

Central Lincolnshire Policy S3: Housing in Urban Areas Evidence Report

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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 S3 Housing in Urban Areas, which relates to Central Lincolnshire's strategy for housing. The strategy for housing is one of urban focus in order to concentrate housing in locations where more services, infrastructure and jobs are available, minimising the need to travel and allowing investment to be focused to achieve maximum benefits. In order to create certainty for allocated sites this policy aims to address those sites that may come forward during the plan period which are not allocated or identified as an area of change. The policy sets out the position of when proposals will be supported in urban areas.

2. Policy Context

National Policy and Guidance

- 2.1. The National Planning Policy Framework (NPPF) Chapter 2 explains, "*Achieving Sustainable Development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*

*a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*

*b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

*c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

- 2.2. Paragraph 16. In Chapter 3, Plan Making sets out that plans should:

a) be prepared with the objective of contributing to the achievement of sustainable development¹¹;

b) be prepared positively, in a way that is aspirational but deliverable;

c) be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

¹¹ This is a legal requirement of local planning authorities exercising their plan-making functions (section 39(2) of the Planning and Compulsory Purchase Act 2004).

d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;
e) be accessible through the use of digital tools to assist public involvement and policy presentation; and
f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."

2.3. Paragraph 20 explains the need for strategic policies, such as this, to set out the overall strategy. *"Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision¹³ for:*

a) housing (including affordable housing), employment, retail, leisure and other commercial development;
b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
c) community facilities (such as health, education and cultural infrastructure); and
d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation."

2.4. Policy S3 (Housing in Urban Areas) sets out the approach that this plan is one of urban focus in order concentrate housing in locations where more services, infrastructure and jobs are available, minimise the need to travel and allowing investment to be focuses to achieve maximum benefits.

2.5. Paragraph 68 of the NPPF states:

"Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) specific, deliverable sites for years one to five of the plan period³⁴; and
b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."

2.6. The plan seeks to adopt site allocations using an urban focus for housing in order to meet the strategic housing needs for Central Lincolnshire. This policy sets out the principles of development for housing in urban areas that is not specifically identified as a site allocation.

2.7. Planning Practice Guidance (PPG) was introduced in 2014 and it sets out live guidance on how to implement the policies of the NPPF.

2.8. Policy S3 sets out that proposals for First Homes exception sites will be supported in principle where they accord with any adopted local design policies. The PPG explains some key questions relating to exception tests which are set out below:

Exception sites

First Homes exception sites

What is a First Homes exception site?

A First Homes exception site is an exception site (that is, a housing development that comes forward outside of local or neighbourhood plan allocations to deliver affordable housing) that delivers primarily First Homes as set out in the First Homes Written Ministerial Statement.¹

Where can First Home exception sites come forward?

First Homes exception sites can come forward on unallocated land outside of a development plan. They cannot come forward in areas designated as Green Belt, within the Broads Authority, or in designated rural areas as defined in Annex 2 of the National Planning Policy Framework. In these areas rural exception sites are the sole permissible type of exception site.²

What evidence can be used to in demonstrating that a proposed First Homes exception site is proportionate in size to the existing settlement?

For decision making, what constitutes a proportionate development will vary depending on local circumstances. As part of their process for preparing planning applications, applicants should consider engaging a relevant built environment professional to provide advice on the scale of their proposal and also consider proactively engaging with local authorities where possible to discuss their proposals.

For plan making, local authorities and neighbourhood planning qualifying bodies are encouraged to set policies which specify their approach to determining the proportionality of First Homes exception site proposals, and the sorts of evidence that they might need in order to properly assess this.³

Can First Homes exception sites deliver market housing?

First Homes exception sites can deliver a small proportion of market housing, provided that it can be demonstrated that this is necessary in order to ensure the overall viability of the site. Local authorities and neighbourhood planning groups can set policies that specify in further detail the proportions of market housing would be considered acceptable, and under what circumstances.⁴

Local Policy

- 2.9. Within the current Local Plan, adopted 2017, the main policy of relevance to Policy S3 is Policy LP2: The Spatial Strategy and Settlement Hierarchy, which sets out Central Lincolnshire's approach to housing growth with an emphasis on homes within urban areas in order to deliver sustainable growth. The approach helps to make the most of the existing services and facilities to where it most needed. It also allows for infrastructure improvements where they will have the greatest effect for communities within Central Lincolnshire.
- 2.10. Policy LP3: Level and Distribution of Growth in the adopted Local Plan sets out the overall growth strategy for Central Lincolnshire. The growth is focus on urban areas with Lincoln

¹ PPG Paragraph: 024 Reference ID: 70-024-20210524

² PPG Paragraph: 025 Reference ID: 70-025-20210524

³ PPG Paragraph: 026 Reference ID: 70-026-20210524

⁴ PPG Paragraph: 027 Reference ID: 70-027-20210524

Strategy Area equating to around 64% of total of new homes and employment, with Gainsborough and Sleaford equating to around 12% of growth within Central Lincolnshire.

- 2.11. Beyond Policy LP3, Policies LP17 and LP26 provide additional policy requirements relating to design and character and there are also settlement-specific policies in Chapters 7-9 which guide development and provide protection in these urban settings.

3. Context and Evidence

- 3.1. Central Lincolnshire has a one city and four towns, making up the main urban areas. These locations, as well as some of the larger, more sustainable villages are the primary focus for development and allocations through this plan.
- 3.2. In the 2017 Local Plan allocations were made for sites of 25 dwellings or more in urban locations and this included at eight Sustainable Urban Extensions (SUEs). In the draft new Local Plan, allocations are proposed made for sites of 10 or more dwellings including in these urban locations and this also includes retention of the SUEs.
- 3.3. However, whilst sites allocated in this plan provide adequate housing supply for this plan, this policy caters for sites which are not allocated or specifically identified through an area of change where development would be considered appropriate. This is considered necessary not only for small sites that were not considered for allocation, but also for opportunities on larger sites which were not available at the time of selecting allocations in the Local Plan. It is not the intention of this plan to restrict wholly sustainable and suitable developments from coming forward in these urban locations when the opportunities arise.
- 3.4. Delivery on sites in these urban locations have made a healthy contribution to housing delivery over recent years, and they are projected to continue to do so as is set out in document HOU007: Housing Delivery Paper. This policy will help to ensure that there is an adequate framework against which to consider such applications.
- 3.5. Throughout this Local Plan, key definitions are referred to in the main glossary such as “developed footprint” and “appropriate locations” this language is defined to ensure consistent wording is used in the Local Plan policies and to avoid ambiguous definitions.

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 difficulty 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.

4.5. 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. Furthermore, a number of detailed comments were received and can be summarised as follows:

- Suggestion that the policy should be more supportive for intensification, infill and regeneration within the urban areas.
- Concerns about size of sites allowed on unallocated sites in the towns.

- Suggestion that the limit on size for windfall sites should be removed or substantially increased.
- Concerns about the lack of investment in facilities in urban areas.
- Suggestion that the policy should add the design criteria that should be applied to First Home Exception Sites.
- Suggestion that settlement boundaries are needed, and 'developed footprint' is ambiguous

5.3. Careful consideration was given to all of the comments received. As a result of the comments, the draft policy was changed to remove the limit on how many dwellings would be supported on a given site. It was considered that the policy (and the wider suite of policies in the plan) provided adequate protection without the need to control larger sites that may come forward.

6. Proposed Approach in Draft Local Plan

6.1. The proposed approach to this policy is aligned to the strategy of the plan which is one of urban focus where new housing will be concentrated in these locations to take advantage of services, infrastructure and jobs available. This policy sets out what proposals will be supported in Lincoln Urban Area, Main Towns and Market Towns where the development does not fall within an allocation or identified through a neighbourhood plan.

6.2. The policy also refers to how First Homes exception sites providing that they accord with any locally adopted design policies. This approach provides clarity and certainty for how land on the edge of settlements for non-allocated sites or sites on the edge of the settlement will be considered. The arrangement also sets out how First Homes exception sites will be supported as another method of tenure for delivering affordable homes in line with the wider plan.

7. Reasonable Alternative Options

7.1. The following alternative options have been considered for this policy (option 1 being the preferred option).

Option 1: A policy which supports non-allocated development on small/medium sized sites in urban areas and which provides clarity on how large, non-allocated sites or sites at the edge of a settlement should be considered.

Option 2: A policy which restricts development on non-allocated sites in and adjacent to urban areas.

Option 3: No policy and instead rely on general plan policies and the NPPF.

7.2. Option 1 sets out a clear policy direction for non-allocated sites and edge of settlement sites as to what is acceptable forms of development. It provides clarity and certainty for land on edge of settlements. It also sets out the support for First Homes exception sites in line with the provision of NPPF and the wider plan.

7.3. Option 2, this approach would restrict development on sustainable sites that are consistent with the strategy but that happen to not be allocated. This could stifle appropriate locations from coming forward.

- 7.4. Option 3 relies on the NPPF. With no local specific policy this would not provide enough certainty and clarity for developers and local communities.

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.