

Central Lincolnshire Local Plan 2012-2036 Examination

MATTER 12: Health, Well Being and Accommodation Needs (LP9 and LP10)

Central Lincolnshire Joint Strategic Planning Committee
Hearing Statement

October 2016



MATTER 12: Health, Well-being and Accommodation Needs

Issue 12a – Health and Well-being

Q 1. What is the threshold of 25 dwellings/0.5 ha for a Health Impact Assessment based on? Why does this requirement only relate to housing proposals?

As explained at para 5.3 (p3-4) of the Evidence Report for LP9 Health and Well-Being (**PS.EVR9**), the threshold for Health Impact Assessment (HIA) aligns with the site allocation thresholds used in the Local Plan, and was introduced in response to representations at the Further Draft Stage seeking greater clarity in relation to the HIA requirement (see para 4.4 (p3) of **PS.EVR9**).

It is also relevant to note that the latter part of criteria b makes it clear that the HIA should be proportionate to the scale of development.

The requirement for HIA does relate to both housing and non-residential proposals and it is considered this is set out clearly in criterion b. which states "...or 0.5ha or more for other development."

Q2. Is this requirement justified, consistent with national policy, and likely to be effective in helping to achieve the plan's Vision?

The requirement for HIA is considered to be justified and effective in achieving the Plan's Vision. The population of Central Lincolnshire is generally healthy, but there are pockets of poorer health, whereby some local communities experience significant health inequalities. The Committee therefore believes it is fully justified to seek to address these health issues through the Local Plan.

Health is a cross cutting theme and therefore this policy requirement will help achieve many aspects of the Plan's vision. The vision is supported by a specific objective on health: "*To reduce health inequalities, promote healthy lifestyles and maximise health and well-being*". Policy LP21, including the requirement for HIA, will help deliver this objective.

Policy LP21, including the requirement for HIA, is considered to be fully consistent with national policy. The built and natural environment is a major determinant of the health and well-being of local communities and the importance of this role is recognised in the NPPF (para 69-78). Health is also recognised as a key element of the three dimensions of sustainable development, the achievement of which is the primary aim of the planning system (paras 6 and 7). The NPPF also encourages local planning authorities, public health leads and health organisations to work together to ensure that health issues and impacts are considered and taken into account in decision making (para 171). The NPPG advises that HIA "may be a useful tool to use where there are expected to be significant impacts", (Reference ID: 53-004-20140306).

The HIA requirement supports the collaborative approach advocated in the NPPF at para 171. It also supports the pursuit of the three dimensions of sustainable development in seeking positive improvements and taking local circumstances into account, as HIA involves identifying the positive and negative impacts that a development proposal may have on local people and in doing so, should aim to enhance the positive impacts whilst avoiding or minimising any negative impacts.

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?

Please see Matter 13, Issue 13d, Q11 for the Committee's response in respect of water standards.

In relation to access standards, in short yes an assessment of evidence has been carried out in setting the standards set out in Policy LP10 and this is explained in the Evidence Report for LP10 Meeting Accommodation Need (**PS.EVR10**) at paragraphs 2.1 and 2.2 (p2-3). The key piece of evidence is the Strategic Housing Market Assessment, July 2015 (**E003**) and specifically evidence of: long term health problems and disabilities (p163), actual population and population estimates including age cohort (p46-49), and projected population change by age cohort (p93). This evidence of need, together with evidence on the overall impact on viability set out in the Central Lincolnshire Local Plan Viability and Community Infrastructure Levy Study, April 2016 (**E011A**) (see detailed pages references in response to next question), justifies Policy LP10.

In relation to space standards, the Committee has found no compelling evidence of need to introduce the standards, nor, at the Preliminary Draft stage when this matter was consulted upon, was there any overwhelming enthusiasm from representors to pursue such standards. As such, the Committee did not investigate it further.

Q4. The PPG also states that local planning authorities should consider the impact of using optional Building 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?

Yes. See p19 and Appendix B (p68) of the Central Lincolnshire Local Plan Viability and Community Infrastructure Levy Study, April 2016 (**E011A**). Please also see the tables (in portrait) in Appendix F of **E011A** (from p107) and specifically line 2.7.3 in any of those site types, which gives an M4(2) cost. The viability testing set out in **E001A** demonstrates that the standards are 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?

The primary explanation is set out in the Evidence Report for LP10 (**PS.EVR 10**). See section 4 (p4-6) and section 5 (p6-7) for an explanation of how the thresholds were developed between the Further Draft Local Plan and Proposed Submission Local Plan. See section 6 (p7-8) for other options considered in relation to the thresholds and why they were discounted, which included options to set a higher starting threshold for the M4(2) requirement or setting no threshold (i.e. it commences at 1 dwelling). Please see Appendix 3 of the IIA (p115) (**E001C**) for the Sustainability Appraisal of these options.

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 Housing Needs Assessment and the Lincolnshire Extra Care Strategy. However, Policy LP10 only requires regard to be had to 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?

The Committee acknowledges an inconsistency between paragraph 4.4.6 and the wording of the first paragraph of LP10, which could limit the ability of the Policy to respond to future housing needs and market signals. As such, the following modification (reference Main/SC/16) is suggested:

Amend Policy LP10, paragraph 1 to:

“Developers are expected to provide housing solutions that contribute to meeting the housing needs of the housing market area, as identified in the latest Strategic Housing Market Assessment (SHMA) **and in any other relevant local evidence.**”