

Jack and Jeff Harvey

**SUBMISSION TO THE EXAMINATION OF THE NORTH LINCOLNSHIRE
HOUSING AND EMPLOYMENT LAND ALLOCATIONS DPD**

Matter 3 – Housing Allocations – Kirton in Lindsey Omission Sites

**Land at Former RAF Kirton in Lindsey Site, North Lincolnshire (Representation ID
846408)**

Prepared by
**Roland Bolton of
DLP Planning Ltd
Sheffield**

December 2014

1.0 INTRODUCTION

- 1.1 This submission is made on behalf of our client Jack and Jeff Harvey in relation to their land at the former RAF Kirton in Lindsey site, North Lincolnshire (as shown in appendix 1).
- 1.2 This submission specifically responds to Housing and Employment Land Allocations (HELA) - Inspectors Issues and Questions Paper on the topic areas for Matter 3 – Kirton in Lindsey Area Omission Sites.
- 1.3 This submission should be specifically considered alongside previous representations submitted by Montagu Evans on behalf of the former owner of the RAF site, the Defence Infrastructure Organisation (DIO) as included for reference in appendix 2. The site has now been sold to our client, and previous representations made in June 2014 confirmed that the former landowner (DIO) was happy for the site to continue to be promoted for development by the new owner. On this basis, our client has instructed these submissions to the Examination Hearing.
- 1.4 In this session we will confirm that, based on the submissions made to Matter 2 of the Hearing Process confirming that the Council do not currently have a five year housing land supply in accordance with the Core Strategy and national policy (the 'Framework'), it will be necessary to allocate additional sites for housing. Within this context, our Client's site at the former RAF Kirton in Lindsey base should be allocated for a mix of uses including residential development. As a vacant brownfield site it can deliver new residential development in the early part of the plan and as part of the wider site, forms a logical extension to the Kirton in Lindsey settlement boundary.
- 1.5 The allocation of this site is considered to be sound in accordance with the test set out in paragraph 182 of the Framework.

2.1 HOUSING ALLOCATIONS

Kirton in Lindsey Omission Sites – RAF Kirton in Lindsey

- 2.2 As set out in detail in the previous representations prepared by Montagu Evans on behalf of DIO, the site at RAF Kirton in Lindsey, to the south of the Market Town of Kirton in Lindsey, is a vacant brownfield site that provides the opportunity for a deliverable and logical extension to the settlement boundary, in accordance with the Framework tests of soundness.
- 2.3 The site extends to approximately 124 ha in total, however this can be split into three distinct elements (as shown in previous representations):
 1. **The Technical area** – Located in the northern quarter of the site this element extends to 14 ha and is closest to the Kirton in Lindsey settlement boundary. This area encompasses the majority of the existing built form on the site including a significant number of Barracks blocks and bunkers, which are now vacant. There is a dedicated vehicular access to this part of the site.
 2. **The Hangars** – Located across the centre of the site, this commercial element extends to 10.5 ha and includes three World War 2 Hangars of 4,180 sqm, as well as a single modern commercial unit. There is also a dedicated vehicular access to this part of the site.

3. **The Airfield** – The southern half of the site (99.5ha) consists of agricultural land with two mown grass strips currently utilised by the local gliding club.

- 2.4 The previously developed, Technical Area of the site presents a strong opportunity to secure residential development in close proximity to the existing settlement. The wider site offers the potential for employment reuse and potentially leisure and agricultural uses on the southern element of the site.

Positively prepared

- 2.5 As set out in DLP's submissions made on behalf of our client to Matter 2 of the EiP Hearing, the Council is unable to demonstrate a five year supply of housing land, and has consistently under-delivery against the housing target. As a result additional housing land should be allocated within North Lincolnshire, which should be sufficient to address both the additional 1,300 dwellings triggered in Policy CS7 on housing contingency in the Scunthorpe urban area but also to provide for choice and competition in the market in accordance with paragraph 47 of the Framework.
- 2.6 To plan positively within this context, our Client's site at Holme Lane should be allocated for housing (together with other uses) based on the opportunity to secure the early delivery of the site.
- 2.7 The previous representations submitted by Montagu Evans (on behalf of DIO) in relation to the site have confirmed that it is suitable, available and deliverable within the plan period and the opportunity should be taken to support the delivery of housing in this location.

Justified

- 2.8 The 2014 SHLAA did not include an assessment of this sites and its potential for development as the site had not been promoted formally by the land owner prior to the document being prepared.
- 2.9 A subsequent representation was made by Montagu Evans (see appendix 2), which confirmed that the site includes brownfield land comprising of vacant former airbase related buildings that could be demolished or converted to enable the delivery of replacement residential development on the site.
- 2.10 A significant proportion of the housing allocations currently included in the HELA document are greenfield sites and as there is a proven need for additional housing land, as set out within our representations on Hearing Matter 2, this site is clearly justified in terms of its potential to deliver sustainable brownfield development within a market town location, as confirmed in the Core Strategy.
- 2.11 The site is in single ownership and if allocated offers the potential for a mix of uses including employment and housing, which would lead to a comprehensive form of development, something that would not be achieved through the allocation of smaller sites within across the other market towns.

Effective

- 2.12 The site presents an opportunity to secure early delivery of housing in accordance with the strategic vision set out in the adopted Core Strategy. The merits of the site and this approach include:
- a. *Existing built form of limited merit offers the opportunity for visual enhancement to the site;*

- b. Established highways access points to the site;*
- c. Lower risk of flooding compared to many other locations the site being entirely in Flood Zone 1;*
- d. Natural continuation of the linear form of the existing settlement;*
- e. Good links directly to local services and facilities, within a walking distance;*
- f. Potential for community benefits within the wider site including links to existing sports facilities on the neighbouring site to the east.*

2.13 Further details of the above are included within the previous representation (appendix 2) and it is clear that the site offers significant potential to contribute to the local economy if allocated.

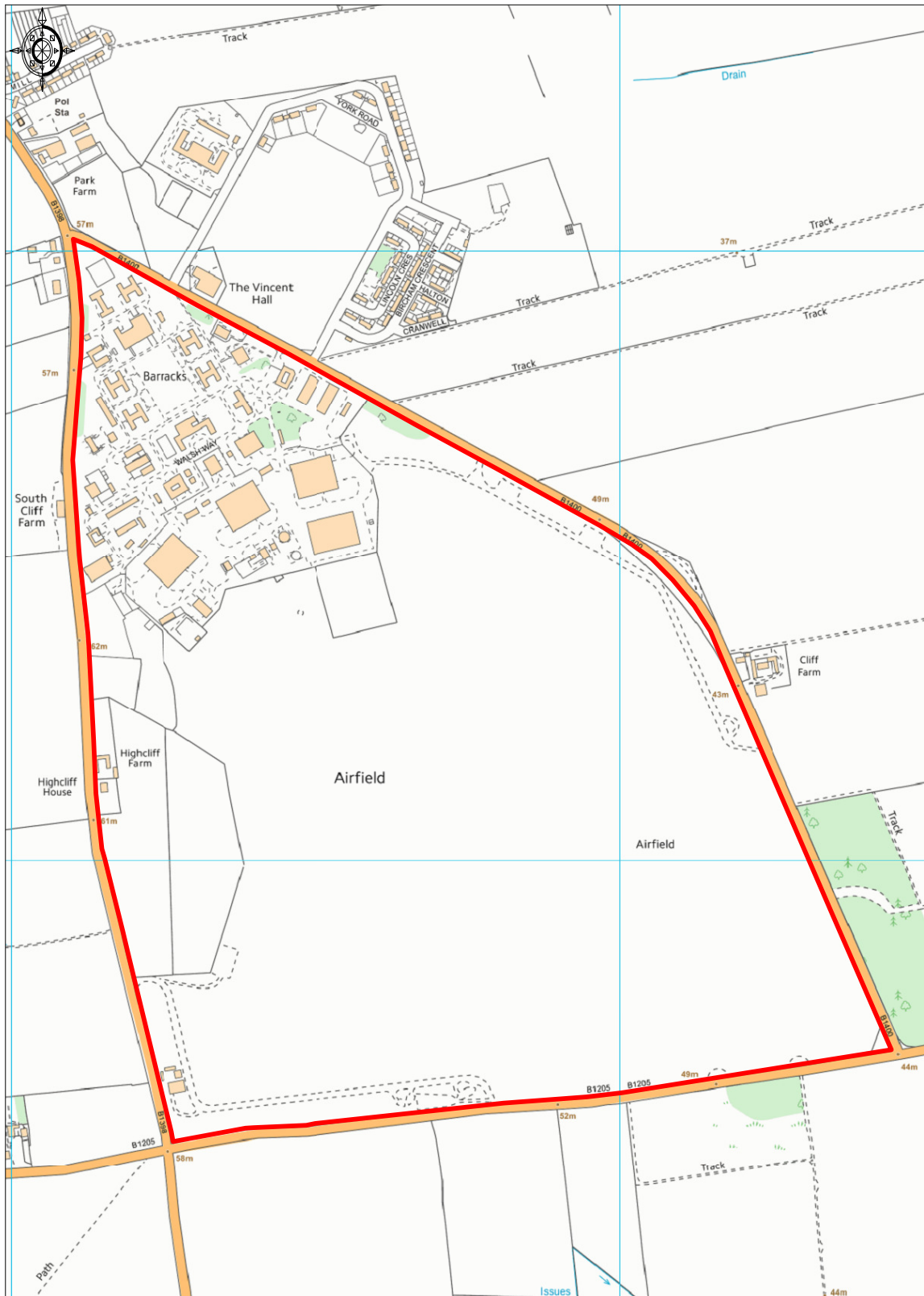
Consistent with National Policy

- 2.14 The site is considered to represent a sustainable opportunity to provide an extension to the Kirton in Lindsey settlement boundary, particularly as it is an established area of built form, which offers significant regeneration opportunities.
- 2.15 The allocation of the site would increase confidence in the delivery of the needed housing requirement in the district and the additional provision would support the aspirations of a number of Core Strategy policies including CS1, CS2, CS3 and CS8.
- 2.16 Together with the potential for employment, leisure and community uses on the wider site, the allocation of this site represents a significant and co-ordinated contribution to housing delivery in North Lincolnshire and offers the opportunity to reuse and enhance existing infrastructure and amenities at limited expense compared to new development.
- 2.17 The submitted plan is not effective it is too reliant upon the performance of site outside of the submitted document to deliver the Core Strategy Housing Requirement. It does nothing to address the current level of undersupply, however the allocation of this site will deliver at approximately 300 dwellings within the timescale of the plan including 90 within the next five years (this allows two years for consents to be achieved and three years of build from the site accesses by a single developer at 30 dwellings a year each). This delivery rate could be increased if part of the development includes the conversion of existing buildings, which could be undertaken by a second developer.
- 2.18 For the reasons set out above, the site at northern element of the site at RAF Kirton in Lindsey should be included as a housing allocation in the Housing & Employment Land Allocations DPD.

Proposed Change to ensure the Soundness of the DPD

Our client, Jack and Jeff's land at the former RAF Kirton in Lindsey site should be allocated, in part, for housing within the Housing and Employment Land Allocation document.

Appendix 1 – Land ownership plan



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Appendix 2 – Representation on Draft HELA Revised Submission Document by Montagu Evans on behalf of DIO (June 2014)

Para 3 306

542(84 6408 -01 -542- 3-306 -NS)

From:**To:****Date:** Friday, June 06, 2014 04:45PM**Subject:** Fwd: Housing and Employment Land Allocations DPD Revised Submission Draft

Dear sir/madam

On behalf of our client, the Defence Infrastructure Organisation, please find attached a copy of our representations on the Housing and Employment Land Allocations DPD.

A hard copy has also been submitted to the council, and I would be grateful if you could confirm receipt of these representations.

We trust that the attached is of use in the formulation of the plan, but please do not hesitate to call should you wish to discuss the points enclosed.

Kind regards

Jon Bradburn


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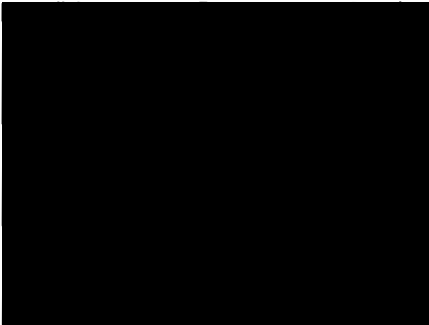
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140606 HELA Reps.pdf

Bradburn, Jon.vcf

PD9454/WE/JWB



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Dear Sir/Madam

**NORTH LINCOLNSHIRE LOCAL DEVELOPMENT FRAMEWORK
HOUSING AND EMPLOYMENT LAND ALLOCATIONS DEVELOPMENT PLAN DOCUMENT
REVISED SUBMISSION DRAFT APRIL 2014
SITE OF THE FORMER RAF KIRTON IN LINDSEY**

On behalf of our client, we set out below our representations to the Pre-submission draft of the Housing and Employment Land Allocations DPD ("the Document").

These representations are submitted on behalf of the Defence Infrastructure Organisation ("DIO"), the current owners of the former RAF Kirton in Lindsey base ("the Site"). The site is currently vacant save the occasional use by the local gliding club and, at the time of writing, is due to be sold on the open market. These representations are therefore made to promote this brownfield site for appropriate forms of development.

It is the conclusion of these representations that the plan is unsound in its current wording. In particular it should be revised to take into account brownfield sites of a strategic nature that have become available during the formulation of this document. These representations have been submitted without prejudice to the views of the future owners of the site and reflect those of the DIO as the current land owners. It is expected however that the site will be sold before adoption of this DPD. The DIO are therefore happy that these representations may be taken on by any such future owner.

Background

The closure of the site was first announced in October 2008, and, as a result of the 2010 Strategic Defence and Security Review, was confirmed as being surplus to requirements within the 2011 Review of the Defence Estate. The RAF vacated the site in April 2012 following engagement with the local community and the Council.

The RAF Kirton Lindsey site extends to approximately 124 ha (306 acre) located to the south of Kirton in Lindsey, North Lincolnshire, and falls to the south of the built settlement boundary. The site forms a triangular shape, bounded on all sides by the local road network (B1400, B1398 & B1205), and is situated on a raised hillock. Access to the site is gained from two points on the eastern boundary, with a third access point in the south-western corner which only provides access to the facilities located in that part of the airfield.

The site has three distinct elements, which can be summarised below:

- **The Technical Area** - Located in the northern quarter of the site, this 14 ha (34 acre) area consists of the barrack blocks, World War II / Cold War bunkers and associated facilities / light industrial units. The main vehicular gates to the site off of the B1400 are also located in this area. This area has previously been used for training purposes by the Armed Forces, and a licence has recently been granted to the Police for further training opportunities.
- **The Hangars** – Located in the middle quarter of the site, this 10.5 ha (26 acre) part of the site consists of three modified 'Type C' World War II hangars of circa 4,180 sq m (45,000 sq ft), and a modern single storey hangar which has been subdivided into individual units and used, amongst other things, for vehicle repair. This element benefits from its own access point on the western boundary of the site.
- **The Airfield** – The southern half of the site (99.5 ha (246 acres)) consists of agricultural land which has two mown grass landing strips crossing it. A local gliding club has facilities in the south-western corner and regularly use the airfield. The eastern boundary includes a golf course which has been created from surplus land, and some equestrian uses on the western boundary.

The site is mainly vacant and in a state of disrepair. The airfield is used by the gliding club, along with associated facilities in the south west corner of the site. The site is also currently used on an ad hoc basis by the local Police for training, although this use is likely to cease once the site has been sold.

It is considered that the site presents a strategic brownfield opportunity to provide housing in the region of 300 units, a minimum of 15,000 sq m of employment space for North Lincolnshire and the leisure and recreational uses as part of a mixed use development. Discussions to inform the sales particulars for the site have been held with officers at North Lincolnshire Council. In principle, the following land uses have been agreed should redevelopment proposals come forward:

- The Technical Area – Residential, commercial and community uses.
- The Airfield – Agricultural activities, continued use by the Trent Valley Gliding Club, and solar energy generation.
- The Hangars – Class B1 (Business), Class B2 (General Industry), Class B8 (Storage and Distribution), Class D2 (Assembly and Leisure – indoor and outdoor sports and leisure use), sui generis outdoor pursuits utilising the existing facilities and opportunities they present.
- The Manège – Class D2 (Assembly and Leisure)

Approach to Housing Delivery

The Framework seeks to ensure that councils boost significantly the delivery of housing, and provide this at a level which, at the very least, meets the identified local need. Councils must also identify a five year supply of suitable housing sites to meet housing delivery. This is to include a buffer of at least 5% to ensure that there is sufficient market choice and competition.

Paragraph 47 of the Framework goes on to identify that where there has been a record of persistent under delivery of housing, local authorities should adopt a 20% housing buffer on their five year housing supply,

brought forward from later in the plan period. As demonstrated below, the Council have only been able to facilitate the delivery of 5,090 units since 2004/2005, against a target 6,853 creating a shortfall of over 1,700 units.

What constitutes "persistent under delivery" has been discussed at the High Court in *Cotswold District Council v Secretary of State for Communities and Local Government & Anor* [2013] EWHC3179 (Admin) November 2013 ["Cotswold"]. The case identified that to identify whether such a record exists, there is the need to look at the plan period as a whole, as well as the overall delivery figure against adopted policy.

Drawing from the Council's 2013 Monitoring Report and 2014 Strategic Housing Land Availability Assessment, the following housing figures are noted:

Year	Delivery	Target *	Surplus / Shortfall	Cumulative Total
04/05	551	550	1	1
05/06	1160	550	610	611
06/07	688	550	138	749
07/08	480	550	-70	679
08/09	337	754	-417	262
09/10	302	754	-452	-190
10/11	457	754	-297	-487
11/12	399	754	-355	-842
12/13	326	754	-428	-1,270
13/14	390	883	-493	-1,763

* For clarity, the source of the targets are as follows: 550 units per annum: RSS target; 754 units per annum: RSS / Core Strategy Target; 883 units per annum: SHLAA target (Core Strategy + shortfall + 5% buffer) as taken forward into the Housing and Employment Land Allocations DPD

The Council have failed to deliver their housing target over the past 10 years, despite the annual target being set on housing figures which they were involved in preparing. This has resulted in a significant cumulative shortfall of 1,763 units, or the equivalent of 2.34 years of the Core Strategy target of 754 units per annum.

Drawing on the conclusions of Mr Justice Lewis, at paragraph 47 of his Judgement in Cotswold, the ten year period assessed above is considered to be an appropriate period of time, encompassing three different evidence based housing targets. There is a clear record of the Council failing to meet the targets over this time frame, and not just at one particular point in time or against one individual target.

Accordingly, the Council should be adopting a 20% buffer for their housing figures, increasing the annual target to 1,009 units per annum (841×1.20) for the purposes of assessing the five year housing supply and for allocating sites within the document. With this in mind, the five year position stands as follows:

	2014 - 2019 (1-5 yrs) Deliverable sites
North Lincolnshire Housing requirement (inc 20% buffer: 1009 units per annum):	5,046
Total number of dwellings on deliverable and developable sites	2,713
Expecting Lincolnshire Lakes to come forward from 2015	1,800
Total 5 yr supply	4,513
Surplus / shortfall	-533

Based on Table 10.1 of the Strategic Housing Land Availability Assessment Review (2014)

To achieve this target, there is self evidently the need to bring forward additional site to overcome the 533 unit shortfall. The Council have already included a number of contingency sites which could be used for this purpose. It is highlighted, however, that all of the 9 contingency sites are located within Scunthorpe, and 237 units are located on 6.39 hectares of Greenfield land which is currently used by the local community for sports provision and open space. Some of this space is also constrained by flood risk, requiring an exception test, and have ecological and heritage constraints and justifications to overcome. There must, therefore, be some doubt as to the extent these contingency sites can realistically deliver the shortfall and certainly in the required 5 year period.

This is not therefore a sound strategy and is therefore unjustified. Not only does the plan seek to allocate valuable community resources (open space and sports provision) it also identifies all of the contingency sites within a single area. This does not provide an appropriate spatial distribution that ensures sufficient market choice and competition as required by the framework.

We can confirm that the former RAF Kirton in Lindsey site is available now, offers a suitable location for development and, subject to planning, has a realistic prospect that housing will be delivered on site within five years. This will provide an opportunity to deliver in the region of 300 homes on a brownfield site and in an alternative location to Scunthorpe, without the need to build on playing fields. This will go some way to assisting the Council in achieving a five year housing supply on sustainable sites when utilising the required 20% buffer, and allow the contingency sites to remain as a fall-back position within the longer Plan period.

Brownfield Development

The delivery of new development on brownfield land is one of the core principles of the Framework, and Council should be proactive in identifying patterns of growth that makes the most effective use of this land source. As currently drafted 70% of the area allocated for residential development (140 ha) constitutes Greenfield land.

To date the site has not been included or assessed within the draft DPD or prior to this the Council's Strategic Housing Land Availability Assessment (SHLAA). This is a failure of the Plan, inherent with the age of the evidence and should be addressed.

The formulation of the document has taken place over a period of 8 years, starting with a call for sites in 2006. This was the only call for sites undertaken by the Council. Given the length of time that has passed it would have been reasonable to expect the Council to undertake a further call for sites towards the end of the recession to gain an accurate picture of the availability of sites.

Additionally, the Council also have a duty to monitor their built environment and the closure of RAF Kirton in Lindsey was publically announced as far back as 2008. Accordingly, the Council should have noted this site coming forward or at least its potential within the evidence base. As it stands the Council has not undertaken this exercise and has therefore failed to produce a robust evidence base upon which it can base the strategy for allocating housing sites. Whilst one could argue that a number of sites have become available over the recession, the strategic scale of this site and importance within the local economy and in particular to the local community of Kirton Lindsey.

This is particularly the case as it has the ability to bring forward a significant amount of housing on large brownfield site. It is noted that of the housing sites identified within the Document, 140 ha (70%) can be classified as Greenfield land. This equates to some 4,400 units on previously undeveloped sites, and when compared to the 1,978 units to be built on brownfield land, clearly shows that the Council are not delivering sustainable development in this regard.

The former RAF Kirton in Lindsey is brownfield land and has the potential to deliver in the region of 300 units, proving an opportunity to increase the number of brownfield units being created within the area.

Whilst Kirton in Lindsey is currently identified as being suitable for a relatively low number of units, it is considered that this is a historical target of its time. The Council should revisit this given the opportunities that the site offers both in terms of delivering housing but also accompanying infrastructure and community facilities.

The site also has the potential to deliver a number of community benefits including a structure of an RAF museum as part of a local heritage trail, and continued use of the gliding club, opportunities which could be lost if the site does not come forward within a positive policy framework.

This is a large and complex brownfield site that has the potential to deliver a number of local benefits and promote sustainable development. However, for this to take place, the market requires a suitable planning policy framework which provides a degree of certainty for bringing the site forward. Without this, these benefits have the potential to be lost.

Built Settlement Boundary

To best facilitate the delivery of this site for development there is a need to alter the settlement boundary of the town. As noted within Section 6 of the report, the development limits need readdressing to ensure that they are up to date and appropriate. The majority of alterations to the settlement boundaries have been made to bring new development into the towns which was formerly not included due to the timescales involved in the statutory process.

It is believed that the military buildings of RAF Kirton in Lindsey and the associated military residential surrounding the site should be brought into the settlement boundary of Kirton in Lindsey, as demonstrated on the enclosed plan.

As noted within the document, adopted Core Strategy Policy CS3: Development Limits, includes a criteria assessment to determining whether settlement boundaries should be changed. Turning to each of the point of the policy in turn:

- **Existing development patterns** – The policy states that *“Scattered, sporadic or disbursed development separated from the main body of the settlement area by area of undeveloped land...will not be included.”* The developed part of the former RAF base covers some 24.5 hectares (60 acres), with the military housing area a further 18 hectares (44 acres) which includes sports pitches and leisure facilities available to the local community. These areas cannot conceivably be termed as “scattered, sporadic or dispersed” development. Whilst there is an area of open space between the town and the site, there are existing dwellings which can be seen along this linear link thus providing a connection. It would in bringing forward redevelopment of the site be important to enhance connectivity between the sites, which could reinforce the relationship. The function of this area as an area of separation is therefore considered to be transitional and of a limited nature. The policy also states that limits should follow clearly defined features or constraints such as roads. The built area of the former RAF base clearly provides such a features, not only in plan form, but also visually through the four store hangers.
- **Capacity** – One of the key points of this policy is the availability of previously developed land. This is a finite resource. The proposed allocation of further greenfield land goes to demonstrate that the town requires additional sources to allow it to continue to develop in a sustainable manner. The former RAF Kirton in Lindsey site provides an extensive area of previously developed land which is suitable for inclusion within the built settlement boundary. Furthermore, it is noted that the military base had 680 personnel stationed at its peak, over half of which lived on site, and was adequately served by the local infrastructure network. It is also noted that there are a number of benefits that could arise from the scheme, which should be maximised for the local community.
- **Existing planning consents / development** – Whilst the site does not have planning permission for residential or employment uses, it is clearly suitable for these and its last use did include the provision of living quarters. Furthermore, the site provides a number of opportunities for public benefit, including the potential for a museum in one of the former bunkers as well as the continuation of the gliding club.
- **Character** – The existing developments are seen on the skyline and from the local road network, and are already read as part of the Market Town, both on approach and exit to the south. The RAF base has been located on the site for over 70 years and it forms an intrinsic part of the town’s character. Altering the built settlement boundary to include the RAF base will not alter the settlement character, and will not alter the characteristics of the open countryside or other areas of open space.

The policy goes on to note that development outside of the defined boundaries will be restricted to that which is essential to the functioning of the countryside. It is acknowledged that the site was created for a bespoke use which has now ceased. It is, however, brownfield land that does not add to the functioning countryside.

In our view managed development can enhance the area. This provides a unique opportunity to include the site within the development boundary and allow the council to identify and control alternative uses which will allow this site to continue to provide important community benefits and bring forward sustainable development. Failure to do so will mean that the market will not respond to this opportunity as strongly as it should, potentially allowing these benefits to fall away. Furthermore, should the Council end up in a position whereby it cannot demonstrate a five year housing supply, it will leave itself open to challenge from other, less sustainable development sites.

Conclusions

The Framework states that development plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency (paragraph 17). The former RAF Kirton in Lindsey site is a major brownfield site of strategic importance capable of delivering significant housing and employment opportunities. As drafted, the Document does not provide such a framework.

The Council have acknowledged that this site presents an important regeneration opportunity which can potentially deliver community benefits as well as jobs and housing, and have publically expressed an interest to purchase the site for this purpose.

This only serves to highlight the importance of the site and the need for its future development to be guided by an appropriate planning policy allocation. The Council has clearly failed in their duty to prioritise brownfield sites for development, or fully consider the sites available for development in the production of this Development Plan Document.

Additionally, the Council's proposed housing figures downplay the significance of the undersupply of housing, impacting on the ability to deliver the necessary level of housing.

Therefore, without the inclusion of the former RAF Kirton in Lindsey site, the plan is considered to be unsound on the basis that:

- It is not positively prepared – It is not consistent with achieving sustainable development as the emphasis on new sites coming forward is for greenfield development, rather than fully utilising brownfield opportunities.
- It is not justified – It does not provide the most appropriate strategy for delivering new housing and employment opportunities, as it fails to consider a strategically important brownfield site.
- It is not deliverable – The plan should include a 20% housing buffer if there is reasonable prospect of the Council fulfilling its five year housing demand and making up the historical shortfall. If this buffer is applied, further brownfield sites should come forward within the first five years of the plan, and as currently drafted, only greenfield sites have been identified.
- It is not Consistent with national policy – The plan fails to bring forward a plan that promotes sustainable brownfield development that provides the levels of housing required by the Framework or identify a practical framework for planning decisions for the former RAF Kirton in Lindsey site.

To make it sound, we believe that the Plan should seek to allocate the former RAF for residential and employment purposes and, at the very least, bring the site into the settlement boundary of Kirton in Lindsey.

Relevant policies for housing and employment use could be worded as follows:

Policy KIRH-2

The northern part of the former RAF Kirton in Lindsey (14 ha) is allocated for housing (300 dwellings) and other appropriate uses as part of a mixed use development. The site will be developed in accordance with the following site specific criteria:

- *A mix of housing size and tenure should be provided on the site and developed at approximately 30 dwellings per hectare*
- *Affordable housing provision will be negotiated at the time of the planning application, having regard to any abnormal costs, economic viability and other requirements associated with the development and in accordance with Core Strategy Policy CS9*
- *A Transport Assessment and Residential Travel Plan will be required to demonstrate that the development will have no adverse impacts upon the local highway network*
- *Footpath and cycle provision should be provided throughout the site, linking the development to local services, residential areas and wider network.*
- *A Flood Risk Assessment should be prepared as part of the application process to assess and mitigate the risk of flooding from surface water drainage. Where practical, Sustainable Urban Drainage Systems should be incorporated into the development.*
- *This site is subject to environmental constraints including potential land contamination and potential adverse noise impact associated with the industrial units allocated under Policy KIRE-1. Prior to submission of a planning application for residential development, it will be necessary to carry out assessment of land contamination and noise so that appropriate design criteria and mitigation measures can be considered.*
- *Residential development should investigate the potential to provide appropriate facilities on site for a museum and how it can contribute towards the continued operation of the gliding club.*
- *Design must be in accordance with Core Strategy Policy CS5*

Policy KIRE-1

The southern part of the former RAF Kirton in Lindsey site (110 ha) is allocated for employment, leisure and agricultural use. This site will be developed in accordance with the following site specific criteria:

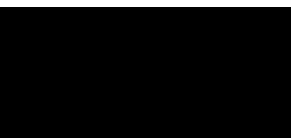
- *99.5 ha of the site is allocated for agricultural use and / or the creation of a solar farm.*

- *Any proposals for a solar farm will need to be accompanied by a landscape and visual assessment, incorporating the assessment criteria of the Council's Supplementary Planning Document for Renewable Energy.*
- *10.5 ha of the site is allocated for a mix of B1 (Business / Light Industrial), B2 (General Industrial) and B8 (Storage and Distribution) uses or Class D2 / sui generis leisure opportunities.*
- *A Transport Assessment and Travel Plan will be required for each use.*
- *Footpath and cycle provision should be provided throughout the site, linking the development to local services, residential areas and wider network.*
- *Development should investigate the potential for facilitating the continued operation of the gliding club.*
- *A Flood Risk Assessment should be prepared as part of the application process to assess and mitigate the risk of flooding from surface water drainage. Where practical, Sustainable Urban Drainage Systems should be incorporated into the development.*
- *Design must be in accordance with Core Strategy Policy CS5*

It is acknowledged that this is potentially a major change to the document. However, the Council have had ample time in which to assess and include the site within this document since its closure was announced; not only during the initial stages of drafting, but also within the 3 year hiatus before publishing a submission draft and proceeding to an Examination in Public.

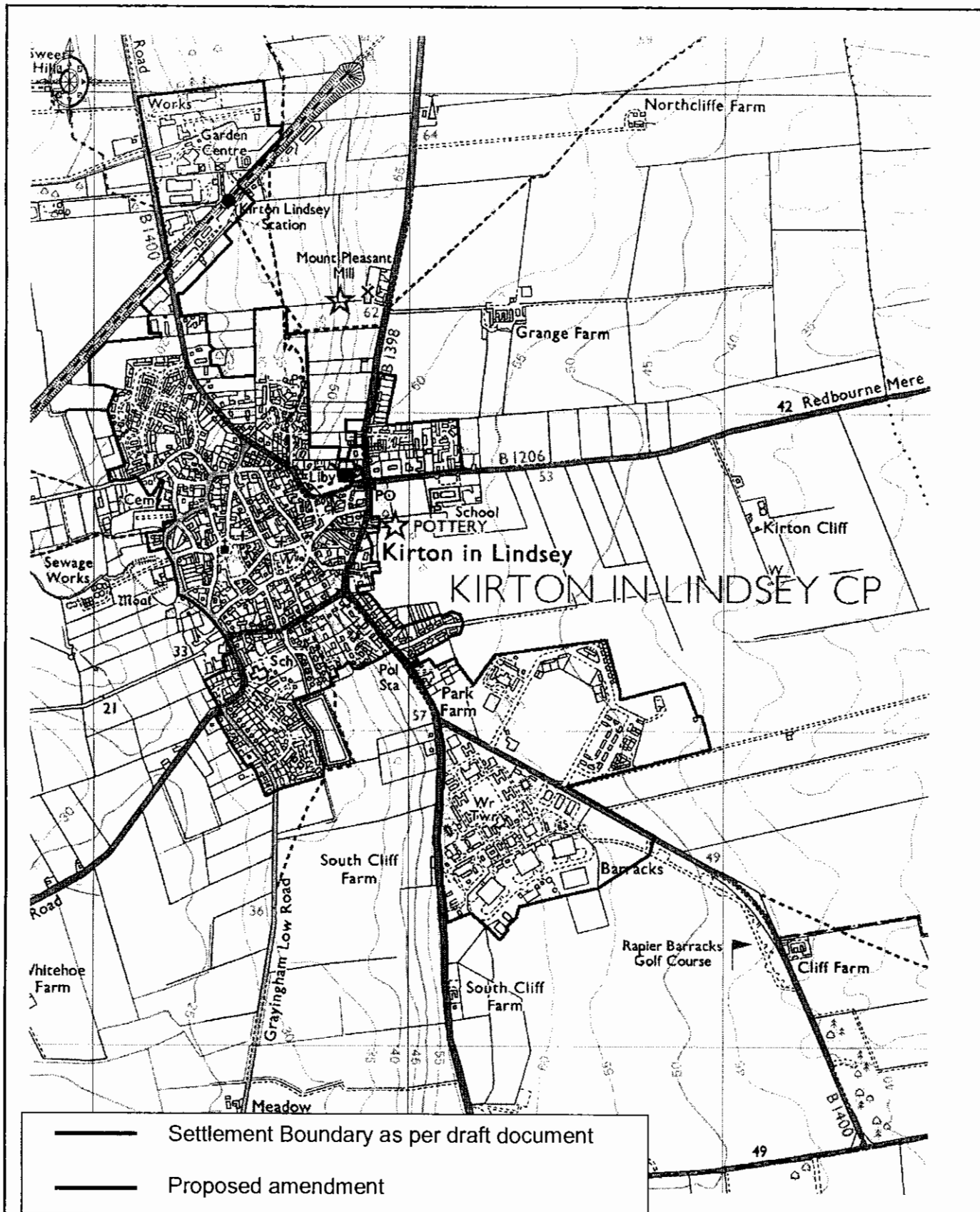
The allocation of a strategically important brownfield site should be included within this plan. Should the Inspector agree and identify this as a main modification to the document, the Council can consult on this at the same time as any other main modifications and, if necessary, hold a further Examination in Public session to discuss the comments received.

We trust that these representations are of use in the formulation of the Plan, and reserve the ability for the future owners of the site to appear at the Examination in Public to discuss its inclusion within the Council's Housing and Employment Land DPD. In the meantime, please do not hesitate in contacting either Will Edmonds (020 7312 7410 / will.edmonds@montagu-evans.co.uk) or Jon Bradburn (020 7312 7452 / jon.bradburn@montagu-evans.co.uk) should you wish to discuss this in further detail.



Montagu Evans LLP

Enc.



FORMER RAF KIRTON IN LINDSEY
HOUSING AND EMPLOYMENT LAND ALLOCATIONS DPD
REVISED SUBMISSION DRAFT

PROPOSED SETTLEMENT BOUNDARY CHANGES

June 2014

Not to Scale

▲ North

**MONTAGU
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