

Central Lincolnshire Local Plan 2012-2036 Examination

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

Central Lincolnshire Joint Strategic Planning Committee
Hearing Statement

October 2016



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

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?

The details of the assessment process is included in Evidence Report EVR48-54 (**PS.EVR48-54**). Paragraphs 4.1-4.7 of the evidence report demonstrate the source of sites and how sites were selected for assessment in the allocation process, and this process was robust. Paragraphs 4.8 to 4.12 of the evidence report details the criteria used in assessing the sites and how they were used. These criteria are appropriate for assessing the suitability of sites and the assessment followed was robust.

As detailed in the table under paragraph 4.10 of the evidence report, the red, amber and green scoring was used to identify constraints on sites and their likely impact on the suitability or deliverability of a site, and also to allow comparison between sites in terms of proximity to services and facilities. Furthermore, as touched upon in paragraph 4.11 of the evidence report, the presence of a red score on a site did not mean it was necessarily ruled out on that basis, as consideration was needed of the ability to mitigate the constraint, and to compare against other sites in the settlement. No particular weighting was applied to specific criteria, they were instead used to build up a picture of the situation on the site which then went into a qualitative consideration of which sites were best placed to deliver housing in accordance with the housing target and distribution strategy in the Local Plan.

In accordance with Sustainability Appraisal guidance, only sites that were considered to be suitable for allocation or reasonable alternatives were included in the Integrated Impact Assessment (IIA) of sites. This means that sites were omitted from the IIA assessment where they were subject to major constraints such as flood risk, where there was little or no scope for viable mitigation, or where they were known not to be available, for example. The scoring assessment used much of the same information as the red, amber, green scoring, but brought them together to consider the sustainability of each site as a whole. The scoring in the IIA formed part of the decision-making process on which sites to allocate, in order to ensure that sites being allocated were sustainable, and that no particularly sustainable sites were being omitted over others that were less sustainable.

Whether a site was previously developed or not was a factor in the assessment and consideration of sites. Whilst this is not included as a red, amber or green scoring factor, it was considered against other constraints and opportunities in deciding which sites to allocate. Typically, where a previously developed site was not of high ecological value, it was preferred over greenfield sites, but consideration was still needed of other factors, including likelihood of achieving a suitable direct access, presence of constraints, proximity to services and facilities, and impact of sites on the sustainability of the settlement pattern, for example.

Q2. Are there any significant factors that indicate that any sites should not have been allocated?

No. All sites included as allocations in the plan are suitable for allocation.

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?

Based on the information available on the sites and the local knowledge of the Local Plan Team and district officers, all sites are deliverable and viable. Whilst there is always a risk of unknown constraints or changes to market conditions impacting the deliverability of a site, the information on each site does not suggest this to be the case on any allocation site.

Q4. Are the site boundaries correctly defined?

The majority of boundaries are correct, however there are two minor changes needed which are suggested as modifications (Modification Main/SC/33 and Main/SC/34):

- The boundary of site CL4660 needs to be amended slightly on Inset Map 24 to reflect the adopted Neighbourhood Plan in Nettleham. This boundary was changed prior to the referendum on the neighbourhood plan. (Main/SC/33)
- The boundary of site CL529 needs to be amended on Inset Map 1 to remove the area to the south of Skellingthorpe Road. This area should not have been included within the allocation area as it is not within the area with planning permission. (Main/SC/34)

Q5. Are the assumptions regarding the density of development and net developable areas justified and based on available evidence?

Yes, the assumptions are justified.

Many of the figures in the Local Plan are based on the numbers coming through permissions and applications on the specific site or based on additional information such as masterplans being drawn up for a site. For those sites where there is no additional information available and an assumption has to be made, the approach detailed in paragraphs 4.13 to 4.19 of the evidence report for residential allocations (**PS.EVR.48-54**). It is important to note that the figures used are only indicative as the Local Plan makes clear in paragraph 10.2.1.

The figures used in the assumptions originate from the Central Lincolnshire SHLAA – March 2010. Section 3.6 of this report highlighted that, in the absence of site-specific information a ‘density multiplier would be used’. The figures were based on historic completions over a five year period in City of Lincoln, and for North Kesteven and West Lindsey settlements assumptions were drawn up locally depending on the type of location in accordance with the East Midlands Regional Plan and Planning Policy Statement 3 which were current at the time. Whilst the situation has moved on since 2010, these density assumptions remain appropriate for Central Lincolnshire today.

The approach in 2010 was to apply the density assumption to the 'developable area' of a site to calculate the capacity. This approach has been replaced by an assumption about the percentage of a site that can reasonably be developed, where the larger the site, the greater the amount of land on the site is needed for infrastructure and incidental open space, for example. This assumption has been used by other Districts, for example Peterborough City Council, in calculations and has been subject to examination.

To ensure that the assumptions were adequate, they were tested against a range of site sizes and locations that were subject of applications across Central Lincolnshire.

This testing is included in the table below:

Application No.	District	Type of Location	Gross Size	Actual site delivery		Assumed delivery		
				No. of dwellings	Gross density	Density Assumption	Proportion Assumption	Dwelling assumption
14/1257/OUT	NKDC	Suburban	7.82	230	29.4	40	75%	235
13/1133/FUL	NKDC	Suburban	2.06	52	25.2	40	75%	62
13/1464/FUL	NKDC	Suburban	1.45	38	26.2	40	85%	49
14/1050/FUL	NKDC	Suburban	1.17	34	29.1	40	85%	40
14/1353/ADVICE	NKDC	Rural	0.9	25	27.8	30	85%	23
14/1481/OUT	NKDC	Rural	6.25	120	19.2	30	75%	141
14/1580/FUL	NKDC	Rural	1.77	38	21.5	30	85%	45
14/1139/FUL	NKDC	Rural	3.06	75	24.5	30	75%	69
14/1553/FUL	NKDC	Rural	5.5	132	24.0	30	75%	124
13/1388/OUT	NKDC	Rural	10.86	198	18.2	30	60%	195
14/0808/OUT	NKDC	Rural	2.7	73	27.0	30	75%	61
14/0833/OUT	NKDC	Rural	4.4	91	20.7	30	75%	99
15/0111/OUT	NKDC	Rural	2.2	50	22.7	30	75%	50
14/0696/OUT	NKDC	Rural	2.4	50	20.8	30	75%	54
14/1124/FUL	NKDC	Rural	5	157	31.4	30	75%	113
15/0031/FUL	NKDC	Rural	2.61	79	30.3	30	75%	59
14/0893/OUT	NKDC	Rural	9.34	275	29.4	30	75%	210
14/0789/OUT	NKDC	Rural	4.45	92	20.7	30	75%	100
14/0191/OUT	NKDC	Rural	8.64	185	21.4	30	75%	194
13/1002/OUT	NKDC	Rural	2	67	33.5	30	75%	45
15/0054/OUT	NKDC	Rural	1.5	23	15.3	30	85%	38
14/1413/FUL	NKDC	Rural	1.7	50	29.4	30	85%	43
2010/504/RM	CoL	Suburban	4.29	255	59.4	40	75%	129
2014/0510/F	CoL	Suburban	1.53	52	34.0	40	85%	52
2014/0017/RM	CoL	Suburban	2.85	80	28.1	40	75%	86
2011/0389/O	CoL	Edge of centre	1.21	150	124.0	70	85%	93
2012/0410/F	CoL	Suburban	0.8	13	16.3	40	85%	27
2013/1268/F	CoL	Suburban	0.35	12	34.3	40	100%	14

2008/1235/RM	CoL	Suburban	1.19	30	25.2	40	85%	40
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This shows that there are occasions where the assumption was higher than the permission and there were occasions where the assumption was lower. In many circumstances the above sensitivity testing demonstrates a close correlation between the method applied and the actual delivery.

Q6. The April 2016 Residential Allocations Evidence Report 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?

Importantly, this question does not fully reflect the referenced PPG (3-010-20140306) in that the PPG states in the same paragraph that ‘Where appropriate, plan makers may wish to consider alternative site size thresholds’.

In addition, this part of the PPG is in relation to preparing Housing and Economic Land Availability Assessments, not Local Plans. The Committee is not aware there is any policy guidance which states that a threshold of five should be used for allocating sites in a Local Plan.

In Central Lincolnshire’s case, the Local Plan is a strategic plan across three district areas covering a greater geographical area than the whole of Nottinghamshire, an area that includes more than 400 individual settlements with a growth level of 36,960 dwellings to 2036.

The use of a 25 threshold for considering allocations means that, not only could officers focus attention on sites that would make a significant contribution, but also that neighbourhood plans can make meaningful decisions about which sites should be delivered in their village. Where neighbourhood plans are not being pursued it will allow the market to deliver in a village in accordance with the policies of the plan. For urban areas, small sites can come forward under the policy framework of the plan and their contribution is taken into account through the conservative estimations of windfall. This is considered to be the appropriate approach for the Central Lincolnshire context. This approach is effective as it provides flexibility for rural areas and also certainty across Central Lincolnshire for what will be acceptable.

It should be noted that a threshold of 250 dwellings has been found sound in a post-NPPF and post-NPPG Local Plan (Fenland), so a figure of 25 for a plan of considerably greater scope (geographically and quantity of growth) is clearly sound.

Adopting a lower threshold would delay preparation of the Local Plan, reduce flexibility within the plan (because the thresholds in LP2 would be similarly be reduced) and reduce the ability of neighbourhood plans to come forward with their own small scale growth.

The threshold of 25 was announced in the Preliminary Draft Local Plan, and no substantive evidence was presented or depth of representation received which considered this threshold to be inappropriate.

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?

Yes. Sites were assessed for potential impact on nationally and locally designated heritage assets; national, regional and local wildlife designations. This is clarified in the table in paragraph 4.10 of the Residential Allocations Evidence Report (**PS.EVR48-54**) and Table 4.3 of the Integrated Impact Assessment (**E001C**). These assessments were developed considering the requirements of the NPPF and policies in the Local Plan to ensure they would be in accordance with the relevant local and national policies.

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?***

Yes. The Residential Allocations Evidence Report (**PS.EVR48-54**) demonstrates the justification for the selection of sites and how they are consistent with national policy. It is considered that the sites, both taken as a whole and individually, are effective for the Lincoln urban area.

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?***

Yes. The Residential Allocations Evidence Report (**PS.EVR48-54**) demonstrates the justification for the selection of sites and how they are consistent with national policy. It is considered that the sites, both taken as a whole and individually, are effective for each of the Main Towns and Market Towns.

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?

This site is coming forward as a housing zone site under a government-backed scheme aimed at boosting the supply of housing. It is the subject of a Local Development Order (LDO), which has now effectively granted outline permission on the site, being adopted by West Lindsey in July 2016. The reason for the changes are that during detailed work leading up to the finalisation of the LDO, an area of a former power station was removed from the LDO area. Furthermore, through consultation on the proposals, Lincolnshire County Council considered the proposed car parking ratio to be insufficient and therefore the dwelling numbers have been reduced to accommodate the additional parking spaces required. As the LDO has now been adopted, it is necessary to make the change to this policy to ensure it is sound and reflect the provisions of the LDO.

Issue 5d – Allocations in Large Villages – Policy LP52***Q11. Are the allocations in the Large Villages justified, effective and consistent with national policy?***

Yes. The Residential Allocations Evidence Report (**PS.EVR48-54**) demonstrates the justification for the selection of sites and how they are consistent with national policy. It is considered that the sites, taken as a whole, for each settlement, and individually, are effective.

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?

The request to add CL4007 is as a result of it being allowed at appeal in April 2016 and therefore it is necessary to ensure the Local Plan is up to date with development sites in Central Lincolnshire. Bardney is an appropriate location for growth of this level, being a Large Village in the Lincoln Strategy Area, in accordance with the spatial strategy and settlement hierarchy. Bardney had 73 dwellings allocated in the submitted plan, a relatively low level of growth in comparison to other Large Villages in the Lincoln Strategy Area. As such it does not affect the spatial distribution of housing or the position of Bardney in the hierarchy and helps present the most up to date position on growth occurring in Central Lincolnshire.

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?

Witham St. Hughs is a new village developed at a former RAF base. The level of growth in Witham St Hughs is implied in the concept of a new village. It is well connected to the road network and is growing in terms of population and services. The area is relatively unconstrained and presents an opportunity to strengthen the provision of services in the village. The growth in the Local Plan for Witham St. Hughs is 1,394 dwellings across three sites. This is larger than any other Large Village in the Local Plan, but it is appropriate given the context of the village. Since the submission of the Local Plan for its examination, an Outline planning application for 1,100 dwellings and 150 care/retirement units (C2/C3) was approved by North Kesteven Planning Committee on the 13th September 2016, subject to the signing of a Section 106 Legal Agreement.

Issue 5e – Allocations in Medium and Small Villages***Q14. Are the allocations in the Medium and Small Villages justified, effective and consistent with national policy?***

Yes. The residential allocations in Medium and Small Villages all benefit from planning permission, with the exception of Hemswell Cliff which is included to support the employment growth as a result of the Food Enterprise Zone designation. Therefore the allocations are 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?

No

See Q6 response.

Q16. It is necessary to add additional allocations proposed through MM/SC/7? Is MM/SC/7 necessary to make the Local Plan sound?

These sites all benefit from planning permission and as such their allocation ensure the Local Plan is as up to date as possible at the adoption stage, accurately reflecting the distribution of growth in Central Lincolnshire. Inclusion of these sites as allocations also provides greater certainty and clarity for villages and developers about the growth that will occur in these villages.

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?

Part 6 of policy LP2 states that Small Villages will “accommodate small scale development of a limited nature, proposals will be considered on their merits but would normally be limited to 4 dwellings...” Conversion of a non-residential building for residential use would typically be considered to be small scale. Furthermore, a site with a building on would constitute brownfield land and so would sit at the top of the sequential test for site selection in policy LP4.

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?

Parts 1 and 2 of policy LP2 provide the basis for considering the principle of development within and adjacent to the Lincoln Urban Area and Main Towns. Both sections state, “Additional growth on non-allocated sites in appropriate locations will also be considered favourably.”

For Market Towns, part 3 of policy LP2 states, “Most of this growth will be via sites allocated in this plan, or appropriate infill, intensification or renewal of the existing urban area. However, additional growth on non-allocated sites in appropriate locations on the edge of these market towns may also be considered favourably...”

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

Please see the answer to Matter 3, Issue 3d, Question 13. No change is needed to this policy.

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.”

Yes.

Central Lincolnshire has a strong agricultural economy which is of local, regional and also national importance. The Committee has made decisions, through site allocations, where the majority of

growth will be located across Central Lincolnshire. As development is not needed in hamlets and the countryside to support the strategic requirement for housing, the Committee consider that the retention of the best and most versatile land in these rural areas is highly desirable in Central Lincolnshire. The criteria in part G of policy LP55 allows decision takers to consider the specific case in hand with some flexibility provided for applicants to justify their case.