

# Central Lincolnshire Policy S2: Growth Levels and Distribution Evidence Report

March 2022



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## 1. Introduction

- 1.1. The Central Lincolnshire Local Plan is being updated since the first Local Plan for Central Lincolnshire, an area covering the districts of City of Lincoln, North Kesteven and West Lindsey, was adopted in April 2017.
- 1.2. This Evidence Report (which is one of a collection) provides background information and justification for Policy S2 Growth Levels and Distribution, which relates to how many houses are required in Central Lincolnshire over the plan period.

## 2. Policy Context

### National Policy and Guidance

- 2.1. Since the Central Lincolnshire Plan was adopted the National Planning Policy Framework (NPPF) was updated in July 2018 with subsequent additional changes being published in February 2019.

- 2.2. Paragraph 11 states: *Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*

- a) *plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas<sup>5</sup>, unless:*
  - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
  - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

- 2.3. Paragraph 17 states:

*The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area<sup>11</sup>. These strategic policies can be produced in different ways, depending on the issues and opportunities facing each area. They can be contained in:*

- a) *joint or individual local plans, produced by authorities working together or independently (and which may also contain non-strategic policies); and/or*

- 2.4. Paragraph 22 states:

*Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.*

- 2.5. Paragraph 23 states:

*Broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies)[Footnote: For spatial development strategies, allocations, land use designations and a policies map are needed only where the power to make allocations has been conferred].*

2.6. Paragraph 60 states:

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

2.7. Paragraph 61 states:

*To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.*

2.8. Paragraph 66 states:

*Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations<sup>32</sup>. Once the strategic policies have been adopted, these figures should not need retesting at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement.*

2.9. The Planning Practice Guidance (PPG) was first introduced in 2014 which offers 'live' government guidance. The PPG provides guidance to help in the implementation of policy in the NPPF.

2.10. The PPG states:

***What is housing need?***

*Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations. For further details on how*

*constraints should be considered once a housing need figure has been identified, please see Housing and economic land availability assessment guidance.<sup>1</sup>*

2.11. The PPG states:

**What is the standard method for assessing local housing need?**

*The National Planning Policy Framework expects strategic policy-making authorities to follow the standard method in this guidance for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply. The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement figure.<sup>2</sup>*

2.12. It goes onto state:

**When might it be appropriate to plan for a higher housing need figure than the standard method indicates?**

*The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*

*This will need to be assessed prior to, and separate from, considering how much of the overall need can be accommodated (and then translated into a housing requirement figure for the strategic policies in the plan). Circumstances where this may be appropriate include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:*

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*
- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

*There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities are encouraged to make as much use as possible of previously-developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and urban centres uplift may strive to plan for more home. Authorities will need to take this into account when considering*

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<sup>1</sup> PPG Paragraph: 001 Reference ID: 2a-001-20190220

<sup>2</sup> PPG Paragraph: 002 Reference ID: 2a-002-20190220

*whether it is appropriate to plan for a higher level of need than the standard model suggests.<sup>3</sup>*

- 2.13. Furthermore it deals with providing housing requirements as a range where it states:

**How is 5 year land supply measured where authorities set out their housing requirements as a range?**

*Where strategic policy-makers have successfully argued through plan-making and examination for a requirement set out as a range, the 5 year land supply will be measured against the lower end of the range.<sup>4</sup>*

- 2.14. This makes it quite clear that the Local Housing Need figure should be used as a minimum, but it also clarifies when alternatives should be considered and provides the option of presenting housing need as a range.

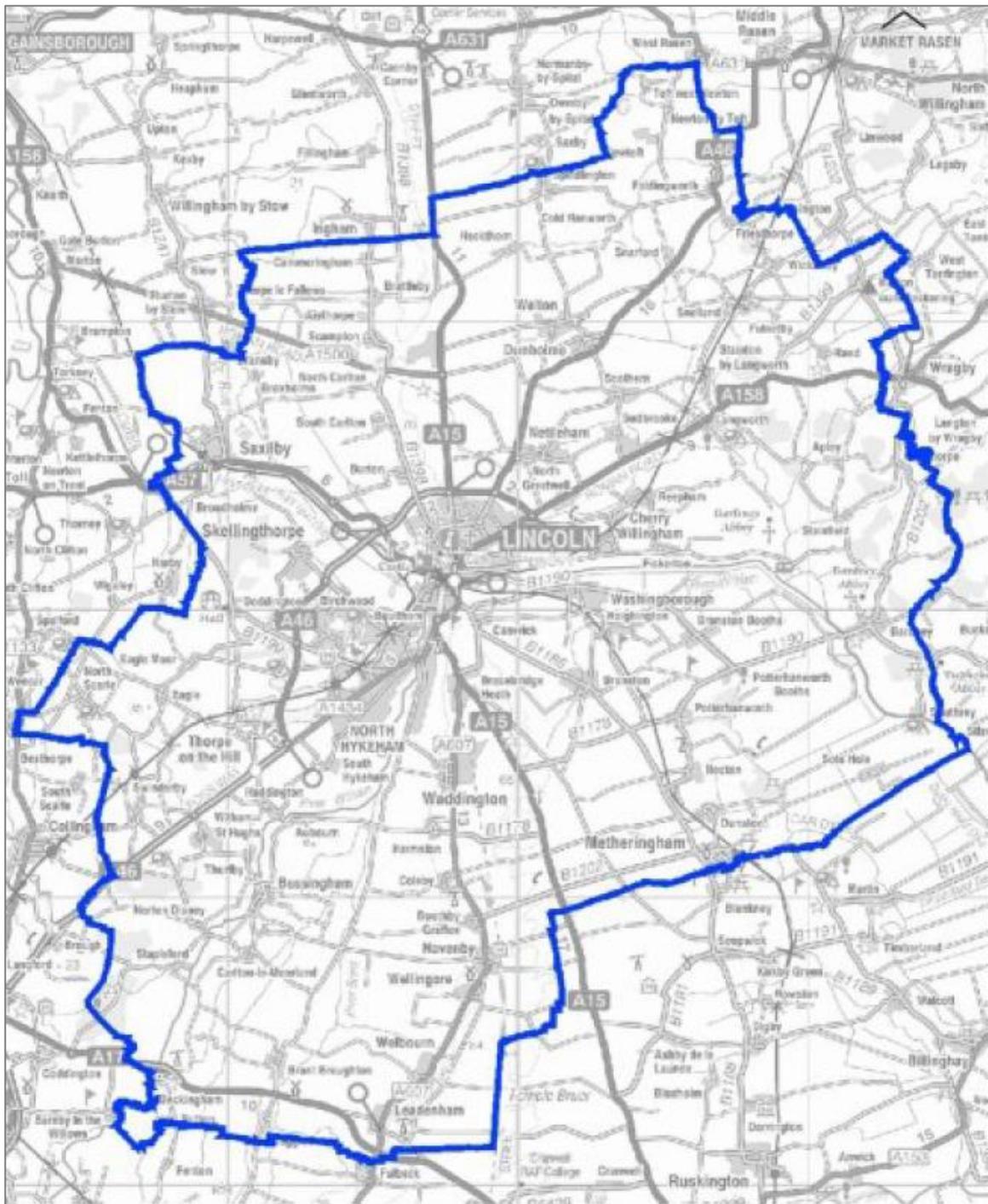
### Local Policy

- 2.15. The current adopted local plan, sets out the Level and Distribution of Growth in Policy LP3. This policy identifies that the 2017 Local Plan would seek to facilitate the delivery of 36,960 dwellings across the 24 year plan period of 2012-2036, or an average of 1,540 dwellings each year. For employment it identified that the aim was to facilitate delivery of 11,894 FTE new jobs across the plan period.
- 2.16. Policy LP3 also goes on to distribute growth amongst four areas – the Lincoln Strategy Area, the main towns of Gainsborough and Sleaford, and elsewhere.
- 2.17. The Lincoln Strategy Area is defined by travel to work patterns identified in the 2011 Census and the boundary of this area is shown in the Map below.

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<sup>3</sup> PPG Paragraph: 010 Reference ID: 2a-010-20201216

<sup>4</sup> PPG Paragraph: 027 Reference ID: 68-027-20190722



2.18. The elsewhere category effectively included all of Central Lincolnshire outside of the Lincoln Strategy Area and excluding Gainsborough and Sleaford.

2.19. Policy LP3 divides up the growth in these four geography as follows:

- Lincoln Strategy Area – 64% (23,654 dwellings)
- Gainsborough – 12% (4,435 dwellings)
- Sleaford – 12% (4,435 dwellings)
- Elsewhere – 12% (4,435 dwellings)

### 3. Context and Evidence

- 3.1. The Central Lincolnshire Growth Options Paper (ref STA008) provides substantial evidence behind decisions made relating to growth in the Local Plan including for the approach to distribution. It sets out detail about spatial issues and opportunities that need to be factored in before considering options for how growth might be distributed taking into account wider evidence and context.
- 3.2. It includes a reflection on the effects of the adopted Local Plan in Table 1 (reproduced below).

*Table 1: Delivery and permissions since the Local Plan adoption and anticipated delivery from sites in plan period*

Area	% in plan	A		B		C		D		E		F	
		2017/18		2018/19		2019/20		2020/21		Outstanding with PP		Outstanding with and without PP	
		No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Lincoln Strategy Area	64%	727	70.8	1,050	72.4	1,029	66.9	770	68.7	7,262	38.5	17,467	54.4
Gainsboro'	12%	36	3.5	80	5.5	106	6.9	36	3.2	6,037	32.0	6,572	20.5
Sleaford	12%	117	11.4	149	10.3	127	8.3	54	4.8	2,257	19.6	3,694	11.5
Elsewhere	12%	147	14.3	172	11.9	276	17.9	261	23.3	3,318	17.6	4,391	13.7
Total	100%	1,027	100	1,451	100	1,538	100	1,121	100	18,874	100	32,124	100

- 3.3. This shows that, in broad terms, the general percentages are being achieved when you take into account all sites including those delivered, those with permission and those allocated without permission.
- 3.4. However, it also shows that delivery over recent years has been lower in the two Main Towns of Gainsborough and Sleaford, with a substantial reliance on the SUEs at both locations.
- 3.5. This study also reviews the findings of the Whole Plan Viability Assessment (ref INF002) and the Value Zones, shown on map 5 in the report, which concludes that both Gainsborough and Sleaford are lower value zones where fewer policy requirements can reasonably be sought taking into account viability in these areas.
- 3.6. The Housing Need Assessment (ref HOU001) and Economic Needs Assessment Update (ref ECO001) assesses the emerging needs for new homes and projections for job growth, linking the two pieces of evidence to identify how much housing is expected to be needed to support the expected level of employment growth in Central Lincolnshire. The Housing Need Assessment concludes that the Local Housing Need figure established using the standard method (which at that time was 1,086 dwellings per year) would support the creation of approximately 677 new jobs per year<sup>5</sup>, which is below the number of jobs forecast in the Economic Needs Assessment Update of 992 jobs per year<sup>6</sup>.
- 3.7. As such the Housing Needs Assessment went on to conclude that approximately 1,323 dwellings per year would be needed to support the job growth being projected<sup>7</sup> and recommended the application of a rounded figure of 1,325 dwellings per year to be delivered through the plan<sup>8</sup>.

<sup>5</sup> Central Lincolnshire Housing Needs Assessment, Turley, 2020 – Paragraph 8.

<sup>6</sup> Central Lincolnshire Economic Needs Assessment update, Turley, 2020 – Paragraph 13.

<sup>7</sup> Central Lincolnshire Housing Needs Assessment, Turley, 2020 – Paragraph 9.

<sup>8</sup> Central Lincolnshire Housing Needs Assessment, Turley, 2020 – Paragraph 10.

## 4. Issues and Options Consultation

- 4.1. The Issues and Options Consultation sought respondents' views on proposals relating the distribution of growth.

### **PROPOSAL 7 – Distribution of Growth**

It is proposed that the Lincoln Strategy Area remains as the focus for growth in the plan. It is proposed that there remains significant growth at the main towns of Gainsborough and Sleaford but that this will be tested in light of evidence of deliverability. It is proposed that the "Elsewhere" category be broken down into areas within North Kesteven and West Lindsey and possibly consider other sub areas within to address housing sub-markets and/or sustainability considerations depending on the evidence gathered in relation to this. Growth will be distributed to satisfy this strategy but it is proposed that this will be sense-checked against market capacity and deliverability and may be adjusted accordingly.

- 4.2. There were four questions asked in relation to Proposal 7:

#### **Q7a – Lincoln Strategy Area**

Do you agree that the Lincoln Strategy Area should remain as the focus for growth in Central Lincolnshire? If not, please provide details and any alternative proposals.

- 4.3. There was good support for retaining the Lincoln Strategy Area as the focus for growth with 83% of respondents supporting it. There were a number of comments received in response to the question and the key issues can be summarised as follows:
- Most of the growth should be within a short commutable range of Lincoln (5 miles) reducing in scale proportionately as you move further away.
  - Making Lincoln the focus for growth will help to achieve regeneration aims and will boost its position regionally and nationally.
  - The city of Lincoln should be the focus by repurposing ex-commercial properties into apartments and focused in already built areas.
  - The Lincoln Strategy Area includes areas which are less accessible and excludes more accessible ones, it should be amended to give higher priority to villages on economic corridors.
  - There is a lot of capacity in neighbouring villages which should be included.
  - The strategy is too focused on Lincoln with other places marginalised and should have a fairer share, such as Gainsborough and Market Rasen.
  - Lincoln area should be spread out more to reduce impact on small villages nearby.
  - It should be 50% Lincoln, 10% Gainsborough, 20% Sleaford, 20% elsewhere.
  - Should be more of a share across Lincolnshire rather than the burden being placed on Central Lincolnshire.
  - There should be more growth in Sleaford and Gainsborough.
  - More growth should be allowed in medium and large villages to increase their vitality and sustainability.
  - More basic infrastructure needs should be taken into account when deciding where growth should be located.
  - There are a number of constraints limiting growth in and around Lincoln.

- The implications for infrastructure, such as water and waste water facilities, will need to be carefully considered.
- The boundary of the LSA seems to rely on travel to work by car – this is not sustainable. Should be a greater focus on and improvements to public transport.
- Lincoln is isolated when compared to other towns and cities in the region – this could result in reducing demand.
- The focus should be on Lincoln Urban Area, not the LSA as the LSA is not in the hierarchy.
- Unclear why a proportion of growth is apportioned to the LSA. The strategy should apportion growth to settlements not areas.
- Turning villages near to Lincoln into dormitories will destroy the character and sense of place of these communities.
- This approach does not adequately support the need for growth in Gainsborough, Market Rasen and Caistor.
- Without better roads and railways Central Lincolnshire will lag behind.
- The proposal to reduce the threshold for allocations to 10 is supported and to reduce reliance on SUEs to enable a greater spread of development.
- The approach to distributing growth should reflect market capacity and desirability, providing a variety of sites in urban and rural locations.
- Care is needed not to result in an oversupply impacting deliverability and land values.
- Should be focused on where new towns will be built.
- More growth should be located “elsewhere” as many people are not working in and commuting to Lincoln.
- Should avoid low-lying areas and flood plains.
- Lincoln cannot take any more traffic and is losing its identity.
- It is bizarre that Spridlington is located within the Lincoln Strategy area as it has lack of facilities.
- Branston is a sustainable location for growth near to Lincoln.
- Scothern is a sustainable location close to Lincoln with a range of services and could accommodate more growth.
- Allocations in Medium villages, such as Nocton, could make a considerable contribution to growth in locations in proximity to Lincoln.
- Witham St Hughs is a key large village in the LSA, located with access to service and employment opportunities.
- Village housing numbers should not be increased if developers cannot sell houses in Lincoln.

#### Q7b – Gainsborough and Sleaford

Do you agree that Gainsborough and Sleaford should remain as a focus for growth? If not, please provide details and any alternative proposals.

4.4. There was strong support for Gainsborough and Sleaford remaining as a focus for growth with 90% of respondents supporting it. There were a number of comments received in response to the question and the key issues can be summarised as follows:

- All towns in Lincolnshire should be considered hubs of activity to share growth, resources and facilities.
- There should also be a focus on growth in settlements located in close proximity to key urban areas and those with good transport links.

- The Gainsborough growth percentage should be reduced.
- Sleaford and Gainsborough should both remain a focus of growth as they have jobs and facilities to withstand pressure from new homes, but should development not be forthcoming, alternative options should be explored to ensure development is properly planned for.
- A broader and less top-heavy strategy would be preferred as it would more equitably distribute growth without putting excessive strain on larger settlements which do not necessarily have the capacity or infrastructure to support a significant step change.
- Sleaford and Gainsborough should remain a focus for growth along with Market Rasen and Caistor to a lesser extent.
- Both Sleaford and Gainsborough are constrained by flood risk, and there are added complications from active railway lines, limited access opportunities and ransom strip issues.
- Gainsborough's remote location & poor transport links do not warrant special status.
- Growth should be devolved from Gainsborough to smaller towns and large villages.
- Gainsborough has struggled in financial terms in recent years, whereas Sleaford is less economically compromised than Gainsborough and it offers a good alternative to focusing all growth near to Lincoln.
- Gainsborough should remain as an area for both economic and housing growth.
- Sleaford should have its growth percentage increased to 16% of the top end of the range (1,300 dwellings per year) which would be a limited and reasonable uplift against the current growth level.
- Gainsborough could accept an increase, but the historic difficulties with delivering growth suggests that more flexibility for growth in Lea and Morton should be considered as part of the "Greater Gainsborough Area".
- Preferable to create new settlements and business opportunities to the north of Lincoln along the A15 corridor, including at Scampton.
- Severn Trent Water are content with current proposals for Gainsborough and are looking at providing capacity – if this number increases it could impact on the capacity and scale of improvements needed.
- Only support Sleaford and Gainsborough as areas for growth if the infrastructure is extended and improved – each require an economic stimulus to support the growth.
- Gainsborough will be flooded.
- Sleaford will be very near to the coast – can additional demands on its infrastructure be withstood?
- Sleaford seems to be dying, especially the town centre, and it lacks sufficient infrastructure to support the population of the town and the surrounding areas.
- The expansion of Sleaford and Gainsborough has had a detrimental effect on safety and law and order – this will be repeated if small and medium villages are expanded too quickly.
- Growth should be located in areas at a higher elevation.
- Wragby, Bardney and Louth all need to be included.

#### Q7c – Breaking down the "Elsewhere" category

Do you agree that the "Elsewhere" category should be broken down further to address deliverability? If so, what break down do you think should be used to reflect sustainability and/or market considerations?

4.5. There was some support for breaking down the “Elsewhere” area to address deliverability with 77% of respondents supporting it. There were a number of comments received in response to the question and the key issues can be summarised as follows:

- It should be broken up by districts.
- The definition of “elsewhere” is meaningless if it is not carried forward in the policies and it should be broken down further taking into account availability of facilities and connectivity.
- There is scope for further differentiation in the “elsewhere” category in order to direct more development to settlements higher up the hierarchy, offering more sustainable locations for development.
- Further evidence and understanding should be developed to support the assumed growth in the elsewhere category and also other housing and economic sub-markets as a result of activity outside of Central Lincolnshire.
- Leave the elsewhere category as it is – the growth should be focused in the towns.
- Only larger conurbations with jobs, schools and dedicated public transport and cycling and walking facilities should receive growth.
- If the large villages list was shortened, by increasing the dwelling numbers or by applying an available amenities requirement, then large villages could be a more focused category, for example Cherry Willingham is already a focus for growth and the potential is enhanced with the LEB.
- Should be decided based on the provision of infrastructure and services – large villages can stand alone and smaller villages should be looked at as clusters.
- Attention is needed to the needs of current residents of these areas, the addition of more people can cause chaos.
- It should be further broken down and should be based on amenities, employment opportunities and good public transport links.
- The areas chosen were selected from a sustainability perspective and market considerations are not a planning consideration.
- It is important that it is clear what is proposed in all levels of the hierarchy so residents can consider planning implications in their area.
- Would reduce the LSA to be tighter to the Lincoln urban area with small and medium villages relocated to the elsewhere category and ensure they are not over-developed or left without access to infrastructure.
- Further clarity about the precise locations of development would assist with infrastructure delivery.
- In light of the proposal to reduce the threshold of allocations to 10 dwellings, it is almost inevitable that there will be more locations in the elsewhere category.
- The focus should be on the settlement hierarchy.
- Individual neighbourhood plans have a lot of answers to the questions.
- Each area has its own level of deliverability and a percentage is not always a good indication of growth, with more attention paid to individuality.
- There is much land in the elsewhere category which is suitable for development and settlement should be considered further away from the Lincoln Strategy Area.
- This should not be broken down if this means that communities that have produced a neighbourhood plan needs to take on additional growth.
- If the “elsewhere” category is broken down, then Policy LP11 Affordable Housing, should also be changed to reflect this change.

- A more flexible approach is needed in the “elsewhere” category to enable market forces to dictate the level of housing achieved. Sustainability can remain the key policy determinant, but deliverability should be given and increased emphasis.
- Other categories such as brownfield and greenfield should be considered.
- Growth in small communities should only be delivered with local community support.
- The focus should be on development benefitting communities in the elsewhere category.
- Parish boundaries should be reinstated for an area’s development limits.
- Market Rasen should continue to be a focus for development.
- Kirkby La Thorpe, with its proximity to Sleaford and the highways network is ideally placed for additional growth.

#### Q7d – Consideration of the Market and Deliverability

Do you agree that market capacity and deliverability should be considered before choosing what growth to distribute to which area?

4.6. There was some support for taking into account market capacity and deliverability when choosing how to distribute growth with 74% of respondents supporting it. There were a number of comments received in response to the question and the key issues can be summarised as follows:

- Local vision should hold more weight than developer interests which are money oriented.
- The areas chosen were selected from a sustainability perspective and market considerations are not a planning consideration. Viability testing will take into account delivery rates.
- Tiers 1-3 should be responsible for the majority of growth.
- This will increase rural poverty – smaller villages and towns need the investment and should have the same amount of growth as Lincoln.
- Local Planning Authorities should be setting out terms of where and what is deliverable, not developers to address the housing shortage.
- Should take into account local needs for local affordable housing.
- Should take deliverability into account to increase certainty for investment in infrastructure.
- It is essential to take into account market capacity and deliverability in order to ensure that the trajectory is realistic and to avoid the allocation of sites which will not come forward for development.
- Market capacity and deliverability should not be taken into account before the approach to the overall distribution is decided upon.
- Should be driven by local need, including for types, sizes and tenures of houses.
- Realistic delivery rates need to be considered in areas to more accurately reflect the development that will occur annually and can be mapped out in a trajectory – this does not necessarily signal market capacity issues.
- It’s not always market capacity that restricts delivery, but can be specific deliverability issues with allocated sites.
- We should be considering ways of stimulating the market in the areas where we want housing built.
- The market can and does change and so should not be used to constrain development in areas.

- There are different markets for different products, e.g. park homes, so should not preclude such variety.
- Market capacity should not be used to reduce growth levels across the local plan area as there is not a market weakness. Simply limiting growth where there are perceived market capacity issues, does not allow for market capacity to be developed.
- Engagement with local property, building and planning professionals is vital.
- A flexible settlement boundary approach would allow for organic growth around lower tier settlements rather than relying on a number of pre-determined allocations.
- A diverse supply is key and this should include short term and long term sites.
- The plan should allocate a greater number of medium sized sites (70-300 dwellings) as these sites can enable significant amounts of growth to be delivered sustainably, without infrastructure delays.
- The ability to deliver the strategy is key to its success so it has to be factored in.
- This approach would penalise popular villages where developers want to build.
- Yes, but it needs to be matched by investment in infrastructure.
- Yes, and neighbourhood plans should also be addressed as they contain information about the deliverability and suitability of development in locations.
- No, not as long as profit remains the number 1 consideration of developers.
- Desirable locations will always attract more growth, resulting in overdevelopment.
- The climate change emergency should be addressed urgently.
- A suitable location is a sustainable one.
- Houses will sell wherever they are built if they are priced accordingly, not necessarily to give developers a 25%+ return on capital.
- Benefits from development should be spread equally across the districts, not retained by developers.
- Need to be mindful of avoiding oversupply.
- Sites that have been allocated but that have made little should be deallocated.
- Action should be taken against developers land banking.
- Should also consider the strength of market in terms of demand.

4.7. The following next steps were identified on page 42 of the Issues and Consultation Report,: “The responses to the questionnaire provided a lot of competing view points and raised many points worthy of further reflection. It is proposed that the breakdown of distribution will reflect the urban focus of the overall strategy which is considered to be a sustainable approach for Central Lincolnshire, but that it be kept under review taking into account both the likelihood of market delivery, availability of infrastructure and any specific needs being identified through evidence.”

## 5. Regulation 18 Consultation

- 5.1. A Consultation Draft of the Local Plan was published for consultation between 30 June and 24 August 2021. During this eight week consultation comments were received on the plan, the policies within the plan, and supporting information and evidence.
- 5.2. A number of comments were received on this draft policy at the Regulation 18 consultation both in support of and objecting to the overall approach, the numbers proposed, the use of a range and the general distribution. Furthermore, a number of detailed comments were received and can be summarised as follows:

- Suggestions that the housing target should be set at the lower end of the range, the upper end of the range, that the upper end should be the minimum, and other suggestions for higher or lower housing requirements.
- Concerns that the amount of growth will undo any efforts to reduce energy demand and carbon reduction and that it will not help affordability.
- Concerns raised about the impact of growth in specific settlements including Market Rasen, Middle Rasen, Branston, Nettleham, Sturton by Stow.
- Suggestions that more development should be located in Lincoln, Gainsborough and Sleaford and that less growth should be located in the Main Towns with more delivered in rural areas.
- Suggestion that more villages near to the Main Towns or in the Lincoln Strategy Area should deliver housing growth to help meet the local requirements.
- There should be a greater focus on brownfield land and urban regeneration.
- Concerns about the lack of investment in infrastructure to support growth.
- Concerns about development not being phased.
- Suggestion that a specific buffer of additional housing should be included above the top end of the range.
- Suggestion that more housing should be delivered in an effort to deliver the affordable housing required.
- Concerns that the market and profit are being placed ahead of sustainability.
- Concerns that the amount being distributed to areas should not be a ceiling with sufficient flexibility.
- Concerns about over-reliance on SUEs.
- Concerns about growth above the minimum having implications for carbon emissions.
- Observations that the pandemic and Brexit will impact on housing and job growth and different opinions on what these effects will be.
- Queries about what 'well-connected' means in the policy.

5.3. The comments received at the Regulation 18 consultation were carefully considered, however, the policy is key to the delivery of the strategy of the plan, it is based on robust evidence, it is considered to be consistent with national policy, it will deliver a sustainable pattern of growth and it is shown to be deliverable. As such, no major changes were made to this policy following the Regulation 18 Consultation.

## 6. Proposed Approach in Draft Local Plan

6.1. The approach to this policy cannot be viewed in isolation as it is linked closely with Policies S1, S3, S4, S5 and the sites being allocated in this plan. It is also closely linked to the employment strategy in Policies S28-S34 and the retail strategy in Policies S35-S40. It is also closely linked to the site allocations in this plan.

6.2. This suite of policies seeks to deliver a balanced approach to growth with an urban focus at the larger settlements with greater facilities, services and employment available.

6.3. The percentages remain the same as in the adopted 2017 Local Plan with the focus for growth remaining within the Lincoln Strategy Area (including both the Lincoln Urban Area and other settlements in the area which are well-connected to Lincoln) and the Main Towns of Gainsborough and Sleaford (with well-connected satellite villages being recognised for their value in supporting growth at these urban locations in deciding on where to allocate sites).

- 6.4. However, it also seeks to ensure that a reasonable amount of growth will take places at other well-connected villages or villages that have good provision of services and facilities both within the Lincoln Strategy and Elsewhere, as investigated in the Village Profiles set out in the Site Allocation Settlement Analysis (Ref: STA008).
- 6.5. The Policy applies a housing requirement range as is endorsed by the PPG with the bottom of the range being formed by the Local Housing Need figure (which at the time of the Regulation 18 Consultation is 1,060 dwellings per year) and the upper end of the range being 1,325 dwellings per year – the recommended housing number identified in the Central Lincolnshire Housing Need Assessment (2020).

## 7. Reasonable Alternative Options

- 7.1. The proposed approach for this policy forms Option 1 in the Sustainability Appraisal and the assessment of the options for this policy were broken into two parts, Part One: Assessing the amount of growth; and Part Two: Assessing the distribution of growth.

### **Part One Reasonable Alternative Options:**

Option 2: A fixed housing figure at the Local Housing Need Figure (currently 1,086 dwellings) and no locally set number of jobs to be delivered

Option 3: A fixed housing figure of 1,325 dwellings and delivery of approximately 24,000 jobs as defined by evidence.

### **Part Two Reasonable Alternative Options:**

Option 2: A policy which delivers more growth to 'Elsewhere', i.e. not the Lincoln Strategy Area and not the main towns

Option 3: A policy which does not actively distribute growth to locations and lets the market decide.

Option 4: Creation of one or more new settlements

## 8. Conclusion

- 8.1. This Evidence Report demonstrates the rationale for the proposed policy as contained in the Proposed Submission Draft Central Lincolnshire Local Plan. This helps bring together relevant evidence that has informed this policy and how we have responded to comments received during the plan making process, as well as how the latest evidence and national guidance has been taken into account.