

Central Lincolnshire Local Plan 2012-2036 Examination

MATTER 3: Spatial Strategy and Distribution of Growth
(LP1, LP2, LP3, LP4, LP54)

Central Lincolnshire Joint Strategic Planning Committee
Hearing Statement

October 2016



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?***

Shortly after the publication of the NPPF, Government issued a statement which, in effect, made it compulsory for a Local Plan to include such a policy. Whilst the Committee is not aware that such advice has changed, it is also aware that such advice does not appear readily available on the .gov website. That said, over the years, there are many Local Plan Inspector Reports which have required, via a Main Modification, the inclusion of the Policy (or very similar policy) if one was not already included. As such, the Committee followed such national precedent. The Committee finds no harm in the policy, but equally it considers no particular need for it, and would have no objection to its removal if it is in the interest of creating a more streamlined, and therefore more effective, Local Plan.

Issue 3b – Settlement Hierarchy – Policy LP2

Q2. How was the hierarchy established, and how was it determined through the evolution of the Plan?

The approach followed in establishing the settlement hierarchy is defined in section 3 of the Central Lincolnshire Settlement Hierarchy and Growth Distribution Study – April 2016 (E018). The spatial strategy has not evolved significantly since the earlier drafts of the Local Plan and so the settlement hierarchy has also remained largely similar to earlier iterations.

Some amendment to the hierarchy has occurred as a result of the primary basis for positioning within the hierarchy changing from population levels to dwellings numbers between the Preliminary Draft and Further Draft versions of the plan. This change was made as it was felt that dwellings is a better indicator of the appropriateness or otherwise, in character terms, of the size of individual sites that could be developed – the primary factor included within villages in the hierarchy. It is also an easier indicator to monitor with accuracy.

Through the consultation stages, some representors (mostly parish councils) have disputed 'their' position in the hierarchy. Where it was found that, based on the methodology for developing the hierarchy, a village should be relocated it was moved as appropriate.

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?

Yes. This is set out in the Central Lincolnshire Settlement Hierarchy and Growth Distribution Study – April 2016 (E018).

Q4. How was the Lincoln Urban Area defined and what is the rationale for it?

The Lincoln Urban Area is defined within part 1 of policy LP2 as the continued built up area of Lincoln, which includes North Hykeham, South Hykeham Fosseway, and Waddington Low Fields. It is an urban conurbation of regional importance, with all parts sharing sustainability credentials and relating well with each other. An alternative designation of, say, 'City of Lincoln' in the hierarchy, matching the administrative boundary of the Council, would be nonsensical in land use planning terms; thus, the more appropriate 'Lincoln Urban Area' was established.

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?

No. The area is defined in words in the Local Plan, and it is considered the reader (whether planning professional or lay person) understands the meaning of the words 'urban area' without the need for a map.

In addition, because the Local Plan does not include settlement boundaries, it would appear odd to introduce once for the Lincoln Urban Area but nowhere else.

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?

Whilst the SUEs will deliver significant growth which will change the geography of the areas within which they sit, none will undermine the plan.

No villages will become part of an urban area as a result of the SUEs being developed and as such there would be no need to reflect any differences in the settlement hierarchy. For example, in policy LP30 in relation to the South East Quadrant SUE, the fourth bullet point requirement for the SUE states “*Extension to the existing green infrastructure network...which avoids the coalescence of the new community with Bracebridge Heath and Canwick villages.*”

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 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?

Paragraphs 3.6 and 3.7 of the Central Lincolnshire Settlement Hierarchy and Growth Distribution Study – April 2016 (E018) confirm how Small Villages are distinguished from Hamlets and the countryside. The rationale for this is that development in villages of 50 or more dwellings, where there is a clearly definable village nucleus, would typically be more capable of absorbing the visual impact of dwellings than sparse, smaller settlements.

It should also be noted that a village which does make it in the hierarchy, but with no facilities, is usually one with not many more than 50 dwellings, and in which case, the full 10% only amounts to five dwellings or so, which is considered reasonable, appropriate and justified.

There clearly has to be a line drawn somewhere between a ‘village’ (where some development might be acceptable) and the open countryside/hamlet (where, in accordance with the NPPF, development should be strictly controlled). 50 dwellings is considered to be that appropriate line.

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

Q8. How was the distribution of growth between the settlements established, and what evidence supports this? Is it justified?

The starting point was determining the extent of a Lincoln Strategy Area (LSA), based on determining an area of relative self-containment for Lincoln, and then determining the existing population extent of that area, as a proportion of the Central Lincolnshire total. Document **E017**, section 3, establishing both these factors. It was then determined that the proportion of future growth should (more or less) match the current proportion of the LSA, namely 64%.

Of the remaining 36%, it was determined that the two major settlements outside of LSA (Gainsborough and Sleaford) should take a slightly larger proportion of growth than their current population proportion, on the basis of locating growth to those areas with clearly the greater level of services and facilities. Each was therefore apportioned 12% of the total growth. Document **E016**, section 3, assisted in justifying this level for Gainsborough. 'Elsewhere' was then apportioned the remaining 12%, which is slightly less than its current proportion, population wise, but reflects the fact that, in principle, development should be steered away from areas with lower levels of services and facilities (which, of course, the Elsewhere category has).

These % figures are not intended to be rigidly and precisely applied, but rather act as a strategic aim for the Local Plan. The allocation of sites were, in part, on the basis of attempting, broadly, to meet this strategic aim, which is demonstrated to be achieved.

At a more detailed level, the subsequent distribution of growth within the LSA and within the Elsewhere category, was based on the settlement hierarchy and based on the merits of specific opportunities at specific settlements.

Overall, the approach is justified and supported by evidence.

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?

There was never an intention to precisely match the strategic distribution set out in Policy LP3 with allocations. However, the intention was to more or less achieve allocations to match the strategic distribution, with perhaps a small buffer (over-allocation) if possible and appropriate in each case, in order to mitigate against the potential under-delivery of sites. We have achieved what we intended.

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?

This is predominantly answered by Q8. The question could also be misinterpreted to mean that 88% of the growth has been directed to the three main settlements. However, it needs to be made clear to those readers not familiar with the Local Plan, that the LSA area covers a large rural area, as demonstrated on the map of the LSA at page 15 of the Local Plan. The remaining rural area is

appropriately allocated around 12% of the growth, and reflects, as is appropriate to do so, the need to direct growth to the larger settlements.

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?

Yes and yes.

To provide greater than 12% would mean that the rural areas, which by their very nature have limited amounts of services, facilities and job opportunities, would receive the same (or, worse still, greater than) pro-rata amount of growth than their population, which inevitably will lead to greater levels of commuting, greater reliance on the car, greater levels of isolation and greater costs on public services (health, schools, etc).

There is no justification and no basis in national policy for increasing the proportion of growth directed to the 'elsewhere' rural category.

And it should not be forgotten that if a particular community feels it necessary and appropriate to increase housing supply in their particular village, to support the sustainable functioning of their village, then a Neighbourhood Plan could do so, and Policies LP3 and LP4 enable this to happen.

Q12. Were alternative distributions of development between the various tiers of the hierarchy considered? If so, why were they discounted?

Yes. The SA tested 4 options, including the proposed option, an option for greater rural proportion, an option for greater urban proportion, and a 'no policy' option.

See page 53 onwards, of the appendix to the IIA (**E001C**), for a full appraisal of the options, and the overall conclusion as to why option 1 (proposed option) was the most sustainable. The Local Plan follows the recommendation of the SA.

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?

This set of questions is best answered in two parts, first dealing with Lincoln and Main Towns, and the second part dealing with Market Towns and other smaller settlements.

Lincoln Urban Area / Main Towns:

For the three settlements which fall within level 1-2 of the hierarchy, the intention of the plan is to direct any unallocated growth to within the existing urban area.

However, it is accepted that the last sentence in each case could be open to misinterpretation. As such, in both cases (i.e. levels 1 and 2 of the hierarchy of Policy LP2’, the last sentence is suggested to be modified (modification Main/SC/35) as follows:

‘Additional growth on non-allocated sites in appropriate locations **within the urban area** will also be considered favourably.’

A ‘windfall’ allowance is only relied upon from Lincoln Urban Area. No allowance is relied upon from the two Main Towns.

Market Towns / Large Villages / Medium Villages / Small Villages / Countryside and Hamlets:

Within levels 3-7 of the hierarchy, the intention of the plan is to direct any unallocated growth to primarily within the existing urban area, though development on the edge of some settlements may be acceptable.

The following gives commentary on each level, with suggested modifications as considered necessary:

Market Towns (Level 3): No change – this is considered clear, with the term ‘appropriate locations’ ensuring that sites are considered against both the other policies in the plan and national policy. It thus gives the decision maker the flexibility to determine what is and what is not an appropriate location. It moves away from the ‘black and white’ approach of having a settlement boundary, which can often result in appropriate small scale development being refused on the edge of a settlement, simply because of a line on a map.

If a site was determined to be in an ‘inappropriate location’ then, by default, the site would fall under level 7 of the hierarchy, and only proposals covered by that part of the policy would, in principle, be considered favourably.

No ‘windfall’ allowance is relied upon from Market Towns.

Large Villages (Level 4): No change. This level of the hierarchy makes it more difficult for development to come forward on the edge of settlements, with the words ‘in exceptional circumstances’ introduced (which it is not for Market Towns) and the scale is reduced to ‘unlikely...over 25 dwellings’ (down from 50 for Market Towns). The policy wording is considered clear.

It should also be remembered that Large Villages have received allocations, so ‘appropriate locations’ for development over 25 units on the edge of such settlements should have been exhausted by the Local Plan allocations process – hence why the limit of 25 is stipulated in the policy.

The interpretation of ‘exceptional circumstance’ will be a matter for the decision maker, and is likely to be only exercised on a very limited basis, and likely only for very small schemes where, for example, a natural rounding of a settlement for a few houses would cause no harm and potentially created positive benefits.

No ‘windfall’ allowance is relied upon from Large Villages.

Medium Villages (Level 5) and Small Villages (Level 6): Whilst the scale of development is clear in these two parts of the policy, it is not clear, when read in isolation, whether development on the edge of such settlements is appropriate. However, this is rectified by the end part of Policy LP4 (from the top of page 20 in particular of the Local Plan), which sets out a clear ‘sequential’ approach to determining proposals.

Whilst not considered strictly necessary (and therefore not presently suggested as a modification by the Committee), a cross reference to Policy LP4 within level 5 and level 6 of Policy LP2 could be inserted, such as ‘see also Policy LP4’ added at the end of paragraph.

Hamlets and Countryside (Level 7): This part of the policy makes it clear that, if a site does not fall within any category 1-6 of the hierarchy, then by default it falls into level 7.

On reflection, the word ‘listed’ in this part of the Policy is perhaps not the best choice or expressed as clearly as it could be. In addition, partly following consideration of Q1 of Matter 17 (which relates to MOD land), reference to Policy LP57 also needs adding to Policy LP2. As such, it is suggested (Modification Main/SC/36) the opening part of level 7 be amended to read:

‘Unless stipulated by policy LP55 or LP57, development in areas not ~~listed above~~ covered by levels 1-6 of the hierarchy above will be deemed to fall within the category ‘hamlets and countryside’ whereby development will be restricted to...’

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?

The main reason for this low level of delivery since 2012 are a lack of allocations, the economic downturn and the considerable preparation work on (rather than delivery of) the urban extensions. Evidence underpinning the SUEs and the site allocations show significant interest in delivering housing in the main towns. The growth level for both settlements are deliverable, enabling the plan to be effective. The 12% growth rate is appropriate as it is encouraging the delivery of housing in some of the most sustainable locations and as it will encourage regeneration and rejuvenation of the settlements. See also responses to earlier questions in this statement.

Q15. What is the justification for Policy LP2 being unlikely to support proposals over 50 dwellings / 2ha on the edge of Market Towns?

The market towns of Caistor and Market Rasen are substantially smaller than the main towns of Gainsborough and Sleaford and they are also receiving a substantial amount of growth from allocations. The threshold of 50 dwellings is included to allow some additional incremental growth, recognising the greater ability of these towns to accommodate development sites than most Large Villages, rather than substantial additional growth on large sites that could undermine the role, function and character of these settlements and their services.

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?

The Local Plan allocates substantial, but appropriate growth in Large Villages across Central Lincolnshire, which will make up the majority of growth coming forward in these settlements in accordance with the spatial strategy. These allocations are sufficient, with other named sources of housing supply in the plan, to meet to meet the housing target for Central Lincolnshire. As such, it is important to ensure that substantial additional growth does not occur in these villages that could harm the village or undermine the spatial strategy. At the same time, development on small sites is an important source of housing supply that allows these villages to grow organically, with limited or no impact (or potentially positive impact) on the village.

Sites of 25 dwellings or more have been considered through the site allocations process in Large Villages and as such suitable and available sites have been allocated through this process.

The interpretation of ‘exceptional circumstance’ will be a matter for the decision maker, and is likely to be only exercised on a very limited basis, and likely only for small schemes where, for example, a natural rounding of a settlement for a few houses would cause no harm and potentially created positive benefits. This approach is considered to be appropriate given the range of settlements and variety of development opportunities that occur across Central Lincolnshire villages. As such the policy is considered to be justified and effective.

Q17. What is the justification for setting a threshold of 25 dwellings? Is this appropriate and justified?

As highlighted in the answers to questions 13 and 16, the threshold of 25 dwellings represents the cut-off for sites being allocated in the Local Plan and as such, all development sites should have been considered and allocated where they are suitable and available and consistent with the spatial strategy. Therefore, it is considered that this approach is 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?

See response to Q13

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?

Yes.

The policies of the Local Plan provide adequate clear guidance for development will come forward in settlements across Central Lincolnshire. The plan is strategic and as such it would be inappropriate to allocate very small sites in the smaller settlements. The approach used in policy LP4 provides a blueprint for considering the suitability of a site in villages based on knowledge of the villages in the area, whilst providing adequate flexibility to ensure that the policies do not unnecessarily block an appropriate amount of development from coming forward in these settlements.

The Central Lincolnshire Districts will monitor and publish the latest growth levels in villages in each district on a regular basis. Therefore it will be clear for developers and communities to understand how much growth can be expected for the remaining plan period. To reinforce that commitment, the Committee has already suggested a modification, Main/SC/2 as set out in V1 of the suggested modifications (**LP05**), and repeated in V2 of the set of suggested modifications.

The combination of these policies, and the other policies in the plan, and the regular monitoring, will provide sufficient clarity of what sites will be considered favourably.

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?

Paragraphs 3.14-3.18 of the Settlement Hierarchy and Growth Study (**E018**) sets out in basic terms the justification for the growth levels. To expand on this, the justification for setting growth levels is to avoid villages being harmed by substantial levels of development in a relatively short period which can lead to harm to the identity and character of a village, overwhelm local services and facilities and overall create resentment of development. However, 10-15% growth, over the plan period, is considered to be an appropriate level of growth to avoid these issues. As there will likely be occasions where it is appropriate to deliver additional growth in these villages, the policy also builds in sufficient flexibility for these levels to be exceeded where appropriate and where there is local support to allow for such growth.

The policy will be effective in its current form and it is not considered necessary to add any additional information on the aims of the policy in the plan.

Q21. What evidence is there to justify higher 15% growth rates in some villages in Policy LP4?

Paragraph 3.4.4 of the Local Plan sets out how the higher growth level was established – where villages are near to large employment areas or the main city or town centres, or where there are some key facilities within the settlement itself. These three criteria are key reasons to justify additional growth over the plan period as residents of new development will have better access to jobs and services. Therefore this approach directs a higher proportion of the growth occurring in Central Lincolnshire in the more sustainable locations.

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%?

Policy LP4 only lists settlements that have 15% growth level, and those ‘10%’ settlements where there is potential that growth will not be delivered due to flooding constraints or presence of AONB in all of the settlement. Please note the ‘*’ next to each 10%, and the footnote at the bottom of the table, which explains this.

Whilst some of these constrained villages would, according to the methodology, usually be appropriate for 10% growth, they are included in here to make clear that no reliance has been placed on their growth figure towards to the total housing need figure and to make clear to developers and communities that these constraints will need to be overcome or mitigated in order for development to occur.

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?

The plan does not 'allow' or expect the same amount of growth as an unconstrained village, nor does the plan claim 10% growth is deliverable in such villages. The plan makes these two points clear – see para 3.4.5 and 3.4.6 in particular, and the * and associated footnote in Policy LP4.

However, if the constraints can be overcome or mitigated so that a particular scheme is acceptable, there is no reason why the development should be further constrained by a policy. The Plan should not impose a strategic blanket ban on development in these locations.

If any development does occur, then this would be 'windfall' development, albeit as the plan makes clear (3.4.6), no windfall allowance has been made for such development in order to meet the plan's housing target (this being another example of a very conservative windfall allowance being used in the Local Plan).

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?

The September 2016 Five Year Land Supply Report (**E007D**) indicates that there are 1,370 dwellings with permission in sites across 95 small and medium villages. This is calculated by looking at all committed sites in Appendix 1 that are within small and medium villages. There is significant developer interest in many of these villages and dwellings in most rural parts of Central Lincolnshire have a strong market.

In addition, Policies C1 and C2 in the North Kesteven Local Plan – 2007 (**CLP2**) and policies STRAT7 and STRAT8 of the West Lindsey Local Plan – 2006 (**CLP3**) limited development in villages to sites within the settlement curtilage. Policies LP2 and LP4 are more flexible to potentially allow sites on the edge of these settlements to be considered and as such this opens up potential to previously constrained sites. As such there can be a good degree of certainty about the deliverability of this windfall development and therefore policy LP4 is effective in this regard. Also note that no windfall allowance has been made for the constrained (i.e. '*' listed villages), whereby in reality some growth will probably occur, further boosting the ability of the plan to meet (and likely exceed) its windfall assumptions.

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?

The source of the base number of dwellings in each settlement (column a of Appendix B) is explained in paragraph 3.8 of the Settlement Hierarchy and Growth Distribution Study (**E018**). The base figures are for the settlement itself and not the parish. Column d of Appendix B provides the number of completions at 31 March 2015 and Column E provides the number of dwellings committed in each settlement also at 31 March 2015, and both are taken into account when calculating the remaining growth for each village in column g.

As part of the annual monitoring undertaken by each district the latest position for each village can now be updated to include the period up to 31 March 2016, and we have done this as a suggested modification (modification Main/SC/37).

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?

Monitoring of the growth within villages, and publication of this monitoring is necessary to make the policy deliverable and to provide a clear position for decision makers, applicants and communities. The proposed modification states “at least once a year”, though in practice it is likely more frequent updates will be necessary.

Overall, the Committee is confident the policy will work in practice, and that an effective monitoring process can be put in place. It draws this confidence from the successful operation of a very similar policy at Fenland, whereby regular updates are published, with the process managed as part of the technical team within the planning department. A copy of the latest Fenland monitoring note (dated 23 September 2016) is attached at appendix A, or available here (though this link may produce a later version, depending on when it is accessed):

<http://www.fenland.gov.uk/CHttpHandler.ashx?id=12605&p=0>

I am reliably informed that the content of the note is used effectively by development management at Fenland, and is well respected by the agents forum of that district. There is no reason why this cannot be replicated in Central Lincolnshire.

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?

Each of the Small and Medium Villages have been assigned a level of growth to deliver, both to protect their vitality and to help retain services, but also to assist in the delivery of the plan’s housing target and spatial distribution of growth. Once the growth level has been delivered, the strategic need for growth in a village has effectively been satisfied. Providing clarity about the level of growth level for a village provides certainty for developers and the communities, but the approach also allows for exceptions to come forward where the local conditions are right and community support can be obtained. Objections against development typically occur where a site is less suitable for development or where there are sustainability issues, so achieving community support will likely be aligned with land use planning issues.

The policy aligns with the wider national policy of localism and neighbourhood planning.

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?

If existing commitments do not come forward and the permission lapses, the monitoring position will take account of this and the growth lost from the lapse will be added to the remaining growth total to be delivered.

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?

The purpose of the sequential test in policy LP4 is to see that suitable small infill sites are prioritised where they are available. These sites will also usually be more accepted by communities and as such in many cases clear support could likely be demonstrated if they were to come forward after growth levels had been achieved. It is a plan-led system and therefore the policy will be applied in each village according to the specific circumstances.

Q30. Is the requirement for ‘clear local community support’ precise enough, and is the policy effective?

It would not be appropriate to specify exactly what would constitute ‘clear local community support’ as it could vary on a case by case basis, depending on the nature of the village and the size and scale of the proposal. The policy places a responsibility on the developer to engage with the community and demonstrate how support has been achieved. Decision makers will consider the information submitted with a planning application about the nature of engagement that has been undertaken and will be able to consider whether this requirement has been satisfied, making 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?

Yes. The policy provides flexibility for neighbourhood plans to deliver additional growth than that required in the Local Plan. Neighbourhood Plans will still need to be in general conformity with other strategic policies in the plan which are listed in Appendix A 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?

The following list indicates the neighbourhood plans being produced in Central Lincolnshire and the stage of their production at the time of writing. Full details are maintained on the relevant district website.

Plans Made:

Caistor, Nettleham, Welbourn, and Welton.

Plans Examined:

Dunston, and Riseholme.

Plans Submitted:

Dunholme, and Scothern.

Plans that have completed their regulation 14, Pre-Submission Consultation:

Saxilby with Ingleby.

Neighbourhood Areas Designated:

Bardney, Bassingham, Billingham, Bishop Norton and Atterby, Bracebridge Heath, Branston and Mere, Brattleby, Cherry Willingham, Coleby, Corringham, Fiskerton, Gainsborough, Glentworth, Hemswell Cliff, Keelby, Langworth, Laughton, Nocton and Potterhanworth, North and South Hykeham, Osgodby with Kingerby, Silk Willoughby, Sleaford and Kirkby La Thorpe, Sudbrooke, Thorpe on the Hill, Waddingham, and Willoughton.

The communities producing these neighbourhood plans are taking care to ensure their plans are in conformity with both the existing local plans and the emerging Central Lincolnshire Local Plan.

The majority of plans being produced are not proposing housing allocations and are not proposing additional growth above that proposed in the Local Plan. However, some neighbourhood plans are proposing additional growth than proposed in the Local Plan, namely Fiskerton, Osgodby and Hemswell Cliff.

Q33. Is the inclusion of a 'sequential test' appropriate, justified and consistent with the Framework? Is the sequential approach in the Policy justified?

Yes. The sequential approach used means that sites that are more suitable to deliver growth in a village will generally come forward ahead of less suitable sites. This is consistent with the NPPF, as is explained in paragraph 1.6 of the evidence report for policy LP4 (**PS.EVR4**). However, it is also flexible enough to satisfy requirements of the NPPF by ensuring that developers can demonstrate that a site further down the list should be developed, for example because sites higher in the list are not available or are unsuitable in other terms.

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

Yes. The plan provides a baseline growth figure for small and medium villages, a figure which in the majority of settlements will be an appropriate level of growth to support the vitality of rural communities. However, it provides the flexibility for additional growth to occur through a neighbourhood plan or where community support can be demonstrated. Where further development is needed to support or enhance a community there are adequate triggers for this to be delivered, as is the case in some neighbourhood plans and other development schemes being pursued.

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?

To be clear, Modification Main/SC/1 (or MM/SC/1 to use the Inspector's referencing) is not suggesting a new allocation – the submitted plan already includes that allocation. The modification is purely to make it clearer, and give more certainty, about growth in Lea. It is considered necessary.

Paragraph 3.4.7 confirms the situation for Canwick and Hemswell Cliff. Hemswell Cliff and Lea satisfy the 10% growth requirements in the plan, and as such are not required to grow further and additional growth would need to be delivered with community support in line with the provisions of policy LP4.

The wording in the supporting text and the proposed modification (along with the updated table in Appendix B, as per suggested modification main/SC/37) provides adequate clarity on how development proposals should be considered in these 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?

Yes, the level of growth is appropriate for each of the category 5 and 6 villages as is justified throughout the Settlement Hierarchy and Growth Distribution report (**E018**) and the Evidence report for LP4 (**PS.EVR4**).

Appendix A: Fenland District Council Monitoring Note

Village Thresholds Position Statement 23 September 2016

The table below provides information on the current position in relation to village thresholds for Policy LP12 Part A of the Fenland Local Plan. A pre-application community consultation exercise is required for developments in villages that have already reached the threshold.

The information does not include any applications currently awaiting a decision. Therefore, even if the threshold for a village has not been reached, it is recommended that a pre-application community consultation is carried out as a safeguard prior to submitting a planning application.

No.	Village	Built Stock April 2011	Threshold for Village (No of dwellings)	Committed/Built since April 2011 (No of dwellings)
1	Benwick	424	42	22
2	Christchurch	228	23	23
3	Church End	65	7	19
4	Coates	506	51	53
5	Coldham	55	6	1
6	Collett's Bridge	26	3	0
7	Doddington (15%)	844	127	123
8	Eastrea	330	33	18
9	Elm	728	73	75
10	Foul Anchor	24	2	0
11	Friday Bridge	575	58	25
12	Gorefield	333	33	23
13	Guyhirn	245	25	46
14	Leverington	952	95	39
15	Manea (15%)	822	123	220 +
16	Murrow	382	38	55
17	Newton	178	18	28
18	Parson Drove	327	33	20
19	Pondersbridge	72	7	2
20	Rings End	41	4	4
21	Tholomas Drove	34	3	14
22	Turves	177	18	12
23	Tydd Gote	11	1	0
24	Tydd St Giles	271	27	7
25	Wimblington (15%)	771	116	85
26	Wisbech St Mary (15%)	564	85	65 (resolution to permit subject to a S106 50 x dwellings - 11 of which already approved)

V	Amendment	By	Date
1	Assessment for Benwick added (22 dwellings complete/built)	M McMahon	29/3/2015

