



Gladman Developments Ltd

Central Lincolnshire Local Plan EIP

Matter 5 – Residential Allocations and Development in the Countryside

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?

Was the site selection process robust?

1. Gladman consider the site selection process was not robust. The Council only considered the top four tiers in the settlement hierarchy for allocation, retrospectively including sites in the medium and small villages that had already gained planning permission. This is clearly not a sustainable approach to allocating growth and places too much reliance upon larger settlements too much reliance upon larger settlements, ignoring the sustainability of smaller but still eminently sustainable settlements such as Bassingham, which are clearly sustainable locations for housing growth.
2. The Plan does not provide any meaningful growth to many of the 400 settlements across the district. Whilst some settlements are small in scale there are many settlements that are able to accommodate further growth to further enhance the viability and vitality of these communities and also offer the required mix of appropriate sites to ensure choice and completion in the market and help the Central Lincolnshire Authorities maintain a 5 year housing land supply. The overly restrictive nature of the Plan with regards to the various caps on development proposals adjacent to existing built form of settlements in relation to where they sit within the hierarchy, PDL sequential test etc. prevents the ability of any meaningful

growth being delivered in these areas to enhance and maintain the vitality of rural communities across the district.

3. Allocating growth in rural areas is important for maintaining the vitality of rural settlements within Central Lincolnshire, as set out in National Planning Policy and Guidance. §55 of the NPPF is clear that housing should be located where it will enhance or maintain the vitality of rural areas.
4. It is of fundamental importance that the settlement hierarchy and spatial distribution is revisited to provide a degree of contingency to help ensure the necessary scale of housing across Central Lincolnshire is delivered across the plan period.

Were an appropriate selection of potential sites assessed?

5. Gladman are concerned that the Council have placed too much reliance on the delivery of sites in the Large Villages and an insufficient amount in the medium and small villages. It is clear within national planning policy that sustainable development should be supported in rural areas. §55 of the NPPF states:

"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities."

6. The PPG is also clear that:

*"It is important to recognise the particular issues facing rural areas in term so housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlement. This is clearly set out in the National Planning Policy Framework, in the **core planning principles**, the section on supporting a prosperous rural economy and the section on housing."*

"...all settlements can play a role in delivering sustainable development in rural areas"

1

7. Medium villages can take a greater role in the delivery of sustainable development across the rural area. Medium villages are likely to be relied upon by the smaller settlements for their provision of services and facilities. The methodology applied by the Council in determining the settlement hierarchy has not been consistently applied and as such has discounted the ability of sustainable growth being delivered in sustainable settlements such as Bassingham.
8. An example of this is the Council's approval of 35 dwellings at Whites Lane, Bassingham (14/1580/FUL, approved 11th May 2016), and also, the scheme at Thurlby Road being

¹ Reference ID: 50-001-20160519

recommended for approval on two separate occasions (once for up to 120 dwellings (14/1481/OUT) and once for up to 98 (15/0688/OUT)).

Were appropriate criteria taken into account in deciding which sites to select and was the assessment against these criteria robust?

9. As considered further in subsequent questions, it is clear that the Council have not conducted a robust assessment of its preferred allocation sites. The red, amber, green scoring system is inconclusive and did not seem to have significant weight in the Council's decision making, and in some instances sites appear to have been discounted regardless of less significant impacts on the surrounding environment and existing communities in which they are proposed.
10. With regards to the distribution of growth, this is discussed in further detail in the Hearing Statement for Matter 3. This has also influenced whether the Council have allocated sites in particular settlements.

How was the red, amber, green scoring system in the *Residential Allocations Evidence Report* used to arrive at conclusions on the preferred allocations?

11. From considering the Residential Allocations Evidence Report, Gladman submit that it is not always clear how the Council have reached their conclusions on the preferred allocations. The Residential Allocations Evidence Report does not discuss the methodology behind the red, amber, green scoring system, and what significance the score would have in determining whether a particular site is suitable. A number of the proposed allocations have several 'Red Indicators' yet have been taken forward, whilst other sites with less 'Red Indicators' were discounted from further consideration.
12. The report states:

"No individual score was used to dismiss a site outright, but each helped to build a picture of the suitability of each site.

Furthermore, planning officers and other consultees at each district were asked to provide professional opinions to help inform of any potential constraints or opportunities that may exist on each site."
13. Without being able to see the professional opinions of Council officers, it is unclear how the Council have reached sound conclusions on the allocations included within the plan. It is clear that the scoring system was not determinative in the Council's final conclusions, but the Council's decision making is not transparent.

Was any weighting given to particular criteria or scores?

14. Again, it is not clear how the Council have applied particular criteria in their decision making process. As an example, the Council's assessment of two sites in Waddington (CL4671 and CL1062) demonstrate inconsistency in the decision making of the Council.
15. It is clear that site CL4671 has scored red against far more criteria than site CL1062, and yet site CL1062 has been rejected from the site allocation process. Site CL1062 also has no significant negative effects, whereas site SK4671 scored red against the AONB or AGLV category. Clearly, the Council has come to its own conclusions seeking comments from its Officers, but we are unable to identify what these conclusions may have been and as such, it is not considered that the Council has provided sufficient information into how it has selected its sites and whether any weighting was given to particular criteria or scores. This is not a unique scenario in the evidence report.

How was the Integrated Impact Assessment Score used given it is omitted from some site assessments?

16. It is unclear from the Council's evidence base how the Integrated Impact Assessment Score has been taken into account. The Council's evidence base is also limited in its information regarding whether a site constitutes a reasonable alternative, and if not, the reasons why it should not be considered as one.

Was the previously developed status of land taken into account?

17. The Council have a sequential approach, in that brownfield sites within settlement boundaries come forward ahead of brownfield sites outside of defined settlement limits. Paragraph 111 of the Framework seeks to "encourage" the effective use of land through the re-use of land that has previously been developed. Greenfield sites outside of settlement boundaries follow these two approaches. Gladman contest that this is not a sound basis upon which to base a Local Plan.
18. A key objective of the Framework is to boost significantly the supply of housing. It also details the presumption in favour of sustainable development, neither of which restricts greenfield development in favour of brownfield land. It should be noted that there may be many instances where PDL is not suitable for development at a point in time and therefore should not be given priority over the delivery of developments on greenfield land that can readily come forward to assist in the delivery of the Councils' full OAN.
19. This is considered in more detail in Gladman's Hearing Statement regarding Matter 3.

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?

20. Gladman support housing allocations in the medium and small villages, although would highlight that additional growth should be allocated to the most suitable medium and smaller villages. Enabling development to come forward in these settlements makes an important contribution to the overall housing requirement and provides flexibility over housing delivery should other sites not come forward in the required timescale or in the required numbers. This would give the Council more security over its five year housing land supply throughout the plan period.
21. The role of rural housing in supporting rural services and facilities should not be underestimated. PPG (Reference ID: 50-001-20140306) makes clear that '*a thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship*' and that '*rural housing is essential to ensure viable use of these local facilities.*'
22. This approach is also consistent with §55 of the NPPF, which is clear that '*To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.*'

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?

23. It is clear from the current allocations (and those proposed as part of MM/SC/7) to the medium and small villages that the Council consider there to be a greater capacity within settlements to accommodate a higher number of dwellings than 25.
24. This is clearly the case given recently approved applications within Central Lincolnshire for sites in excess of 25 dwellings, including the site at The Old Scrapyard, Stow Lane (Application ref: 130739, West Lindsey DC), approved on 10th February 2016 for 31 dwellings and a site at Rauceby Hospital, Greylees (Application ref: 15/0932/FUL, NKDC), approved 30th September 2015. Clearly in both of these cases the respective Councils concluded that there was limited harm to the existing settlements, but in any event the Framework will balance whether the sites are acceptable or not, and whether the benefits of new proposals in the Medium Villages outweigh the adverse impacts. This is also covered by the Council's own presumption policy.
25. Gladman do not consider there to be a need for a more comprehensive approach. It is clear from the Council's own evidence base that settlements, such as Bassingham, which has a

convenience store, primary school and also employment provision are sustainable locations for growth. Gladman consider that Bassingham should instead be classified as a Large Village. It is located within the Lincoln Strategy Area which is to deliver a significant share of Central Lincolnshire's housing requirements over the plan period. It is a sustainable settlement and is capable of accommodating a high proportion of housing growth.

26. Bassingham does not appear to receive enough credit within the evidence base for the full range and diversity of provision within the settlement, which includes a doctor's surgery, a mobile library and a recently improved community hall. It is not listed as being within 5km of the key service centres of Lincoln, Sleaford and Gainsborough or the strategic employment centres allocated within the Local Plan. Several other settlements with similar credentials are classified as 'Large Villages', only being distinguished from Bassingham, it appears, by the number of dwellings they currently contain.
27. Again, this is discussed in the Officer's Report to committee for the two schemes at Thurlby Road, Bassingham recommended for approval (14/1481/OUT and 15/0688/OUT), and also the Officer's Report to committee for the scheme for up to 35 dwelling at land off Whites Lane, Bassingham (14/1580/FUL). Indeed, the Officer's Report for the scheme for up to 120 dwellings (14/1481/OUT) states:

"From the assessment methodology used in the 'Central Lincolnshire Settlement Hierarchy Study', it is apparent that Bassingham continues to have a range of the key services and facilities reflective of a second tier service village (i.e. in policy terms comparable to villages such as Bracebridge Heath, Waddington, Metheringham and Skellingthorpe), but with the exception of equivalent levels of public transport provision (see 'highways and transport' below). It appears that the relative paucity of bus service frequency serving Bassingham is a key factor in Bassingham's indicative settlement status in the preliminary draft Local Plan. However, in every other regard, the services and facilities present within the village would be well placed to serve and support development of the scale proposed (as required by the NPPF, paragraph 37)..."

28. The recognised lack of significant constraints and its demonstrably more sustainable status both point to the fact that, were it not for its population size, Bassingham would (and should) be higher up the settlement hierarchy. It ought to be classified as a Large Village, with a level of growth accordingly.

**Q16 – Is it necessary to add additional allocations proposed through MM/SC/7?
Is MM/SC/7 necessary to make the Local Plan sound?**

29. The Framework is clear that Local Planning Authorities should ensure choice and competition in the market for land. §47 is explicit that Local Planning Authorities should seek to "boost

significantly the supply of housing". The housing requirement, derived from the FOAN, is not, and should not be viewed as a ceiling to development.

30. Gladman consider the site it is promoting for residential use on land off Thurlby Road should be included as a residential allocation under this policy. A planning application has been submitted for this site (applications no. 14/1481/OUT), which is currently the subject of an appeal. A second application (15/0688/OUT) was also refused permission by North Kesteven District Council. In both cases North Kesteven planning officers have positively recommended the applications for approval and have raised no technical objections. The site is clearly suitable and does not suffer from any of the strategic constraints that would preclude its development. Gladman can confirm the site is available now, is deliverable now and is achievable, being able to make a significant contribution to the Local Planning Authority's five year housing land supply.
31. It is pertinent that the Council's own planning officers have twice found the proposed application to represent sustainable development, having recommended approval for both the application for up to 120 dwellings, and the subsequent 98 dwelling application.
32. The conclusions in the Officer's Report to committee are important:

"...The site is not within any of the statutory landscape designations noted in paragraph 115 of the NPPF, the planning weight must therefore be reduced, and the residual harm would be outweighed by demonstrable social and economic benefits and the strong presumption in favour of increased housing delivery in sustainable locations.

The site would be well served by existing services and facilities within the village that would meet a number of the day to day needs of residents, which are within adopted maximum walking distances. Bassingham is identified as a second tier service village in the saved Local Plan where the principle of extensions to the settlement are accepted through the Locational Strategy. The direction of residential extension, to the north of the village, accords with the commentary within the Council's LCA.

...Taking all material considerations into account, it is apparent that the development of the site would help satisfy and deliver across a wide range of the economic, social and environmental roles of sustainable development highlighted within the NPPF, notwithstanding the accepted degree of localised landscape harm. Overall it is considered that the proposal, with the suggested s106 obligations, and conditions, would constitute a sustainable form of development."

33. It is clear that the other site in Bassingham, in preference to Gladman's site at Thurlby Road, share many of the same characteristics. There is no clarity, therefore, as to why the proposed site at Thurlby Road was rejected in favour of the other allocated site (Land off Whites Lane,

Bassingham 14/1580/FUL). The site at Whites Lane was only included as an allocation due to it being granted planning permission rather than testing through the Sustainability Appraisal and other evidence base documents. On this basis, Gladman consider these elements of the plan are unsound as additional housing sites are required to allow for flexibility and contingency and should be tested through the SA process.