



## **Gladman Developments Ltd**

### **Central Lincolnshire Local Plan EiP**

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

*Issue 1d – Sustainability Appraisal*

O9. Does this test the submitted plan against all reasonable alternatives where these exist, such as different options for the distribution of housing?

1. Gladman have concerns with the approach taken in the sustainability appraisal towards the consideration of housing sites and the distribution of growth.
2. The reasonable alternatives set out in Table 4.7 of the SA<sup>1</sup> include references to the approach taken in the assessment of LP3: Level and Distribution of Growth and LP4: Growth in Villages. In both instances, the assessment process has failed to take into account reasonable alternatives to provide a more balanced distribution between the urban and rural settlements across Central Lincolnshire.
3. It is the view of Gladman that not all of the reasonable alternative housing sites have been assessed through the SA process. Paragraph 4.16 of the Sustainability Appraisal (SA)<sup>2</sup> states that:

*'In terms of housing allocations, sites that were subject to significant constraints, or in a location that would be unsuitable in line with the overall approach to the Local Plan, were rejected and were not subject to IIA as they were not considered to be a 'reasonable alternative'. Sites outside the top 4 categories of the settlement hierarchy in LP2 were also not considered to be reasonable alternatives, as allocation would be contrary to the settlement hierarchy. These sites were not subject to IIA.'*

4. This error in the SA process and has meant that the Central Lincolnshire authorities have not considered and tested the sustainability of housing sites in lower order settlements. This issue goes to the fundamental core of Gladmans' **submissions in response to Matter 3**, the methodology applied

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<sup>1</sup> Integrated Assessment EC001c

by the Councils in determining the settlement hierarchy has not been consistently applied and as such has discounted the ability of sustainable growth being planned for in lower order settlements.

5. It is entirely unclear as to how the Central Lincolnshire Local Plan team have arrived at the strategy that forms the basis of the plan to 2036. The Plan should have looked at the variety of ways in which the development needs of the district could be delivered to ascertain which was the most appropriate approach having regard to the three limbs of sustainable development. This should have been undertaken in a systematic manner and robust testing through the Sustainability Appraisal process and other supporting evidence base documents. Whilst evidence relating to different growth scenarios was tested through the SA process for the identified settlement tiers, we would question the adequacy of the statement made at paragraph 5.17 of the SA as follows:
  - A. The growth option for 20% growth elsewhere was not supported and lacked evidence. This is due to the Councils own inadequate assessment through the various settlement hierarchy papers.
  - B. The second option based on basic population levels within each defined area, was dismissed **as it would 'not follow the key objective of the plan of directing development to the most sustainable locations and would leave growth levels short of what is expected in the main towns where there are regeneration ambitions.'**
6. It is clear from the above statement that the Plan is a predetermined strategy, rather than supported by robust evidence. It is therefore considered that the Plan, as set out, does not justify the strategy upon which it is based and does not adequately set out the reasoning why other distribution approaches were rejected. The Plan is not justified and is therefore contrary to paragraph 182 of the Framework.
7. Paragraph 55 of the Framework seeks to promote sustainable development in rural areas to maintain and enhance rural vitality and viability. It is an error therefore, to have failed to assess the needs of the rural settlements and considered associated development options. Such an approach is necessary to ensure the preservation and enhancement of rural services and facilities; and, to allow local rural communities to meet their own needs for housing whilst tackling affordability issues.
8. The decision not to consider sustainable rural housing options has also undermined the sustainability appraisal in respect of policies LP2, LP3 and LP4 as it has not been possible for the Central Lincolnshire authorities to compare the relative sustainability of those options in the context of the housing options that are available to them in rural locations.