND (INCLUDING KEY INFRASTRUCTURE) FOR SPORT, RECREATION AND LEISURE (D2), A HOTEL (C3) FOOD AND DRINK OUTLETS (A3 AND A4) AND A NEW COMMUNITY STADIUM FOR LINCOLN CITY FOOTBALL CLUB; AREAS OF FORMAL AND INFORMAL PUBLIC OPENSOURCE; A NETWORK OF PUBLIC FOOTPATHS AND CYCLEWAYS ASSOCIATED ENGINEERING WORKS TO INFORM DEVELOPMENT PLATFORM AND DRAINAGE SYSTEM; NEW TRANSPORT BRIDGE LINK OVER AND BEEVOR STREET, AND A NEW PUBLIC FOOTPATH BRIDGE OVER TRITTON ROAD. IN FULL - DETAILS FOR MEANS OF ACCESS INTO THE SITE FROM SKELLINGTHORPE ROAD AND TRITTON ROAD

LOCATION: WESTERN GROWTH CORRIDOR, SKELLINGTHORPE ROAD, LINCOLN, LINCOLNSHIRE

Thank you for the opportunity to comment on the above application. The site is within the Upper Witham Internal Drainage Board district. The proposed development will affect a number of Board land drainage pumping stations and Board maintained watercourses.

The Board **Objects** to the proposed development.

**Reason** The location is within flood plain that has historically flooded, it is also identified on the Environment Agency Flood maps as being in Zone 3/2. Alternate locations outside the flood plain are available for development.

The Flood Risk Assessment considers the current flood design criteria, however there is uncertainty over the impact of climate change and the availability of funding to maintain or improve flood defences that protect the proposed development both immediately adjacent to the site (River Witham, Fosdyke Navigation and Boutham Catchwater) and the River Trent, which potentially is the greater threat (with tidal as well as fluvial flood risk from the River Trent).

Whilst the Board objects to the development, it will continue to work with the developer, Environment Agency, Lincolnshire CC and City of Lincoln Council through the Task and Finish Group/Technical Group. This is because the development will have a significant impact on the Board's pumped drainage system that serves Lincoln and the surrounding area and the Board wishes there is no negative impact on the surface water drainage to this area.

The Flood Risk Assessment and Drainage Strategy submitted with the application in general is acceptable. However, there are parts of it that are **not acceptable**. Until the following areas have been addressed the application should not be determined:

- The development is phased over 23 years but the FRA does not set out the required drainage infrastructure for this phased approach. Drainage infrastructure must be put in place in advance of each phase of development to ensure existing property, land and infrastructure is not adversely affected.
- At various points it refers to Upper Witham Internal Drainage Board undertaking future maintenance of the new/modified watercourses severing the site. A formal request has yet to be received by the Board to consider scheduling these watercourses (6.4) and no agreement is in place for future maintenance. The LPA is urged to be clear about all future maintenance responsibilities for the drainage system.
- (3.6.4 & 4.4) Although the Board is currently undertaking the maintenance of Boultham Catchwater it should be noted that this is through the current Public Sector Co-operation Agreement (PSCA) for the Environment Agency.
- (4.4) Currently the Upper Witham Internal Drainage Board Byelaw distance is 6m not 9m, other references in the document correctly state 6m.
- (5.11 & 7) These sections state that the flood risk to existing housing is not increased. However, 5.6 states there is an increased flood risk. This is an anomaly needs to be clarified.
- (6.6.1 & 6.6.2) Refers to a 'temporary scenario for the discharge of surface water' this is unacceptable. It is essential an appropriate drainage link to the correct Board maintained watercourse is established at the onset of the development, particularly because of the relatively minimal cost of providing it in comparison to the Highway and other infrastructure works that will be provided. While it is important to create the drainage link, the size and attenuation volumes can be phased with the development.

It is also noted:

- (3.6.7 & 5.7) The Environment Agency model for the main river system gives a breach flood level 4.67m on the site from the River Trent.
- (5.1.3) Refers to the provision, at the cost to the developer, of a third pump at the Board's Coulson Road Pumping Station and an Automatic Weedscreen Cleaner at the 'Old' pump at Pyewipe Pumping station. This is to provide resilience to the Board's pumped system that serves the site. The need for such is stressed and the timing of the provision needs to be agreed.
- (5.5.1 & 5.6) The closure of the tunnel or syphon underneath the Fossdyke Navigation has negligible impact on the breach modelling.
- (6.3) SuDS will be used within the development in the form of swales and permeable pavement. This is in addition to the new linear watercourses providing attenuation directly within the Board's pumped drainage system.
- (6.10) The development is phased over a 23 year period.
- (7) Dwellings will be on raised platforms with a minimum level of 4.7m, the commercial area will remain within the flood plain with no ground raising.



In addition, the LPA is asked to note that under the terms of the Land Drainage Act 1991 the prior written consent of the Board is required for any proposed temporary or permanent works or structures within any watercourse, including infilling or a diversion.

Under the terms of the Board's Byelaws, the prior written consent of the Board is required for any proposed temporary or permanent works or structures in, under, over or within the byelaw distance (6m) of the top of the bank of a Board maintained watercourse.

The work done within the Flood Risk Assessment and Drainage Strategy highlights the continued Flood Risk to areas of the City of Lincoln and the need to consider flood mitigation and drainage measures for proposed development in these areas and in future strategies.

The land ownership plan shows the ownership to include Skellingthorpe Pump Drain and Boultham Pump Drain and the adjacent access strips. This land is owned by Upper Witham Internal Drainage Board and has been registered with the Land Registry, title number LL361876. This therefore needs to be amended.

Regards

Guy Hird

Engineering Services Officer

Witham First District Internal Drainage Board

Witham Third District Internal Drainage Board

Upper Witham Internal Drainage Board

North East Lindsey Drainage Board

J1 The Point,

Weaver Road,

LINCOLN,

LN6 3QN.

01522 697123

**From:** HighwaysSUDsSupport <[HighwaysSUDsSupport@lincolnshire.gov.uk](mailto:HighwaysSUDsSupport@lincolnshire.gov.uk)>  
**Sent:** 17 April 2019 11:55 AM  
**To:** Planning and Consents <[planning@witham3idb.gov.uk](mailto:planning@witham3idb.gov.uk)>  
**Subject:** OBSERVATIONS ON CONSULTATION REQUEST 2019/0294/RG3

Dear Sir/Madam

**REFERENCE: 2019/0294/RG3**

**DEVELOPMENT: HYBRID PLANNING APPLICATION FOR THE SUSTAINABLE URBAN EXTENSION OF LINCOLN ON THE SITE OF THE WESTERN GROWTH CORRIDOR TO COMPRISE:-IN OUTLINE - HOUSING DEVELOPMENT OF UP TO 3,200 DWELLINGS; LOCAL CENTRE COMPRISING COMMUNITY, RETAIL (A1 TO A5), EMPLOYMENT (B1) USES AND PARKING; A PRIMARY SCHOOL; UP TO 8HA OF LAND (INCLUDING KEY INFRASTRUCTURE) FOR UP TO 40,000SQ.M OF B1 AND B2 DEVELOPMENT; UP TO 12HA OF LAND (INCLUDING KEY INFRASTRUCTURE) FOR SPORT, RECREATION AND LEISURE (D2), A HOTEL (C3) FOOD AND DRINK OUTLETS (A3 AND A4) AND A NEW COMMUNITY STADIUM FOR LINCOLN CITY FOOTBALL CLUB; AREAS OF FORMAL AND INFORMAL PUBLIC OPENSAPCE; A NETWORK OF PUBLIC FOOTPATHS AND CYCLEWAYS ASSOCIATED ENGINEERING WORKS TO INFORM DEVELOPMENT PLATFORM AND DRAINAGE SYSTEM; NEW TRANSPORT BRIDGE LINK OVER AND BEEVOR STREET, AND A NEW PUBLIC FOOTPATH BRIDGE OVER TRITTON ROAD. IN FULL - DETAILS FOR MEANS OF ACCESS INTO THE SITE FROM SKELLINGTHORPE ROAD AND TRITTON ROAD**

**LOCATION: WESTERN GROWTH CORRIDOR, SKELLINGTHORPE ROAD, LINCOLN, LINCOLNSHIRE**

The County Council has received the above application for consultation.

If you have any comments they should be returned to [HighwaysSUDsSupport@lincolnshire.gov.uk](mailto:HighwaysSUDsSupport@lincolnshire.gov.uk) within 14 days of the date of this email. If no observations are received within the specified time then it will be assumed that you have no comments to make on this application.

Should you require an extension to the period of consultation for any reason, or wish to discuss any matter direct with the lead officer, please email [HighwaysSUDsSupport@lincolnshire.gov.uk](mailto:HighwaysSUDsSupport@lincolnshire.gov.uk) .

Yours faithfully

Highways Support on behalf of

Flood Risk and Development Manager

Phone: 01522 782070

**Your Personal Data – The law has changed, please read our [Privacy Notice](#)**



**Save a tree. Don't print this e-mail unless it's really necessary**

**From:** Guy Hird <guy.hird@witham3idb.gov.uk>  
**Sent:** 19 October 2020 09:50  
**To:** Technical Team (City of Lincoln Council);  
'HighwaysSUD:Support@lincolnshire.gov.uk'  
**Cc:** lan.Field@lincolnshire.gov.uk  
**Subject:** FW: Reconsultation on Planning Application 2019/0294/RG3  
**Attachments:** ufm46.pdf; ufm48.pdf

**Categories:** Kelly Bray

UD-4618-2019-PLN  
UD-128-2013-PLN  
UD-2928-2016-FIN

Dear Sir/Madam,

2019/0294/RG3

Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire,

Description of the proposed development:

Hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise:- In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (E, F.2 and Pub or drinking establishment/Takeaway as Sui Generis uses), employment (E) uses and parking; a primary school; up to 8HA of land (including key infrastructure) for up to 40,000sq.m of E and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (E and F.1 and F.2), a hotel (C1) food and drink outlets (E and Sui Generis) and a new community stadium for Lincoln City Football Club; Areas of formal and informal public openspace; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over to Beevor Street, and a new public footpath bridge over to Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road (revised description).

Thank you for the opportunity to comment on the above application. The site is within the Upper Witham Internal Drainage Board district. The proposed development will affect a number of Board land drainage pumping stations and Board maintained watercourses.

As in the previous comments for this Application (August 2019) the Board Objects to the proposed development.

**Reason** The location is within flood plain that has historically flooded, it is also identified on the Environment Agency Flood maps as being in Zone 3/2. Alternate locations outside the flood plain are available for development.

It is noted that the covering letter included in the submitted documents (September 2020) addresses some of the issues raised in the previous comments from the Board. The developer confirms

*that as part of the initial stage highway works positive surface water drainage connections will be established using one of the following options*

- *Where a current drainage route exists, surface water will discharge to the existing on-site ditch network (at a restricted rate).*
- *Where the current drainage route cannot be determined, works will be undertaken to provide a positive drainage route.*

*Prior to the occupation of any properties, linear drainage channels with sufficient capacity will be provided to connect the proposed development to the Skellingthorpe Main Drain, as outlined in the Drainage Strategy drawing.*

However there are a number of areas that have not been addressed from the Upper Witham Internal Drainage Board comments (August 2019) and have not been resolved through direct discussions with the developer. The August 2019 comments are as below with the areas that have been addressed struck through.

The Flood Risk Assessment considers the current flood design criteria, however there is uncertainty over the impact of climate change and the availability of funding to maintain or improve flood defences that protect the proposed development both immediately adjacent to the site (River Witham, Fossdyke Navigation and Boultham Catchwater) and the River Trent, which potentially is the greater threat (with tidal as well as fluvial flood risk from the River Trent).

Whilst the Board objects to the development, it will continue to work with the developer, Environment Agency, Lincolnshire CC and City of Lincoln Council through the Task and Finish Group/Technical Group. This is because the development will have a significant impact on the Board's pumped drainage system that serves Lincoln and the surrounding area and the Board wishes there is no negative impact on the surface water drainage to this area.

The Flood Risk Assessment and Drainage Strategy submitted with the application in general is acceptable. However, there are parts of it that are not acceptable. Until the following areas have been addressed the application should not be determined:

- ~~• The development is phased over 23 years but the FRA does not set out the required drainage infrastructure for this phased approach. Drainage infrastructure must be put in place in advance of each phase of development to ensure existing property, land and infrastructure is not adversely affected.~~
- At various points it refers to Upper Witham Internal Drainage Board undertaking future maintenance of the new/modified watercourses severing the site. A formal request has yet to be received by the Board to consider scheduling these watercourses (6.4) and no agreement is in place for future maintenance. The LPA is urged to be clear about all future maintenance responsibilities for the drainage system.
- (3.6.4 & 4.4) Although the Board is currently undertaking the maintenance of Boultham Catchwater it should be noted that this is through the current Public Sector Co-operation Agreement (PSCA) for the Environment Agency.
- (4.4) Currently the Upper Witham Internal Drainage Board Byelaw distance is 6m not 9m, other references in the document correctly state 6m.
- (5.11 & 7) These sections state that the flood risk to existing housing is not increased. However, 5.6 states there is an increased flood risk. This is an anomaly needs to be clarified.
- (6.6.1 & 6.6.2) Refers to a 'temporary scenario for the discharge of surface water' this is unacceptable. It is essential an appropriate drainage link to the correct Board maintained watercourse is established at the onset of the development, particularly because of the relatively minimal cost of providing it in comparison to the Highway and other infrastructure works that will be provided. While it is important to create the drainage link, the size and attenuation volumes can be phased with the development.

It is also noted:

- (3.6.7 & 5.7) The Environment Agency model for the main river system gives a breach flood level 4.67m on the site from the River Trent.
- (5.1.3) Refers to the provision, at the cost to the developer, of a third pump at the Board's Coulson Road Pumping Station and an Automatic Weedscreen Cleaner at the 'Old' pump at Pyewipe Pumping station. This is to provide resilience to the Board's pumped system that serves the site. The need for such is stressed and the timing of the provision needs to be agreed.

- (5.5.1 & 5.6) The closure of the tunnel or syphon underneath the Fosdyke Navigation has negligible impact on the breach modelling.
- (6.3) SuDS will be used within the development in the form of swales and permeable pavement. This is in addition to the new linear watercourses providing attenuation directly within the Board's pumped drainage system.
- (6.10) The development is phased over a 23 year period.
- (7) Dwellings will be on raised platforms with a minimum level of 4.7m, the commercial area will remain within the flood plain with no ground raising.

In addition, the LPA is asked to note that under the terms of the Land Drainage Act 1991 the prior written consent of the Board is required for any proposed temporary or permanent works or structures within any watercourse, including infilling or a diversion.

Under the terms of the Board's Byelaws, the prior written consent of the Board is required for any proposed temporary or permanent works or structures in, under, over or within the byelaw distance (6m) of the top of the bank of a Board maintained watercourse.

The work done within the Flood Risk Assessment and Drainage Strategy highlights the continued Flood Risk to areas of the City of Lincoln and the need to consider flood mitigation and drainage measures for proposed development in these areas and in future strategies.

The land ownership plan shows the ownership to include Skellingthorpe Pump Drain and Boutham Pump Drain and the adjacent access strips. This land is owned by Upper Witham Internal Drainage Board and has been registered with the Land Registry, title number LL361876. This therefore needs to be amended.

Regards

Guy Hird  
Engineering Services Officer

Our office is closed to visitors but our staff are still working. Please email or telephone with all enquiries.

enquiries@witham3idb.gov.uk  
accounts@witham3idb.gov.uk  
planning@witham3idb.gov.uk  
consents@witham3idb.gov.uk

Witham First District Internal Drainage Board  
Witham Third District Internal Drainage Board  
Upper Witham Internal Drainage Board  
North East Lindsey Drainage Board

Witham House,  
Meadow Lane  
North Hykeham,  
LINCOLN,  
LN6 9QU (for sat nav use LN6 9TP)  
Tel: 01522 697123

Four independent statutory Land Drainage and Flood Risk Management Authorities working in partnership.

Dear Sir/Madam

2019/0294/RG3

Hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise:- In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (E, F.2 and Pub or drinking establishment/Takeaway as Sui Generis uses), employment (E) uses and parking; a primary school; up to 8HA of land (including key infrastructure) for up to 40,000sq.m of E and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (E and F.1 and F.2), a hotel (C1) food and drink outlets (E and Sui Generis) and a new community stadium for Lincoln City Football Club; Areas of formal and informal public openspace; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over to Beevor Street, and a new public footpath bridge over to Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road (revised description). Western Growth Corridor Skellingthorpe Road Lincoln Lincolnshire

Thank you for the opportunity to comment on the above application. The site is within the Upper Witham Internal Drainage Board district. The proposed development will affect a number of Board land drainage pumping stations and Board maintained watercourses.

The Board has no further comment on the documents submitted in 2021.

The Boards position remains unchanged and the standing objection remains in place, it is noted however that the Board continues to engage with the developer on the drainage proposals and details.

Regards

Guy Hird  
Acting Head of Technical & Engineering Services

Our office is closed to visitors but our staff are still working. Please email or telephone with all enquiries.



## Planning Applications – Suggested Informative Statements and Conditions Report

If you would like to discuss any of the points in this document please contact us on 03456 066087, Option 1 or email [planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk).

AW Site Reference: 157592/1/0081421

Local Planning Authority: Lincoln District (B)

Site: Western Growth Corridor Skellingthorpe Road Lincoln Lincolnshire

Proposal: In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8HA of land (including key infrastructure) for up to 40,000sq.m of B1 and B2

Planning application: 2019/0294/RG3

**Prepared by:** Pre-Development Team

**Date:** 6 April 2020

### ASSETS

#### Section 1 - Assets Affected

There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted.

Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence.

## WASTEWATER SERVICES

### Section 2 - Wastewater Treatment

The foul drainage from this development is in the catchment of Canwick Water Recycling Centre which currently does not have capacity to treat the flows from the development site. Anglian Water are obligated to accept the foul flows from the development with the benefit of planning consent and would therefore take the necessary steps to ensure that there is sufficient treatment capacity should the Planning Authority grant planning permission.

### Section 3 - Surface Water Disposal

The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.

4.5 From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse. Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

### Section 4 - Suggested Planning Conditions

Anglian Water would therefore recommend the following planning condition if the Local Planning Authority is minded to grant planning approval.

#### Used Water Sewerage Network (Section 3)

We have no objection subject to the following condition: Condition Prior to construction above damp proof course a Phasing Plan setting out the details of the phasing of the development shall be submitted to, and approved in writing by the Local Planning Authority. Thereafter, the development shall be carried out in complete accordance with the approved Phasing Plan. Reason To ensure the development is phased to avoid an adverse impact on drainage infrastructure. Condition Prior to the construction above damp proof course, a scheme for on-site foul water drainage works, including connection point and discharge rate, shall be submitted to and approved in writing by the Local Planning Authority. Prior to the occupation of any phase, the foul water drainage works relating to that phase must have been carried out in complete accordance with the approved scheme. Reason To prevent environmental and amenity problems arising from flooding

## FOR THE ATTENTION OF THE APPLICANT - If Section 3 or Section 4 condition has been recommended above, please see below information:

### Next steps

Desktop analysis has suggested that the proposed development will lead to an unacceptable risk of flooding downstream. We therefore highly recommend that you engage with Anglian Water at your earliest convenience to develop in consultation with us a feasible drainage strategy.

If you have not done so already, we recommend that you submit a Pre-planning enquiry with our Pre-Development team. This can be completed online at our website <http://www.anglianwater.co.uk/developers/pre-development.aspx>

Once submitted, we will work with you in developing a feasible mitigation solution.

If a foul or surface water condition is applied by the Local Planning Authority to the Decision Notice, we will require a copy of the following information prior to recommending discharging the condition:

#### Foul water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution including:
  - Development size
  - Proposed discharge rate (Should you require a pumped connection, please note that our minimum pumped discharge rate is 3.8l/s)
  - Connecting manhole discharge location (No connections can be made into a public rising main)
- Notification of intention to connect to the public sewer under S106 of the Water Industry Act (More information can be found on our website)
- Feasible mitigation strategy in agreement with Anglian Water (if required)



## Planning Applications – Suggested Informative Statements and Conditions Report

If you would like to discuss any of the points in this document please contact us on 03456 066087, Option 1 or email [planningliaison@anglianwater.co.uk](mailto:planningliaison@anglianwater.co.uk).

AW Site Reference: 157592/1/0104284

Local Planning Authority: Lincoln District (B)

Site: Western Growth Corridor Skellingthorpe Road Lincoln Lincolnshire

Proposal: Hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise:- In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (E, F.2 and Pub o

Planning application: 2019/0294/RG3

Prepared by: Pre-Development Team

Date: 30 September 2020

### ASSETS

#### Section 1 - Assets Affected

There are assets owned by Anglian Water or those subject to an adoption agreement within or close to the development boundary that may affect the layout of the site. Anglian Water would ask that the following text be included within your Notice should permission be granted.

Anglian Water has assets close to or crossing this site or there are assets subject to an adoption agreement. Therefore the site layout should take this into account and accommodate those assets within either prospectively adoptable highways or public open space. If this is not practicable then the sewers will need to be diverted at the developers cost under Section 185 of the Water Industry Act 1991. or, in the case of apparatus under an adoption agreement, liaise with the owners of the apparatus. It should be noted that the diversion works should normally be completed before development can commence.

## WASTEWATER SERVICES

### Section 2 - Wastewater Treatment

The foul drainage from this development is in the catchment of Canwick Water Recycling Centre which currently does not have capacity to treat the flows from the development site. Anglian Water are obligated to accept the foul flows from the development with the benefit of planning consent and would therefore take the necessary steps to ensure that there is sufficient treatment capacity should the Planning Authority grant planning permission.

### Section 3 - Used Water Network

This response has been based on the following submitted documents: - FLOOD RISK ASSESSMENT AND WATER MANAGEMENT STRATEGY Development will lead to an unacceptable risk of flooding downstream. Anglian Water will need to plan effectively for the proposed development, if permission is granted. We will need to work with the applicant to ensure any infrastructure improvements are delivered in line with the development. (if we can be more specific e.g. a full assessment cannot be made due to lack of information, the applicant has not identified a discharge rate) We therefore request a condition requiring phasing plan and/or on-site drainage strategy (1) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (2) INFORMATIVE - Notification of intention to connect to the public sewer under S106 of the Water Industry Act Approval and consent will be required by Anglian Water, under the Water Industry Act 1991. Contact Development Services Team 0345 606 6087. (3) INFORMATIVE - Protection of existing assets - A public sewer is shown on record plans within the land identified for the proposed development. It appears that development proposals will affect existing public sewers. It is recommended that the applicant contacts Anglian Water Development Services Team for further advice on this matter. Building over existing public sewers will not be permitted (without agreement) from Anglian Water. (4) INFORMATIVE - Building near to a public sewer - No building will be permitted within the statutory easement width of 3 metres from the pipeline without agreement from Anglian Water. Please contact Development Services Team on 0345 606 6087. (5) INFORMATIVE: The developer should note that the site drainage details submitted have not been approved for the purposes of adoption. If the developer wishes to have the sewers included in a sewer adoption agreement with Anglian Water (under Sections 104 of the Water Industry Act 1991), they should contact our Development Services Team on 0345 606 6087 at the earliest opportunity. Sewers intended for adoption should be designed and constructed in accordance with Sewers for Adoption guide for developers, as supplemented by Anglian Water's requirements.

### Section 4 - Surface Water Disposal

The preferred method of surface water disposal would be to a sustainable drainage system (SuDS) with connection to sewer seen as the last option. Building Regulations (part H) on Drainage and Waste Disposal for England includes a surface water drainage hierarchy, with infiltration on site as the preferred disposal option, followed by discharge to watercourse and then connection to a sewer.

From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse. Should the proposed method of surface water management change to include interaction with Anglian Water operated assets, we would wish to be re-consulted to ensure that an effective surface water drainage strategy is prepared and implemented.

### Section 5 - Suggested Planning Conditions

Anglian Water would therefore recommend the following planning condition if the Local Planning Authority is mindful to grant planning approval.

#### Used Water Sewerage Network (Section 3)

We have no objection subject to the following condition: Condition Prior to construction above damp proof course a Phasing Plan setting out the details of the phasing of the development shall be submitted to, and approved in writing by the Local Planning Authority. Thereafter, the development shall be carried out in complete accordance with the approved Phasing Plan. Reason To ensure the development is phased to avoid an adverse impact on drainage infrastructure.

**FOR THE ATTENTION OF THE APPLICANT - if Section 3 or Section 4 condition has been recommended above, please see below information:**

#### Next steps

Desktop analysis has suggested that the proposed development will lead to an unacceptable risk of flooding downstream. We therefore highly recommend that you engage with Anglian Water at your earliest convenience to develop in consultation with us a feasible drainage strategy.

If you have not done so already, we recommend that you submit a Pre-planning enquiry with our Pre-Development team. This can be completed online at our website <http://www.anglianwater.co.uk/developers/pre-development.aspx>

Once submitted, we will work with you in developing a feasible mitigation solution.

If a foul or surface water condition is applied by the Local Planning Authority to the Decision Notice, we will require a copy of the following information prior to recommending discharging the condition:

#### Foul water:

- Feasible drainage strategy agreed with Anglian Water detailing the discharge solution including:
  - Development size
  - Proposed discharge rate (Should you require a pumped connection, please note that our minimum pumped discharge rate is 3.8l/s)
  - Connecting manhole discharge location (No connections can be made into a public rising main)
- Notification of intention to connect to the public sewer under S106 of the Water Industry Act (More information can be found on our website)
- Feasible mitigation strategy in agreement with Anglian Water (if required)

Place Directorate  
Lancaster House  
36 Orchard Street  
Lincoln  
LN1 1XX  
Tel: (01522) 782070  
E-Mail:Highwaysudssupport@lincolnshire.gov.uk



To: Lincoln City Council

Application Ref: 2019/0294/RG3

With reference to this application dated 15 April 2019 relating to the following proposed development:

Address or location

**Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire**

Date application referred:  
15 April 2019

Type of application: Outline/Full/RM/:  
OM

Description of development

Hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise:-In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8HA of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; Areas of formal and informal public openspace; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over and Beevor Street, and a new public footpath bridge over Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road

Notice is hereby given that the County Council as Local Highway and Lead Local Flood Authority:

- **Requests that the Local Planning Authority refuses the application for the reasons set out below.**

## HIGHWAY AUTHORITY AND LEAD LOCAL FLOOD AUTHORITY RESPONSE

### Introduction

LCC as Local Highway Authority (LHA) and Lead Local Flood Authority (LLFA) supported the allocation in the Central Lincolnshire Local Plan (CLLP) of land at Swanpool, Fen Farm and Decoy Farm known as Western Growth Corridor (WGC).

Policies LP28 and LP30 within the CLLP directly relate to Sustainable Urban Extensions (SUE) and the requirements needed for development to come forward in these locations. The policy requirements for WGC are repeated below:

#### Western Growth Corridor SUE (WGC) – Land at Swanpool, Fen Farm and Decoy Farm

Proposals for the WGC area, as identified on the Policies Map, should provide:

- Approximately 3,200 houses;
- Approximately 20 ha of land for mixed employment (B Use Classes) and leisure (D2 Use Class) serving the wider Lincoln area for significant local growth and inward investment of strategic importance complementary to that on the adjacent Lincoln Science and Innovation Park;
- A distinctive place to live that has its own identity and respects its local surroundings including key views and vistas of and from Lincoln Cathedral and the historic core of the City and the setting of Decoy Farm scheduled monument and Hartsholme Registered Park;
- Comprehensive solutions to drainage and flood risk, guided by an agreed flood risk assessment and water management plan;
- A direct route incorporating priority for public transport linking Skellingthorpe Road through to the city centre via the Beevor Street area with connection onto the A46 if required;
- Transport infrastructure, such as measures to encourage walking, cycling and use of public transport (which might include park and ride facilities) in order to maximise opportunities for sustainable modes of travel, in line with the aims of the Lincoln Integrated Transport Strategy;
- A wide range of community facilities including a new Local Centre;
- A wide range of open space, recreation and leisure uses, together with consideration of the provision of a regional leisure complex;
- A development that maximises the opportunities for low carbon and sustainable design including, if feasible, use of the heat from the Energy from Waste plant at North Hykeham;
- Comprehensive solutions to reclaim and remediate the former tip on the eastern part of the site; and
- Improved linkages, enhancement and support of green wedges and other green infrastructure.

This current application is a hybrid application with outline for:

- Housing development of up to 3,200 dwellings;
- local centre comprising community, retail (E, F.2 and Pub or drinking establishment/Takeaway as Sui Generis uses), employment (E) uses and parking; a primary school;
- up to 8HA of land (including key infrastructure) for up to 40,000sq.m of E and B2 development;
- up to 12ha of land (including key infrastructure) for sport, recreation and leisure (E and F.1 and F.2),

- a hotel (C1) food and drink outlets (E and Sui Generis) and
- a new community stadium for Lincoln City Football Club;
- Areas of formal and informal public openspace;
- a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system;
- new transport bridge link over to Beevor Street, and
- a new public footpath bridge over to Tritton Road.

The full application is for:

- Details for means of access into the site from Skellingthorpe Road and Tritton Road

The application is supported by a range of documents including a Indicative Masterplan, Phasing proposals, Transport Assessment, Travel Plan, Junction Layout drawings, Flood Risk Assessment and Surface Water Drainage Strategy.

## Complete Application

LCC consider that the application for the whole development could continue to be supported in our role as statutory consultee for LHA and LLFA.

Whilst the proposed development would add significant transport demand to the highway network, the provision of new highway links from Skellingthorpe Road to Tritton Road and Beevor Street will increase capacity and network resilience over the existing situation. Direct footway, cycle and bus connections are being proposed within the site and across these new links which will connect the site to the City Centre. These proposals combined with a full package of mitigation measures which promote sustainable transport modes in would ensure that the development accords with the Objectives set out in CLLP Policy LP30 and Government Guidance for development in the NPPF.

The application could therefore be acceptable subject to the mitigation and further detailed checks as described below:

### Mitigation:

The transport infrastructure to encourage sustainable modes is not yet adequately defined within the application and the necessary obligations for inclusion within a Section 106 Agreement need to be determined. These would include measures both off site and on site such as:

- A mobility hub - The Lincoln Transport Strategy (LTS) proposed that each SUE should have a mobility hub which provides facilities to serve the development and encourage interchange between modes and promotes the use of alternative modes. It is recognised that a development of this scale will take up to 20 years to build out and flexibility is required such that future sustainable travel patterns can be supported. At this stage, it is envisaged that the mobility hub may need to accommodate: car clubs, bike hire and parking facilities, e-scooter hire and facilities, bus stops, parking and charging points. At this stage, an area of around 1 Ha is considered necessary for the hub. LCC are currently undertaking further studies and by the time the drafting of the S106 is undertaken, LCC should be in a position to provide further evidence and detail for the Mobility Hub.

- Travel Plan – Detailed comments are provided on the Travel Plan as attached. It is recommended that the Travel Plan Framework is amended to incorporate these comments and then the Travel Plan can be condition. LCC requests £1000 per year for 5 years to monitor the Travel Plan.
- Stadium Demand Management Travel Plan – There is insufficient detail in the application to ensure that the necessary Section 106 obligations for Travel Demand management associated with the stadium use can be captured at this outline stage. The phasing indicates that the Stadium would only be delivered after 2800 houses and the Beevor Street bridge link have been completed and are open, this is therefore likely to be at least 10-15 years after grant of outline consent and the highway network could be operating significantly differently in this timescale. Either, significant further evidence is provided to demonstrate the impact of the stadium and the necessary mitigation for inclusion in the S106 agreement, or it is suggested that this use is removed from the Outline proposals.
- Bus infrastructure (Bus stops, bus priority junctions, bus lanes). The Masterplan indicatively shows some proposals for these within the site and the proposed layouts for the Tritton Road/Site access and Skellingthorpe Road/Site access junctions include these. The principle of bus priority on the main spine road through the site is necessary and as reserve matters applications come forward the detail will need to accord with this principle.
- Bus infrastructure Off Site - Measures in Mitigation Package B include a new dedicated Bus Lane along the High Street. After further discussions with Stagecoach, it is clear the off-site measures such as these are required, the precise location and detail of these measures could change. Due to events in the last year Stagecoach has introduced rapid bus routes using the east-west link and it is possible that more appropriate mitigation may be provided along Tritton Road. It is therefore suggested that a financial contribution is provided for off-site bus infrastructure which has some flexibility to be used on the most appropriate corridor between the site and the City Centre.
- Bus services – The current application does not propose to provide any new bus services. It is proposed that some of the existing services using Skellingthorpe Road would divert through the new site and serve the development. Due to the current demand from the Birchwood area, and the likely new demand from WGC it is considered by Stagecoach that new bus services could be provided and would be funded by revenue. Therefore, no subsidy is required for new bus services, provided the infrastructure improvements above are delivered which will make these bus services viable and reliable alternatives to the private car.
- Walking and cycling infrastructure are shown indicatively on the Masterplan for within the site. When the reserve matters applications are submitted, the pedestrian and cycle network should be provided in line with current guidelines, these are set out in Local Transport Note 1-20.

- Catchwater Drain - Walking and Cycling Off site. The application includes proposals for the Boutham Catchwater to provide an enhanced vehicular / cycle route from the site, along the existing route adjacent to the Boutham Catchwater to connect with the new pedestrian / cycle bridge over the railway to Tritton Road and into the City Centre. There are no layout plans for these proposals nor any further details, these are required to ensure adequate detail can be included within a S106 Agreement. The footway/cycleway should also be extend from the site west under the A46 to where it meets the Sustrans route. The Almond Avenue estate requires a ped and cycle connection to the catchwater drain.
  
- Other off Site Walking and Cycling - LCC has requested that the applicant consider the impact of the development on the adjoining network with regard to walking and cycling. A development of this scale will generate significant demand by these modes on the adjoining network. Figure 2.1 of the TA shows the likely catchment to be impacted when the development and bridge connections are delivered but the TA does not identify any necessary mitigation. Within this area LCC consider that mitigations including the following maybe necessary:
  1. East side of Tritton Road between Skellingthorpe Road and Dixon Street is currently footway only. Scope to incorporate cycleway (either shared or segregated).
  2. Existing shared ped & cycleway to north and south sides of Skellingthorpe Road (between Birchwood & Tritton Road). The existing facilities have limited widths (except for small section adjacent to City school). There is scope to undertake minor improvements on this section.
  3. Existing pelican crossing at Almond Ave junction. Improve to a toucan crossing.
  4. No cycleways to Skellingthorpe Road between Tritton Road and Boutham Park Road. Cycleways should be considered.
  5. Tritton Road between Skellingthorpe Road and Dixon Street is currently single carriageway. Given the availability of existing highway land, could a bus lane (or bus priority measures) be introduced (between the new site access travelling north).
  6. No tactile paving blocks at the Tritton Road/Chieftain Way junction.
  7. Dixon Street/Tritton Road junction, subject to check below regarding bus provision through junction and controlled crossings for pedestrians on all arms.
  8. The existing pedestrian & cycleway to the east side of Tritton Road ends at Coulson Road and re-starts at Tritton Retail Park. Consideration of this missing link to be addressed.
  9. Tritton Road/Centaur Road junction has no pedestrian & cycle crossing facility to Tritton Road south arm.
  10. Tritton Road/Beevor Street junction;
    - a) Tritton Road south arm has no controlled crossing facility.
    - b) Tritton Road north arm has no controlled crossing facility.
  11. Beevor Street has no cycleway provision between the proposed site access and Tritton Road.
  12. Beevor Street ped & cycle provision required between proposed site access and Poplar Avenue.
  13. Poplar Avenue no cycle provision to the west side.
  14. Ruston Way no cycle provision to the south side between Poplar Avenue and Picton Street.
  15. Ruston Way/Tritton Road roundabout – no controlled ped & cycle crossing at Ruston Way arm.



16. Ruston Way/Tritton Road roundabout – not all arms have toucan crossings. Possible improvements required.
  17. Ropewalk/The sidings ped & cycle controlled crossings. Possible improvement to toucan.
  18. No cycle provision to St Marks Street.
  19. High Street only has cycle provision between Firth Road and St Marks Street. Could this be extended along the High Street.
  20. No cycle provision to Firth Road.
- Parking Controls - The Transport Assessment has been based on lower car trip rates which has been agreed as a result of the applicants agreement to restricting car parking for the residential element of the development to an average of 1.5 spaces per dwelling. This will need to be controlled by planning conditions which tie into the delivery and adoption of the roads under Section 38 agreements with LCC and Traffic Regulation Orders (TRO) which control the on street parking within the site. This can be achieved but requires coordination between the Authorities and Developers to ensure parking remains controlled over the whole site for the development including the time between construction and adoption of roads by LCC.
  - Off Site Junction Improvements – Mitigation Packages A and B include:
    - Doddington Road / Birchwood Avenue – the conversion of the existing priority arrangement to a signal-controlled junction
    - Doddington Road / Tritton Road – capacity improvement works to the junction
    - Whisby Road / Doddington Road junction – provision of a yellow box junction on Doddington Road eastbound to keep the junction clear during busy times and improve bus journey times along Whisby Road eastbound.
    - High Street / Dixon Street junction – the Dixon Street arm is proposed to be made left turn only, to remove vehicular flow from cars wishing to turn right and allow for improved throughput specifically for buses wishing to turn left to access the new dedicated route towards the City centre.
    - The above are proposed to be delivered by the 300 dwelling. If these mitigations are to address the impact of Phase 1A as suggested by the applicant, then they would need to be delivered earlier than the 300 dwelling. Further comment on Phasing is made later in this response.
  - Off Site Junction Improvements – Mitigation Packages C includes:
    - A46 / Skellingthorpe Road roundabout – Widening the Skellingthorpe and Lincoln Road arms to 3 lane entries and include pedestrian signalised crossings on the A46 arms north and south of the roundabout. This is proposed to be delivered by 1000 houses, but as no interim year assessments were undertaken it is not clear how this has been determined. Clarification and evidence is sought as to when this mitigation is necessary.

## Detailed Checks

As full planning is sought for the junction proposals at Skellingthorpe Road / Site Access and Tritton Road / Site Access / Dixon Street it is recommended that these layouts and signal operation should be subject to a more detailed technical check to ensure the junctions can be delivered within the land take shown and that the phasing and staging of the signals assumed for the transport assessment is acceptable to the LHA.

Confirmation from Network Rail that the clearance over the railway has been agreed is needed, detail of the structural depth of the bridge and confirmation that the adopting authority for the structure has agreed this is also needed. Both of these factors are fundamental to determining the road level over the bridge and then the vertical alignment and gradients down to the Tritton Road junction.

## Phasing

The planning submission includes a phasing proposal which sets out the intended Phasing for the development. Phase 1A is for 300 dwellings to be accessed from the new signalised site access on Skellingthorpe Road. Mitigation Packages A and B would be completed by completion of Phase 1A.

LCC raised concerns with the City of Lincoln Planning Department and the developers in response to the original application in April 2019. As a result the applicant has undertaken a series of traffic surveys of the existing highway network in Feb 2020. These surveys show the observed turning movements and queues, the survey results corroborate anecdotal evidence collected by LCC Officers and reported by local residents that Skellingthorpe Road in particular experiences lengthy queues especially in the am peak. The survey showed that throughout the peak hour these queues were over 100 vehicles and reaching around 200 vehicles at times.

The Phase 1A proposals are forecast to add a further 81 vehicles to this eastbound movement in the am peak hour. The existing surveyed flows are 447 for this link and therefore this would be an increase of around 18%.

Mitigation on Skellingthorpe Road is not possible due to physical constraints and the applicant has proposed mitigation on an alternative route into the City from Birchwood via Doddington Road and Tritton Road in the form of junction improvements in Mitigation Packages A and B described above.

These junction improvements could provide increased capacity, however, they will not provide relief for the residents of the new development and it is questionable how many existing residents from Birchwood would reallocate to Doddington Road, given the existing distribution, journey times and destinations.

The mitigation packages for Phase 1A are junction improvements remote from the site and a bus lane on the High Street, also remote from the site. There are no pedestrian or cycling mitigation

measures proposed for Phase 1 A, and the Developer has advised that Phase 1A would not have a restricted parking ratio of 1.5 spaces per dwelling.

For all of the above reasons LCC objects to Phase 1A since it would result in a severe impact on the local road network and does not accord with the sustainable objectives within Local Plan Policies LP28 and LP30 and the guidance within the NPPF.

Phase 1A is a development which does not adequately promote alternative sustainable modes, there is no improvement for walking and cycling. The bus services will be adversely affected by additional traffic on the local network and the pinch point of Skellingthorpe Road is not addressed. The development adds 18% additional car traffic to a link which is already under severe stress, operating at capacity with frequent extensive queuing and suppressed demand manifest in demand and queues extending beyond the peak hours.

## Surface Water

As Lead Local Flood Authority, LCC is responsible for consideration of surface water impact and mitigation. The IDB's assist with water management and have provided the following comments:

The Flood Risk Assessment and Drainage Strategy submitted with the application in general is acceptable. However, there are parts of it that are not acceptable. Until the following areas have been addressed the application should not be determined:

- The development is phased over 23 years but the FRA does not set out the required drainage infrastructure for this phased approach. Drainage infrastructure must be put in place in advance of each phase of development to ensure existing property, land and infrastructure is not adversely affected.
- At various points it refers to Upper Witham Internal Drainage Board undertaking future maintenance of the new/modified watercourses severing the site. A formal request has yet to be received by the Board to consider scheduling these watercourses (6.4) and no agreement is in place for future maintenance. The LPA is urged to be clear about all future maintenance responsibilities for the drainage system.
- (3.6.4 & 4.4) Although the Board is currently undertaking the maintenance of Boultham Catchwater it should be noted that this is through the current Public Sector Co-operation Agreement (PSCA) for the Environment Agency.
- (4.4) Currently the Upper Witham Internal Drainage Board Byelaw distance is 6m not 9m, other references in the document correctly state 6m.
- (5.11 & 7) These sections state that the flood risk to existing housing is not increased. However, 5.6 states there is an increased flood risk. This is an anomaly needs to be clarified.
- (6.6.1 & 6.6.2) Refers to a 'temporary scenario for the discharge of surface water' this is unacceptable. It is essential an appropriate drainage link to the correct Board maintained watercourse is established at the onset of the development, particularly because of the relatively minimal cost of providing it in comparison to the Highway and other infrastructure works that will be provided. While it is important to create the drainage link, the size and attenuation volumes can be phased with the development.

Other LLFA comments:

- In June 2016 a GI was carried where trial pits were taken at a depth of 3mbgl. Ground water was found in seven trial pits at 1.4 – 2.5mbgl. I have been unable to find any evidence that 12 month ground water monitoring has been carried out. Whilst some of the site will be raised I have concerns that there is a risk the ground water could be encountered in the attenuation ponds and swales in the areas that are not to be raised (for example at the junctions with Skellingthorpe Road and Tritton Road). Section 3.6.5 of the Flood Risk and Drainage strategy states that a number of GI's at locations across the site found groundwater levels to be as shallow as 0.54mbgl.
- There are several references throughout the report to a 'roundabout' on Skellingthorpe Road. This needs to be amended.
- There are several connections to existing sewers. Confirmation is required that :
  - the capacity of the sewers been checked. Is there sufficient capacity to allow for these connections?
  - Consent been given by the Water Authority
- The report states that drainage will be offered for adoption by AW, swales adjacent to the highway offered for adoption by LCC and linear drains will ultimately become part of the UWIDB network but this does not appear to have been confirmed to be accepted by the relevant parties. Who will be responsible for the attenuation ponds?
- A drainage phasing plan is required.
- A MAG/PAD meeting is recommended as the best way to determine the above and provide further clarity to the information that has been provided. This will ensure that the best drainage outcome is delivered.

## Recommendations

It is expected that LCC could support the application for the whole development subject to agreeing detailed mitigation and further technical checks and clarifications as identified in this response.

LCC objects to Phase 1A on grounds of severe impact and lack of alternative sustainable travel modes in accordance with NPPF.

Case Officer:  
*Ian Field*  
for Warren Peppard  
Head of Development

Date: 18 November 2020

Warren Peppard  
Head of Development Management  
Lincolnshire County Council  
County Offices  
Newland  
Lincoln LN1 1YL  
Tel: 01522 782070  
HighwaysSUDsSupport@lincolnshire.gov.uk

To: Lincoln City Council

Application Ref: 2019/0294/RG3

**Proposal:** Hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise:-In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8HA of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; Areas of formal and informal public openspace; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over and Beevor Street, and a new public footpath bridge over Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road

**Location:** Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire

With reference to the above application received 15 April 2019

Notice is hereby given that the County Council as Local Highway and Lead Local Flood Authority:

Requests that the Local Planning Authority refuses the application for the reasons set out below.

#### CONDITIONS (INCLUDING REASONS) /REASONS FOR REFUSAL

Lincolnshire County Council (LCC) is the Local Highways Authority (LHA) responsible for the maintaining and operating the local highway in Lincolnshire. As a Statutory Consultee in the planning process LCC has provided a technical consultation response to the above application in November 2020, objecting to the impact of Phase 1 of the proposed development on the local highway network.

I refer to the BSP report dated 19 April 2021 which you have requested a formal consultation response to.

It is noted that the BSP Report is a review of the evidence provided to date, this is predominantly the supporting Transport Assessment and Technical Notes prepared by Connect Consultants, and the formal consultation response provided by LCC. The BSP report is primarily a re-statement of transport information supporting the application prepared by Connect Consultants and states the same conclusions as Connect Consultants. However, we have the following observations on the BSP report:

#### Junction Capacity Assessments

The BSP report does not query why the junction assessments of February 2020 surveyed flows prepared by Connect Consultants do not reflect the observed queues. Significant queues were observed in the surveys but have not been forecast by the model, the model has not been calibrated as requested by LCC, yet BSP accept the results which show that "in isolation" the junctions have capacity. The surveys would clearly indicate that there is not sufficient capacity on the network for existing demand, due to the observed queues. The junction modelling provided does not therefore accurately reflect the existing situation and it is thereby questionable with regard to future year assessments.

#### Mitigation

The mitigation proposed on an alternative route is suggested as being acceptable by Connect Consultants and BSP based on the likelihood of traffic re-routing, there is no evidence to support this and BSP has not actually considered the existing problems of reassignment that already occur. There is evidence of suppressed demand on the existing traffic network and some residents already use the A46 bypass and Carholme Road to access the City due to Skellingthorpe Road congestion, this has not been considered. Para 4.39 as an example, provides a possible explanation of existing traffic flows, an alternative explanation is that residents use Doddington Road because of the congestion on Skellingthorpe.

The assumption that an existing 81 vehicles could transfer from Skellingthorpe Road to Doddington Road is not supported by any evidence. The surveys show that 283 vehicles turn right from Birchwood Road to Skellingthorpe Road in the am peak hour, for 81 of these vehicles to reassign to Doddington Road is nearly 30% of existing traffic. This is a significant proportion of traffic which is required to re-assign.

Given the existing network conditions and observed turning counts, it is likely that significant traffic is already diverted away from Skellingthorpe Road in the peak hour and uses alternative routes. In this case, mitigation on Doddington Road would be of no benefit and would not address, even indirectly, the impact of Phase 1 on Skellingthorpe Road. The assumption that a further 81 vehicles could do this ignores the likely destinations and journeys of the drivers who continue to choose this route despite severe congestion, it is probably because their destinations are local to Skellingthorpe Road and there is no realistic alternative.

#### Sustainable Transport

The sustainable aspect of longer car journeys as a result of the proposed mitigation is not considered by BSP. How is it sustainable to be encouraging car drivers to undertake significantly longer journeys to access their destination by car on a longer improved car routes, than addressing the need for modal shift to occur over the shorter more direct route?

The BSP report is very limited in its aspirations for sustainable modes and shows an outdated approach to transport provision, in that cars take priority. Examples from BSP's report include: Para 5.14 - as the development is all within 400m of a bus route that is acceptable bus provision. Para 5.10 - There are few (only 11) pedestrians and cyclists from 300 houses that it is unwarranted to do anything to encourage more. Table 5.1 - Improvements for pedestrians at junctions is not advised because it will reduce traffic capacity.

In accordance with Government policies, the LHA consider that all new developments, but

especially Sustainable Urban Extensions should provide significant and realistic alternatives to the private car, to encourage sustainable and active travel in order that the Lincolnshire can be a better, more healthy place for its residents and help achieve the carbon neutral targets which have been set.

These aspirations and criteria are set out in the policies in the Central Lincolnshire Local Plan, and LCC consider that Phase 1 of this development does not accord with these policies.

#### Conclusion

In summary, the BSP report provides no new evidence, and the consultation response of the LHA with regard to this application remains as stated in our correspondence of 18 November 2020.

LCC remain in support of the Western Growth Corridor application as a whole and reiterate that our primary concern relates to the impact of Phase 1 on the local highway network. LCC consider that with modified phasing and if delivery of suitable mitigation encouraging sustainable transport is provided, then a development could be delivered which would have an acceptable impact on the highway network. LCC wishes to continue its support of the WGC development and is committed to working with both the planning authority and the developer to find suitable sustainable mitigation measures that will address the impact of the early phases of development.

Case Officer:  
Ian Field  
**for Warren Peppard**  
**Head of Development Management**

Date: 17 June 2021

Warren Peppard  
Head of Development Management  
Lincolnshire County Council  
County Offices  
Newland  
Lincoln LN1 1YL  
Tel: 01522 782070  
HighwaysSUDsSupport@lincolnshire.gov.uk

To: Lincoln City Council

Application Ref: 2019/0294/RG3

**Proposal:** Hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise:- In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (A1 to A5), employment (B1) uses and parking; a primary school; up to 8HA of land (including key infrastructure) for up to 40,000sq.m of B1 and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (D2), a hotel (C3) food and drink outlets (A3 and A4) and a new community stadium for Lincoln City Football Club; Areas of formal and informal public openspace; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over and Beevor Street, and a new public footpath bridge over Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road

**Location:** Western Growth Corridor, Skellingthorpe Road, Lincoln, Lincolnshire

With reference to the above application received 15 April 2019

Notice is hereby given that the County Council as Local Highway and Lead Local Flood Authority:

Requests that the Local Planning Authority refuses the application for the reasons set out in our previous consultation responses. Should the LPA determine in favour of the application, requests that the Local Planning Authority shall include the conditions below.

Lincolnshire County Council as Highway Authority **OBJECTS** to the above planning application. The reasons for the **OBJECTION** were formally provided to you in our statutory response in November 2020.

Following our objection we have continued to offer our commitment to work with all parties to seek appropriate mitigation in order to be able to support these development proposals.



Your communication dated 31 August 2021 confirmed that *"the applicants are clearly not going to have further detailed discussions on those matters and so as the LPA we are now in a position of dealing with the detail before us"*. Therefore, you have requested from us some suggested conditions.

Below is our additional statutory response, which includes suggested planning conditions, which we feel will be necessary to make the planning application acceptable in highway terms. Please note that this additional statutory response does not replace our formal objection dated November 2020.

#### CONDITIONS (INCLUDING REASONS)

##### Highway Condition – On site Infrastructure

Before any dwelling is occupied, all of the spine road from Skellingthorpe Road to Tritton Road and associated footways and infrastructure works, including the bridge, shall be completed in accordance with details to be submitted to, and approved in writing by, the Local Planning Authority.

In the interests of mitigating the impact of the development on the adjoining highway network,

##### Highway Condition - Parking

Off road residential parking provision for the whole site is to be a maximum of 4800 spaces (average of 1.5 space per unit). A Parking Plan which details the number of dwellings and associated parking spaces for each Phase, including how they will be delivered and enforced, is to be submitted and approved by the Local Planning Authority, this would align with the Estate Road Phasing Plan (Condition 29). Throughout the build-out of the estate roads, the on road parking is to be controlled by the Developer such that the agreed provision is not exceeded and on-road parking is controlled until such time as the highways are Adopted by the Highway Authority. Parking on private estate roads is to be controlled by the Developer or Management Company in accordance with the Approved Parking Plan.

In order that the permitted development conforms to the requirements of the National Planning Policy Framework, by ensuring that access to the site is sustainable and that there is a reduced dependency on the private car for journeys to and from the development,

##### Highway Condition – Off site Mitigation

An Off Site Mitigation Plan is to be submitted and approved by the Local Planning Authority. This will detail all the required junction improvements, pedestrian, cycle and bus improvements necessary on the adjoining highway network and the trigger points at which the improvements are required in accordance with the Approved Phasing Plan. Before any dwelling in any particular Phase is occupied, the Off Site mitigation required for that Phase will have been completed in accordance with details to be submitted to, and approved in writing by, the Local Planning Authority.

In the interests of mitigating the impact of the development on the adjoining highway network,

#### Highway Condition – Mobility Hub

A Mobility Hub Plan is to be submitted and approved by the Local Planning Authority. This will provide details of the location, size, function and timing of delivery for the Mobility Hub. Before any dwelling in any particular Phase is occupied, the elements of the Mobility Hub Plan required for that Phase will have been completed in accordance with details to be submitted to, and approved in writing by, the Local Planning Authority.

In order that the permitted development conforms to the requirements of the National Planning Policy Framework, by ensuring that access to the site is sustainable and that there is a reduced dependency on the private car for journeys to and from the development,

#### Highway Condition 00

No development shall take place until a Construction Management Plan and Method Statement has been submitted to and approved in writing by the Local Planning Authority which shall indicate measures to mitigate against traffic generation and drainage of the site during the construction stage of the proposed development.

The Construction Management Plan and Method Statement shall include;

- phasing of the development to include access construction;
- the parking of vehicles of site operatives and visitors;
- loading and unloading of plant and materials;
- storage of plant and materials used in constructing the development;
- wheel washing facilities;
- the routes of construction traffic to and from the site including any off site routes for the disposal of excavated material and;
- strategy stating how surface water run off on and from the development will be managed during construction and protection measures for any sustainable drainage features. This should include drawing(s) showing how the drainage systems (permanent or temporary) connect to an outfall (temporary or permanent) during construction.

The Construction Management Plan and Method Statement shall be strictly adhered to throughout the construction period.

Reason: To ensure that the permitted development is adequately drained without creating or increasing flood risk to land or property adjacent to, or downstream of, the permitted development during construction and to ensure that suitable traffic routes are agreed.

#### Highway Condition 26

Before any dwelling is occupied, all of that part of the estate road and associated footways that forms the junction with the main road and which will be constructed within the limits of the existing highway, shall be laid out and constructed to finished surface levels in accordance with details to be submitted to, and approved in writing by, the Local Planning Authority.

In the interests of safety, to avoid the creation of pedestrian trip hazards within the public highway from surfacing materials, manholes and gullies that may otherwise remain for an extended period

at dissimilar, interim construction levels.

#### Highway Condition 27

The permitted development shall not be occupied until those parts of the approved Travel Plan that are identified therein as being capable of implementation before occupation shall be implemented in accordance with the timetable contained therein and shall continue to be implemented for as long as any part of the development is occupied.

In order that the permitted development conforms to the requirements of the National Planning Policy Framework, by ensuring that access to the site is sustainable and that there is a reduced dependency on the private car for journeys to and from the development.

#### Highway Condition 29

The permitted development shall be undertaken in accordance with an Estate Road Phasing and Completion Plan, which shall first be approved in writing by the Local Planning Authority. The Plan shall set out how the construction of the development will be phased and standards to which the estate roads on each phase will be completed during the construction period of the development.

To ensure that a safe and suitable standard of vehicular and pedestrian access is provided for residents throughout the construction period of the development.

#### Highway Condition 33

The permitted development shall be undertaken in accordance with a surface water drainage scheme which shall first have been approved in writing by the Local Planning Authority.

The scheme shall:

- be based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development;
- provide flood exceedance routing for storm event greater than 1 in 100 year;
- provide details of how run-off will be safely conveyed and attenuated during storms up to and including the 1 in 100 year critical storm event, with an allowance for climate change, from all hard surfaced areas within the development into the existing local drainage infrastructure and watercourse system without exceeding the run-off rate for the undeveloped site;
- provide attenuation details and discharge rates which shall be restricted to greenfield run-off rate;
- provide details of the timetable for and any phasing of implementation for the drainage scheme; and
- provide details of how the scheme shall be maintained and managed over the lifetime of the

development, including any arrangements for adoption by any public body or Statutory Undertaker and any other arrangements required to secure the operation of the drainage system throughout its lifetime.

No dwelling shall be occupied until the approved scheme has been completed or provided on the site in accordance with the approved phasing. The approved scheme shall be retained and maintained in full, in accordance with the approved details.

To ensure that the permitted development is adequately drained without creating or increasing flood risk to land or property adjacent to, or downstream of, or upstream of, the permitted development.

#### Highway Informative 07

The highway improvement works referred to in the above conditions are required to be carried out by means of a legal agreement between the landowner and the County Council, as the Local Highway Authority.

#### Highway Informative 05

All roads within the development hereby permitted must be constructed to a satisfactory engineering standard. Those roads that are to be put forward for adoption as public highways must be constructed in accordance with the Lincolnshire County Council Development Road Specification that is current at the time of construction and the developer will be required to enter into a legal agreement with the Highway Authority under Section 38 of the Highways Act 1980. Those roads that are not to be voluntarily put forward for adoption as public highways, may be subject to action by the Highway Authority under Section 219 (the Advance Payments code) of the Highways Act 1980. For guidance please refer to <https://www.lincolnshire.gov.uk>

#### Highway Informative 08

Please contact the Lincolnshire County Council Streetworks and Permitting Team on 01522 782070 to discuss any proposed statutory utility connections and any other works which will be required within the public highway in association with the development permitted under this Consent. This will enable Lincolnshire County Council to assist in the coordination and timings of these works. For further guidance please visit our website via the following links:

Traffic Management - <https://www.lincolnshire.gov.uk/traffic-management>  
Licences and Permits - <https://www.lincolnshire.gov.uk/licences-permits>

Stadium - Conditions are required for the inclusion of a Stadium in the development. LCC consider the Transport Assessment does not adequately address the transport impact of the stadium, so cannot advise what conditions would be necessary for the Stadium.

Case Officer:

Date: 1 October 2021

*Ian Field*

for Warren Peppard  
Head of Development Management

City of Lincoln Council  
Development Control  
Planning Department

My Ref: S106/L/0294/19  
22 December 2020

Dear Mr Cousins

**Development – Western Growth Corridor, Skellingthorpe Road, Lincoln  
Application Number – 2019/0294/RG3**

Thank you for your notification of 17 September 2020, concerning the proposed development at the above site. Further to our letter of 11 December 2019, the County Council withdraw our objection to this development in terms of education impact (this does not impact the current objection in terms of Highways infrastructure) subject to the below request. Please see below overview in relation to the impact, and details for primary, secondary and sixth-form that follow.

**Overview**

Please see below table in relation to the number of places required and available in local schools from/for the proposed development:

Type	Children produced by scheme	Sufficient places available 2019/20 (Y/N/Partial)	Places to be mitigated	Contribution sought
Primary	640	Partial	498	£5,615,667
Secondary	608	N	608	£0
Sixth-form	121	N	121	£0
			<b>Total</b>	<b>£5,615,667</b>

Please note, where an application is outline a formulaic approach will be taken in a section 106 agreement, this may result in a higher contribution if a high proportion of large houses are built. This would be finalised at the reserved matters stage. All section 106 agreements should include indexation using the Tender Price Index of the Royal Town Planning Institute Building Cost Information Services (RICS BCIS TPI).

The above contributions would be spent on the following:

Type	Amount	Scheme
Primary	£5,615,667	Towards a new primary school in Lincoln
Secondary	£10,330,819	N/A - CIL
Sixth-form	£2,229,739	N/A - CIL

Following the removal of Regulation 123 from the Community Infrastructure Levy Regulations on 01 September 2019, requests for items formerly on a Regulation 123 list are now permitted; the Central Lincolnshire Developer Contributions Supplementary Planning Document (2018) still restricts secondary and school-based sixth form to CIL only. Requests can also be made toward more than one scheme to provide the ability to extend the most appropriate school to mitigate the impacts of development at the time those impacts are felt.

The County Council also requires the transfer of 2.7ha of land for a new on-site primary school; this is shown on the masterplan and, following the removal of a drain traversing the site, is considered an acceptable site based on the plan. The site should be fully services and free from encumbrances, including the re-directing of any over-head cabling that crosses the site. Transfer of the site should be on occupation of the 601<sup>st</sup> dwelling.

#### Detail

The below table indicates the number of pupils generated by the proposed development. This is on the basis of research by Lincolnshire Research Observatory utilised to calculate Pupil Production Ratio (PPR) multiplied by the number of homes proposed.

House Type (if known)	No of Properties	PPR Primary	Primary Pupils	PPR Secondary	Secondary Pupils	PPR Sixth Form	Sixth Form Pupils
2 Bedroom		0.09		0.09		0.018	
3 Bedroom		0.17		0.17		0.034	
4+ Bedroom		0.33		0.27		0.054	
Unknown	3,200	0.2	640	0.19	608	0.038	121.8
Total (rounded down)	3,200	-	640	-	608	-	121

Capacity is assessed using the County Council's projected capacity levels at 2023/24, this is the point when it is reasonable to presume that the development would be complete or well on the way.

Type	Local School/School Planning Area	Pupils generated	Sufficient places available 2019/20 (Y/N/Partial)	Places to be mitigated
Primary	Primary schools within 2 miles road distance from submitted easting/northing	640	Partial	498
Secondary	Lincoln South Secondary planning area	608	N	608
Sixth-form	Lincoln South Secondary planning area	121	N	121

As the development would result in a direct impact on local schools, a contribution is therefore requested to mitigate the impact of the development at local level. This is a recognisable and legitimate means of addressing an impact on infrastructure, accords with the NPPF (2019) and fully complies with CIL regulations; we feel it is necessary, directly related, and fairly and reasonably related in scale and kind to the development proposed in this application.

The level of contribution sought in this case is in line with the below table.

Type	Places to be mitigated	Contribution per place*	Sub-total	Local multiplier**	Total contribution requested
Primary	498	£12,257	£6,103,986	0.92	£5,615,667
Secondary	608	£18,469	£11,229,152	0.92	£10,330,819***
Sixth-form	121	£20,030	£2,423,630	0.92	£2,229,739***
Total	-	-	£19,756,768	-	£18,176,225

\*current cost multiplier per pupil place based on National Cost Survey

\*\*to reduce cost and to reflect Lincolnshire's lower than average build cost compared to national average

\*\*\*amounts for indicative purposes only, request reduced to £0 in line with Developer Contributions Supplementary Planning Document

We would suggest the s.106 monies are paid on a phased basis through the development to allow timely investment by the County Council whilst not adversely affecting the developer's viability.

Please note the County Council retains the statutory duty to ensure sufficiency of school places and this includes capital funding provision of sufficient places at maintained schools, academies and free schools. We would invest the funding at the most appropriate local school(s) regardless of their status, but ensure the s.106 funding is used only to add capacity as this is the only purpose for which it is requested.

I look forward to hearing from you, thank you for your notification of the application and thank City of Lincoln Council for your continued cooperation and support.

Yours sincerely

**Simon Challis**  
**Strategic Development Officer**  
**Corporate Property Service**

(By e-mail)

## Neighbouring Authority Consultation



Name and address of applicant

Name and address of agent (if any)

City of Lincoln Council  
City Hall  
Beaumont Fee  
Lincoln  
LN1 1DF

### Notice of decision to raise representations to the proposal and request further consultation

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Application number: 19/0548/NEIAUT

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Proposal: Hybrid planning application for the sustainable urban extension of Lincoln on the site of the Western Growth Corridor to comprise:- In Outline - Housing development of up to 3,200 dwellings; local centre comprising community, retail (E, F.2 and Pub or drinking establishment/Takeaway as Sui Generis uses), employment (E) uses and parking; a primary school; up to 8HA of land (including key infrastructure) for up to 40,000sq.m of E and B2 development; up to 12ha of land (including key infrastructure) for sport, recreation and leisure (E and F.1 and F.2), a hotel (C1) food and drink outlets (E and Sui Generis) and a new community stadium for Lincoln City Football Club; Areas of formal and informal public open space; a network of public footpaths and cycleways associated engineering works to inform development platform and drainage system; new transport bridge link over to Beevor Street, and a new public footpath bridge over to Tritton Road. In Full - Details for means of access into the site from Skellingthorpe Road and Tritton Road.

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Location: Western Growth Corridor Skellingthorpe Road Lincoln

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North Kesteven District Council hereby raises the following representations:

North Kesteven District Council (the 'Council') welcomes and supports the early delivery of the Western Growth Corridor in terms of meeting housing, employment, leisure and recreation needs within Central Lincolnshire during the plan period. In this respect the detailed provisions and proposals set out in planning application ref 2019/0294/RG3 are noted.

Continued...

Date: 7th January 2021  
District Council Offices, Kesteven Street

*Mark Williets*  
Development Manager



However, at this stage, it is apparent that certain unresolved issues remain and the Council comment on each as follows:

#### Traffic and Transport:

It is evident upon reviewing technical and specialist comments from both Highways England and Lincolnshire County Council Highways that matters have not been satisfactorily addressed with both consultees objecting at this stage. The Council must therefore conclude that at this stage the proposals fail to accord in with policies LP13, LP28 and LP30 of the CLLP in this respect.

Whilst the Council recognises that we are not a statutory consultee on such highways and transport matters, bearing in mind the comments of the technical consultees, we nevertheless wish to highlight our concerns about the proposed development and its impact in terms of traffic and transport on the highway network and settlements within North Kesteven, in particular the Skellingthorpe Road/A46 roundabout and Lincoln Road. In particular, the Council needs to be assured that the dispersal of traffic from the site via the A46 Skellingthorpe Roundabout, as well as inbound movements via this junction, have been fully assessed and will be subject to appropriate mitigation in terms of the scale of any proposed works/alterations and the timely delivery of appropriate infrastructure. In addition, in terms of non-motorised users of the junction, whilst the provision of surface crossing facilities is noted and supported, the Council asks for further re-appraisal of alternative grade-separated provision for pedestrians and cyclists such as an under-pass.

The Council welcomes the focus towards sustainable transport set out in the application and set within the context of the response of Lincolnshire County Council (LCC). In this respect the Council firstly welcomes the emphasis within the proposals for good quality connectivity for pedestrians and cyclists within the site and focussed towards access to the city centre to the east. However, the Council believes there is a strong case for wider connectivity to other neighbourhoods surrounding the application site and asks for further consideration to be given to more comprehensive pedestrian and cycling connectivity. Secondly, mindful of the observations of LCC relating to the provision of a 'mobility hub', the Council asks that further details for this proposal are supplied by LCC and consideration given to its inclusion as part of the proposal. The Council wishes to understand and support the modal shift opportunity presented by the inclusion of such infrastructure in how it would benefit residents within the City and the District.

The Council therefore requests that the outstanding matters relating to concerns raised by both Highways England and Lincolnshire County Council Highways, as well as those set out in this response above, are fully addressed prior to the determination of this application, to ensure that the appropriate mitigation measures/planning conditions/planning obligations are put in place in order to minimise and mitigate the impact on traffic and transport on land and settlements within the district of North Kesteven, and to ensure that the proposed development conforms with policies LP13, LP28 and LP30 of the CLLP.

#### Flood Risk, Drainage and Contaminated Land:

Whilst the Council notes the positive response from the Environment Agency, it is evident that further assessment is required in order to fully address flood risk and drainage issues associated with the development in light of comments raised by Lincolnshire County Council in their role as Lead Local Flood Authority in their letter dated 18th November 2020. The Council therefore concludes that at this stage the proposals fail to accord satisfactorily with policies LP14 and LP30 of the CLLP in this respect.

Continued...

The Council therefore requests that the outstanding matters relating to the concerns raised in the technical consultee response from LCC as Lead Local Flood Authority be fully addressed and that due regard is taken to any proposed conditions, alongside those proposed by the Environment Agency to ensure there are no potential detrimental impacts on land and settlements within the district of North Kesteven as a result of the proposed development.

#### Affordable Housing:

The application indicates that a 20 per cent provision of affordable homes is proposed as part of the scheme. The proposals however indicate that flexibility is to be sought with regard to when this is provided during the phases of development indicating that a lower level of provision is likely to be needed during the earlier phases to ensure the scheme remains viable.

The Council asks that the determining authority should satisfy themselves that any s.106 legal agreement entered into provides the correct amount of affordable dwellings overall and that the delivery of affordable housing within subsequent reserved matters applications is controlled and directed in such a way that they are well integrated within the overall development across the whole SUE, to accord with Policies LP11 and LP28 of the CLLP.

#### Noise and Construction:

The Council asks that the determining authority satisfy themselves that the proposals accord with relevant policy, and suitable and enforceable planning conditions can be applied as appropriate.

#### Provision of Gypsy and Traveller Pitches:

Policy LP28 requires that an area of land is set aside which is suitable for the provision of Gypsy and Traveller Pitches, sufficient to accommodate 5-10 pitches. It is noted that the applicant has indicated that alternative provision is sought by way of legal agreement to provide this required element off site.

The Council asks that the determining authority satisfies itself that the proposals accord with relevant policy considerations and can be applied as appropriate.

#### Visual Amenity - Trees, Landscaping & Ecology:

The Council asks that the determining authority seeks advice from relevant consultees (ecology consultant/tree officer) and thereafter that the proposals accord with relevant policy and conditions can be applied as appropriate. The Council requests that regard is made toward the indicative Masterplan in providing trees/landscaping along the western boundary of the site so as to retain and indeed enhance green infrastructure in these locations providing a natural break between the proposed built form and the agricultural land within North Kesteven directly adjacent to the west.

#### Re-consultation:

For the reasons set out, the Council wishes to be re-consulted on amended proposals and additional information submitted pursuant to the application.

**From:** Helen Cattle <[Helen.Cattle@sportengland.org](mailto:Helen.Cattle@sportengland.org)>

**Sent:** 16 July 2021 18:07

**To:** Meddings, Lana (City of Lincoln Council) <[Lana.Meddings@lincoln.gov.uk](mailto:Lana.Meddings@lincoln.gov.uk)>

**Subject:** App Ref: 2019/0294/RG3 - Site: Land West of Tritton Road and North of Skellingthorpe Road (Western Growth Corridor) - Sport England Ref: PA/19/EM/LN/52070

Dear Lana

Thank you for consulting Sport England on updated proposals in relation to the above planning application.

### **Sport England – Non Statutory Role and Policy**

The Government, within their Planning Practice Guidance (Open Space, Sports and Recreation Facilities Section) advises Local Planning Authorities to consult Sport England on a wide range of applications. <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space#open-space-sports-and-recreation-facilities>

This application falls within the scope of the above guidance as it includes plans for up to 3,200 dwellings and also because it incorporates proposals for major indoor and outdoor sports facilities including playing fields. These would form part of a wider overall development also incorporating a primary school along with a further range of uses including employment, retail, community and leisure. Since the original application submission, the description of development has been updated to reflect amendments to the Use Classes Order with sports uses now being split between Class E and Class F2.

The submitted documents propose upper parameters for the quantities of the different uses, but it is understood that the precise amounts, formats and configurations would be dealt with at reserved matters stage. Some phasing information is included, and indicative layouts are provided, but the detailed extent and arrangement of uses is not precisely defined at this stage. It is understood that the scale, mix and format of sports and leisure uses (which would predominantly be included in Phase 4) is still to be confirmed. The main detailed element of the scheme that is submitted for approval is means of access to the site (from Skellingthorpe Road and Tritton Road).

Sport England assesses applications of this type in light of the National Planning Policy Framework (NPPF) and against its own planning objectives, which are Protect - To protect the right opportunities in the right places; Enhance - To enhance opportunities through better use of existing provision; Provide - To provide new opportunities to meet the needs of current and future generations. Further information on the objectives and Sport England's wider planning guidance is available at: <http://www.sportengland.org/planningforsport>

Where major sports facilities are proposed, whether in isolation or as part of a wider mixed use scheme, the level and nature of such proposals, the timing of their delivery and the details of the catchment/users they would serve should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy or other

relevant needs assessment. This is to ensure that the scale and nature of facilities are appropriate to meet identified needs, taking into account the level of existing provision in the area and any planned changes that could affect this in the future. For a sports development of the scale proposed, this should include evidence across neighbouring areas and authorities, especially where the development sits in close proximity to local authority boundaries or contains a type of facility that has a sub-regional level catchment, as could be the case on this occasion.

Occupiers of certain types of new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating current and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site sports facilities and/or providing additional capacity off-site. Again, the level and nature of any provision (and whether it is provided on or off-site, or a mix of both) should be informed by a relevant needs assessment, to understand the current supply and availability of facilities, and identify any existing deficiencies that could be exacerbated by the extra demand or any initial spare capacity that could be absorbed.

The original planning application was accompanied by a Sports Planning Statement which provided a summary of available baseline information as a starting point and basis for further discussion around formal sports provision within the proposal, and contained an acknowledgement that this would need to be developed further.

The Sports Planning Statement also provided commentary about supporting physical activity and active lifestyles through the wider design approach to the development and planned measures to encourage active travel, including walking and cycling routes.

### **The Proposal and Assessment against Sport England's Objectives and the NPPF**

The residential element of the application would generate a population of approximately 7,040 people. Without increased demand for sports facilities from the development's occupiers being met, then additional pressure would be placed on existing sports facilities, thereby creating potential deficiencies in provision.

As well as additional demand for sports facilities being created by the new residential occupiers, the employment uses included within the wider scheme could also create some extra demand for facilities that could feed into the business/strategic outcomes planning for sports facility investment at the site.

In the case of the current application, the outline scheme (as shown on the 'Parameters Plan' and 'Illustrative Masterplan AB') proposes that 8.2 hectares of land would be provided on site to accommodate playing pitches/playing field. There would also be a leisure/sports complex with swimming pool, gym and studio space, and potentially a football stadium with a 12,000 spectator capacity (to serve as a new home for Lincoln City Football Club should they resolve to relocate to the site). At this stage, the detailed format of facilities remains to be worked up for both the indoor and outdoor sports, although it is understood that the

intention would be for space to be made available on site to accommodate facilities up to the maximum envelope shown on the indicative submission.

It is understood that the 'leisure village' component of the scheme, including some of the facilities within the football stadium, although potentially being available to occupiers of the new development would be aimed at/could draw from a much wider catchment including not only the three 'Central Lincolnshire Authorities' of Lincoln City, West Lindsey and North Kesteven, but also users from other local authority areas within the sub-region. This would therefore have possible impact in terms of importing demand away from those other areas, with a knock on effect on the balance of supply and demand for facilities within them.

In accordance with the NPPF, Sport England seeks to ensure that any new sports facility needs arising as a result of development are adequately met and that proposals for major sports facilities are informed by a robust and up to date understanding of the needs they are intended to meet, and any potential impacts on the use of existing facilities.

#### Sports Needs Generated by Occupiers of the Development

In terms of indoor sports facilities, Sport England's Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain facility types. The SFC indicates that a population of 7,040 people in this local authority area will generate a demand for 0.51 of a 4 badminton court sports hall and 71.65 square metres of swimming pool/water space. Based on 2020 (quarter 2) build costs, this would equate to a capital sum of approximately £1,312,000 (sports hall) and £1,330,000 (swimming pool) with a combined total of **£2,642,000**. (A copy of the SFC report is appended to this email. Build costs that feed into the calculations are regularly reviewed, and updated 2021 (quarter 2) figures are anticipated shortly.) The SFC does not factor in the extent to which existing facilities may or may not be able to contribute towards meeting the needs created by new development, but instead provides an understanding of what the additional needs would be from the development and the costs of meeting them.

Dependent on the proposals that are ultimately planned within the on-site leisure sports/complex (and the associated community access arrangements), it is recognised that additional sports hall and swimming provision sufficient to meet the additional needs generated by residential occupiers of the development could potentially be accommodated on site, along with extra capacity to serve elements of wider city and sub-regional catchments. However, based on the phasing information submitted, on-site delivery of such facilities would not appear to take place until the latter stages of the development, and so off-site facilities would need to be provided/available to residential occupiers of the earlier phases to ensure their needs were met.

In principle, Sport England considers that there could be on-site and off-site solutions for meeting the additional indoor sports facility needs of future occupiers of the development, subject to a suitable mechanism (legal agreement and/or planning conditions) being put in place to secure delivery proportionate to those identified needs (whether in kind or via off-site financial contribution) and to a timetable suitably aligned to the generation of the additional needs.

The submission documents (including Sports Planning Statement, 'Parameters Plan and 'Illustrative Masterplan AB'), show up to 7.744 hectares or up to 8.2 hectares (there appears to be a slight discrepancy between the figures quoted in the different documents) of the site being set aside for the provision of playing field land. The playing field land would be positioned in close proximity to the proposed 'leisure village', with a small area also provided as part of the primary school campus). It is noted, though, that the land mainly identified for playing field includes part of the site affected by flood risk, which could present a limitation in terms of its reliable availability for use and also require extra consideration in relation to robust design specification.

Whilst reference is made to the provision of accompanying changing rooms to serve the playing pitches, the submission indicates that further details of such ancillary facilities would be provided at a later date. There is no firm proposal advanced in relation to the pitch configuration, surface type or construction specification (including underdrainage) or the sports that the pitches would be designed to accommodate.

The phasing proposals indicate that some of the playing field land would be delivered during Phase 2A, along with the primary school and 400 dwellings (adding to 600 dwellings from Phase 1). Further playing field land would appear to be provided at Phase 2D, together with 600 dwellings (adding to 2,200 dwellings from Phase 1 - Phase 2C).

Sport England notes that the total amount of land indicated to be assigned to playing field/playing pitches accords with the Council's 2018 adopted Supplementary Planning Document. However, as with the indoor sports facilities, none of this would be delivered in Phase 1 and the precise configuration and full extent of provision, including in qualitative terms, remains to be determined.

To help secure the timely delivery of adequate outdoor sports provision to meet additional needs generated by occupiers of the development, a suitable legal mechanism would be required. This would need to set out parameters for delivery linked to the different phases, requiring facilities to be provided in line with best practice specifications but, given the long timescales involved with later phases, enabling a degree of flexibility for the precise format to be finalised at a later date to best align with a more refined understanding of needs at the time of implementation. Published costings for fit for purpose facilities could be provided by Sport England to feed into this process but these would need to be adapted to the specific proposals and a mechanism for review would be required to take account of changing costs over time.

Sport England would be willing to provide input to the above process, but to underpin such engagement there would need to be progress made with the development of a robust assessment of needs and accompanying strategy for delivery. Given the scale of the housing development and inclusion of major sports facilities, such an assessment and strategy would need to look beyond the site boundary and include the wider Lincoln City area and, for some elements, neighbouring local authorities.

### Sport/Leisure Village

The submission document indicates that the sport/leisure village and potential football stadium would not be delivered until Phase 4 of the development, along with the final 400 dwellings. (Phases 1-3 would incorporate 2,800 of the total 3,200 dwellings). Therefore any indoor sports facility demand from the residential occupiers of Phases 1 to 3 of the development would need to be met off-site pending any on-site delivery during Phase 4, unless other on-site proposals were introduced at the earlier phases. Whichever the proposed route(s) for provision are taken, a suitable legal mechanism/conditions would be needed to adequately secure delivery. Again, Sport England would be willing to provide input to this process, though again this would need to be underpinned by more work on needs analysis.

In terms of the strategic case for the major sports facility elements, the Sports Planning Statement identifies a requirement for further assessment work, together with stakeholder engagement to support this.

Sport England agrees that this is needed and understands that some work may have begun to start to address this requirement. We would welcome further dialogue in relation to the scope of and timescale for its completion, along with associated input from Sport England that could potentially help to support this exercise. The scale and form of the leisure/sports village proposals, if built out to the maximum envelope indicated within the application documents, would involve sports facilities that could impact both the local and wider sub-regional pattern of provision. Once more, Sport England would welcome an opportunity to engage in discussions about this.

### Active Design

As previously referenced, Sport England is also keen to discuss the wider site design with you in the context of our 'Active Design' principles and the aim of encouraging physical activity as part of daily life. Whilst the initial submission indicated a strong commitment to this approach, and later amendments reinforce this, it is still felt that detailed measures are not adequately pinned down at this stage to provide certainty of delivery on the ground.

It is noted that achieving positive connectivity of the site (via sustainable travel methods) to the City Centre is heavily reliant on new bridge construction. There also looks to be the potential to better secure connection with other neighbourhoods. As above, both of these elements would need to be worked up in more detail and secured by suitable legal mechanism/planning conditions to ensure certainty of delivery.

### Overall Sport England Position

Taking into account the points raised above, including the current lack of precision in terms of what sports facilities would be provided to meet the needs of the residential occupiers of the development, what facilities would be incorporated within the 'leisure village', the mechanism and timing of their delivery and the accompanying strategic rationale to support this, Sport England's position is to raise a non-statutory objection to the application at this stage.

However, as indicated in previous discussions and within this main body of this response, Sport England is willing to provide constructive input with a view to identifying a positive way forward and enabling the identified issues to be resolved through the development of suitable legal mechanisms underpinned by robust needs analysis.

Yours sincerely,

Helen

**Helen Cattle**

Principal Planning Manager - Operations

**T:** 07767832996

**M:** 07767832996

**F:** 01509 233 192

**E:** [Helen.Cattle@sportengland.org](mailto:Helen.Cattle@sportengland.org)