

# Central Lincolnshire Policy S4: Housing Development in or Adjacent to Villages 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 S4 Housing Development in or adjacent to Villages, which relates to development within small, medium or large villages.

## 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 development<sup>11</sup>;*

*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;*

*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).”*

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<sup>11</sup> 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).

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 provision<sup>13</sup> 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. Paragraph 69 of the NPPF goes onto state that:

*“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:*

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*
- b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;*
- c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and*
- d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.”*

2.5. Paragraph 78 then states, *“In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.”*

2.6. Paragraph 79 says, *“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”*

2.7. 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.

2.8. Planning Practice Guidance states:

***How can planning policies support sustainable rural communities?***

*People living in rural areas can face particular challenges in terms of housing supply and affordability, while the location of new housing can also be important for the broader sustainability of rural communities. Strategic policies will need to be informed by an understanding of these needs and opportunities, especially where authorities in designated rural areas wish to demonstrate that it is appropriate to set lower thresholds for affordable housing than those which apply generally.*

*The nature of rural housing needs can be reflected in the spatial strategy set out in relevant policies, including in the housing requirement figures for any designated rural areas. A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness. A neighbourhood plan can allocate additional sites to those identified in an adopted plan so long as the neighbourhood plan meets the basic conditions.*

*Local planning authorities can support opportunities to bring forward rural exception sites by working proactively with landowners and potential delivery partners such as parish councils and community land trusts.<sup>13</sup>*

### **What sorts of affordable housing can be delivered on rural exception sites?**

*Rural exception sites should seek to address the affordable housing needs of local communities. They can be used to deliver any form of affordable housing, including First Homes, provided this is supported by appropriate evidence of local need, such as a local housing needs survey.<sup>14</sup>*

## **Local Policy**

- 2.9. The 2017 Local Plan allocated sites in the top four tiers of the hierarchy, and this process will set the general level of growth expected to occur in these settlements. However, this does not mean some growth should not take place in the smaller settlements lower down the hierarchy as growth will help to enhance or maintain the vitality of rural communities (as required by the NPPF) and support the wider growth aspirations of this Local Plan.
- 2.10. The Settlement Hierarchy in Policy LP2 set out the broad approach for settlements in the different tiers of the hierarchy. For villages, sites were only allocated in Large Villages with less growth expected to come forward in Medium and Small Villages on sites of a suitable scale through windfall development.
- 2.11. Policy LP4: Growth in Villages, then went on to set a percentage growth allowance for Small and Medium Villages, to grow by 10% in the number of dwellings, or 15% in certain scenarios based on sustainability credentials. In some locations it also clarifies that this growth level may not be achievable due to constraints in a settlement (such as AONB and flood risk zones covering the settlement).

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<sup>13</sup> PPG Paragraph: 009 Reference ID: 67-009-20190722

<sup>14</sup> PPG Paragraph: 012 Reference ID: 67-012-20210524

- 2.12. The planning authorities within Central Lincolnshire monitor the level of growth within these settlements. There are number of the settlements across Central Lincolnshire that have already reached the growth allowance that is set out in LP4.

### 3. Context and Evidence

- 3.1. The mains aim of LP4 is to provide a strategic steer as to what growth would be appropriate in Small and Medium Villages. However, there have been a number of issues in the application of this policy, including:
- Occasions where perfectly suitable and sustainable sites would push the growth level beyond the percentage and so are refused;
  - Occasions where less sustainable or suitable sites come forward ahead of better sites, potentially resulting in less sustainable growth of these villages;
  - Issues with revisiting the percentages in each plan review – the evidence has moved on since the local plan was adopted and further growth may be needed in these villages; and
  - Changes in national policy requiring the allocation of small and medium sites.
- 3.2. In an effort to address these issues, it was decided that allocations would be made in Medium and Small Villages, taking into account the suitability or development in these settlements. This matter is addressed in STA008: Site Allocations Settlement Analysis where the presence of facilities, connectivity with main urban areas, amount of recent growth and other constraints and opportunities were taken into account.
- 3.3. The approach for the new Local Plan is still to focus growth on urban locations, with development in the smaller settlements generally being more limited to locations with a good range of facilities and/or that are well-connected to the main urban areas. There is also provision that local communities through developing a neighbourhood plan could seek further growth through a locally supported approach for a specific village.
- 3.4. The use of neighbourhood plans allows communities to develop their own local based approach for growth within smaller settlements. Neighbourhood plans give local communities the option of allocating sites within their village.
- 3.5. The framework set out within S4 provides certainty for the small, medium and large villages as to what development would be acceptable in these locations. Within the policy it sets out the expectations of not only size of proposals, character and rural setting but also the inclusion of First Homes. First Homes are included in part 3 of the policy and will be supported providing the criteria is met and is aligned with the NPPF and brings about rural affordable homes.

### 4. Issues and Options Consultation

- 4.1. The Issues and Options Consultation sought respondents' views about growth in villages under proposal 11.

#### **PROPOSAL 11 – Growth in Villages**

The principle of allowing a set amount of growth in smaller settlements is proposed to be retained. Other questions in this consultation document are seeking to investigate the suitability of allocating sites in more villages, such as Medium Villages, for this new Plan (see Question 9b) and revising the Settlement Hierarchy (see Question 5). It is proposed that the approach of using a growth level for smaller settlements be retained and that, as with the 2017 Local Plan, this should have a baseline of 10% with the potential to be increased to 15% where certain criteria

are achieved. The 2017 Local Plan used the presence of key facilities (primary school, convenience store and some employment), proximity to main urban centres and Strategic Employment Areas as the criteria to define where the growth level should be boosted to 15%. Your views are being sought on whether the same criteria should be used to boost a growth level in the new Local Plan.

#### Q11a – Use of a Growth Level for Villages

Do you agree with the principle of using a percentage growth level for villages? If not please provide alternative suggestion.

4.2. There were a number of comments received in response to the question and the key issues can be summarised as follows:

- Each village should be looked at individually to take into account facilities available and the capacity remaining. Presence of a school or shop does not make it available or suitable for growth.
- Local employment needs consideration.
- Public transport, cycle and walking must be a factor to ensure private transport is not the key transport factor.
- Potential to harm heritage assets must be assessed.
- Using population or dwelling numbers as a means to identify growth levels for villages is not a sustainable approach and the three pillars of sustainability in paragraph 8 of the NPPF should be used to assess each settlement for potential.
- A blanket growth level is not suitable for every village as it is too much for some villages and too little for others. Form and function should be considered as well as connectivity and availability of necessary infrastructure.
- Percentages should only be used for estimating purposes.
- Environmental receptors within the area should be taken into consideration.
- The value of the area, community and realistic propositions for growth are not considered in decision making, which is unacceptable.
- More should be done to support post offices, pubs and shops – this should be taken into account in the plan to consider to build sustainable villages.
- There does not seem to be a logical alternative to this approach.
- Growth amounts should be numerical and not percentage as this can be open to abuse or inflation by developers.
- Changes should be led by villagers and the needs of the village, not arbitrary percentage figures.
- The principle of this approach has been tested in the Local Plan and accepted by the Local Plan Inspector and therefore this approach is suitable and there is no evidence to suggest otherwise.
- The Local Plan evidence should assess past and current decisions to assess the suitability of the policy.
- Some criteria appear to be applied inconsistently in the Local Plan, such as villages in the Lincoln Strategy Area would indicate proximity to Lincoln and therefore should get a higher percentage growth level.
- The approach applied to require developers to demonstrate clear community support is a flawed mechanism. Clear guidelines on the type and extent of engagement and the threshold for support have not been provided.
- Such a policy needs to avoid a race to the finish line for applications submitted at similar times.

- Percentage figures should be seen as a guide and not a ceiling for development with qualitative analysis being used to consider proposals at the time of application.
- Growth levels should be reset to allow for market delivery and to be aligned to the NPPF.
- Evidence for neighbourhood plans should be used.
- Percentage growth level provides a starting point but over time, should a community want more than 10% then an appraisal should be carried out to inform the decision the percentage figure alone is not good enough reason to make a decision.
- Some villages have already met their requirements.
- Growth figures should not be set at zero without taking account of growth already occurring.
- Growth levels in villages should be reduced, if possible, with more being located in Lincoln and the main towns.
- Small villages and hamlets are a key part of the character of English countryside and by allowing growth there is a risk of this character being lost.
- Development in hamlets and in most small villages is not sustainable.
- There should be a mechanism for the parish councils and communities to have the final say on development outside of the developed footprint and on green spaces.
- Additional allocations should be made in the plan in and adjacent to small, medium and large villages on small parcels of land.
- The growth level is referred to as “permitted growth” whereas in practice it is a target and so an honest label should be used.
- Every site should be considered on its own merits.
- Some confusion over whether or not this includes large villages.
- Ewerby is over 7km outside of Sleaford and so should not have a 15% allocation – 10% is more appropriate and could be accommodated within the village.

4.3. There were a number of other questions posed in the Issues and Options consultation including:

- Q11b – 10% Baseline Growth Level
- Do you think that, like it is in the 2017 Local Plan, using a 10% baseline for village growth is appropriate? Please provide details of what you think is appropriate if you do not agree.
- Q11c – Increasing Growth Level
- Do you agree that this baseline percentage should be boosted where certain sustainability criteria are satisfied?
- Q11d – Criteria for Increasing Growth Level
- Should the criteria used in the 2017 Local Plan for increasing the growth level of a village above the baseline percentage continue to be used or should alternative criteria be used? Please provide details if you propose an alternative.
- Q11e – 15% Increased Growth Levels
- Do you agree that 15% is the maximum that a growth level should be set at? If you disagree, please provide details of what percentage you think is appropriate and why.

4.4. The following next steps were identified on page 58 of the Issues and Consultation Report: “The issue of growth in villages is clearly one that causes concern for communities across Central Lincolnshire. Responses to this proposal highlighted a great divide on all matters for how to address growth. It is proposed that this position be further considered to identify the most appropriate approach for the Central Lincolnshire context

taking into account further evidence as it evolves. The concerns and suggestions will also need full consideration as to the overall approach and settlement-specific issues.”

4.5. Proposal 12 outlines further comments on growth levels in villages.

**PROPOSAL 12 – Preferred Approach for Growth Levels in Villages**

The preferred approach is to take account of cases where a substantial amount of growth has occurred in recent years, namely where 100% of the growth level in the 2017 Local Plan was built out by 1 April 2018. For those locations, the percentage growth level would be halved in the new Local Plan. This approach allows for sites with permission but not built by 1 April 2018 to be counted towards the new growth levels.

**Q12 – Preferred Approach for Growth in Villages**

Do you think the preferred approach to reviewing the growth level for villages in the new Local Plan is appropriate? If not, please provide details of what alternative approach you would suggest.

4.6. There were a number of comments received in response to the question and the key issues can be summarised as follows:

- Each village needs to be individually assessed for capacity.
- Should consider prioritising allocations in villages that are close to high performing settlements.
- Yes, it takes account of where growth targets have been met and makes an allowance for growth with permission but also ensures that there is a positive approach to growth.
- Where areas have met their need the growth level should be zero not halved.
- Growth delivered should be carried forward from the previous plan.
- Paragraph 4.46 is wrong. Five year housing land supply is positive, housing need is down and as such there is no need to increase above the level in the adopted plan.
- The base date of 1 April 2018 should be brought forward as many villages will have more growth after this date.
- The base date should be 2012 to match the last Local Plan.
- Option 2 provides the most equitable and reasonable approach to determining future growth levels. It is a good balance between the need for growth and the need to protect rural settlements from over-development.
- Options 1 and 2 take the wrong approach in resetting growth levels and taking no account of permissions granted.
- Option 2 fails as it puts more development in the areas where the most growth has occurred, resulting in the fastest growing villages, growing faster still.
- Option 3 is the best option presented, but it is extending the same growth rate on a year on year across the new plan period.
- Option 4 should be retaining the growth levels across the whole plan period as originally agreed. Development can take place but with community support. This has been working and development has occurred – numbers should be based on permissions not homes built as there is no definition of “built”.
- It is natural for populations to migrate for a variety of reasons and as a result some places will grow quicker than others, and this should not be discouraged – allowing villages to grow increases the sustainability of local services, bringing benefits.
- It needs to address issues like transport and employment – all cars will be electric by 2040.

- People live in villages because they are villages – if you expand them by 10% each year, they will no longer be attractive.
- The reasons for non-implementation have not been fully investigated and presented to allow a basis to proceed.
- Support sites with permission but not complete to count towards future growth.
- Should retain the current approach.
- The proposals are not positively prepared and there is no evidence provided to demonstrate why the growth levels should not be reset. It takes no account of the possible effects of limiting further growth on vitality and affordability in a settlement.
- Resetting growth levels would be more appropriate and aligned to the NPPF.
- The 2017 plan growth level and baseline should form the baseline in this plan to ensure areas that have delivered their growth are not penalised.
- The new plan should not require more from the villages if the overall target is being reduced.
- The approach needs to take account of an inspector decision at Land on Barlings Lane, Langworth which applied the local plan adoption as the start date for the growth level in making his decision.
- Reducing growth levels in areas where they have shown to have the capacity to support growth and has market appetite to react well to urgent housing requirements would disregard their evident growth potential.
- Is this not at odds with any approach to take account of market capacity and deliverability?
- Villages should be provided with more support to produce neighbourhood plans – too much time and energy is expected from volunteers in this process.
- The approach should not seek to place a ceiling on growth and should allow it to be responsive to market conditions, and it should consider proposals for development on considerations of sustainability, impact on character, impact on services and the need for housing.
- Under option 2 we understand that Thorpe on the Hill increase is 22.2%. If this is incorrect, we feel we have not been adequately consulted on this issue.

4.7. The following next steps were identified on page 60 of the Issues and Consultation Report: “The proposed approach to ‘resetting’ growth levels received a good level of support, but also a number of concerns. These concerns will require further consideration and emerging evidence will need to be taken into account when firming up an approach for the local plan.”

## 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:

- Suggestions that the policy should be more or less flexible in various ways including in relation to type of locations, amounts of homes and delivery mechanisms for unallocated sites.

- Suggestion that any development being allowed should have the support of the local residents.
- Concerns about impact of additional growth in specific villages including Nettleham, Bassingham, Branston, Norton Disney, Swinderby, Nocton, Scothern, Glentham, Saxilby, Newton on Trent, Brant Broughton, Fenton, Walesby, Beckingham, and Stragglethorpe.
- Concerns about cumulative impacts of developments in villages without a cap.
- Suggestion that sometimes development at the edge of a village will be preferable over development within a village.
- Concerns about lack of investment in services and infrastructure.
- Concerns that thresholds will result in affordable housing not being delivered.
- Concerns about lack of control on development in this policy.
- Suggestion that the site size limit in the policy should be removed in some or all cases, or that it should be increased for Large Villages, or increased or reduced for Medium Villages, or reduced for Small Villages.
- Suggestion that the settlement increase percentage in part 3 of the policy relating to First Homes Exclusion Sites be removed or reduced.
- Suggestion that the policy should allow for rural affordable housing exception sites in hamlets.
- Suggestion that part 3 of the policy should be revised to allow for alternative sites to be delivered where an allocated site in the same village is not delivering.
- Both support and objection to providing flexibility for neighbourhood plans to deliver housing in villages.
- Objection to use of designated rural areas and AONB as limitations to First Homes Exceptions Sites.
- Objection to not using settlement boundaries.
- Objection to the exclusion of agricultural buildings from the 'developed footprint'.

5.3. Careful consideration was given to all of the issues raised; however, it was felt that the policy strikes the right balance between allowing flexibility for future development to occur and for development to be effectively managed, based on the attributes of the village and the site. As such, no major changes have been made to the policy with the exception of aligning the First Homes percentage to national policy (5% instead of 10%).

## 6. Proposed Approach in Draft Local Plan

6.1. The approach for this policy is aligned to the general urban focus of the strategy, with some development occurring in villages that are sustainable, but only where it is appropriate for the context.

6.2. Much of the development that will occur in these villages will be on sites allocated in this plan or a neighbourhood plan, with this policy applying to potential windfall sites. It provides a clear framework for decision makers to consider the constraints and opportunities of not only a site when an application is made, but also the wider settlement. This approach ensures modest scale of development can occur yet still maintaining the sustainability and vibrancy of villages.

6.3. The policy is set out in three sections. Section 1 sets out typical growth expectations with limits applied to large and medium villages along with a lower limit to small villages. Section 2 sets out what unallocated sites within the size thresholds will need to adhere to

if section 1 has been satisfied. Section 3 sets out a framework for residential development on unallocated land immediately adjacent to the developed footprint.

## 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 allows for development on suitable small sites or in allocations in the development plan within villages and seeks to ensure that any other residential development proposals for unallocated sites will not harm the village character and restricting unallocated development outside of the village.

**Option 2:** A policy which seeks to restrict all unallocated development in villages.

**Option 3:** Retain the approach in the adopted Local Plan applying a percentage growth for villages.

**Option 4:** No policy and reliance placed on the wider plan and the NPPF.

7.2. Option 2 would stop potential sustainable sites from coming forward. It would also reduce opportunities for small, medium and large size villages that come from development such as more sustainable local services/facilities.

7.3. Option 3 would continue with the application of a percentage growth allowance. A number of settlements have already reached the growth allowance with some proposals now needing to apply a community consultation process.

7.4. Option 4 would not provide enough local certainty. Development could occur in a piecemeal way which may not yield the most sustainable approach unlike a strategic local method.

## 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.