
Independent Examination of the Central Lincolnshire Local Plan

Inspectors' Matters, Issues and Questions for Examination

By Jeremy Youle BA(Hons) MATRP MRTPI DipPSM and

Matthew Birkinshaw BA(Hons) Msc MRTPI

Inspectors appointed by the Secretary of State for Communities and Local Government

Date: 16 September 2016, updated 26 September 2016

Introduction

- 1) Prior to the forthcoming Hearing sessions responses are invited from participants on the following Matters, Issues and Questions ('MIQs') raised by the Inspectors. The MIQs do not intend to cover every policy in the *Central Lincolnshire Local Plan Proposed Submission* (the 'Local Plan'). Instead they are based on the Main Issues identified by the *Central Lincolnshire Joint Strategic Planning Committee* ('the Committee'), and other pertinent issues raised by the Inspectors and representations.
- 2) Where reference is made to numbers brackets this relates to the relevant policies as they are listed in the Local Plan. The numbers in footnotes relate to Examination and Evidence Base library documents.
- 3) Further information about the Examination, Hearings and format of written statements is provided in the accompanying Guidance Note, which should be read alongside the MIQs.

Update – 26 September 2016

- 4) Following comments by representors the MIQs have been updated. Four additional questions are shown in ***bold italics*** as follows:
 - Matter 7, Issue 7a, Question 4a
 - Matter 7, Issue 7a, Question 5
 - Matter 7, Issue 7e, Question 23a; and
 - Matter 9, Issue 9a, Question 5a.

Matter 1 – Compliance with the Local Development Scheme, Consultation, Habitats Regulations, the Act and Regulations, and national planning policy.

Issue 1a – Duty to Cooperate

- Q1. What strategic, cross-border matters have arisen through the preparation of the Local Plan and what cooperation took place to resolve them? Has the cooperation between authorities been constructive and proactive?
- Q2. The South East Lincolnshire Joint Planning Unit initially expressed concerns that in particular the level of housing growth proposed for Sleaford was disproportionate and represented a threat to housing growth in Boston. How were concerns regarding the balance of employment and housing in Boston Borough and North Kesteven (Sleaford) reconciled?
- Q3. Has the Duty to Cooperate under sections 22(5)(c) and 33A of the 2004 Act and Regulation 4 of the 2012 Regulations been complied with, having regard to advice contained in the Framework and the National Planning Practice Guidance (the 'PPG')?

Issue 1b – Public Consultation

- Q4. Has public consultation been carried out in accordance with the Council's Statement of Community Involvement, the Framework and the PPG, and the requirements of the 2004 Act and 2012 Regulations?
- Q5. Were adequate opportunities made available for participants to access and make comments on the Local Plan and other relevant documents across Central Lincolnshire?
- Q6. Were representations adequately taken into account?

Issue 1c – Local Development Scheme

- Q7. Has the Local Plan been prepared in accordance with the published Local Development Scheme?

Issue 1d – Sustainability Appraisal

- Q8. Have the likely environmental, social and economic effects of the Local Plan been adequately assessed in the Sustainability Appraisal (contained within the Integrated Impact Assessment)?
- Q9. Does this test the submitted plan against all reasonable alternatives where these exist, such as different options for the distribution of housing?

Issue 1e – Habitats Regulations

- Q10. Have the requirements of the Habitats and Species Regulations 2010 been complied with, having regard to relevant national policy and guidance? It is likely that the Plan would have a significant effect on a European site? If so, has an appropriate assessment been carried out?

Matter 2 – Objectively Assessed Need, the Housing Requirement and Affordable Housing (LP3, LP11)

- 6) The *Strategic Housing Market Assessment* (SHMA)¹ indicates that Lincoln, North Kesteven and West Lindsey act as a single housing market area with a generally contained pattern of house moves, common characteristics in house prices and strong commuting relationships centred on Lincoln². Although recognising the links with other housing markets, based on evidence produced by neighbouring authorities, the SHMA concludes that Central Lincolnshire should be taken as a single housing market area ('HMA').

Issue 2a – Housing Market Area

- Q1. Is the degree of containment sufficient to justify Central Lincolnshire as a single HMA for the purposes of the Local Plan?
- Q2. Does the HMA include the western part of East Lindsey, which forms part of the Lincoln HMA as defined in *The Lincolnshire Sub-Regional Housing Strategy*? If so, what implications would this have on calculating OAN?
- Q3. Have any neighbouring authorities identified housing needs which they are unable to accommodate, and which could affect the Central Lincolnshire HMA?

Issue 2b – Objectively Assessed Need for Housing ('OAN')

- 7) The 2012 sub-national household projections (SNHP) were released in February 2015. The SHMA translates this data into a baseline housing need across Central Lincolnshire of around 23,280 dwellings over the plan period, or approximately 970 dwellings per annum (dpa).
- 8) DCLG recently released its 2014-based household projections, determined from the 2014 sub-national population projections (SNPP). The Council's response³ to the Inspectors Initial Questions provides a comparison between the 2012 and 2014 data. In summary it suggests that there is a difference of only 1 dwelling pa across Central Lincolnshire.
- Q4. Does the latest data have any bearing on the OAN?
- 9) The 2012-based SNPP (which underpin the SNHP) assumes a higher rate of out-migration than actually experienced prior to, and post the 2008 recession in Central Lincolnshire. For this reason the SHMA uses a different demographic model derived from an assessment of population trends and patterns of migration over a longer, 10 year period. When taking these figures into account the SHMA identifies a higher OAN of approximately 33,600 (or roughly 1,400 dpa).
- 10) Added to this is an allowance for Unattributable Population Change and an assumption that household formation rates for younger people (aged 20-39) recover to pre-recession levels. This increases the OAN further to around 34,368 (or approximately 1,432 dpa).

¹ E003

² E003 paragraph 2.30

³ ED004

11) Taking into account economic assumptions the SHMA applies an uplift in population growth giving rise to a housing need of between 36,960 – 42,720 dwellings (or around 1,540 dpa – 1,780 dpa). The greatest requirement is for 2 or 3 bedroom flats, mews or semi-detached houses.

12) Taking this into account;

- Q5. The baseline household projection has been adjusted upwards based on 10 year migration trends (rather than 5 years assumed in the CLG figures). Why are 10 year trends more likely to be representative of what will happen over the plan period than 5 year trends?
- Q6. Figure 6.2 of the SHMA illustrates that levels of net internal migration were higher between 2001-07 than from 2007-12 (on which the DCLG projections are based). What factors caused the higher levels of internal migration pre-2007? What evidence is there to suggest that these factors will underpin a higher rate of internal migration over the plan period going forward?
- Q7. Is the increase in the OAN to account for Unattributable Population Change reasonable and justified?
- Q8. Is the return to previously higher household formation rates for younger people (aged 20-39) reasonable and justified?
- Q9. Is it appropriate to use adjustments to household formation rates of younger people (aged 20-39) as a mechanism for responding to worsening market signals? Is the level of uplift appropriate?
- Q10. Has the assessment of housing need adequately taken market signals into account, including in respect of land prices, house prices, rents, affordability, rate of development and overcrowding (PPG Ref 2a-030-20140306). Should any specific uplift be made to the OAN?
- Q11. What factors underpin the difference between the Experian Economic Forecasts and the Oxford Economics Forecasts for total job creation? Why are they so different? Why does the Oxford Economics baseline provide the more robust set of data and why has it been used? Is this justified? Applying the Oxford Economics baseline, what would be the requirement for new employment land?
- Q12. The Local Plan states (paragraph 3.5.10) that baseline job growth will result in a requirement for around 23 ha of new employment land over the plan period. However, the Local Plan allocates significantly more – some 153 ha (111ha through Policy LP5 and 42ha through the SUEs). Given that the housing land requirement is based on baseline economic growth, will the supply of housing land be sufficient to ensure that there are enough workers in relation to the amount of allocated employment land?
- Q13. What if employment land development and job creation is higher than the baseline forecast, and subsequently there is insufficient housing to support the development of allocated employment sites? Will there be a need to find more housing sites?

-
- Q14. Should this be monitored and should there be a review mechanism in the Local Plan to review job growth against the forecasts?
- Q15. The SHMA identifies that Bishop Grosseteste University has seen sustained periods of growth which reflects their ambitions. Representations from the University of Lincoln also identify plans for growth as part of a new 'food corridor'. Does this have any bearing on the OAN?

Issue 2c – Housing Requirement

- Q16. The conclusions of the SHMA identifies an OAN of between 34,368 - 42,720 (or 1,432 - 1,780 dpa), but confirms that the bottom end of the range only represents a modest 'boost' to long-term housing supply. With this in mind, why was the housing requirement for Central Lincolnshire established as 1,540 (baseline economic growth), which sits towards the lower end as identified by the SHMA?
- Q17. Will the housing requirement in the Local Plan significantly boost the supply of housing as sought by paragraph 47 of the Framework? Does it reflect the Vision of the Local Plan which states that Central Lincolnshire will be a location of 'positive growth'?
- Q18. Should the housing requirement at paragraph 2.4.1 and Policy LP3 be expressed as a minimum figure given the range of OAN identified by the SHMA? Is it adequately clear that this figure is the housing *requirement*?
- Q19. Is the housing requirement expressed as a net or gross figure? Has the figure taken into account potential demolitions or other changes of use (i.e. any losses from existing housing stock)?
- Q20. Have there been any requests from neighbouring authorities to accommodate any of their unmet housing needs?

Issue 2d – Affordable Housing

- 13) The SHMA identifies a need to provide around 676 affordable houses per year to meet newly arising needs, with an uplift to some 911 units between 2014-2019 to meet existing backlogs of households on the housing register. This equates to a need for approximately 17,400 affordable homes in total over the plan period, or roughly half the total housing growth proposed in the Local Plan.
- 14) In delivering affordable housing the Committee's response to the Inspector's Initial Questions suggest that a Main Modification is required to Policy LP11 to make it consistent with national planning policy (**MM/SC/3**). This includes increasing the affordable housing threshold from sites of 4 dwellings or more to sites of 11 dwellings or more.
- 15) Depending on their location, Policy LP11 requires proposals to provide 15-25% affordable housing on qualifying developments.
- Q21. Has the affordable housing need (17,400 dwellings) been correctly established?
- Q22. How have the three Local Authorities performed since 2012 on the delivery of affordable housing to cover the first years of the plan period? Is the figure of 17,400 still appropriate or does it need up-dating? What overall percentage of affordable housing has been achieved over recent years?

-
- Q23. Is **MM/SC/3** necessary to make the Local Plan consistent with national planning policy?
- Q24. Based on a higher threshold of 11 units how many affordable housing units are likely to be delivered in the plan period through the application of Policy LP11 and from any other sources? Policy LP11 recognises that not all of the need will be met through the planning system. What will be the extent of the shortfall? Will Policy LP11 help deliver the Vision of the Plan, which seeks to meet the housing needs of all?
- Q25. The PPG (Ref 2a-029-20140306) states that an increase to the total housing figures should be considered where it would help deliver the required number of affordable homes (i.e. to deliver more market housing and therefore more affordable housing). Has an uplift to the housing requirement for this reason been considered? If no uplift is proposed, what is the justification for that?
- Q26. Is the requirement for 15-25% affordable housing justified by reference to viability evidence?
- Q27. Why is the requirement lower for the Sustainable Urban Extensions (SUEs) (20% in Lincoln and 15% elsewhere), than for other sites in the Lincoln Strategy Area (25%) and elsewhere (20%)? Is this justified?
- Q28. Is the policy sufficiently flexible? Should it accept that policy requirements for affordable housing would be proportionately reduced if it were demonstrated that a full contribution would cause a development to be unviable?
- Q29. In Rural Areas Policy LP11 states that a local needs assessment is required to demonstrate both a need and a 'desire' in respect of exception sites. How is this defined from a development management perspective? Would the Policy be effective in this regard? Does it give sufficient clarity to decision makers, developers and communities?
- Q30. Is the local support for rural affordable housing facilitated by a small amount of market housing a relevant and justified criterion? Would the Policy be effective in this regard?
- Q31. Should Policy LP11 and/or its supporting text recognise and/or reference the different types of affordable housing, including Starter Homes?
- Q32. Is it necessary to have a review mechanism in the Plan to consider progress against the delivery of affordable housing and to identify any appropriate steps to help increase supply, if appropriate?

Issue 2e – Conclusion on Local Plan Housing Requirement

- Q33. Overall, is the housing requirement in the plan justified? If not, what should it be?

Matter 3 –Spatial Strategy and Distribution of Growth (LP1, LP2, LP3, LP4, LP54)

Issue 3a – Presumption in Favour of Sustainable Development – Policy LP1

- Q1. What is the rationale for the inclusion of Policy LP1? Is it necessary and justified given that it broadly repeats paragraph 14 of the Framework?

Issue 3b – Settlement Hierarchy – Policy LP2

16) Policy LP2 of the submitted Local Plan states that in order to significantly strengthen the role of Lincoln and meet its growth objectives and regeneration needs, the Lincoln urban area and sites allocated on the edge of Lincoln will be the principal focus for development. The 'Lincoln Urban Area' is defined as the built up parts of Lincoln, North Hykeham, South Hykeham Fosseway, Waddington Low Fields, and any developed land adjoining these areas.

17) Below Lincoln, the hierarchy includes 6 tiers as follows:

- Main Towns – Sleaford and Gainsborough;
 - Market Towns – Caistor and Market Rasen;
 - Large Villages;
 - Medium Villages;
 - Small Villages; and
 - Hamlets and the Countryside.
- Q2. How was the hierarchy established, and how was it determined through the evolution of the Plan?
- Q3. Does it take into account sufficient and appropriate factors? Is this approach justified and is it consistent with national planning policy? Have settlements been appropriately allocated to the hierarchy?
- Q4. How was the Lincoln Urban Area defined and what is the rationale for it?
- Q5. Should the plan include a graphical illustration of the Lincoln Urban Area to differentiate between the Lincoln Strategy Area as illustrated on page 15?
- Q6. Will the delivery of any SUEs change the geography of an area to such an extent that the effectiveness of the Plan would be undermined over the longer term? For example, would any villages become part of an urban area, and if so, should this be reflected in the settlement hierarchy?
- Q7. How have the 'Small Villages' been distinguished from 'Hamlets and Countryside'? What is the rationale behind this? For example, the *Central Lincolnshire Settlement Hierarchy and Growth Distribution Study*⁴ identifies that some small villages have no convenience store, primary school or employment and are not within 2km of a strategic employment area or 5km of a key service centre, yet 10% growth is proposed compared to none in hamlets? Is this justified?

⁴ E018

Issue 3c – Level and Distribution of Growth – Policy LP3

18) Policy LP3 establishes the level and distribution of housing growth across the hierarchy as follows:

- Lincoln Strategy Area – around 64% (23,654 units);
- Gainsborough – around 12% (4,435 units);
- Sleaford – around 12% (4,435 units); and
- Elsewhere – around 12% (4,435 units).

- Q8. How was the distribution of growth between the settlements established, and what evidence supports this? Is it justified?
- Q9. Why is there a difference between the distribution of dwellings proposed for each tier in Policy LP3, and the total number in the housing trajectory on page 109 of the Local Plan? Are the differences significant?
- Q10. Is it appropriate to aim around 88% of the growth in the Lincoln Strategy Area, Gainsborough and Sleaford when a significant part of the area covered by the plan is rural?
- Q11. Is the 12% growth for the 'elsewhere' settlements sufficient to help support sustainable communities in small, medium and large villages? Will the overall housing distribution be effective in meeting the Vision of the Plan?
- Q12. Were alternative distributions of development between the various tiers of the hierarchy considered? If so, why were they discounted?

Issue 3d – Lincoln Urban Area, Main Towns and Market Towns – Policies LP2 and LP3

- Q13. Policy LP2 states that additional growth will be considered favourably on non-allocated sites in appropriate locations in the Lincoln Urban Area, Main Towns and on the edge of Market Towns. In contrast, Policy LP55 restricts new dwellings in the countryside. How will it be decided if a site represents an *appropriate location* or *countryside* and, therefore, which plan policy should apply if the plan does not define a boundary between settlement and countryside? In this context, will the policy be effective and will it provide a clear indication of how a decision maker should react to development proposals? Should the plan include a clear definition of 'countryside', 'appropriate locations' and 'locations on the edge of market towns'? Is development in 'appropriate locations' necessary to ensure the housing requirement is met? What is the justification for this policy stance?
- Q14. Is the level of growth for Sleaford and Gainsborough appropriate? Page 109 of the Plan illustrates that there were only 54 completions in Sleaford between 2012 and 2015. Commitments on small sites at March 2015 were also relatively modest, with only 63 in Sleaford and 91 in Gainsborough. What were the reasons for this? In this context will the 4,435 dwellings be deliverable, and will the plan be effective? Is it appropriate to have 12% growth in these areas?
- Q15. What is the justification for Policy LP2 being unlikely to support proposals over 50 dwellings / 2ha on the edge of Market Towns?

Issue 3e – Large Villages – Policies LP2, LP3 and LP4

- Q16. Policy LP2 states that in exceptional circumstances additional growth from non-allocated sites in appropriate locations on the edge of large villages might be considered favourably, but are unlikely to be of a scale over 25 dwellings / 1ha in size. What is the justification for this policy stance? How are the 'exceptional circumstances' going to be considered and tested in a consistent and transparent manner across large and medium villages? Is the policy effective?
- Q17. What is the justification for setting a threshold of 25 dwellings? Is this appropriate and justified?

Issue 3f – Growth in Villages – Policy LP4

- Q18. Policies LP2 and LP4 accept the possibility of development on the edge of settlements in small, medium and large villages. In contrast, Policy LP55 restricts new dwellings in the countryside. How will it be decided if a site represents a development at the 'edge' of a village or in 'the countryside', and therefore, which policy should apply? In this context, will Policies LP2 and LP4 be effective and will they provide a clear indication of how a decision maker should react to development proposals? Should the plan include a clear indication of how this will be resolved when making development management decisions? As per Q13 above, should the plan include a clear definition of 'the edge of a village' for category 5 and 6 villages?
- Q19. In determining a development proposal Policy LP4 requires an assessment of the number of dwellings in the village, houses built since 2012, extant planning permissions and allocated sites to determine if capacity remains. A sequential test will also be involved and consideration of whether or not a site falls within the developed footprint or edge of a settlement (without a settlement boundary), and whether it is infill or not. In this context does Policy LP4 provide sufficient certainty to developers and local communities alike about where development will go and when? Does the policy comply with paragraph 154 of the Framework which requires that policies should provide a clear indication of how a decision maker should react to a development proposal?
- Q20. What is the justification for the maximum 10-15% growth levels identified for tier 5-6 settlements in Policy LP4? For example, is the aim of the policy to help ensure that development is focused in locations which are sustainable and/or to protect the character of villages and the surrounding countryside? Should the aim of the policy be clearly set out in the Local Plan? Will the policy be effective in achieving its aims?
- Q21. What evidence is there to justify higher 15% growth rates in some villages in Policy LP4?
- Q22. If Policy LP4 establishes that in principle, tier 5 and 6 villages will be permitted to grow by 10%, why are certain villages listed in the Table with a growth level of 10% alongside those permitted to expand by 15%?

-
- Q23. If some villages are heavily constrained by factors such as flood risk, or because they fall within an AONB, what is the justification for allowing the same amount of growth as an 'unconstrained' village? Is the 10% growth deliverable in such villages?
- Q24. What certainty is there that the expected rates of growth from windfall development in tier 5 and 6 villages will occur? Is Policy LP4, and subsequently the Local Plan, effective in this regard?
- Q25. What are the housing figures in Appendix B based on? Do they take into account commitments or the current total number of dwellings? Are they per Parish or per Settlement? Are they correct and up-to-date?
- Q26. Is **MM/SC/2** (relating to the monitoring of dwellings) necessary to make the plan sound? Are annual updates sufficient? How will this be carried out in a transparent manner?
- Q27. Where the growth level in a tier 5-6 village has been achieved, Policy LP4 states that proposals for additional housing will only be supported if there is demonstrable evidence of local community support or support from the Parish or Town Council. What is the justification for this? Is this based on land-use planning issues?
- Q28. What happens if existing commitments do not come forward, or are unlikely to come forward due to constraints/infrastructure/viability issues? Would this prevent other forms of sustainable development from being achieved?
- Q29. Equally, is it appropriate to preclude otherwise acceptable, small scale infill development in villages without local support if the percentage growth level has been exceeded? How will consistency in decision making be achieved across the different villages?
- Q30. Is the requirement for 'clear local community support' precise enough, and is the policy effective?
- Q31. Policy LP2 states that medium villages will accommodate a 'limited amount of development' and small villages 'small scale development' unless *"...otherwise promoted via a neighbourhood plan..."* Is this consistent with paragraph 184 of the Framework which requires neighbourhood plans to be in general conformity with, and reflect the strategic policies of the Local Plan?
- Q32. Does the Committee have a list of Parish Council's currently preparing a Neighbourhood Plan and confirmation of those that have been made? Do any of these include proposals for housing and if so, how do they relate to the policies in the Local Plan?
- Q33. Is the inclusion of a 'sequential test' appropriate, justified and consistent with the Framework? Is the sequential approach in the Policy justified?
- Q34. Is the approach to development in small and medium villages consistent with paragraph 55 of the Framework? Will there be enough growth in small, medium and large villages to help support sustainable rural communities? Is the Local Plan consistent with paragraph 55 of the Framework which states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities

-
- Q35. Is the inclusion of site allocation CL3044 in **MM/SC/1** necessary to make the plan sound? Aside from the allocated sites, how will future growth be considered in Hemswell Cliff, Lea and Canwick? Will they still be permitted to grow by 10% in principle in addition to the allocations? To be effective does the Local Plan need to specifically address how development proposals will be considered in these three 'exception' villages?

Issue 3g – Category 5 and 6 Villages – Policy LP4

- Q36. Is the proposed level of growth for each of the category 5 and 6 villages appropriate and justified having regard to their size, role, function and accessibility to employment, services and facilities?

Matter 4 – Sustainable Urban Extensions(LP28, LP30, LP39, LP44, LP48)

Issue 4a – Sustainable Urban Extensions

19) Policy LP28 is the overarching policy for all the SUEs in the Plan. In total an indicative 14,700 new dwellings are proposed over the plan period on 8 sites as follows:

- Western Growth Corridor, Lincoln
- South East Quadrant, Lincoln
- North East Quadrant, Lincoln
- South West Quadrant, Lincoln
- Gainsborough Northern Neighbourhood
- Gainsborough Southern Neighbourhood
- Sleaford South Quadrant
- Sleaford West Quadrant

General Questions – Policy LP28

- Q1. What was the process for identifying the SUEs, their size, location and distribution throughout Central Lincolnshire? How were they chosen?
- Q2. What was the rationale behind the reliance upon SUEs rather than smaller site allocations in order to meet the OAN?
- Q3. Were alternative locations for growth and SUEs considered and tested as part of the Local Plan preparation? Where is this set out?
- Q4. How was the mix of uses and number of dwellings / amount of employment land decided? What is the reason for requiring employment land within each of the SUEs (42ha in total) given the overall employment land need is only 23ha and Policy LP5 seeks to allocate 111ha of strategic employment sites? Should the SUE policies include a greater degree of flexibility regarding employment uses?
- Q5. Why does the amount of employment land vary from one SUE to another? How were the overall amounts decided?
- Q6. The SUE policies require 'employment use' to be provided (e.g. Policy LP30 – Lincoln Western Growth Corridor). What is meant by employment use? Does it mean land that is ready to be developed? Is the plan clear enough about what a developer is expected to provide?
- Q7. Are the constraints of each SUE clearly set out in the Local Plan?
- Q8. Taking into account physical and planning constraints, infrastructure and land ownership, are all of the SUE's capable of being delivered in a manner envisaged by the Plan? Are they all viable?

-
- Q9. What contingency arrangements are in place should one or more of the SUEs fails to come forward in the manner envisaged? Should the plan include a policy to ensure that sufficient housing land is delivered if monitoring identifies that any of the SUEs may not be deliverable/developable or would be significantly delayed? If so, what action would be appropriate and how and when would it be triggered?
- Q10. Why does Policy LP28a require proposals to demonstrate availability and deliverability – is that not a prerequisite for allocation?
- Q11. Are the infrastructure requirements of each SUE clearly set out in the Local Plan? Is it clear what developers are expected to provide to overcome constraints and to provide infrastructure?
- Q12. How will the necessary infrastructure be provided on each SUE, such as schools and healthcare provision? How does this relate to the phasing of development? Should this be set out in the Plan?
- Q13. Is it clear what developers will be expected to provide in terms of schools and healthcare provision - for example Policy LP30 (Lincoln Western Growth Corridor) requires a new primary school on site. Is it clear what the developer is being required to provide in terms of a site and buildings? On the other hand, the Sleaford South Quadrant (Policy LP44) refers to buildings and their specific sizes. Is the different approach justified?
- Q14. What is the rationale for the overall approach to incorporating gypsy and traveller sites on SUEs under Policy LP28? Is this justified? How will these sites be delivered?
- Q15. Should Policy LP28 refer to other services and facilities typically required by residents on a day-to-day basis, rather than just 'retail'? Will this be effective in achieving a balanced and mixed community and the aims and objectives of the policy? Is it clear what developers are being required to provide?
- Q16. Will it be clear to developers how much open space, recreation, leisure and community facilities will be required, and/or what is expected of new district, local and neighbourhood centres?
- Q17. Is the use of a 'broad concept plan' specific enough, or should Policy LP28 refer to the need for phased masterplans? Should the policy require that the masterplanning exercise identifies at what stage the relevant employment uses, transport connections, community facilities, retail, leisure, open spaces, education and recreational uses etc. should be provided? Will the policy be effective in this regard?
- Q18. Have the transport effects of each SUE been adequately assessed? Can they be developed without significant adverse effects? Is any mitigation required, and if so, is this made clear in the plan?
- Q19. Are any of the SUEs in Flood Zones 2 or 3? Are the allocations consistent with paragraph 100 of the Framework which states that Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change? Where is this set out?

Issue 4b – Western Growth Corridor – Policies LP30 and LP48

- Q20. The August 2016 Evidence Topic Paper⁵ summary table describes the detailed viability assessment as 'Ongoing 2016'. What does this refer to? When will it be complete? Why is it necessary when paragraph 4.4 of the Topic Paper confirms that the "...site is viable and deliverable..."
- Q21. The Committee's response⁶ to the Inspectors' Initial Questions states that applications have been, and will be, submitted for European, National, Regional and Local Funds to assist in enabling the earlier provision of housing and commercial development. What is the current position with regard to this funding? What implications do the possible outcomes have on the delivery of the SUE (for example in the event that no funding is forthcoming)?
- Q22. Is the site deliverable and developable in the plan period?
- Q23. The August 2016 Evidence Topic Paper refers to a phased development, with the infrastructure relating to community facilities and services, health, education and Gypsy and Traveller accommodation in the later phases. Should this approach be set out in the plan to provide sufficient certainty to developers and local communities?
- Q24. Representations from Highways England identify concern that the level of growth proposed across the Lincoln SUEs "...could place significant pressure on the A46 trunk road, particularly at the A46 Hykeham Roundabout". Have the effects of the SUE on the A46 been considered in light of Highway England's representations to the Local Plan? How will the effects of development be mitigated in this regard?
- Q25. Has an assessment been carried out to determine whether or not heat recovery from the North Hykeham Energy from Waste plant is feasible? Is the policy effective as currently worded?
- Q26. Are 'comprehensive solutions' available to reclaim and remediate the former tip? How does this affect viability?
- Q27. Is the park and ride area justified? Will it be clear to developers what they are required to provide and when? For example, how large should the park and ride be?

Issue 4c – South East Quadrant - Policies LP30 and LP48

- Q28. What is the current progress and timescale for completion of the Lincoln Eastern Bypass? Is there an upper limit on the number of dwellings that can be completed until the bypass is completed?
- Q29. What is the justification for Policy LP30 specifying that the Local Centre has to be 'small'? How would this be assessed as part of a development proposal? Is the Policy effective in this regard?

⁵ EO14B2

⁶ ED004

-
- Q30. Why are the costs associated with access, heritage, environmental considerations, design criteria, utilities and community facilities 'TBC' in the August 2016 Topic Paper⁷? On this basis what evidence is there to indicate the SUE is viable?
- Q31. The August 2016 Topic Paper also states that the costs to open the site up are assumed' – what evidence are these assumptions based on? It is reliable and justified?

Issue 4d – North East Quadrant - Policies LP30 and LP48

- Q32. What is the current status regarding the outline planning application submitted on the site? Has this now been granted planning permission following completion of the Section 106 Agreement? If so, when are reserved matters submissions expected?
- Q33. How does the outline planning application relate to the remainder of the SUE and its delivery? (i.e. the relationship between the land in West Lindsey and Lincoln City) Will this have an effect on the overall delivery and masterplanning of the SUE?
- Q34. Paragraph 4.3 of the August 2016 Topic Paper⁸ states that the affordable housing provision will be 10% for Phase 1 with a 'target' for 20% on later phases. Does this need to be reflected in the Local Plan if the 20% listed under Policy LP11 is not achievable? Why is a lower percentage justified?

Issue 4e – South West Quadrant - Policies LP30 and LP48

- Q35. What is the current status concerning the first part of Phase 1 of the Southern Bypass? How is this going to be funded / delivered? How does it affect the viability and deliverability of the site?
- Q36. Unlike the other Lincoln SUEs (which refer to specific types of schools) Policy LP30 states only that 'appropriate' levels of education provision will be provided on site with scale 'to be determined'. Is this precise enough? What is expected of developers in this regard? Does it give the community sufficient certainty regarding what will be delivered?
- Q37. Policy LP30 requires a detailed odour assessment 'to demonstrate no adverse impact on future residents'. Has consideration been given to the proximity of the South Hykeham Water Recycling Centre? What happens if an odour assessment finds adverse impacts? Could they be satisfactorily mitigated without compromising the delivery of the planned development? To be effective does Policy LP30 need to refer to any necessary mitigation through the design, layout and masterplanning process? What about non-residential occupiers?

Issue 4f – Gainsborough Southern Neighbourhood SUE – Policies LP39 and LP48

- Q38. What is the current position regarding outline planning permission?
- Q39. What is the justification behind the provision of 2,000m² of Class A1 retail in Policy LP39? Is this gross or net? How does it relate to the mix of uses in the outline planning permission?

⁷ E014C2

⁸ E014A2

-
- Q40. To be effective should the policy reflect the mix of uses that have been approved?
- Q41. Why does Policy LP39 not make provision for Class B8 uses?
- Q42. Is the allocation compatible with the site forming part of an Area of Great Landscape Value? Were options considered which would avoid such areas, and if so, why were they rejected?

Issue 4g – Gainsborough Northern Neighbourhood SUE - Policies LP39 and LP48

- Q43. Why, compared to the southern SUE, must delivery of the employment land come forward alongside or before residential completions? Is this justified? How will this affect the delivery of housing?
- Q44. What are 'appropriate contributions' towards secondary education provision? Does the Policy need to be more precise? Is it effective?
- Q45. What is the current status regarding the planning application 'expected Summer 2016'?
- Q46. Is the allocation compatible with the site forming part of an Area of Great Landscape Value? Were options considered which would avoid such areas, and if so, why were they rejected?

Issue 4h – Sleaford South Quadrant SUE – Policies LP44 and LP48

- Q47. What is the current position regarding outline planning permission? Have any reserved matters submissions been made?
- Q48. What is the justification for the precise floorspace requirements in Policy LP44? Are the figures gross or net?
- Q49. The August 2016 Topic Paper⁹ sets out different affordable housing thresholds for different phases. Why is this? What is it based on? Should it be set out in the Local Plan?

Issue 4i – Sleaford West Quadrant SUE - Policies LP44 and LP48

- Q50. What is the rationale for only providing employment uses falling in Class B1? Have other uses been considered, would they be appropriate or suitable and contribute towards the Vision of the Plan?
- Q51. How have the access arrangements been determined? What evidence underpins taking the primary access from the A15? Who will provide this? Is it viable and deliverable?
- Q52. The August 2016 Topic Paper¹⁰ states that a detailed viability appraisal is 'underway'. When is this likely to be completed? What evidence is there that the site is viable and deliverable?
- Q53. The August 2016 Topic Paper also indicates that affordable housing on site will be 'up to 35%'. What is this based on? How does it relate to the Local Plan through Policy LP11?

⁹ E014G2

¹⁰ E014H2

Q54. What is the justification for the specific infrastructure requirements? For example, Policy LP44 states that the local centre should be 1ha, a healthcare facility of 0.5ha and a minimum of 'mainly' B1 use classes. What is this based on? Why is it different to the other SUEs?

Matter 5 – Residential Allocations and Development in the Countryside (LP49, LP50, LP51, LP52, LP53, LP54, LP55)

- 20) In addition to the SUEs Policy, LP49 predominantly allocates sites for residential development in the Lincoln Urban Area, the Main Towns of Gainsborough and Sleaford, Market Towns and Large Villages. Some sites with planning permission are also allocated in Medium and Small Villages, with more proposed through the Council's suggested Main Modifications¹¹.
- 21) The following Issues and Questions primarily relate to the rationale and justification for the allocations in each tier of the hierarchy. Discussions at the Hearing sessions will be based upon the following questions and applied to the Lincoln Urban Area allocations, Main and Market Town allocations and allocations in Large Villages.

Issue 5a – General Questions

- Q1. Was the site selection process robust? Were an appropriate selection of potential sites assessed? Were appropriate criteria taken into account in deciding which sites to select and was the assessment against these criteria robust? How was the red, amber, green scoring system in the *Residential Allocations Evidence Report* used to arrive at conclusions on the preferred allocations? Was any weighting given to particular criteria or scores? How was the Integrated Impact Assessment Score used given it is omitted from some site assessments? Was the previously developed status of land taken into account?
- Q2. Are there any significant factors that indicate that any sites should not have been allocated?
- Q3. Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery? Are all sites viable and deliverable?
- Q4. Are the site boundaries correctly defined?
- Q5. Are the assumptions regarding the density of development and net developable areas justified and based on available evidence?
- Q6. The April 2016 Residential Allocations Evidence Report¹² states that a site threshold of 25 dwellings was used to consider potential allocations as this allowed Officers to 'focus on sites that would make a significant contribution to housing supply'. Is this consistent with the PPG (3-010-20140306) which states that plan makers will need to assess a range of different site sizes and should consider all sites capable of delivering five or more dwellings? What impact does adopting a higher threshold have on the effectiveness of the Local Plan?
- Q7. Did the Constraints and Sustainability Assessment in the Residential Allocations Evidence Report assess each site against any relevant national/local planning policies and/or designations to establish which have reasonable potential for development?

¹¹ LP05

¹² PS.EVR48-54

Issue 5b - Allocations in Lincoln Urban Area – Policy LP49

- Q8. Are the allocations in the Lincoln Urban Area justified, effective and consistent with national policy?

Issue 5c – Allocations in Main Towns (Gainsborough and Sleaford – Policy LP50) and Market Towns (Caistor and Market Rasen – Policy LP51)

- Q9. Are the allocations in the Main Towns and Market Towns justified, effective and consistent with national policy?
- Q10. What are the reasons for the revised indicative dwelling capacity on site CL4686? Why has this been reduced from 450 to 245 units? Is **MM/SC/5** necessary to make the Local Plan sound?

Issue 5d – Allocations in Large Villages – Policy LP52

- Q11. Are the allocations in the Large Villages justified, effective and consistent with national policy?
- Q12. Is the addition of allocation CL4007 through **MM/SC/6** necessary to make the Local Plan sound? Is this necessary? Does the allocation materially affect the spatial distribution of housing or position of Bardney within the hierarchy of villages?
- Q13. How was the scale of development proposed in allocation CL1100, and cumulatively with other allocations in Witham St Hughs defined? Is the level of growth proposed comparable with other Large Villages in the Lincoln Strategy Area?

Issue 5e – Allocations in Medium and Small Villages – Policy LP53

- Q14. Are the allocations in the Medium and Small Villages justified, effective and consistent with national policy?
- Q15. Should the plan take a more comprehensive approach to providing allocations (say under 25 dwellings) in Medium and Small villages commensurate with their size, role, function and accessibility to services?
- Q16. It is necessary to add additional allocations proposed through **MM/SC/7**? Is MM/SC/7 necessary to make the Local Plan sound?

Issue 5f – Development in Hamlets and the Countryside – Policy LP55

- Q17. Policy LP55 Part A refers to the re-use and conversion of non-residential buildings for residential use in hamlets and the countryside. What criteria and/or policies apply to similar proposals in small villages
- Q18. Similarly, how does the Local Plan provide a basis upon which to assess the re-use and conversion of non-residential buildings in the Lincoln Urban Area or adjacent to Main / Market Towns?
- Q19. As identified through Issues 3c and 3d above, Policies LP2, LP3 and LP4 accept the possibility of development on the edge of settlements. In contrast, Policy LP55 restricts new dwellings in the countryside. In this context how will the 'countryside' and 'appropriate locations' (as per Policy LP2) be defined? Does Part D need to provide a caveat, explanation and/or

or other mechanism so as not to preclude residential development under Policies LP2 and LP4?

- Q20. Is Part G consistent with paragraph 112 of the Framework which states that *"local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality."*

Matter 6 – Housing Land Supply (LP2, LP3, LP4, LP49, LP50, LP51, LP52, LP53, LP54)

Issue 6a – The Five-Year Housing Land Requirement

- 22) Based on the SHMA the Submission Local Plan identifies a housing requirement for 36,960 dwellings between 2012 and 2036 (or 1,540 dpa). This provides a basic five-year housing requirement of 7,700 houses based on a flat trajectory as identified on page 109 of the Local Plan.
- Q1. Taking into account the reliance upon SUEs, is a flat trajectory realistic and appropriate? If not, what should it be? Should it be re-profiled so that the annual targets are lower earlier on in the plan period and higher later on?
- 23) The September 2016 *Central Lincolnshire Five Year Land Supply Report*¹³ confirms that between 1 April 2012 and 31 March 2016 a total of 3,735 units were completed. This is roughly 2,425 less than the basic five-year requirement.
- 24) The PPG (Ref ID: 3-035-20140306) states that local planning authorities should aim to deal with any undersupply within the first five years of the plan period where possible. This approach has been set out in the updated Five Year Land Supply Report (i.e. the 'Sedgefield' approach)
- Q2. Taking into account the number of allocations in the Local Plan, and the strategic nature of the SUEs and their anticipated commencement, is this method the most appropriate? Alternatively, should the undersupply be spread over a longer period of time? (i.e. the 'Liverpool' approach)
- 25) Paragraph 47 of the Framework states that to boost significantly the supply of housing, local planning authorities should identify and update annually a deliverable five-year supply of housing, with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and completion in the market for land. Where there has been a record of persistent under delivery this should be increased to 20% to provide a realistic prospect of achieving the planned supply and also to ensure choice and competition in the market for land.
- 26) In making this assessment the PPG advises that the assessment of a local delivery record is likely to be more robust if a longer-term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle.
- Q3. Taking into account a longer-term view how have the three authorities performed against their annual housing requirements, both individually and cumulatively? Could this data be provided by the Committee? Does this represent the 'persistent undersupply' defined by the Framework? In this context, should the buffer be 5% or 20%?
- 27) The updated Five Year Housing Land Supply Report indicates that the 20% buffer should be applied to the basic five-year requirement (i.e. 20% of 7,700 = 1,540), rather than the five-year requirement including any previous undersupply.

¹³ E007D

-
- Q4. Is this approach justified and is it the most appropriate methodology to adopt in this scenario? Shouldn't the buffer be applied to the annual requirement *after* undersupply since the start of the Plan period has been added?
- 28) The latest Five Year Land Supply Report identifies a supply of deliverable sites sufficient to provide roughly 12,712 dwellings in the next five years. Based on the 'Sedgefield' method and applying the buffer only to the basic requirement this would provide enough land for around 5.26 years. Under the 'Liverpool' method the report cites a supply of some 6.4 years.
- Q5. What would the five-year housing land requirement be, for both the 'Sedgefield' and 'Liverpool' methodologies, if the 20% buffer was applied to the average annual requirement and accounted for any undersupply? What would be the five year supply if a 5% buffer was applied?

Issue 6b – Housing Land Supply – General Questions

- Q6. For development management purposes will the five-year housing land supply position be based on a Central Lincolnshire figure, or per local authority area? To be effective does this need to be clearly set out in the Local Plan, along with direction on what should happen if one particular area has an undersupply, but others do not?
- Q7. Are the totals for completed sites and sites under construction correct and up-to-date? Does this include sites which have been granted planning permission which are now proposed as allocations in the Local Plan (as per **MM/SC/6** and **MM/SC/7**)?
- 29) The PPG (Ref 3-031-20140306) advises that planning permission or allocation in a development plan is not a prerequisite for a site being deliverable in terms of the five-year supply. Local planning authorities will need to provide clear evidence to support the deliverability of sites, ensuring that their judgements on deliverability are clearly and transparently set out.
- 30) The PPG (Ref 3-031-20140306) also confirms that the size of sites will be an important factor in identifying whether a housing site is deliverable within the first five years. It advises that plan makers will need to consider the time it will take to commence development on site and build out rates to ensure a robust five-year housing supply.
- Q8. What lead-in times and delivery rates have been used to underpin the assumptions regarding the deliverability of sites? What is this based on? Where is it set-out?
- Q9. Have the same delivery rates and lead-in times been used on a consistent basis across Central Lincolnshire, or does the location of a development mean that a varied approach should be used?
- Q10. Do the delivery rates and lead-in times take account of the size of sites and the possibility that there will be more than one developer on larger sites / SUEs?
- Q11. Does the list of sites 'with planning permission' make any allowance for sites with outline planning permission where subsequent reserved matters submissions will be necessary before works start on site?

-
- Q12. Some of the sites identified in Appendix 1 to the updated Five Year Housing Land Supply Report are listed as not currently having planning permission but where units are expected in Years 2016/17 and 2017/18 – is this realistic and justified? If so, where is this set out?

Issue 6c – Housing Land Supply – Site Specific Questions

Sustainable Urban Extensions

- Q13. Lincoln Western Growth Corridor – 275 units are estimated to come forward in the next five years. The August 2016 Topic Paper states that detailed viability assessments are ongoing, that a planning application is not expected until 'summer 2017' and that the infrastructure required to unlock the site is estimated to cost £17.5m. Is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?
- Q14. Lincoln North East Quadrant – 250 units are estimated to come forward in the next five years with the first houses delivered in 2017/18. The August 2016 Topic Paper confirms that conditions need to be discharged, the site marketed, a developer secured and reserved matters submissions made and approved. Is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?
- Q15. Lincoln South East Quadrant – 420 units are estimated to come forward in the next five years with 60 houses in year 3, 160 in year 4 and 200 in year 5. The August 2016 Topic Paper indicates that there will be 4/5 developers on site each delivering around 40 dpa. What is this based on? How many developers have been secured so far? Is the delivery of up to 200 houses a year justified?
- Q16. The Topic Paper also confirms that no planning permission is in place. Is the estimated delivery realistic, reasonable and justified considering the time required to secure planning permission, sign Section 106 agreements, discharge conditions and get developers involved and building?
- Q17. Lincoln South West Quadrant – what is the reason for not including any dwellings within the first five years? Do the same reasons apply to other SUEs?
- Q18. Gainsborough Northern Neighbourhood – 150 units are estimated to come forward in the next five years with the first houses delivered in 2018/19. The August 2016 Topic Paper suggests that an outline planning application is 'expected late summer 2016'. Taking into account that this would need to be considered, approved, a Section 106 agreed, conditions discharged, the site marketed, a developer secured and reserved matters submitted and approved, is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?
- Q19. Gainsborough Southern Neighbourhood – 200 units are estimated to come forward in the next five years with the first houses delivered in 2017/18. The August 2016 Topic Paper confirms that conditions are yet to be discharged and that the site needs marketing, a developer securing and reserved matters submitted and approved. Is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?

-
- Q20. Sleaford South Quadrant – 230 units are estimated to come forward in the next five years with the first houses delivered in 2018/19. Is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?
- Q21. Sleaford West Quadrant - 340 units are estimated to come forward in the next five years with the first houses delivered in 2018/19. The August 2016 Topic Paper confirms that the outline planning application is still under consideration. Is this still the same? Bearing in mind that conditions would need to be discharged, a Section 106 agreed, the site marketed, a developer secured and reserved matters approved, is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?

Other Site Allocations

- Q22. CL525 – Former CEGB Power Station, Lincoln – 250 units are estimated to come forward in the next five years. However, the *Central Lincolnshire Plan Viability and Community Infrastructure Levy Study*¹⁴ indicates that *"...The biggest constraint and abnormal cost for this site is the need to relocate the existing EON / Western Power cabling and kit which would involve a five year lead in time to move, and requires some 80% of the £5.226m costs upfront to facilitate... Given the site's complications and abnormal works required to clear this site for development, delivery is not expected to take place in the first five years of the plan, and this scheme should be considered as part of the medium to longer term strategy"* Is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?
- Q23. CL704 – Land rear of Newark Road, Lincoln – 150 units are estimated to come forward all within 2019/20. Is this correct? What is the delivery based on?
- Q24. CL4652 – Land at Usher Junior School, Lincoln – 60 units are estimated to come forward in the next five years. The Committee's response to the Inspector's Initial Questions indicates that this involves the possible loss of a playing field. What is the position regarding this site? Will it be necessary to provide alternative provision? Is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?
- Q25. CL4686 – Gateway Riverside Housing Zone, Gainsborough – 120 units are estimated to come forward in the next five years. Does the reduction in capacity as a result of the Local Development Order affect the delivery of the site and the number of dwellings likely to be achieved in the next five years? Is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on? What is the relationship with allocations CL4687, CL4688, CL4689? Will these sites be delivered jointly or are they independent of one another?

¹⁴ E011

-
- Q26. CL1014 – Grantham Road, Sleaford – 260 units are estimated to come forward in the next five years, with 20 units delivered in 2017/18. What is the position regarding planning application 14/1257/OUT? Should conditions need to be discharged, legal agreements signed and reserved matters submitted and approved is the estimated delivery realistic, reasonable and justified? What is the reason for increasing delivery to 80 dpa in years 4 and 5? What evidence is the delivery trajectory based on?
- Q27. CL417 – Land off Moor Lane, Branston – 73 units are estimated to come forward in the next five years, with 20 units delivered in 2017/18. Does the planning permission relate to a full or outline application? If outline is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?
- Q28. CL418 – Land at Silver Street, Branston - 188 units are estimated to come forward in the next five years, with 40 units delivered in 2017/18. Does the planning permission relate to a full or outline application? If outline is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?
- Q29. CL4667 – Land south of Fen Road, Heighington – 49 units are estimated to come forward in the next five years, with 40 units delivered in 2017/18. Does the planning permission relate to a full or outline application? If outline is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?
- Q30. CL904 – Land northwest of Metheringham – 140 units are estimated to come forward in the next five years. Is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?
- Q31. CL906 – Land at Top Farm, Navenby – 125 units are estimated to come forward in the next five years, with 30 units delivered in 2018/19. What is the status regarding any planning applications on this site? The Committee’s response to the Inspectors’ Initial Questions refers to active owners pursuing applications and appeals. Is a development proposal subject to an appeal? Is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based
- Q32. CL994 – Land east of Lincoln Road, Skellingthorpe – 180 units are estimated to come forward in the next five years, with 20 units delivered in 2017/18. Does the planning permission relate to a full or outline application? If outline is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?
- Q33. CL4496 – Land east of Grantham Road and south of Millers Road, Waddington - 142 units are estimated to come forward in the next five years, with 40 units delivered in 2018/19. Does the planning permission relate to a full or outline application? If outline is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?
- Q34. CL4469 – Land east of Canterbury Drive, Washingborough - 185 units are estimated to come forward in the next five years, with 50 units delivered in 2018/19. Does the planning permission relate to a full or outline application? If outline is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?

-
- Q35. CL1491 – Land east of Prebend Lane, Welton - 175 units are estimated to come forward in the next five years, with 35 units delivered in 2017/18. Does the planning permission relate to a full or outline application? If outline is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?
- Q36. CL1100 – Land north of Witham St Hughs (Phase 3) – 360 units are estimated to come forward in the next five years, with total output in years 4 and 5 of 120 dpa. How many developers are envisaged to be working on the site? Is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?
- Q37. CL3018 – Billingham Field, Mill Lane, Billingham – 120 units are estimated to come forward in the next five years. Is planning permission and/or a developer in place? Is the estimated delivery realistic, reasonable and justified? What evidence is the delivery trajectory based on?

Issue 6d – Five-Year Housing Land Supply Conclusion

- Q38. Having regard to the answers provided to the questions above, is the trajectory on page 109 of the Local Plan justified and will there likely to be a five-year supply of deliverable housing sites on adoption of the plan?
- Q39. Is there likely to be a sufficient supply of housing land throughout the lifetime of the plan?
- Q40. What flexibility does the plan provide in the event that the SUEs and other large housing sites do not come forward in the timescales envisaged? Is it necessary to have a review mechanism in the Plan to consider progress against the delivery of these sites and to identify any appropriate steps to help increase supply, if appropriate?

Issue 6e – Broad Locations for Future Growth – Policy LP54

- Q41. What is the justification for identifying broad locations for future growth? What are the locations based on and how have they been determined? Are the locations justified, and are the criteria to trigger their development clear, reasonable and justified?

Matter 7 – Employment Land, the Visitor Economy and Retailing (LP3, LP5, LP6, LP7)

Issue 7a – Employment Land – Policy LP5

- 31) The *Central Lincolnshire Economic Needs Assessment (ENA)*¹⁵ states that between 23 ha (Baseline Scenario) and 53 ha (Adjusted Scenario (Higher Growth)) of land will be required for 'B' Use Classes over the plan period. Paragraph 3.5.10 confirms that the Local Plan allocates 23ha of new employment land.
- Q1. Should the Local Plan set out the requirement for employment land in the same way as it does for housing? Is the OAN/requirement intended to be 23ha?
- 32) The ENA also states that in order to plan positively for potential future employment growth it is considered best practice to add a margin of choice/flexibility factor to the figures. The ENA confirms that this is not an exact science but an allowance equivalent to five years supply would be appropriate for enabling the Council's to remain responsive to potential changes and increased market demand. An allowance for losses is also required to account for land recycled for alternative uses, such as residential. With this in mind:
- Q2. Policy LP5 allocates 153.1ha of employment land on Strategic Employment Sites (SES) and Employment provision on Sustainable Urban Extensions (ESUEs). Given the need identified in the ENA is this appropriate and justified?
- Q3. Is the job target of 11,894 justified? How much of this will be achieved from development proposals in the Local Plan, including employment sites?
- Q4. How were the sites selected? What factors were taken into account? Where is this evidenced? Has a robust process been followed including the consideration of alternatives?
- Q4.a *How were the Established Employment Areas (EEAs) selected? What factors were taken into account? Are they justified?***
- Q5. What evidence is there that the amount of land proposed for employment is deliverable and likely to be developed over the plan period? ***Is the overall strategy for job growth and employment appropriate and justified, and does it adequately reflect the existing and future needs of rural businesses?***
- Q6. How much of the allocated employment land has extant planning permission?
- Q7. What is the rationale for seeking employment land on most of the SUEs, and will this be deliverable?
- Q8. Why does the Sleaford South Quadrant SUE contain no employment land?

¹⁵ E008

-
- Q9. For clarity should the amount of employment land be listed alongside dwelling numbers in Policy LP3? Is reference to an 'appropriate amount of employment land' specific enough to be effective?

Issue 7b – Local Employment Sites – Policy LP5

- Q10. What is intended by 'the amenities of the area' in Policy LP5? Is this policy effective as currently worded?

Issue 7c – Loss of Employment Sites to Non-Employment Uses – Policy LP5

- Q11. What is the justification for retaining the established employment areas in Policy LP5?
- Q12. The first criteria requires consideration of "...whether the loss of land or buildings would adversely affect the economic growth and employment opportunities in the catchment area the site or building would likely serve..." How is the catchment area defined? Is the policy effective?
- Q13. The final criterion requires a marketing exercise based on the lawful use of the premises. What if there is no demand for a B8 use but there is for a B1 or B2 operator? It is intended that all 4 criteria would need to be met or just one? Does the Policy achieve its aims and objectives in this regard? Is this policy effective?
- Q14. Is Policy LP5 consistent with paragraph 22 of the Framework which states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose? Does it provide the necessary flexibility?

Issue 7d – Retail and Town Centres – Policy LP6

- Q15. What criteria have been used to determine the hierarchy of centres? Does this relate to the size and existing provision within settlements?
- Q16. Have the town centre boundaries, primary and secondary frontages, and secondary shopping areas been appropriately defined in Lincoln, Gainsborough and Sleaford?
- Q17. Should Policy LP6, or elsewhere in the Local Plan, set out a requirement for additional convenience and comparison floorspace as established by the Central Lincolnshire and Town Centre Study Update¹⁶? How will this be delivered?
- Q18. Is the requirement for 'other town centre uses' to carry out a sequential test consistent with the Framework?
- Q19. Where an impact assessment is required, Policy LP6 refers to retail proposals. Is this consistent with paragraph 26 of the Framework which refers to applications for retail, leisure and office developments? Does it need to be?
- Q20. How have the thresholds and locations for impact assessments been derived? What are they based upon?

¹⁶ E019A

-
- Q21. In accordance with paragraph 23 of the Framework does the Local Plan set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres?

Issue 7e – Sustainable Visitor Economy – Policy LP7

- Q22. Does Policy LP7 need to recognise that some visitor sites are location specific, for example, their operation needs to be situated close to a particular area and so cannot always be located within existing settlements?
- Q23. Does Policy LP7 need to set out how a decision maker would respond to development that seeks to expand or consolidate an existing, established visitor facility?

Q23.a Does the Local Plan adequately take into account the role and function of Market Rasen Racecourse?

Issue 7f – Lincolnshire Showground – Policy LP8

- Q24. What is the current status of the Local Development Order (LDO)?
- Q25. What are the specific uses and thresholds in Policy LP8 based on? Are they justified and appropriate?
- Q26. Policy SP8 states that a masterplan will be 'welcomed' – is this effective? Is a masterplan necessary, if so, should it be reflected in the Plan?

Matter 8 – Infrastructure, Accessibility and Transport and Community Facilities (LP12, LP13, LP15)

Issue 8a – Infrastructure – Policy LP12

- 33) Policy LP12 states that planning permission will only be granted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the necessary requirements arising from a development. Conditions or planning obligations will be used to ensure that proposals deliver the necessary infrastructure required.
- Q1. To be effective is it necessary clearly specify what is 'infrastructure' for the purposes of Policy LP12 and what will be provided as part of the CIL charging schedule for the area?
- Q2. Does Policy LP12 need to make reference to the relationship between providing additional infrastructure and the viability of a development proposal? How will this be considered?
- Q3. Have the cumulative effects of the Plan and its growth strategy for housing and employment been tested against the existing road infrastructure, particularly the A46? Is the plan justified in this regard and likely to be effective in delivering the Vision?

Issue 8b – Accessibility and Transport – Policy LP13

- Q4. Policy LP13 states that that all development proposals should contribute towards the delivery of transport objectives e-q, either directly or through developer contributions. Is this appropriate for small-scale developments?
- Q5. Will all of the related transport infrastructure in Policy LP13 form part of each Council's CIL Regulation 123 list?
- Q6. Are the Lincoln Eastern Bypass (LP36) and Sleaford Link Road (LP47) justified and deliverable? What evidence is there for this? Is any planned development dependent on either of these roads?

Issue 8c – Community Facilities – Policy LP15

- Q7. Is the first part of Policy LP15 effective? How would a decision maker be required to determine whether or not all development proposals have recognised that community facilities are an integral component of sustainable development?
- Q8. Should Policy LP15 set out criteria for an applicant to meet in demonstrating that a site is no longer viable? How will this be determined?
- Q9. Under the heading 'Existing Facilities' Policy LP15 refers to the loss 'via redevelopment'. Should the policy also refer to loss by demolition?

Matter 9 – Lincoln (LP29, LP31, LP32, LP33, LP34, LP35, LP36, LP37)

Issue 9a – Lincoln

- Q1. Is the introduction of a reference to Lincoln Castle through **MM/SC/4** necessary to make the plan sound?
- Q2. To be effective does Policy LP31(d) need to specify what the 'Lincoln area' refers to? Is this the urban area / strategy area or somewhere different?
- Q3. Policy LP32 supports higher and further education establishments in the City, but what about any located elsewhere? How are they considered in the Local Plan?
- Q4. To be effective in meeting the Vision of the Plan does Policy LP33 need to make reference to the Lincoln Masterplan?
- Q5. Paragraph 23 of the Framework states that in drawing up Local Plans local planning authorities should "*allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of suitable sites.*" Has this exercise been carried out? How does the Local Plan seek to ensure that the right amount of land is available in the right places to meet the needs for retail, leisure, office and other main town centre uses?
- Q5.a Does Policy LP33 provide sufficient certainty to decision makers, developers and the local community regarding the relevant tests for main town centre uses proposed outside the Primary Shopping Area in Lincoln? Is Policy LP33 consistent with the Framework in this regard?**
- Q6. Why is it necessary for retail, leisure and/or office developments to meet a need within the 'immediate locality' under Policy LP34? Is this justified and consistent with the Framework? How will the 'immediate locality' be determined for the purpose of the decision making process?
- Q7. What is the justification for only having Class A2 uses at ground floor and Class B1 uses on upper floors in the South High Street Regeneration and Opportunity Area in Policy LP35? Does this represent the flexible approach to development that is encouraged in supporting paragraph 7.9.3?

Matter 10 – Gainsborough (LP38, LP40, LP41, LP42)*Issue 10a – Gainsborough*

- Q1. What is the justification for Policy LP38 criterion a. which seeks to preserve and enhance the special character, setting and appearance of conservation areas?
- Q2. Are the 'important local views' in Policy LP38 set out anywhere? To be effective should they be set out in the Plan?
- Q3. Is the requirement for proposals to 'protect and enhance' the landscape character and setting of Gainsborough and the surrounding villages justified? Is it consistent with paragraph 109 of the Framework which refers to protecting and enhancing valued landscapes? Does the Local Plan need to distinguish between any areas of valued landscape in and around Gainsborough and the surrounding villages?
- Q4. Policy LP40 refers to 'all relevant development proposals' and the requirement that they 'must' assist in the delivery of the long term aim of creating an uninterrupted and attractive pedestrian and cycle corridor connecting the riverside area with Lea and Morton. It is justified to require that all development proposals must contribute to this corridor, even small scale development proposals? How will development proposals assist in its delivery? Is it clear to decision makers, developers and communities what is required of development along the Gainsborough Riverside under Policy LP40?
- Q5. What is a 'town centre use' for the purpose of Policy LP42? Does this need to be defined in the Local Plan? Similarly, what is a 'recognised town centre use' under criteria a.? Is a consistent approach required? Is the policy effective in this regard?
- Q6. Is the requirement for non-retail uses not to affect the 'broad area' in which they are located precise enough under Policy LP42 criteria b.? Is the policy effective in this regard?

Matter 11 – Sleaford (LP43, LP45, LP46, LP47)*Issue 11a – Sleaford*

- Q1. What is the justification for Policy LP38 criterion a. which seeks to preserve and enhance the special character, setting and appearance of conservation areas?
- Q2. Are the 'important local views' in Policy LP43 set out anywhere? To be effective should they be set out in the Plan?
- Q3. Is the requirement for proposals to 'protect and enhance' the landscape character and setting of Sleaford and the surrounding villages justified? Is it consistent with paragraph 109 of the Framework which refers to protecting and enhancing valued landscapes? Does the Local Plan need to distinguish between any areas of valued landscape in and around the Sleaford and the surrounding villages?
- Q4. To be effective should Sleaford's Regeneration and Opportunity Area's under Policy LP45 be identified on the policies map?
- Q5. Should the 'former Advanta Seeds site' be allocated and illustrated on the Policies Map given its inclusion within Policy LP45?

Matter 12 – Health, Well-being and Accommodation Needs (LP9, LP10)

Issue 12a – Health and Well-being – Policy LP9

- Q1. What is the threshold of 25 dwellings / 0.5ha based for a Health Impact Assessment (HIA) based on? Why does this requirement only relate to housing proposals?
- Q2. Is this requirement justified, consistent with national policy, and likely to be effective in helping to deliver the plan's Vision?

Issue 12b – Meeting Accommodation Needs – Policy LP10

- Q3. The PPG states that local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard. It also advises that local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans (Ref ID 56-002-20160519). Has such an assessment been carried out and does it justify Policy LP10?
- Q4. The PPG also states that local planning authorities should consider the impact of using optional Building Regulation requirements and the nationally described space standard as part of their Local Plan viability assessment (Ref 56-003-20150327). Has this been carried out? Have the standards been tested to ensure that new residential development would still be viable and deliverable?
- Q5. What are the thresholds for proposals of 6 or more dwellings (or 4 or more dwellings in small villages) based on? Is this justified?
- Q6. Paragraph 4.4.6 states that developments should have regard to evidence of need contained within the latest SHMA, Central Lincolnshire Housing Growth Plan or other appropriate evidence such as the Joint Strategic Needs Assessment and the Lincolnshire Extra Care Strategy. However, Policy LP10 only requires regard to be had of the latest SHMA. Is the policy effective? If other evidence comes forward ahead of the latest SHMA does the policy have the requisite flexibility to respond to changing housing needs and market signals?

Matter 13 – Design and the Natural Environment (LP26, LP14, LP16, LP17, LP18, LP19, LP21)

Issue 13a – Design – Policy LP26

- Q1. It is possible for a development proposal to both 'respect' and 'enhance' local distinctiveness? Is this consistent with paragraph 60 of the Framework which states that it is proper to seek to promote or reinforce local distinctiveness? Policy LP26k also requires materials to 'reinforce or enhance'. To be effective is a more consistent approach needed?
- Q2. What is the justification for preventing development that results in ribbon development or extends existing linear features of a settlement? How does this relate to Policies LP2 and LP4 of the Local Plan which allows for new development on the edges of a settlement, and residential allocations?
- Q3. Should Policy LP26m-u require applicants to consider amenity issues in relation to the construction phase? If the effects of construction were adverse in respect of these criteria would planning permission be refused?
- Q4. What is a 'bad neighbour' for the purposes of Policy LP26? Is this precise enough? Is the policy effective in this regard?

Issue 13b – Landscape, Townscape and Views – Policy LP17

- Q5. How have the Areas of Great Landscape Value been determined? What evidence are the designations based on?
- Q6. Are the designations justified, effective and consistent with national policy? Are there any significant factors that indicate that any sites or areas should not have been designated?
- Q7. Are there any areas where evidence-based documents recommended inclusion as part of an Area of Great Landscape Value that were not taken forward into the Local Plan? If not, why not? Is this justified?
- Q8. What is the justification for including land at Urban Street, Bracebridge Heath (site CL416) within an Area of Great Landscape Value?
- Q9. For purposes of Policy LP17 how are 'key local views and vistas' defined? Does this give certainty to decision makers, developers and communities? Is the policy effective in this regard?

Issue 13c – Climate Change and Renewable Energy – Policies LP18 and LP19

- Q10. The Written Ministerial Statement of 25 March 2015 states that local planning authorities should not set in their emerging Local Plans any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings. Does Policy LP18 introduce any new standards relating to the construction of buildings that are inconsistent with national planning policy?

Issue 13d – Water Resources and Flooding – Policy LP14

- Q11. The PPG states that all new homes already have to meet the mandatory national standard in the Building Regulations of 125 litres/person/day. Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations requirement of 110 litres/person/day (Ref ID 56-014-20150327). Is the standard of 110 litres/person/day in Policy LP14 justified on available, up-to-date evidence?
- Q12. Is the requirement to meet the tighter standard location specific, or does it apply to proposals across Central Lincolnshire? If so, is there a need for a higher requirement across the whole plan area?
- Q13. The PPG also states that it will be for a local planning authority to establish a clear need based on, amongst other things, a consideration of the impact on viability and housing supply of such a requirement. Has this been done? Will the standard of 110 litres/person/day be viable?
- Q14. Is the Local Plan based on the most up-to-date Water Cycle Study and Strategic Flood Risk Assessment? Are updates to either document material to the Local Plan?

Issue 13e – Biodiversity – Policy LP21

- Q15. Is Policy LP21 consistent with paragraph 117 of the Framework, in particular with regard to the need to plan for biodiversity at a landscape-scale across local authority boundaries, and, identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation?
- Q16. What is the definition of 'major development' for the purposes of Policy LP21? To be effective does this need to be set out in the Plan? The supporting text refers to 'large scale major development schemes'. Is this the same? Is a consistent approach required?

Matter 14 – The Historic Environment (LP25)

Issue 14a – The Historic Environment

- Q1. In considering proposals that 'affect the significance of a heritage asset', does Policy LP25 need to make a distinction between substantial and less than substantial harm to be consistent with paragraphs 126-141 of the Framework?
- Q2. Following on from Q1, does Policy LP25 need to more explicitly reflect paragraph 134 of the Framework which states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- Q3. In its approach to 'Listed Buildings' in Policy LP25 is the plan consistent with paragraph 132 of the Framework which states that substantial harm to or loss of a grade II listed building, park or garden should be 'exceptional'. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be 'wholly exceptional'.
- Q4. Is the requirement for planning applications to provide 'an appropriate and proportionate assessment' to assess archaeological remains sufficiently clear? Is the Policy effective in this regard?

**Matter 15 – Green Wedges, Open Space and Green Infrastructure
(LP20, LP22, LP and LP24)**

Issue 15a – Green Wedges – Policy LP22

- Q1. How were the 'Green Wedges' identified on the Policies Map and what process was followed? What evidence-based documents were used to inform this process?
- Q2. Are the Green Wedge designations justified, effective and consistent with national policy? Are there any significant factors that indicate that any sites should not have been designated?
- Q3. Are there any areas where evidence-based documents recommended inclusion within a Green Wedge that were not taken forward into the Local Plan? If not, why not? Is this justified?
- Q4. What is the justification for the Green Wedges identified on the Policies Map (Inset Map 1 – Lincoln) including Anglian Water's Recycling Centres at Lincoln, Waddington and South Hykeham? How does Policy LP22 respond and relate to existing, established premises? Does it allow for the sustainable consolidation or expansion of such operations? Is it effective in this regard?
- Q5. What is the justification for including land between Welton and Dunholme, to include site CL1187, within a Green Wedge?
- Q6. What is the justification for including land at Urban Street, Bracebridge Heath (site CL416) within a Green Wedge?
- Q7. What is the justification for including land at the University of Lincoln's Riseholme Campus within a Green Wedge? Is this necessary or appropriate given the existing use of the site and existing designations?

Issue 15b – Local Green Space and Other Important Open Space – Policy LP23

- Q8. How are the designations of Local Green Space within the Plan consistent with paragraphs 76-77 of the Framework? Does Policy LP23 meet the tests in national policy?
- Q9. How were areas of Local Green Space identified on the Policies Map and what process was followed? What evidence-based documents were used to inform this process?
- Q10. Are the Local Green Space designations justified, effective and consistent with national policy? Are there any significant factors that indicate that any sites should not have been designated?
- Q11. What criteria have been used to inform the designation of land as 'Important Open Space'? Are they justified?
- Q12. Is the designation of land as 'Important Open Space' consistent with the Framework, which seeks to rule out new development on Local Green Space where the bullet-point list at paragraph 77 is satisfied?

-
- Q13. Are there any areas where evidence-based documents recommended inclusion as part of a Local Green Space or Important Open Space that were not taken forward into the Local Plan? If not, why not? Is this justified?
- Q14. What is the justification for including land off Wolsey Way, Lincoln (site CL4432) as part of an area of Important Open Space?
- Q15. What is the justification for including land to the rear of Riby Road and Woodlands Avenue, Keelby as Important Open Space?
- Q16. What is the justification for including land at Ferry Lane/High Street, Skellingthorpe as Important Open Space?

Issue 15c – New Open Space, Sports and Recreation Facilities – Policy LP24

- Q17. What process and/or evidence base has informed the standards in Appendix C of the plan?
- Q18. Policy LP24 requires development to provide new or enhanced open space, sports and recreation facilities in accordance with standards in Appendix C. Is it justified to seek open space in connection with all development or just housing? Is it justified to seek open space where existing provision is satisfactory?

Issue 15d – Green Infrastructure – Policy LP20

- Q19. Policy LP20 expects development proposals to make contributions towards green infrastructure. Does this relate to all development? If so, is this appropriate and justified even for small scale proposals?

Matter 16 – Gypsy and Traveller Allocations (LP56)

Issue 16a – Gypsy and Travellers – Policy LP56

- Q1. Is the identified need for 72 pitches justified?
- Q2. Have an appropriate selection of potential sites been assessed? Is it clear why some sites have been selected and/or rejected?
- Q3. Does the plan make suitable provision to meet this need?
- Q4. Are the allocations justified, effective and consistent with national policy? Are there any significant factors that indicate that any sites should not have been allocated?
- Q5. Is there any risk that site conditions and constraints might prevent development or adversely affect viability and delivery?
- Q6. Are the site boundaries correctly defined?
- Q7. What factors were determinative in allocating sites?
- Q8. Have the three allocated sites been assessed against a) – e) in Policy LP56 (and the site's proximity to services). If not, should this not be a determining factor in the suitability of a site allocation?
- Q9. Do the site allocations, along with provision within the SUEs, provide sufficient pitches to provide five-years' worth of supply?

Matter 17 – MoD Establishments (LP57)*Issue 17a – Development of MoD land and assets – Policy LP57*

- Q1. Policy LP57 supports the redevelopment or change of use of MOD land and assets surplus to requirements. Are all MoD sites suitably located for redevelopment or change of use? How would a decision maker balance the support for a proposal under Policy LP57 with the requirement of other policies in the plan, such as the distribution of housing in Policies LP2, LP3 and LP4?