



The Planning Inspectorate

Report to the Central Lincolnshire Joint Strategic Planning Committee

by Jeremy Youle BA(Hons) MATRP MRTPI DipPSM and

Matthew Birkinshaw BA(Hons) Msc MRTPI

Inspectors appointed by the Secretary of State for Communities and Local Government

Date 10 April 2017

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

REPORT ON THE EXAMINATION OF THE CENTRAL LINCOLNSHIRE LOCAL PLAN

The Plan was submitted for examination on 29 June 2016

The examination hearings were held between 1 November and 14 December 2016

File Ref: PINS/M2515/429/4

Abbreviations used in this report

2004 Act	Planning and Compulsory Purchase Act 2004
AGLV	Area of Great Landscape Value
AONB	Area of Outstanding Natural Beauty
CLLP	Central Lincolnshire Local Plan
Committee	Central Lincolnshire Joint Strategic Planning Committee
CIL	Community Infrastructure Levy
DCLG	Department for Communities and Local Government
DtC	Duty to Co-operate
dpa	Dwellings per annum
EA	Environment Agency
EEA	Established Employment Area
ENA	Central Lincolnshire Economic Needs Assessment
ESUEs	Employment Land on Sustainable Urban Extensions
GTAA	Gypsy and Traveller Accommodation Assessment
HIA	Health Impact Assessment
HMA	Housing Market Area
IOS	Important Open Space
IIA	Integrated Impact Assessment
LCC	Lincolnshire County Council
LDO	Local Development Order
LDS	Local Development Scheme
LEB	Lincoln Eastern Bypass
LES	Local Employment Site
LGS	Local Geological Site
LIAT	Lincoln Institute for Agri-Food Technology
LNR	Local Nature Reserve
LPA	Local Planning Authority
LSA	Lincoln Strategy Area
LSB	Lincoln Southern Bypass
LWS	Local Wildlife Site
MM	Main Modification
MoD	Ministry of Defence
NEQ	North East Quadrant
OAN	Objectively assessed need for housing
ONS	Office for National Statistics
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
PSA	Primary Shopping Area
SA	Sustainability Appraisal
SES	Strategic Employment Site
SEQ	South East Quadrant
SWQ	South West Quadrant
SHELAA	Strategic Housing and Economic Land Availability Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SSSI	Site of Special Scientific Interest
SUE	Sustainable Urban Extension
WRC	Water Recycling Centre
WGC	Western Growth Corridor
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the Central Lincolnshire Local Plan provides an appropriate basis for the planning of the City of Lincoln and the districts of North Kesteven and West Lindsey, provided that a number of main modifications are made to it. The Central Lincolnshire Joint Strategic Planning Committee has specifically requested that we recommend any main modifications necessary to enable the Plan to be adopted.

The main modifications all concern matters that were discussed at the examination hearings. Following the hearings the Committee prepared schedules of the proposed modifications and where necessary carried out sustainability appraisal of them. The MMs were subject to public consultation over a six-week period between 23 January and 6 March 2017 and we have recommended their inclusion in the Plan after considering all the representations made.

In summary they:

- Amend Policies LP2 and LP4 to ensure greater clarity for decision-makers concerning the principle of development throughout the settlement hierarchy, including clarity surrounding exceptions;
- Provide a mechanism for the monitoring and review of Policies LP2 and LP4;
- Delete residential allocations within medium and small villages to reflect the spatial strategy of the plan and distribution of housing, and introduce a new tier allowing infilling within hamlets;
- Define the OAN for housing and jobs;
- Provide greater flexibility and clarity regarding proposals for economic development, including a positively prepared framework for development of unallocated sites;
- Change the affordable housing threshold to ensure consistency with national planning policy;
- Provide additional flexibility to Policies LP28, LP30, LP39 and LP44 concerning Sustainable Urban Extensions;
- Provide greater clarity to decision makers concerning the principle of development within Green Wedges and affecting Important Open Spaces;
- Revise Policy LP32 regarding Lincoln's Universities and Colleges to support education, teaching and research at the University of Lincoln's Riseholme Campus; and
- Amend Policy LP57 to provide greater clarity regarding the redevelopment of MoD land and buildings.

Introduction

1. This report contains our assessment of the Central Lincolnshire Local Plan ('CLLP') in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first, whether the CLLP's preparation has complied with the duty to co-operate and other legal requirements. It then considers whether the plan is sound. The National Planning Policy Framework ('the Framework') makes it clear that, in order to be sound, a local plan should be positively prepared, justified, effective and consistent with national policy.
2. This is a joint Local Plan which covers the local planning authority ('LPA') areas of the City of Lincoln Council, North Kesteven District Council and West Lindsey District Council. It has been prepared by the Central Lincolnshire Joint Strategic Planning Committee ('the Committee') in a formal partnership between the three authorities and Lincolnshire County Council ('LCC').¹
3. The starting point for the examination is the assumption that the Committee has submitted what it considers to be a sound plan. The Local Plan, submitted in June 2016 is the basis for the examination. This was published for consultation in April 2016.

Main Modifications

4. In accordance with section 20(7C) of the 2004 Act the Committee has requested that we should recommend any main modifications ('MMs') necessary to rectify matters that make the Plan unsound and thus incapable of being adopted.² This report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearing sessions, are necessary. The MMs are referenced in bold in the report (**MM/1**, **MM/2** etc.) and are set out in full in the accompanying Appendix.
5. Following the examination hearings the Committee prepared a schedule of proposed MMs and carried out sustainability appraisal of them where relevant. The MM schedule was subject to public consultation for 6 weeks. We have taken account of the consultation responses in coming to our conclusions and have made some amendments to the detailed wording of the modifications where necessary for clarity. None of the amendments significantly alter the content of the modifications as published for consultation or undermines the participatory process and/or sustainability appraisal that have been carried out. Where necessary these changes are highlighted in the report.

Policies Map

6. The adopted policies map illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, LPAs are required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the Central Lincolnshire Policies Map and associated Inset Maps.

¹ Under Sections 28 and 29 of the 2004 Act

² Committee's letter dated 7 July 2016

7. The policies map is not defined in statute as a development plan document and so we do not have the power to recommend main modifications to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map. Examples include where amendments have been necessary to some of the site allocations under Policies LP48-54. In addition, there are also some instances where the geographic illustration of policies on the policies map is not justified and changes are required to ensure that the relevant policies are effective. Examples include changes to Green Wedges and Important Open Space designations.
8. These changes to the Policies Map were published for consultation alongside the MMs for the same 6 week period³. An additional inset map for Middle Rasen was also included, as this had been omitted from Inset 20 in error. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Committee will need to update the adopted policies map to include all the changes proposed in the Central Lincolnshire Policies Maps, and relevant Insets as amended by the further changes published alongside the MMs.

Assessment of the Duty to Cooperate (DtC) and legal compliance

Duty to Cooperate

9. Section 20(5)(c) of the 2004 Act requires that we consider whether the Committee has complied with any duty imposed on it by section 33A in respect of the Plan's preparation. The duty applies where there are 'strategic matters' which would have a significant impact on at least two planning areas or on a county matter in a two-tier area.
10. In this case, cooperation between the three authorities and the County Council has taken place through the preparation of a joint local plan prepared by the Committee. Through this cooperation the position on all strategic matters between these authority areas has been considered and resolved. This includes the amount and distribution of housing and employment growth and the role and status of settlements.
11. The Committee has documented the interactions with planning authorities which adjoin the Local Plan area and other prescribed bodies.⁴ None of this evidence indicates that there are any unresolved strategic matters. It is significant here that the Committee is seeking to provide for all its own identified housing and employment needs and that no neighbouring authority has made a request for the Committee to accommodate any unmet need from outside the plan area. The only potentially significant issue arose in connection with the possible effects of the proposed level of housing growth on South East Lincolnshire. However, Appendix 3 of the DtC Evidence Report confirms that these concerns were subsequently resolved following dialogue.

³ Document ED025

⁴ Documents E052 and E052A

12. Consequently, we are satisfied that the Committee and the three authorities have engaged constructively, actively and on an on-going basis on strategic matters in the preparation of the Plan. The duty to co-operate has been met.

Legal Compliance

Local Development Scheme (LDS)

13. The CLLP conforms to the subject matter and geographic area set out in the LDS⁵. It was submitted for examination only one month later than the date specified in the LDS, and has therefore been prepared broadly in line with the timetable.
14. The Plan area is logical given that the administrative boundary of the City of Lincoln is tightly constrained and our conclusions below on the housing market area. The plan period is from 2012 to 2036. This complies with the Framework which seeks an appropriate timescale to take account of longer term requirements.

Consultation

15. The Committee has confirmed that consultation was carried out in accordance with the Central Lincolnshire Statement of Community Involvement⁶ and the relevant regulations, as evidenced in the Consultation Statements and elsewhere.⁷ This included three separate consultation stages on the preliminary draft, further draft and proposed submission draft plan.
16. At the submission stage the plan was made available on-line and in paper copy at the offices of the three Councils and at various community buildings. Supporting information was only provided in paper form at North Kesteven's offices but it was also available on the website. Those parties on the consultation database were notified by e-mail and letter. The consultation period lasted for six weeks. Throughout the preparation of the plan use has been made of public consultation events, media briefings and social media. Comments could be made on-line or by use of a paper form.
17. Concerns have been raised that the website was difficult to navigate, that the policy maps could not always be easily found on-line, that not all the supporting evidence was available in the earlier stages of consultation and that advance notice of some public events was limited. It is possible that there have been some imperfections in the process. However, the plan has been publicised widely throughout its preparation and a substantial number of representations have been made. Overall we are satisfied that sufficient publicity has been carried out and that interested parties have had adequate opportunities to engage in the process and make representations. In particular, we have not been provided with any clear evidence to show that any party has been denied an opportunity to comment or that their interests have been prejudiced.

⁵ Document E002A

⁶ Documents E045 and E045A

⁷ Documents E053 and ED004

18. The Committee has not prepared detailed tables or lists summarising its response to each individual point made in representations, but nor is it specifically required to do so by any legislation or national policy. Furthermore, the absence of such a list does not mean that the Committee did not take representations into account. Indeed, extensive summaries of the concerns raised were prepared at each consultation stage⁸. In addition, the Committee has prepared an 'Evidence Report' for each policy in the plan. These summarise the comments made in some detail and provide a brief overall commentary in response.
19. In some cases there is an indication that comments made have led to changes, for example to the positioning of some settlements in the hierarchy.⁹ Some of the responses are brief and quite broad brush in nature. However, the Committee is clear that it has taken account of representations¹⁰ and we have no compelling evidence before us to conclude that it did not. Similarly, we have no strong reasons to doubt that elected Members had adequate access to information when making decisions about the plan.

Habitat Regulations

20. A Screening Report has been prepared and this concludes that the CLLP would not be likely to have a significant effect on any European biodiversity site either alone or in combination with other plans or projects. Consequently, no further assessment work is necessary. Natural England has confirmed that it agrees with this conclusion and we have no reason to disagree.

Sustainability Appraisal

21. The Committee has carried out a sustainability appraisal of the plan.¹¹ There have been some criticisms of the alternatives considered, particularly in relation to options for the distribution of development between the tiers.
22. However, the Planning Practice Guidance ('the PPG') states that a sustainability appraisal does not need to be done in any more detail, or using more resources than is considered to be appropriate for the content and level of detail in the plan¹². It is possible that some of the options tested could have been expressed differently, or in more detail, or sometimes more specifically. In places the conclusions could perhaps have been clearer or set out in more depth. Nevertheless, in overall terms, the Committee has carried out an adequate sustainability appraisal of the plan and reasonable alternatives have been considered to a sufficient degree.

Conclusion on legal compliance

23. The Plan complies with the 2004 Act and the relevant Regulations.

⁸ Documents LP01A, LP02A and LP03A

⁹ For example, see para. 4.1 and 5.1 of Document PSEVR2

¹⁰ For example in Document ED004 in response to the Inspectors' initial question 3

¹¹ Documents E001, E001A, E001B and E001C

¹² Paragraph: 009 Reference ID: 11-009-20140306

National Policy

24. We have considered whether the CLLP is consistent with national policy at the time of the examination. Consultation on various changes to national policy was announced in the Government's White Paper *Fixing our broken housing market* in February 2017, at a late stage in the examination. Once changes to national policy are in place, the Committee will need to consider if any action would be necessary. This might, for example, include an early review of the plan or parts of it.

Assessment of Soundness

Main Issues

25. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings, we have identified 16 main issues upon which the soundness of the CLLP depends. The remainder of the report deals with the main issues and focuses on matters of soundness, rather than responding to every point raised by representors.

Issue 1 – Whether the plan identifies a sound assessment of the overall level of housing need, and whether it makes appropriate provision to meet that need.

26. The objectively assessed need for housing ('OAN') in the plan area has been established through the July 2015 *Central Lincolnshire Strategic Housing Market Assessment*¹³ ('SHMA'). The plan states that the OAN is between 1,432 and 1,780 dwellings per annum ('dpa'). This equates to 34,368-42,720 dwellings over the plan period.

Housing market area

27. Lincoln occupies a central position within the plan area, with the main towns of Gainsborough to the north-west and Sleaford to the south. The remainder of the area is largely rural in character with two market towns and a large number of villages of varying sizes.
28. Given this geography, and based on an analysis of various spatial indicators, the SHMA concludes that the three local authority areas (i.e. the plan area) can reasonably be regarded as forming one housing market area. For example, about 68% of household moves are contained within the Central Lincolnshire area and a high percentage of those who work in the combined area also live within it (c.77%).
29. However, it is inevitable that the boundaries between housing market areas will not always be clear cut and housing market areas will rarely conform precisely to local authority administrative boundaries. Indeed, the national research presented in the SHMA dating back to 2010 shows that parts of the Lincoln Strategic HMA extend into adjoining local authority areas and research carried out in connection with the former Regional Strategy in the mid-2000s

¹³ Document E003

also showed 'shaded overlaps' between the Central Lincolnshire HMA and its neighbours.

30. Nevertheless, the Lincoln Strategic HMA covers the majority of the three combined local authority areas taken together. Furthermore, plan making is carried out on the basis of LPA boundaries, even where a joint plan is prepared. It is therefore pragmatic and sensible to look for a 'best fit' HMA which conforms to relevant LPA boundaries, where this can reasonably be achieved. In this case the degree of containment is sufficient to justify the approach taken, and there is nothing in the SHMA to suggest that an alternative approach is justified.
31. Concerns have been raised about the potential for some neighbouring authorities to have unmet housing needs which should be accommodated in Central Lincolnshire. This was said to be a particular risk in relation to the coastal areas to the east where development may be constrained by flood risk issues, including East Lindsey, which is shown in the SHMA as potentially falling within four different Strategic HMAs.
32. However, at the time of the examination there had been no requests from neighbouring authorities to help accommodate any unmet need for housing, or other development. Nor is there any clear indication at this time that there will be. Moreover, the assessment of need in neighbouring authorities, their capacity to meet that need, and how any potential unmet need would be dealt with would be part of the examination of neighbouring plans and their legal compliance, including in relation to the duty to cooperate. At this stage such hypothetical scenarios do not justify any alternative approach in Central Lincolnshire, or the significant delay that would result to plan preparation from recalculating the OAN for any different spatial area.

Starting point to establish housing need

33. The SHMA uses the 2012-based sub-national household projections published by the Government as the starting point to establish housing need.¹⁴ These were the most up to date projections while the plan was being prepared. They establish a baseline need of around 970 dpa as expressed in the SHMA, which equates to about **23,280** dwellings over the plan period between 2012 and 2036.
34. However, the Government's 2014-based household projections were issued in July 2016, shortly after the plan was submitted for examination. The PPG states that, wherever possible, assessments of OAN should be informed by the latest evidence, but that a change does not automatically mean that the housing assessments are rendered outdated every time new projections are issued.
35. The Committee's assessment indicates that the 2014-based projections could result in a difference of about 31 dwellings a year, or roughly an additional 750 houses over the plan period.¹⁵ This is only a very small percentage increase on the baseline projections (and less on the overall OAN figure after

¹⁴ Department for Communities and Local Government

¹⁵ Committee's Matter 2 statement

the various uplifts discussed below have been applied). In our view the scale of difference is limited, and in this context it is not meaningful. Consequently, the assessment has not been rendered out-of-date and a recalculation of the OAN figure is not required.

Migration assumptions

36. The PPG advises that, although the Government projections are statistically robust, plan-makers may consider sensitivity testing based on locally specific assumptions. The 2012-based projections are primarily informed by migration trends over the five year period from 2007-12. However, this coincided with a period of economic downturn and the SHMA concludes that this led to an increase in out-migration and to lower in-migration.¹⁶ This can be seen in Figure 6.9 of the SHMA which shows that net internal migration was significantly higher between 2001 and 2007 than it was between 2007 and 2011. The Committee attributes this difference to a fall in house completions and a loss of jobs, compared to strong jobs growth in the years before. Accordingly, there is a risk that the Government projections could significantly under-estimate the numbers of dwellings needed as the economy recovers. Consequently, the SHMA prefers the use of a 10 year migration trend (based on the period 2002-2012) which would cover the more economically prosperous pre-2008 period as well as the economic downturn which followed.
37. There is no certainty about which trends will most accurately forecast what will happen in the future. However, in circumstances where actual net internal migration has shown significant variations over recent years it is reasonable to use a longer-term trend. This avoids the problem of making forecasts primarily on the basis of what happened in a recessionary period and has the advantage of balancing out highs and lows. Furthermore, as the SHMA points out, the use of a 10 year trend does not suggest a full return to the rates of net migration seen in the early 2000s. It is therefore a prudent, reasonable and justified approach. Using a 10 year trend results in a significant increase in the OAN to 1,367 dpa or **32,808** dwellings over the plan period.
38. A small increase has also been made to allow for Unattributable Population Change. This derives from an adjustment made by the Office of National Statistics ('ONS') to reconcile differences between the 2011 mid-year estimate and the estimate based on the 2011 Census. The SHMA indicates that these differences may result from discrepancies in the assessment of migration flows dating back to the earlier part of the 2000s and that these are less likely to apply if more recent trends are relied upon which are less prone to data error. We have no reason to doubt this analysis and, given that the OAN is based on longer term migration trends, the adjustment is reasonable. In any case the uplift is marginal in the context of the overall OAN figure, leading to an OAN of 1,387 dpa or **33,288** dwellings over the plan period.

Market signals

39. The SHMA concludes that, taken as a whole, Central Lincolnshire has not seen a significant worsening in market signals compared to neighbouring authorities and the national position. There has, however, been a limited worsening

¹⁶ As shown in Figure 6.4 of the SHMA

primarily in relation to house prices and affordability. On this basis, we agree with the SHMA's conclusions that a response to the market signals justifies a moderate uplift to the OAN.

40. The SHMA also concludes that families have been increasingly restricted from forming independent households, that the rates of concealed households are higher in the younger age groups and that housing completions have been lower in recent years. As a result of this analysis, the SHMA assessed the impact of a return to the household formation rates experienced in 2001 for younger age groups. Applying an adjustment on this basis results in an uplift to 1,432 dpa or **34,368** over the plan period (around 3% above the demographic baseline, as adjusted based on long term migration trends).
41. It has been argued by some that this uplift should be regarded as a demographic adjustment to the baseline household projection figures rather than as a response to market signals. However, the Committee's decision to base the scale of the uplift on analysis relating to household formation in younger age groups is reasonable because this appears to be the area where the affordability problems are having the most marked effect in terms of household formation.
42. Furthermore, while the PPG states that the level of uplift should relate to the scale of improvement in affordability which is needed, it does not set out any specific formula or methodology for doing so. The precise amount of any uplift is therefore a matter of planning judgement based on a consideration of the signals. We consider the Committee's adjustment to be a reasonable one.
43. In addition, as will be discussed below, a further uplift has also been applied to the OAN to take account of forecast jobs growth. However, the adjustments to the demographic baseline in response to market signals and to jobs growth do not necessarily have to be applied as separate additional uplifts. This is because an uplift to help ensure a balance between jobs and workers could have a positive effect on market signals, including in relation to affordability. The same could also be said about the substantial uplift which has already been applied to the Government's household projections based on 10 year migration trends given that these are, in part, a response to a fall in house completions and jobs, both of which are factors which can affect affordability.
44. Conversely, arguments have also been put forward that further increasing the supply of housing as a response to market signals will not necessarily result in more young people forming separate households. This is because there are other factors operating outside the planning system which could suppress household formation in these age groups, including access to work and the cost of student education. However, the Committee has advised that 2001 represents a time when the ratio between house prices and earnings was at a long term average.¹⁷ It therefore represents a period where there were fewer constraints on younger households exercising a choice to form a new household. Overall, this is a reasonable position.
45. We appreciate that Inspectors examining some other plans may have recommended higher percentage increases in response to market signals.

¹⁷ Document E003 and Committee's Matter 2 Statement

Nevertheless, taking all of the above into account, and the evidence in the SHMA, we consider that in this case the Committee has made a reasonable planning judgement about the scale of the market signals uplift based on the significance of the affordability constraints which apply in Central Lincolnshire.

Jobs

46. The SHMA then recommends that one final upwards adjustment is made to the OAN in relation to projected job growth. This is in line with the PPG which seeks to avoid a position where the labour force supply is less than the projected job growth, potentially resulting in unsustainable commuting patterns and a reduction in the resilience of local businesses.
47. The SHMA examines three scenarios. A baseline economic forecast indicating 1,540 dwelling pa (36,960 over the plan period) and two further scenarios based on forecasts in the Central Lincolnshire Economic Needs Assessment (ENA, 2015).¹⁸ These are referred to as the Adjusted Scenarios - Lower and Higher Growth rates. These scenarios would lead to a higher need for 1,681 or 1,780 dwellings pa respectively (40,344-42,720 over the plan period).
48. The plan sets out a forecast baseline jobs growth of 11,894 new jobs (full time equivalent) over the plan period. This equates to 15,071 net new jobs in total, allowing for part-time working.¹⁹ Based on modelling the SHMA concludes that an additional 1,540 dwellings pa would support about 630 jobs pa. This equates to around 15,000 jobs over the plan period.
49. Accordingly, an uplift to 1,540 dwellings pa (**36,960** over the plan period) would help ensure an appropriate balance is achieved between the jobs growth target in the plan and housing growth. In contrast, both the Adjusted Scenarios would lead to a significantly higher level of job growth than the plan envisages.²⁰ In this context, the uplift is justified and, given the conclusions we reach below about the job growth target in the plan, it would not be appropriate to apply a higher uplift.

Student accommodation

50. The SHMA notes that Lincoln's two universities both have ambitions to increase their number of students and that any such increase is unlikely to be fully reflected in the projections. The SHMA also notes that no additional accommodation is currently planned to support this potential growth and that, without this, there could be an increase in demand to use the existing housing stock as student accommodation. However, in the absence of any firm figures relating to student numbers or plans for student accommodation there is no clear justification for increasing the OAN any further, but this is an area the Committee will need to monitor carefully.

¹⁸ Document E008

¹⁹ Para 4.35 of Document PS.EVR3 and Document ED016

²⁰ Figure 6.22 of the SHMA

Conclusions on OAN

51. The PPG advises that establishing the future need for housing is not an exact science and that no single approach will provide a definitive answer. The assessment of the OAN is therefore based on the exercise of reasoned judgements on a careful assessment of the relevant evidence. In our view the Committee has followed this approach and the OAN figure of 1,540 dpa (or **36,960** over the plan period) is justified.
52. However, the plan states that the OAN is *between* 1,432 and 1,780 dpa. Although the SHMA presents a possible OAN range (the difference being largely due to the choice of jobs growth projections), it is clear from the evidence and the discussion at the hearing sessions that the Committee considers the OAN to be 1,540 dpa (or 36,960 over the plan period), a figure that we have endorsed above. In order to be clear and effective the plan should set out the single OAN figure and explain that it is based on a consideration of the SHMA's recommendations. **(MM/3)**

The housing requirement and meeting the objectively assessed need for housing

53. The table on page 109 of the Plan summarises the expected housing supply between 2012 and 2036 from completions, commitments, allocations and windfall development. It reflects the position as of March 2015 and shows the overall total to be 38,610. A more up-to-date version is now available taking into account recent completions and planning permissions. As such the plan should be amended accordingly so that it is up-to-date. **(MM/66)**²¹
54. Despite these various adjustments the new overall total (38,475) is not significantly different from the 2015 figure. On this basis the intention of the plan is to bring forward a supply of housing that will allow the OAN of 36,960 to be met in full. Issues relating to whether the supply is deliverable and developable will be considered in more detail below.
55. Meeting this OAN figure would represent a significant boost to the supply of housing as envisaged by the Framework. Achieving an annual average of 1,540 new dwellings over the lifetime of the plan would also result in more housing being built than has been achieved in recent years, given that the average annual completions rate between 2012 and 2016 was 934²² and between 2008 and 2012 it was 1,199.²³
56. The plan refers to the average 1,540 pa (36,960) figure as the housing or dwelling *target* (para 3.3.3). For clarity, and to ensure that the plan is effective, this should be specifically referred to as the housing *requirement* and it should be made clear the 36,960 figure will be used to calculate the five year supply requirement at any specific time. It should also be clarified that the requirement figure is not intended to be a ceiling **(MM/3)**. However, it is not necessary for the plan to refer to the figure as a minimum, as this could

²¹ Including Annex B

²² Table 3 in Document E007E (which corrects the table presented in Document E007D)

²³ Committee's Matter 6 Statement

cause uncertainty when assessing delivery against the requirement. Nor would there be any clear benefit from doing so.

57. The housing requirement does not make any allowance for the loss of housing stock through demolitions or changes of use. However, there is no evidence to indicate that there might be any significant loss of existing dwellings over the plan period. In particular, the Committee confirmed at the hearings that there are no plans for any significant demolitions of housing areas.
58. Accordingly, and having regard to the conclusions below about housing supply and subject to the recommended main modifications, we conclude that the plan makes appropriate provision to help ensure that the OAN for housing will be met in full.

Issue 2 – Whether the plan appropriately identifies the overall level of affordable housing need and makes appropriate provision to meet it.

Objectively assessed need for affordable housing

59. The plan identifies a need for 17,400 affordable homes over the plan period (or 725 affordable dpa). This is based on analysis in the SHMA which takes into account newly arising needs and the existing backlog. We have no substantive reason to disagree with this assessment or the assumptions behind it. Indeed, as the Committee have pointed out, the assessment is based on a reasonably cautious approach regarding the percentage of income that a household might spend on housing (for example, 25% of household income on private rent), given higher percentages have been assumed elsewhere.²⁴ In any case, as will be discussed below, this figure is significantly higher than the amount of affordable housing that is likely to be delivered through the application of plan policy and other means. Overall, therefore, the precise level of need is somewhat academic in this context.

Threshold for Affordable Housing

60. Policy LP11 seeks affordable housing on all qualifying developments of 4 dwellings or more. As submitted this is not consistent with national policy as expressed in the Written Ministerial Statement ('WMS') on *Small-scale Developers* or with the PPG.²⁵ These both state that affordable housing should not be sought on sites of 10 units or less.
61. The *Central Lincolnshire Local Plan and Community Infrastructure Levy Viability Study*²⁶ concludes that developments of between four and ten dwellings could generally sustain a contribution to affordable housing and still remain viable. However, the WMS states that it is seeking to tackle the disproportionate burden on small-scale developers by lowering construction costs (our emphasis). By doing this the intention is to help increase the supply of housing, encourage development on smaller brownfield sites and help diversify the house building sector by providing a boost to small and medium sized developers. Thus, the fact that smaller developments may be

²⁴ Committee's Matter 2 Statement – Question 21

²⁵ WMS of 28 November 2014 and PPG ID: 23b-031-20161116

²⁶ E011A para.6.6.7

able to sustain a contribution to affordable housing does not in itself justify an exception from clearly stated national policy.

62. The Committee has estimated that the application of Policy LP11 as set out in the submitted plan could help deliver around 7,300 affordable dwellings out of the 17,400 which are needed. This might be reduced by something around 450 units if the threshold is raised in line with the WMS.²⁷ In overall terms, this would represent the loss of a relatively small percentage of the affordable housing that might otherwise be delivered. It would be an even smaller percentage of the overall need for affordable housing. Clearly though, the loss of any affordable housing has significance, particularly for those people who it would have provided for. Nevertheless, the relatively limited scale of the potential contribution from smaller sites does not justify a departure from national policy.
63. As noted above, one of the aims of the WMS is to encourage development on smaller *brownfield* sites. However, this is not the sole aim of the policy and there is no indication in the WMS or the PPG that the threshold is only intended to apply to greenfield sites or to non-rural locations. Indeed, the PPG only specifically refers to the possibility of a lower threshold in "*designated rural areas*".²⁸ In addition, the PPG specifically states that the threshold restrictions do not apply to Rural Exception Sites. As a result, they remain an option for providing affordable housing in rural areas and villages.
64. For the reasons that apply in this specific case, and to ensure consistency with national policy, Policy LP11 should therefore be amended to reflect the thresholds expressed in the WMS and PPG. **(MM/21)**

Amount of affordable housing

65. On qualifying sites Policy LP11 requires that varying percentages of residential developments should be provided as affordable housing. Within the Lincoln Strategy Area the percentage sought will be 25%, except for the Sustainable Urban Extensions ('SUEs') which are expected to deliver 20%.
66. In Gainsborough and Sleaford the SUEs are required to provide 15%, and in all other locations ('Elsewhere') it is 20%. These percentages are based on the conclusions of the plan viability study²⁹ and the variations in the rates are justified by the higher costs of developing SUEs, particularly in relation to infrastructure provision. A higher viability 'buffer' is also assumed for the SUEs to take into account the greater uncertainty and risks regarding costs. With regard to affordable housing we have no reason to question the assumptions which have informed the viability assessments or the conclusions which have been drawn from them concerning relevant thresholds in the plan.
67. Since 2012, 16.6% of all new dwellings in Central Lincolnshire have been built as affordable homes, even though Policy LP11 has not yet been adopted.³⁰ This helps to demonstrate that the percentage requirements are likely to be

²⁷ Committee's Matter 2 Statement

²⁸ Under section 157(1) of the Housing Act 1985 and including National Parks and Areas of Outstanding Natural Beauty

²⁹ Document E011A

³⁰ Committee's Matter 2 Statement – question 22

realistic and achievable. In addition, the policy accepts that the level of affordable housing can be reduced if an accurate viability assessment demonstrates that the percentages sought cannot be met in full. This builds in some degree of flexibility depending on site specific circumstances. Overall, the policy approach should help ensure that housing development is not held back due to viability problems.

68. Some concerns have been raised that the proposed Community Infrastructure Levy (CIL) charges which are being advanced by the three local authorities are proposing rates which, if combined with contributions towards affordable housing as set out in Policy LP11, could render some developments unviable. However, the PPG states that the costs of local plan policy requirements, including for affordable housing, should be taken into account when setting CIL rates.³¹ Accordingly, this is a matter which would stand to be considered, if appropriate, as part of the examination of the draft charging schedules. It is not a soundness issue for this plan, nor does it need to set out proposed CIL rates.
69. Finally the policy accepts the possibility of providing affordable housing in rural areas as an exception to plan policies where there is both a need and a desire. It also accepts the possibility of facilitating such development by allowing a limited amount of market housing. This is in line with the approach set out in the Framework. However, the term 'desire' is unclear and this should be clarified to ensure the policy is effective. **(MM/22)**

Starter homes

70. The Housing and Planning Act 2016 includes a general duty for local authorities to promote the supply of starter homes.³² By the time the plan had been submitted for examination the relevant parts of the Act had not been commenced, and national planning policy and guidance had not been amended. Accordingly, Policy LP11 does not specifically refer to starter homes.
71. The Government's February 2017 White Paper *Fixing our broken housing market* initiated a consultation to revise the definition of affordable housing, to include, amongst other things, starter homes. Such changes could affect the implementation of Policy LP11 and the Committee will need to consider taking appropriate action if national policy is amended.
72. At the hearing session a possible change to the definition of affordable housing in the glossary to the plan was discussed. This would have amended the definition so it merely referred to national policy and legislation. However, this would not be sufficient to future proof the plan regarding any changes in national policy or legislation relating to starter homes and, in any case, the glossary as drafted is consistent with current national policy. Consequently, such a change is not necessary to achieve soundness, although it should be made clear that the current definition derives from the Framework **(MM/76)**.

³¹ PPG ID 25-020-20140612

³² In summary - dwellings available to purchase by qualifying first time buyers at a discount from the market value

Including the date of publication of the Framework will ensure that any potential future changes are obvious to decision-makers.

Meeting the objective assessment of need for affordable housing

73. The Committee estimates that the application of Policy LP11, as modified, could deliver around 6,850 affordable homes over the plan period. In addition, it is possible that 1,000-2,000 additional homes might be delivered by the Councils or other providers, although this is a difficult figure to accurately predict.³³ There could also be some delivery through rural exception sites.
74. This would still leave a significant shortfall against the overall need of 17,400. This is made clear in Policy LP11 and it reflects a realistic view of potential delivery taking into account viability. Thus, it is likely that some of those with affordable housing needs will continue to be dependent on the private rented sector, in some cases supported by housing benefit. It could also leave some households being reliant on overcrowded accommodation.
75. The PPG states that an increase in total housing figures should be considered where it could help deliver the required number of affordable homes.³⁴ This matter was considered in the SHMA and we accept the Committee's position that to increase the housing requirement beyond the OAN of 36,960 could result in an imbalance between jobs and housing.³⁵ Furthermore, the OAN has already applied a substantial uplift to the demographic starting point based on the Government's household projections. Providing for this level of increase will result in more affordable housing being delivered than if the national projections had been used. Consequently, we are not persuaded that a further uplift to the housing figures would be justified in this particular case, even though we appreciate that uplifts may have been applied in other plans.

Conclusions on affordable housing

76. Subject to the recommended main modifications Policy LP11 will be sound. The application of the policy will help achieve the plan's objective of meeting the housing needs of all the plan's communities but, inevitably, only as far as this is realistic in the circumstances of this plan having regard to viability considerations and national policy.

Issue 3 – Whether the settlement hierarchy and the spatial distribution of housing growth in the plan is sound.

Settlement hierarchy

77. Policy LP2 sets out a hierarchy of settlements which has been informed by the *Central Lincolnshire Settlement Hierarchy and Growth Distribution Study*.³⁶ In the first tier, Lincoln is the largest urban settlement in the plan area and it

³³ Committee's Matter 2 Statement – question 24

³⁴ PPG ID 2a-029-20140306

³⁵ As expressed in the Matter 2 hearing session

³⁶ Document E018

clearly has a significant regional and sub-regional role, including in terms of its city centre and the two universities. In the second tier, Gainsborough and Sleaford are both Main Towns which act as major service centres in the areas to the north and south of Lincoln. The third tier contains Caistor and Market Rasen. These are historic Market Towns which also serve their surrounding rural areas. These three tiers are all justified.

78. Below this, settlements have been placed into tiers solely on the basis of their size, as measured by dwelling numbers. The Large Villages are those with over 750 homes, Medium Villages are between 250 and 750 and Small Villages 50 to 250. Anything less than this is regarded as a Hamlet or Countryside. Some representors have suggested that a more sophisticated approach should have been taken based on the particular level and type of services on offer in each settlement. Indeed, an approach along these lines was advanced in an earlier study to inform the Plan.³⁷ However, the availability of services in a particular village can vary over time and the overall size of a village is a reasonable way of deciding its position in the hierarchy. It also has the advantage of being a relatively straightforward and constant measure to count on a consistent basis. Furthermore, in very broad terms, larger settlements will generally tend to provide more services than smaller ones.
79. The precise size thresholds between settlement tiers are clearly arguable one way or the other. Nonetheless, the thresholds used are reasonable ones based on planning judgement and we have nothing before us to suggest any significant variation would be justified.
80. While the development of the SUEs will, to some degree, change the character and size of Lincoln, Sleaford and Gainsborough, care has been taken to ensure that they will not merge with any nearby villages. For example, Policy LP30 specifically requires that the Lincoln South East Quadrant SUE avoids coalescence with the villages of Bracebridge Heath and Canwick. Accordingly, the settlement hierarchy status of nearby villages should not be affected by the development of any of the SUEs.
81. It is possible that, over the plan period, the levels of housing growth in some settlements could result in the total number of homes passing over the upper threshold defining a particular tier. This would be a matter for the review of the plan and the settlement hierarchy is a reasonable starting point to help determine growth levels in this plan.
82. During the hearing sessions the Committee accepted that the settlement of Riseholme does not have a typical village centre or core. Instead, it consists of a row of houses along Riseholme Lane leading up to the University of Lincoln's Riseholme Campus with additional properties further to the south on St. Georges Lane. As a result, it does not accord with the description of a small village in Document E018 which precludes dispersed or ribbon development. This should be corrected by removing Riseholme from the list of small villages under Policy LP2. **(MM/9)**

Overall distribution of housing growth

³⁷ Document ED015 – Preliminary Central Lincolnshire Hierarchy Study

83. Policy LP3 sets out the overall distribution of housing growth to meet the housing requirement, with around 64% in the 'Lincoln Strategy Area' (LSA), 12% each to Gainsborough and Sleaford and 12% 'Elsewhere'.
84. The LSA includes the urban area of Lincoln (which is larger than the administrative area of the City) and the surrounding villages. This is justified on the basis of travel to work patterns and self-containment in terms of those who live and work in the same area.³⁸
85. The level of housing growth within the LSA broadly reflects its population size. This is reasonable given that it includes both the main city of Lincoln, which might reasonably be expected to be a main focus for growth, and several surrounding rural villages where less growth is appropriate. Within the Lincoln Strategy Area 67% of the housing growth (16,837 dwellings) will be within or next to Lincoln itself (including the SUEs), with 33% (8,328) in surrounding villages.³⁹ This is a reasonable split having regard to the size and number of villages in the LSA.
86. Sleaford and Gainsborough each contain about 6% of the area's population⁴⁰ and the intention of the Plan is deliver a higher level of housing growth in these towns, in part to support regeneration. The remaining 'Elsewhere' category includes all the settlements outside the LSA (except for the two Main Towns). These areas accommodate around 24% of the area's population.⁴¹ However, due to the upwards adjustment to Sleaford and Gainsborough the housing growth target for 'Elsewhere' is set at 12%. In effect therefore, the plan has broadly chosen to concentrate more development in the two Main Towns and less in the villages and Market Towns outside the LSA than would have been the case if growth had been apportioned solely on the basis of existing population.
87. In very broad terms the plan, including through the application of Policies LP2 and LP4, is seeking to provide more housing in the larger settlements which offer a wider range of services, including the Main and Market Towns, and less in the smaller ones. However, the precise distribution to individual settlements has also been influenced by the site selection process and by the extent of commitments through planning permissions. As a consequence, there is, quite reasonably, no precise correlation between the size of a settlement and the proposed housing numbers planned for.
88. Furthermore, establishing growth levels in individual settlements is not a simple mechanical exercise but is, instead, one that is informed by the exercise of planning judgement. Overall, the distribution of housing growth between the settlement hierarchy tiers and to individual settlements is justified and conforms to the Framework's core planning principle of focussing significant development in locations which are, or can be made sustainable. It is also generally the case that larger settlements will usually be able to absorb proportionately more housing growth than smaller ones without compromising their character, appearance and setting.

³⁸ Document E017 – Lincoln Strategy Area Growth Study Options Report

³⁹ Document ED018

⁴⁰ Document PS.EVR3 – page 15

⁴¹ Document PS.EVR3 – page 15

89. We have not been provided with any clear evidence that shows a direct link between particular growth levels and the maintenance or enhancement of particular services in the Large, Medium or Small Villages. However, as a matter of planning judgement a reasonable level of growth has been allowed for in these rural villages and this will be likely to help support their vitality, as sought by the Framework. Furthermore, Policies LP2 and LP4 allow for more growth to come forward in Small and Medium villages, for example if advanced through a Neighbourhood Plan or with the benefit of demonstrable community support. There is also some provision for additional growth in Large Villages through infill and exceptionally, on the edge of the settlement. As a result, we consider that the distribution of housing across the villages in Central Lincolnshire will enable an appropriate amount of growth and support sustainable rural communities.
90. We are also satisfied that the Sustainability Appraisal considered reasonable options, including the preferred strategy with a boost to Sleaford and Gainsborough, an option to place more growth in rural areas and one where a higher proportion would be directed towards the urban areas.

Conclusion on settlement hierarchy and housing growth

91. Taking into account completions, commitments, allocations and windfall development the plan will help achieve something close to the overall distribution in Policy LP3, including in Sleaford where past levels of development may have been suppressed by a shortage of allocated sites.⁴² We therefore conclude that the overall spatial distribution of housing growth, including as set out in Policy LP3, is sound.

Issue 4 – Whether the approach to development in Policies LP2 and LP4 will be effective in achieving an appropriate distribution of housing growth.

Overall approach

92. The Plan does not define any settlement or development boundaries. The Committee has advised that the overall aim is to produce a flexible and responsive plan that does not seek to limit acceptable housing development simply because of a line drawn on a map. Instead, the Plan supports residential development in two ways. Firstly, through the allocation of specific housing sites and SUEs, and secondly, through the application of Policies LP2 and LP4. These seek to explain the circumstances in which development will be permitted on non-allocated sites in all tiers of the settlement hierarchy.
93. The fundamental difficulty here, in the absence of settlement or development boundaries, is to develop policies that strike an appropriate balance between flexibility and certainty. They must also be clearly expressed in order to meet the Framework's requirement that policies should provide a clear indication of how a decision maker should react to a development proposal.
94. In broad terms we support the overall approach taken by the Committee. It seeks to facilitate sufficient development to meet the housing requirement in

⁴² As shown in the table on page 109 of the Plan, as proposed to be modified

accordance with the settlement hierarchy without being unduly restrictive on further development, particularly if there are reasons to support it locally. In some respects it is similar in approach to a policy advanced in the *Fenland District Council Core Strategy*, particularly in relation to the Small and Medium villages. This plan was found sound following examination in April 2014.⁴³

95. However, there are differences in the policy wording between the two plans and the overall circumstances are not necessarily the same. In this case, we consider that there are problems with the drafting of Policies LP2 and LP4 and several changes are needed to ensure the plan will be clear and effective. These are considered below, looking at each tier in turn.

Lincoln Urban Area (Tier 1)

96. Policy LP2 provides for development to be delivered in, and around the edge of the 'Lincoln Urban Area', principally through allocations. The policy also allows for the favourable consideration of "*additional growth on non-allocated sites in appropriate locations*". However, the term 'appropriate locations' is not defined in the Plan. It is therefore unclear how a decision-maker would decide if a proposal is *appropriate* or not. Furthermore, the Committee has confirmed that the intention is to limit this *additional growth* to locations *within* the developed footprint of Lincoln. This is a reasonable position given the very substantial growth that is being proposed, including via the four SUEs and several residential allocations (around 16,800 in total over the plan period).⁴⁴ Nevertheless, the policy as drafted is ambiguous on this point.
97. Consequently, the policy should be modified so that it defines what is meant by *appropriate locations*. This can be done by explaining that it involves locations where development would not conflict with other plan policies, including in particular Policy LP26 (a design policy), and where development would retain the core shape and form of the settlement, and would not significantly harm the settlement's character and appearance or its rural setting. This would inevitably rely on some planning judgement, but so does the determination of any proposal against a design-based policy. It also needs to be made clear that the potential for *additional growth* only applies to sites falling within the *developed footprint*, a term which then needs to be defined by reference to the built form of the settlement. **(MM/2)**
98. The 'Lincoln Urban Area' is described briefly in Policy LP2. But without any settlement boundaries there is a lack of clarity in the plan about whether some particular built-up areas might belong to Lincoln or to neighbouring villages. This could create difficulties when deciding which policies are relevant in decision-making, and should be rectified by modifying the key diagram for Lincoln to more clearly define the built up area **(MM/35)**. Additional text is also required to refer decision makers to the amended key diagram. **(MM/2)**

Main Towns (Tier 2)

99. The approach in the Main Towns of Gainsborough and Sleaford is similar to the Lincoln Urban Area. However, as with Lincoln, it needs to be made clear that

⁴³ Documents ED012, ED013 and ED014

⁴⁴ Document ED018

"*additional growth on non-allocated sites in appropriate locations*" will be considered favourably *within* the developed footprint (as defined) (**MM/2**). This is a reasonable approach given the substantial growth proposed across both towns (around 8,200 in total).

100. In addition, the term *appropriate locations* needs to be defined, including by reference to Policy LP26, and it should be made clear that growth in the main towns will primarily be through allocations (**MM/2**). Finally, as with Lincoln, the key diagrams for Gainsborough and Sleaford should be amended to make it clear where the indicative built-up areas are (**MM/52** and **MM/61**). This is especially important given the relationship and proximity of Gainsborough to Lea and Morton.

Market Towns (Tier 3)

101. The approach in the Market Towns of Caistor and Market Rasen is different. Most of the housing growth is expected to be from allocations (367 and 640 dwellings respectively⁴⁵) and infill, intensification and renewal in the existing urban areas. However, the plan also favourably considers the prospect of "*additional growth on non-allocated sites in appropriate locations on the edge of these market towns, though these are unlikely to be supported if over 50 dwellings or 2 ha*". This flexibility to allow additional edge-of-settlement housing is appropriate having regard to the Market Town status of these settlements (i.e. their role as service centres), and given that growth through allocations in both towns will be less than some Large Villages such as Billingham (563), Ruskington (549) and Skellingthorpe (651).

102. The presumption against individual edge of settlement developments of over 50 dwellings is a reasonable one. It will help ensure that housing growth respects the form of the settlement and will not unduly extend development into the countryside. However, the policy needs to be amended to clarify the criteria that will be used to assess whether a development is in an *appropriate location*, including by reference to the *developed footprint* and Policy LP26 (**MM/2**). This specific policy reference is particularly important because, amongst other things, Policy LP26 seeks to prevent the coalescence of settlements and ribbon development. These are likely to be key considerations when determining edge of settlement proposals.

Large Villages (Tier 4)

103. The approach in the Large Villages is different again. Most housing growth is intended to come from the allocations in Policy LP52 and infill, intensification or renewal. The policy accepts the possibility of development on non-allocated sites in "*appropriate locations on the edge of these villages*", but, only in *exceptional circumstances* (and with a size limit of 25 dwellings or 1 ha). The presumption against developments beyond this size is reasonable, for the reasons given above in relation to Tier 3.

104. Some of the Large Villages are larger in size than one or both of the Market Towns, as measured by dwelling numbers.⁴⁶ This has led to some

⁴⁵ As recommended to be modified by MM/69 – indicative remaining capacity

⁴⁶ Document E018 – Table A

representors suggesting that the plan should be amended to either increase the number of allocations or to specifically permit higher levels of growth (such as by removing the restriction on site size and dwelling numbers). Examples include villages such as Cherry Willingham and Ruskington where it has been argued that more development should be promoted due to their size and facilities when compared to Caistor and Market Rasen.

105. We do not see this as necessary. This is because even the largest of these villages do not generally have the same range of functions as the Market Towns. This can be seen by comparing the services and facilities listed in the Large Villages and the two Market Towns in the Appendix to the 2014 Settlement Hierarchy Study.⁴⁷ Furthermore, the Large Villages generally lack anything that could be described as a town centre along the lines of Market Rasen or Caistor. We therefore agree with the Committee that they have a quite different character and 'feel'. As such, and given the scale of growth in the Large Villages through allocations (many have allocations totalling between around 200 and 560 dwellings), a more restrictive approach to edge of settlement development than in the Market Towns is justified.

106. However, as with Tier 3, the policy needs to be clarified to make clear the broad circumstances in which development will be permitted on non-allocated sites. In particular, the terms *exceptional circumstances* and *appropriate locations* need to be clarified and reference made to the developed footprint. The policy should also make it clear that these large villages have a role to play in providing *housing* as well as for employment, retail and key services, to correct an omission (**MM/2**). Although it has been suggested that examples of exceptional circumstances should be listed, this would be too prescriptive and is not the intention of the policy. Reference to the criteria in Policy LP26 provides decision-makers with a clear indication of what types of edge-of-settlement schemes may be appropriate.

107. Finally, the submission version CLLP did not include an Inset Map for Middle Rasen. This has been rectified by consulting on a map alongside the MMs. It shows the geographic illustration of relevant policies, although there are no specific allocations. Rather than illustrating the entire parish the Inset Map focuses on the village and its immediate surroundings. The adopted policies map should be updated accordingly when this plan is adopted.

Medium and Small Villages (Tiers 5 and 6)

108. The approach in the Medium and Small Villages is again different from that set out above. In these settlements the amount of development is based on a percentage growth level rather than allocations. This is measured against the existing number of dwellings in each village at the start of the plan period. The starting point is to permit 10% growth, raised to 15% if the village has key facilities (such as a primary school) or if it is reasonably close to Lincoln, Sleaford, Gainsborough or a Strategic Employment Area. In this way the villages within the LSA will accommodate more housing than they might otherwise have, reflecting their proximity to Lincoln. This is reasonable in that it attributes more growth to villages with access to a wider range of services.

⁴⁷ Document ED015 – Preliminary Central Lincolnshire Settlement Hierarchy Study

It is also consistent with the Framework which seeks to locate housing where it will enhance or maintain the vitality of rural communities.

109. Some settlements are constrained by flood risk or their location within the Lincolnshire Wolds Area of Outstanding Natural Beauty (AONB). While these settlements each have a notional 10 or 15% growth level attached, Policy LP4 and the supporting text make it clear this growth level can only be achieved if the particular constraints can be resolved. Thus, the housing supply figures presented in the plan do not assume any contribution from these villages. This is a justified position and the policy is reasonably clear on the approach to be taken. However, the reference to constraints being 'mitigated' in the supporting text is incorrect in this context (e.g. in relation to flood risk) and should be replaced by the term 'overcome'. **(MM/5)**
110. There is an argument that some Tier 5 and 6 villages have few planning constraints and benefit from comparatively higher levels of local employment and/or services, and could therefore accommodate more development than the 10 or 15% growth level, such as Bassingham. However, the growth levels are reasonable taking into account the relatively limited size of these settlements (50-750 dwellings) and the potential effect that less constrained growth could have on their character and identity. There is also no firm evidence that a more sophisticated or bespoke approach, for example based on an analysis of access to a wider range of services or jobs would have led to a significantly better distribution of growth. The approach in Policy LP4 was tested alongside other reasonable options through the Integrated Impact Assessment ('IIA') and is appropriate and justified.
111. It is also relevant that the growth levels for each of the small and medium villages are not intended to be an absolute limit on new housing. Instead, there are two means by which additional development will be acceptable under Policies LP2 and LP4.
112. The first is where further growth is permitted by a Neighbourhood Plan. This complies with the Framework which states that neighbourhood planning provides a powerful set of tools for local people to ensure they get the right amount of development for their community and that such plans should not promote less development than set out in the Local Plan. Given the stance taken in the CLLP there is scope for a Neighbourhood Plan which seeks to advance more than the specified 10 or 15% level to be in general conformity with its strategic policies.
113. Secondly, Policy LP4 allows for additional development where there is "*clear local community support*" (or, where demonstrable evidence of this cannot be determined, support from a Parish or Town Council). Again, this aligns with the principles of 'localism'. The Inspector examining the *Fenland District Core Strategy Local Plan* concluded⁴⁸ that a similar policy approach recognised that "*individual communities are best placed to determine the level of growth required beyond these thresholds.*" The same logic applies here, and the policy places a responsibility on local communities to base their support or otherwise on sound planning reasons. In overall terms, the plan builds in a

⁴⁸ Para 142 of Inspector's Report – Document ED014

suitable level of flexibility in these villages to allow for the possibility of more development even when the specified village growth level has been achieved.

114. The size limits for individual development proposals (typically up to 9 dwellings in Medium Villages and 4 dwellings in Small Villages) are based on reasonable planning judgements and should help ensure that the scale of individual developments is proportionate to the village. There is also some flexibility in medium villages given that Policy LP2 accepts developments of up to 25 dwellings in 'exceptional circumstances'. To provide flexibility in small villages, and in recognition that some small villages have a range of employment opportunities and good access to services, the policy should be amended to specify that 'around' 4 dwellings would be acceptable. A MM is also required to make it clear that the identification of a site within a Neighbourhood Plan or through clear local community support would enable larger sites to come forward (**MM/2**). We have amended the modification which was consulted on so that it refers more precisely to the 'local planning authority' rather than the 'Council'.
115. Policy LP4 also includes a sequential test based on location and greenfield or brownfield status. The Framework does not specifically require a sequential test in these circumstances. Nevertheless, it only intends to set out the Government's requirements for the planning system as far as it is relevant, proportionate and necessary to do so. This is to allow accountable Councils the potential to produce their own plans within the framework provided.⁴⁹
116. In this case the sequential test seeks to ensure suitable sites within the built footprint of a settlement are developed first and that greenfield sites outside settlements are only used where necessary (i.e. if sites within the developed footprint or brownfield sites at the edge of the settlement are not available or suitable). This approach will help minimise the development of fields and countryside surrounding settlements. This is a reasonable aim for rural settlements and the policy gives a local expression to the Framework's core planning principle which encourages the effective use of brownfield land.
117. However, several changes are necessary to ensure clarity and effectiveness. There should be a clear cross-referencing and clarity of wording between Policies LP2 and LP4 given that they need to be read and applied together. This also removes the need for some text to be duplicated in both policies, such as that referring to the support of a Parish or Town Council. In addition, the degree of flexibility regarding the size of individual developments needs to be clarified, and finally Policy LP4 needs to confirm that any sequentially preferable location must also be 'appropriate' (and the term must be defined) (**MM/2** and **MM/10**).

Hamlets and countryside (Tier 7)

118. In these locations Policy LP2 limits development to that which is essential to the effective operation of agriculture and other listed uses and as set out in Policy LP55. Policy LP55 does allow for some housing development, including

⁴⁹ Introduction to the National Planning Policy Framework

through the re-use of buildings and to replace existing dwellings. However, the overall approach is intentionally restrictive.

119. There are two problems with Policy LP2 as drafted. Firstly it does not entirely comply with the PPG on Rural Housing which states that *all* settlements (our emphasis) can play a role in delivering sustainable development and so blanket policies restricting development in some settlements should be avoided, unless supported by robust evidence.⁵⁰ Hamlets are defined in this plan as settlements of up to 50 dwellings and there is no clear evidence to justify what amounts to a blanket restriction which would preclude even small scale infill developments. Nor does this approach sit comfortably with the Framework which seeks to avoid isolated new homes in the countryside, but which is more supportive of housing to help support the vitality of rural communities. This can be rectified by accepting the possibility of small scale infill developments within these hamlets.
120. Secondly, there is a potential tension within the plan between Policies LP2, LP4 and LP55. For example, when would a field on the edge of a settlement in Tiers 3, 4, 5 and 6 be regarded as an 'appropriate' location for housing and when would it be regarded as a site within the countryside which should be determined against the more restrictive Policy LP55? There is no easy answer to this, because deciding whether a particular location is 'appropriate' will require an assessment against the various relevant policy criteria, including in Policies LP2, LP4 and LP26. If it fails those tests it would be considered against LP55. However, the plan should recognise that this is an issue which will need to be decided upon in the context of individual applications. **(MM/2)**
121. Achieving these changes logically requires that Tier 7 is divided into two tiers, Hamlets (Tier 7) and the Countryside (Tier 8) setting out a different approach in each **(MM/2)**. A consequential change also needs to be made to Part D of Policy LP55 to ensure internal consistency **(MM/71)**. Whereas Policies LP2 and LP4 specify that additional development can come forward through Neighbourhood Plans, the same text has not been used for hamlets. But this does not mean that the preparation of Neighbourhood Plans would be unsuitable. Instead, Policy LP2 (as modified) seeks to allow a level of development that would be proportionate within what are typically very small settlements of less than 50 houses.

The effectiveness of Policies LP2 and LP4

122. Policies LP2 and LP4 set out a quite different policy approach to the management of housing growth from that which previously applied in the plan area, particularly with regard to the small and medium settlements. Furthermore, the approach will be somewhat complex to apply. For example, in the Small and Medium Villages the decision-maker will need to assess what capacity is left in the village, whether the site complies with the sequential test, whether it is appropriately located, falls within the specified site sizes, and, if the percentage growth limit for the village has been exceeded, whether there is clear local community support.

⁵⁰ PPG ID 50-001-20160519

123. The plan is setting out a largely un-tried and fairly complex approach and there are some risks in terms of potentially foreseeable complications and unintended consequences. For example, if a committed development in a Small or Medium Village starts but then stalls, the growth level could be left unfulfilled over a long period of time. Inevitably there are some uncertainties about whether the approach will be effective and sufficiently clear to decision-makers and developers. Nor can it be known for sure how local communities will respond to the responsibilities placed on them by this policy, given the potentially direct effect they could have on some planning outcomes. However, the extent to which Neighbourhood Plans have been pursued in the area is a positive sign that this role will be handled responsibly.⁵¹
124. We appreciate that the Committee consider the similar policy in Fenland is working well.⁵² Nevertheless, two changes are required to deal with these potential risks. Firstly, to ensure that there is clarity for decision makers, local people, parish councils and potential applicants, the plan needs to commit to providing regular (at least quarterly) up-to-date information about the remaining growth levels in the small and medium villages. This should replace the table in Appendix B of the plan which specifies the remaining growth levels as of March 2015 and so is already out-of-date and, therefore, potentially misleading (**MM/7** and **MM/75**). Secondly, the plan should include a clear commitment that this policy approach will be monitored to ensure that it is delivering appropriate levels of growth in the right locations and that it is providing an effective framework for decision-making. The Plan should also confirm that, if necessary, following monitoring corrective action will be taken, for example, through a partial review of the plan. (**MM/1**)
125. Although concerns were expressed at the hearings about whether the growth levels in the Small and Medium Villages will be correctly applied or treated as a ceiling, the way a Council applies its own policies is outside the scope of this examination.

Conclusions on Policies LP2 and LP4

126. Subject to the recommended main modifications Policies LP2 and LP4 will be capable of providing an effective basis for determining planning applications and should help achieve an appropriate distribution of housing growth.

Issue 5 – Whether the process for selecting the Sustainable Urban Extensions was robust, and whether they are justified, viable and capable of being developed within the plan period.

Contribution to housing requirement

127. Policy LP48 allocates 8 SUEs around the edges of Lincoln, Gainsborough and Sleaford. The SUEs aim to deliver around 14,700 dwellings over the plan period, or roughly 40% of the identified housing requirement. The rationale for pursuing SUEs is consistent with the Framework which states that the

⁵¹ Inspectors' Note: Document ED017 – as of 7 November 2016, 4 Neighbourhood Plans have been 'made', 4 are at referendum or examination stage and 6 are being prepared and have been, or are about to be, consulted upon.

⁵² Committee's Matter 3 Statement – Question 26

supply of new homes can sometimes be best achieved through planning for larger scale development.

128. Although the SUEs are expected to make a significant contribution to the housing requirement, over half of the planned housing growth would be spread over a range of other sites throughout Central Lincolnshire. As identified above, this includes new development across a range of different settlements from the Lincoln Urban Area to infilling in hamlets. As a consequence, the plan does not place an over-reliance on the SUEs in order to meet the housing requirement during the plan period.

Site Selection

129. Appendix 6 of the IIA sets out the overall approach taken to the selection of the SUEs. This started with a strategic assessment of the three principal urban areas of Lincoln, Gainsborough and Sleaford, which reflects the spatial vision and distribution of housing in the plan. By focusing the SUEs in and around the main urban areas it also enables significant new housing to come forward close to existing services, facilities and infrastructure. This is an entirely reasonable approach to adopt.
130. Lincoln, Gainsborough and Sleaford were then divided into segments and tested against SA objectives to determine their potential to accommodate an urban extension. Within each 'segment' candidate zones were identified and tested again. For Lincoln the appraisals identified that areas within the existing and planned by-passes scored significantly higher than sites beyond. This was primarily due to their proximity to the City Centre and ability to limit their landscape and visual impact and prevent coalescence with surrounding villages.
131. One further zone to the south of Lincoln was identified as being suitable for an urban extension. However, due its potential landscape impact in the short-medium term, and its deliverability, land south of Waddington Low Fields is instead identified as a broad location for future growth under Policy LP54. It is likely that this area would come forward after completion of the Lincoln Southern By-pass ('LSB'), and compared to the other zones around the city, was not reasonably a preferred option for this plan period.
132. A similar pattern emerged for Gainsborough, with segments to the north-east and south-east benefitting from close proximity to the town centre and a lower risk of flooding. The area to the north-east of the town is also partially contained by existing landscape features. Due to the geography of the town, bounded to the west by the River Trent, and taking into account that the Gainsborough Southern Neighbourhood already has outline planning permission, there were no clearly preferable alternatives.
133. Similarly, throughout Sleaford areas within the by-pass and the railway line scored considerably better than sites outside, primarily due to their accessibility and landscape impact. Access to the town centre from the east/south-east is also limited by the Grade II listed former Bass Maltings site, with uncertainties regarding the deliverability of the Sleaford link-road. Sites to the south and west therefore represented the preferred location for growth at this point, with the A15 providing a clearly defined boundary to the town.

134. Based on the assessments that have been carried out we are satisfied that the Committee has considered reasonable alternatives for the location of the SUEs, and adequately justified their distribution across Central Lincolnshire.

Lincoln Western Growth Corridor (WGC)

135. The WGC encompasses roughly 390ha of land to the east of the City Centre extending west up to the A46. One of the main constraints to development is the location of the site within Flood Zones 2 and 3.
136. The Framework advises that that Local Plans should apply a sequential, risk-based approach to the location of development, with the aim to steer new development to areas with the lowest possibility of flooding. However, it also confirms that if, following application of the sequential test, it is not possible "*consistent with wider sustainability objectives*" for the development to be located in zones with a lower probability of flooding then, where appropriate, the exception test can be applied. This requires proposals to demonstrate that the wider benefits outweigh the flood risk and that the development would be safe for its lifetime.
137. Such an approach has been adopted at the WGC. Despite being located in Flood Zones 2 and 3 the site is within close proximity to the City Centre. It therefore provides an opportunity to deliver new a mixed-use development that would make a substantial contribution to housing needs in an accessible urban location. By containing development within the boundary of the A46 it would also enable significant growth without extending the existing footprint of the City beyond the by-pass. For the purposes of the Framework, there is nothing to suggest that it is possible (consistent with wider sustainability objectives) to locate the SUE in an area with a lower probability of flooding.
138. In terms of flood risk a working group was established in 2012. This consists of the Environment Agency ('EA'), the Upper Witham Internal Drainage Board and LCC as the lead local flood authority. The group has carried out a number of investigations and tests using the EA's approved flood model which demonstrates that only roughly the northern half of the site would be affected by a 1 in 100 year + climate change fluvial flood event. This also indicates that raising parts of the site and carrying out upgrades to existing infrastructure would create a developable area outside the highest area of risk.
139. During the hearing sessions the EA confirmed that parts of the site would have to be raised by around 1m in total, which would not increase the risk of flooding elsewhere. On the contrary, modelling has demonstrated that by adopting a strategic, collaborative approach to the management of water in the area there would be some benefits to local residents. Subject to upgrading existing pumps improved management practices would reduce, rather than increase the likelihood of localised flooding. The evidence presented therefore indicates that the risks to both new and existing development could be adequately mitigated as part of the final design.

140. Due to the size of the allocation there would also be an inevitable increase in traffic on local roads, especially around Skellingthorpe Road which provides a direct link between the City Centre and the A46. Nevertheless, LCC confirm that recent work with the site promoters has shown that access could be taken from Skellingthorpe Road without the residual cumulative impacts becoming severe. Similarly, Highways England advise that whilst the WGC and other planned developments would have a direct impact on the A46 and some local roads, where this occurs appropriate mitigation could be put in place through the development management process. Network Rail has also confirmed that agreement has been reached to allow a new link over the railway line to provide a direct connection with Beever Street and the City Centre. We conclude the effects of the WGC on the local road network have therefore been adequately considered, and based on the evidence provided the allocation can be accessed without requiring a link onto the A46 for the early phases. Should connections be required at a later date this is provided for in Policy LP30.
141. A requirement of all the Lincoln SUEs is that proposals 'consider' the need for a park and ride. However, this is not an effective policy requirement as there is no mechanism to actually provide such facilities. There is also no evidence to substantiate that park and ride facilities are needed, that the SUEs are the appropriate location for them, or that they have been considered as part of a wider parking strategy for Lincoln. As a result, this part of Policy LP30 is unjustified, ineffective and should be removed. Instead, **MM/38** introduces a requirement that proposals maximise the use of sustainable modes of transport such as walking, cycling and public transport. This is consistent with the Framework's Core Planning Principles and *could* potentially include park and ride facilities, if justified.
142. Other constraints include the proximity of the site to Lincoln's historic core to the north east, Hartsholme Country Park to the south (a Registered Park and Garden) and a Scheduled Ancient Monument ('SAM') at Decoy Farm to the west. Given the size of the site, and subject to an appropriate design and layout it should be feasible for development to respect key views of Lincoln Cathedral and the historic core of the City, which are requirements of Policy LP30. Similarly, through a sympathetic layout the setting of Hartsholme Country Park would be preserved.
143. With regard to The Old Decoy the indicative masterplan in the latest Topic Paper⁵³ illustrates residential development south of the SAM. However, large areas of land would be retained around the pond as part of landscaping and for drainage purposes as part of flood mitigation measures. Alternative designs and/or layouts could also come forward as part of a detailed masterplanning process. Given the size of the allocation we are satisfied that this process would allow the site to come forward without causing any substantial harm to the significance of this heritage asset.
144. In terms of the site's deliverability plans to develop the WGC have been on-going for a number of years. National housebuilders who have previously been involved with the site have since decided not to proceed. However, a local developer active in Lincoln has recently secured a large part of the site

⁵³ Document E014B2

and has expressed confidence in bringing it forward. At the hearing sessions it was suggested that constructive dialogue between the developer and the City of Lincoln Council has been taking place for a number of months, and that following financial re-appraisals it was possible to develop the site without grant funding. A planning application for Phase 1 (around 500 new homes) is expected in 2017 and would be relatively 'infrastructure light'. As a result, based on the evidence provided there is nothing to indicate that the site cannot be developed over the plan period.

145. In order to ensure that the allocation is deliverable, effective and sufficiently flexible, several modifications are required to Policy LP30. **MM/40** is needed to confirm that 'approximately 20ha' of land is proposed for employment and leisure purposes, rather than a fixed amount for each use, which is still to be decided. Due to the size of the site and scale of development proposed a Local, rather than a Neighbourhood Centre is also more appropriate (**MM/37**).
146. In terms of education provision the requirement to provide a specific type of primary and/or secondary school could change depending upon when the majority of the site comes forward. The same objectives can also be achieved by a more flexible approach that requires education provision on site if the scale of the urban extension justifies it. If not, then a contribution towards off-site provision would also be appropriate to meet the needs generated by the development. **MM/34** and **MM/39** therefore remove references to education under Policy LP30 in favour of a more flexible, pragmatic approach for all the SUEs under Policy LP28. The same reasoning applies to all of the SUEs, and to ensure internal consistency changes are required to the remainder of Policy LP30 and Policies LP39 and LP44 (**MM/49** and **MM/55**).

Lincoln North East Quadrant (NEQ)

147. The NEQ is intended to provide around 1,400 dwellings on and around the site of the former Greetwell Quarry. Roughly the eastern half of the site falls within the administrative boundary of West Lindsey District Council and has outline planning permission for up to 500 dwellings. It would be bounded by the proposed Lincoln Eastern by-pass ('LEB'). The remainder of the site encompasses the former quarry and is a designated Site of Special Scientific Interest ('SSSI'), a Local Geological Site ('LGS') and part of a Local Wildlife Site ('LWS').
148. The primary interest of the SSSI is the former quarry face. However, both the Committee and landowners confirm that the design and layout of Phase 2 could avoid the quarry face and provide a buffer to the nearest development in order to maintain its integrity and geological interests. To inform the design and layout of potential future planning applications Policy LP30 therefore requires proposals to protect and enhance the SSSI. It also states that development should protect and enhance the setting of designated heritage assets and ensure, where practicable, that the archaeology of ironstone mining is retained. The plan therefore provides an appropriate framework to protect the integrity of the SSSI and LGS.
149. Immediately to the west of the site is the Greetwell Hollow Nature Reserve. There is evidence that this is important to local residents as an area of accessible open space and is popular with dog walkers. In response Policy

LP30 requires existing important open spaces within, or adjacent to the site to be protected and enhanced, or, that proposals provide adequate compensatory open space to account for any loss. It also specifies that an appropriate buffer would be required between any new development and the LNR, along with measures to address visitor management issues. However, for clarity **MM/41** is necessary to introduce a specific reference to 'Greetwell Hollow', rather than simply referring to 'adjacent' areas.

150. As drafted Policy LP30 also requires a phased approach to development of the NEQ which reflects the LEB. Although this could potentially delay delivery of the site, the Committee confirms that the route has been safeguarded, has planning permission and that funding has been secured with work set to start in 2017 for a period of approximately 2 years. Given the timescales involved in preparing reserved matters and commencing development, the phased approach with regard to the LEB is unlikely to prejudice the SUE from coming forward and being developed in the plan period.
151. Given that the second phase involves the construction of new housing in a former quarry, ground conditions could pose a risk to the timely delivery of the site. Nevertheless, the latest Topic Paper⁵⁴ confirms that the site owners have undertaken investigations which demonstrate that the former quarry can be developed through a combination of land stabilisation and the use of suitable foundations. On this basis there is nothing to suggest that redevelopment of the site is unviable or unfeasible.
152. For consistency with the other SUEs, and to ensure that the policy is flexible and effective it is necessary to specify the requirement for employment land as an 'approximate' figure. To reflect the fact that the plan seeks to provide a flexible approach to employment land at the NEQ it is also necessary to amend Policy LP30 to confirm that the employment land can come forward to provide a range of job creating uses (**MM/40**). This approach is justified at the NEQ given its size, location and context of its surroundings.

Lincoln South East Quadrant (SEQ)

153. The SEQ is the largest of the proposed SUEs and is expected to deliver around 6,000 new homes in total, with approximately 3,500 over the plan period.
154. It lies on a limestone plateau in between the villages of Canwick and Bracebridge Heath. In recognition of their proximity to the site Policy LP30 requires proposals to come forward without causing coalescence between the new community and the neighbouring villages. It also requires proposals to protect and enhance important open spaces adjacent to the site and include an appropriate buffer to the South Common and the International Bomber Command Centre memorial. The policy therefore provides a robust framework to prevent any harmful coalescence or development that would undermine locally important landscape features.
155. In terms of the impacts from additional traffic movements LCC have been involved with the preparation of the plan and have raised no objections to the SEQ, concluding that the cumulative adverse impacts would not be severe. A

⁵⁴ Document E014A2

MM is nevertheless required to Policy LP30 for soundness. Aside from the park and ride (as discussed above in relation to the WGC) Policy LP30 sets out a presumption that a bus priority lane will be provided on the B1188 Canwick Road. This is overly prescriptive and does not require proposals to consider the feasibility or practicalities of undertaking such works. To ensure that the policy is effective **MM/38** is necessary to provide more flexibility surrounding the provision of bus connections between the site and the City Centre.

156. As with the NEQ, the SEQ would also come forward in phases in accordance with completion of the LEB. However, given that work on the LEB is due to commence shortly and take roughly 2 years to complete it will not constrain development of the site. A national housebuilder is actively involved with the project and a planning application for the first phase has been submitted. The allocation is developable within the plan period.
157. Finally, given the flexible approach advocated in Policy LP30 towards employment provision on the site, and for the same reasons as the NEQ, **MM/40** is necessary to make it clear that approximately 7ha of land should be provided for a wide range of job creating uses.

Lincoln South West Quadrant (SWQ)

158. Compared to the other Lincoln SUEs the SWQ is at a much earlier stage in its preparation and the majority of development is subject to providing the first phase of the LSB. However, whilst this represents a significant piece of infrastructure, development of the site only requires the initial connection from the A46 at the Newark Road junction to the site's primary access. At the hearing sessions the site promoters confirmed that this was not an unusual requirement for urban extensions of this nature, and that the landowner has experience of bringing forward such projects in the past. When considering that the plan period runs until 2036, this does not present an insurmountable obstacle to the development of the SUE.
159. Nevertheless, **MM/42** is necessary to correct an error in the plan which refers to connections from Meadow Lane. This should specify that connections to Meadow Lane would be required with construction of the next phase of the LSB from South Hykeham Road.
160. Whereas a more flexible approach towards employment land is justified at the NEQ and SEQ, the Committee confirmed during the examination that this was not the intention for all of the SUEs. For example, Policy LP30 requires proposals at the SWQ to provide around 5ha of land to compliment and expand the neighbouring Boundary Lane Enterprise Park. This is identified as an Existing Employment Area ('EEA') under Policy LP5 where proposals falling within Use Class B1/B2/B8 are supported (Site Ref E23). As such, a different approach is warranted to reflect the opportunities to expand the EEA. In order to make this clear the plan should refer to land for development within the 'B' Use Classes, rather than 'mixed-use employment'. (**MM/40**)
161. To the north-east of the site is the South Hykeham Water Recycling Centre (WRC) operated by Anglian Water. The plan includes a requirement under Policy LP30 that proposals "*undertake a detailed odour assessment to demonstrate no adverse impact on future residents*". This is necessary to ensure that the relationship between the WRC and the proposed development

is considered as part of the masterplanning process. Although the policy would benefit from some additional text to provide clarity, it is not unsound as currently written. Requiring a consideration of air quality and odour is also set out in Policy LP26 and there is no need to duplicate any further tests in Policy LP30. As such, the proposed MM/43 as consulted upon is not required for soundness.

Gainsborough Southern Neighbourhood

162. The Southern Neighbourhood is expected to deliver around 2,500 dwellings in total, with approximately 1,400 in the plan period. Outline planning permission for 2,500 new homes with a mix of employment and community services and facilities was approved in 2011 (Ref 125020).
163. Although Policy LP39 refers to the date of the planning permission as 2010, this drafting error does not affect the soundness of the plan. Despite being consulted upon as a MM (MM/48), it can therefore be amended by the Committee as an additional modification upon adoption.
164. Given that no development has occurred on the site since the approval of planning permission in 2011 concerns have been raised regarding deliverability. However, planning permission was secured shortly after a period of recession. At the hearings the Committee also confirmed that the local market has started to improve in Gainsborough over the past few years and several sites have come forward for development, increasing confidence in the town. In addition, Gainsborough has been identified as one of 20 Housing Zones outside London and is due to benefit from roughly £18m of investment aimed at heritage-led regeneration and housing-led economic growth. This will assist in the further stimulation of growth and development.
165. Furthermore, the landowners have been working to secure an infrastructure provider with experience of unlocking large sites. On the back of this involvement the site has been marketed and an offer has recently been put forward. In summary therefore, developer interest in the site has intensified and planning permission is already in place. As a result, the allocation is justified and should be developable within the plan period.
166. However, Policy LP39 is very prescriptive and refers to the amount of floorspace approved in the 2011 scheme. This fails to anticipate the possibility of revised schemes coming forward or the acceptability of different amounts of development. It is also unnecessary for the plan to mirror precisely what has been approved. For effectiveness a MM is therefore required to provide further flexibility. (**MM/50**)

Gainsborough Northern Neighbourhood

167. The Gainsborough Northern Neighbourhood is allocated for approximately 2,500 dwellings, but only roughly 750 are expected to come forward in the plan period. Although this allocation has not reached the same advanced stage as the Southern Neighbourhood, discussions are on-going between West Lindsey District Council and the landowners regarding submission of a planning application for the first phase in early 2017. As with the Southern

Neighbourhood, the site is a relatively flat, unconstrained area of predominantly arable land. Subject to securing a developer there is nothing to indicate that 750 units cannot be developed over the plan period.

168. As drafted Policy LP39 includes a requirement that the 7ha of employment land should come forward before or alongside dwelling completions. This is not justified and risks prejudicing the delivery of housing. **MM/51** is therefore needed to amend the policy and remove this requirement.

Sleaford South Quadrant (Handley Chase)

169. Sleaford South Quadrant, or 'Handley Chase' as it is referred to by the latest Topic Paper⁵⁵ proposes 1,450 dwellings over the plan period in accordance with an outline planning permission approved in 2015.

170. Since planning permission was granted the landowners have been progressing details for the first phase of development, and a reserved matters application for an initial 32 units has been submitted. Although this represents a relatively small number, the landowners are seeking to deliver the initial access and drainage works and in doing so, generate interest for serviced plots across the remainder of the site. Work is therefore actively on-going to bring the allocation forward.

171. As with the Gainsborough Southern Neighbourhood, there is no need for the policy to precisely reflect an existing planning permission. To be effective **MM/57** is necessary to provide greater flexibility and anticipate the possibility of revised schemes coming forward. The change does not remove the requirement to provide community facilities of a suitable size, type and location. This would be for the development management process to determine should a revised scheme come forward in the future.

172. Similarly, the requirement to mitigate "*unacceptably adverse transport impacts on Silk Willoughby, Quarrington, King Edward Street and Castle Causeway*" directly relates to the approved scheme and should be amended. The reference to the mitigation of 'unacceptably adverse' transport impacts is also imprecise and ambiguous. This should be clarified by (**MM/58**), which still requires proposals to provide appropriate transport mitigation measures.

173. Finally, Policy LP44 relates to the 'Sleaford Area'. It implies that a specific 'Area' has been defined when it has not. This should be clarified by changing the emphasis of the policy wording. (**MM/56** and **MM/59**).

Sleaford West Quadrant

174. Sleaford West is allocated for approximately 1,400 dwellings over the plan period. The first phase of development is to be accessed from Covell Road, Stokes Drive and St Deny's Avenue. Thereafter the remaining site will be delivered from the adjacent A15.

175. There are some local concerns regarding accessing the site from existing streets. However, the wording of Policy LP44 makes it clear that this would

⁵⁵ Document E014G2

only be for limited development informed by traffic modelling. It also directs that the primary vehicular access would be from the new junction with the A15, which would be required to deliver subsequent phases. As a result, sufficient safeguards are in place to prevent any harmful levels of additional traffic using the surrounding residential streets.

176. Similar concerns have been raised in respect of The Drove/Drove Lane, which provides access to allotments to the south and west of the site. But due to the limited capacity of this route Policy LP44 seeks to ensure that it would only be used by allotment holders, cyclists, buses, existing residents and a limited number of new dwellings. This could be implemented and controlled by the final design and development management process.
177. With regard to wider transport considerations criterion g. is ambiguous in its requirement that proposals must manage adverse impacts on movement within the wider Sleaford area. **MM/60** is therefore required to rectify this by referring to the aims and objectives of the Sleaford Transport Strategy. For consistency with the other SUEs and the Framework, and to ensure that the site can be accessed by a wide range of transport measures, **MM/60** is also needed to amend criterion i. by making reference to measures to encourage walking, cycling and public transport.
178. The River Slea is located to the south of the SUE which is fed by a Catchwater Drain running along the northern side of Drove Lane. The submission plan therefore includes a requirement to ensure that any development is safe from flooding by applying the sequential test to inform the site layout. This is consistent with the Framework and ensures that development can come forward across those parts of the site which are at the lowest risk of flooding.
179. In contrast to some of the other SUEs in the plan, the Sleaford West Quadrant specifies that proposals for employment should mainly incorporate uses within Use Class B1. This is because of the site's location next to the A15 corridor, with offices better suited to creating an attractive frontage and gateway to Sleaford than B2 and B8 uses. There are also other locations in Sleaford which are more appropriate for such uses, including the Sleaford Industrial Area and the Sleaford Enterprise Park. The emphasis on providing land for mainly B1 operators is therefore appropriate and justified.
180. Similar to other SUEs, Policy LP44 is very prescriptive on the site areas that should be provided for the local centre, health facilities and education. In order to ensure that the site comes forward effectively **MM/59** is necessary to provide a more flexible approach.
181. Finally, Policy LP44 does not include reference to a hotel. However, it does not preclude such a use either. This would be a matter for the development management process to consider, and the policy is not unsound by failing to refer specifically to hotel developments.

Contingency arrangements

182. For the reasons given above each of the SUEs are developable within the plan period. However, these are all large, strategic sites. Several have significant infrastructure costs and/or no developers in place. A review mechanism is therefore required should their delivery stall.

183. This is provided for in Policy LP54, which allows any post-2036 capacity on the SUEs to come forward before the end of the plan period should any of the sites come forward more quickly than anticipated. A higher demand and build-out rate on one SUE could therefore potentially compensate for a lower rate of delivery on another. The plan also includes a wide range of sites with some 150 residential allocations, in addition to a flexible approach to development in villages with no settlement boundaries. This is not a plan which rests on the delivery of a particular site or project. Consequently, there is no requirement to amend LP54 in favour of releasing sites in Large Villages, for example, if any of the SUEs stall.

Conclusions on SUEs

184. In conclusion the process of selecting the location of the SUEs was robust. Subject to the recommended main modifications the plan will provide a flexible, effective framework for proposals to follow. Based on the evidence provided all of the SUEs are justified, viable and developable within the plan period.

Issue 6 – Whether the other residential allocations are justified, have been subject to a robust process of site selection and are sound.

Methodology

185. A number of assessments have been used to consider whether or not sites proposed for allocation by representors should have been carried forward into the submission CLLP. This includes the *Residential Allocations Evidence Report*⁵⁶, the IIA⁵⁷ (Including Appendices) and the *Strategic Housing and Economic Land Availability Assessment Update* (SHELAA).⁵⁸

186. With the exception of land at Hemswell Cliff⁵⁹ (Ref CL4673) the plan only allocates land for housing in Tiers 1-4 of the settlement hierarchy. Residential development in the Medium and Small Villages and Hamlets is provided for in Policies LP2 and LP4. We have already concluded that the strategy in this regard is justified. Accordingly, it was reasonable for the Committee to focus the search for allocations in only Tiers 1-4.

187. The starting point for considering residential allocations is that sites had to be capable of delivering 25 dwellings or more. While smaller sites can also make an important contribution to housing land supply, especially in rural areas, this is a reasonable approach given that the plan only seeks to allocate land in 'Large' Villages and above. Windfall development, including on smaller sites, is positively supported and facilitated throughout the hierarchy by Policies LP2 and LP4.

188. Where sites of 25 units or more were identified in Tiers 1-4 the assessment in document PS.EVR48-54 considered them against a number of criteria, including matters relating to the natural and built environment, landscape

⁵⁶ Document PS.EVR48-54

⁵⁷ Document E001C

⁵⁸ Document E005

⁵⁹ Inspectors Note: Land South of Willingham Road, Lea is also allocated for housing. However, for the purpose of the draft Local Plan the site falls under Policy LP50: Residential Allocations in the Main Towns.

character and heritage, education, transport and infrastructure. This involved a desk-based assessment, site visits and consultation with external bodies such as the EA, Natural England, Anglian Water, Severn Trent and LCC highways, education and minerals and waste departments. The description of each site also includes commentary on its current status and confirms whether it has been previously developed. Sites were then scored against the relevant criteria using a Red/Amber/Green system.

189. However, these values do not, in isolation, indicate whether a site should be allocated. There is no particular weight given to each value and sites have not been selected by adding up the number of 'Green' scores. Instead, the matrix identified potential suitable sites which were then considered alongside reasonable alternatives in the IIA. The use of a site and its proximity to employment formed part of this process, as did factors such as accessibility by public transport. The scores, taken together with the matrix in PS.EVR48-54, were then used to make an informed judgment about which sites to allocate.
190. The methodology and the presentation of evidence has been criticised, with concerns that there is no transparent reasoning why one site was allocated but another, with similar constraints, was not. However, the IIA and assessment in PS.EVR48-54 have been developed to ensure that the overall sustainability merits of sites have been tested on a broadly consistent basis. Given the extent of this task, and bearing in mind that it relies on involvement from various consultees (such as LCC and the EA), there may well be some inconsistencies in the assessment. There may also be instances where it would have been helpful to expand on conclusions, rather than summarising that "*other better sites are available*". But this does not mean that the site selection process is flawed, or that the wrong sites have been allocated.
191. Furthermore, planning decisions about which sites to allocate are inevitably based on professional judgement. This is not a simple exercise of adding up scores to filter out 'the best' sites for a particular area. As the Committee advised at the hearing sessions, some planning constraints may carry more 'weight' than others, such as flood risk. In summary therefore, the site selection process has been adequate and reasonable alternatives have been taken into account.
192. The approach adopted by the Committee has also resulted in varying levels of new housing being proposed across the Large Villages. For example, Witham St. Hughs has allocations totalling 1,355 dwellings, yet the village only has roughly 1,123 existing houses. On the other hand, around 384 new properties are proposed in Bracebridge Heath, which is one of the largest Tier 4 villages. But this is because Witham St. Hughs is identified in the existing *North Kesteven Local Plan* as a location where a new village was proposed, and the allocation for 1,250 homes (Ref CL1100) comprises Phase 3 of this scheme. Bracebridge Heath is also situated adjacent to the Lincoln SEQ, a development of approximately 6,000 new homes. Due to this relationship Policy LP30 seeks to prevent any harmful coalescence between the existing and proposed communities, which is also reflected in the size and location of allocations.
193. This demonstrates that given the specific circumstances of the Large Villages it is not appropriate to simply apply a generic 10/15/20% growth rate and allocate land for housing to meet a set figure. Instead, the Committee's

judgement is based on the premise that significant new development should be focused in locations which are, or can be made, sustainable. Based on the evidence provided and our site visits of the various Large Villages there is nothing to indicate that this judgement is unsound, or that any settlements are going to be 'left behind'. The majority of Large Villages have generous allocations that will see significant numbers of new houses built.⁶⁰ As modified Policy LP2 also allows additional development to come forward within the existing built up areas of the Large Villages, and in exceptional circumstances, non-allocated sites on the edges of settlements. The plan is positively prepared in this regard and will allow sustainable forms of development to come forward over the plan period.

194. On the other hand a reoccurring theme throughout the hearing sessions was the ability of existing services and facilities within the Large Villages and Market Towns to cope with the level of growth proposed. However, both the level and distribution of growth set out in Policy LP3, and the individual allocations in Policies LP48-54, have been subject to consultation with LCC having regard to highways and education, the EA and relevant drainage authorities. None of these consultees have raised any overriding objections to sites allocated in the plan, either individually or cumulatively in any given location. It is also important to consider that the identification of a site for housing does not negate the need for decision-makers to consider other policies in the plan. Instead, Policy LP12 states that planning permission will only be granted if it is demonstrated that there is, or will be sufficient infrastructure capacity to support a proposed development. This ensures that appropriate mitigation will be put in place where required, even for allocations.
195. In summary therefore, the methodology used to assess site allocations, and to determine their size and location is adequate and is based on transparent evidence. The level of growth proposed by the allocations across the settlements broadly reflects the intended spatial distribution of housing and is sound.

Site allocations

Lincoln Urban Area (Policy LP49)

196. Several allocations in the Lincoln Urban Area have already been constructed. Although the plan period runs from 2012 these allocations should be deleted as they now represent completions, rather than planned housing growth (site Refs CL452, CL516 and CL920). Conversely, additional sites with planning permission granted since the start of the examination are now proposed for allocation (site Refs CL4735 and CL540). **MM/69** is therefore necessary to amend the list of sites in Policy LP49, and their geographical illustration is shown on the Inset maps which accompanied the MM consultation. For clarity the descriptions of sites should also remove references to previous local plans. **(MM/69)**
197. As with the table in Appendix B, the 'Status' column in Policy LP49 is already out-of-date. For effectiveness, and to avoid confusion it should therefore be

⁶⁰ Inspectors' Note: the exception to this is Middle Rasen where no allocations are proposed. However, it is situated close to Market Rasen which is a Market Town with allocations for 640 dwellings

deleted (**MM/68**). However, as a consequence of this change an amendment is required to the final column to reflect circumstances where construction has started and/or is being delivered in phases. A change should also be made to the supporting text to make it clear what the figure in the final column, as amended, relates to (**MM/65**).

198. Several of the allocations in the Lincoln Urban Area relate to former school sites.⁶¹ Sport England has raised objections to allocations at Usher Junior School and on land adjacent to Yarborough School in particular, stating that the plan results in the loss of playing fields contrary to the Framework. Paragraph 74 of the Framework states that playing fields should not be built on unless, amongst other things, it has been clearly shown that the land is surplus to requirements.
199. However, the Usher Junior School closed in roughly 2011, pupils have moved to a new academy and the buildings on site have been cleared. This formed part of a comprehensive review of assets by the education authority and the site is therefore clearly surplus to requirements. A similar process has been followed at the former Moorland Infant and Nursery School and the old Ermine Community Infant School on Thoresway Drive. All of the sites have been redundant for a number of years, and their allocation and reuse for housing is appropriate and justified in this instance.
200. Land adjacent to Yarborough School (CL703) is different, as this is not a derelict former school site. Instead, the allocation relates to a grassed area of land to the south of the school and to the east of a leisure centre. Based on the evidence provided and clarifications from the Committee at the hearing sessions it is not a playing field, and the northernmost part of the site is used for car parking. Thus, use of the land for housing is appropriate in principle.
201. Part of the Romangate Development in Lincoln is allocated for roughly 99 dwellings under Ref CL4615. However, the developer advises that the site boundary does not reflect what is likely to be delivered on site, with an area nearest the roadside benefitting from extant planning permission for a commercial use. **MM/69** is therefore necessary to amend the site area and capacity under Policy LP49. The revised geographical illustration of the allocation should also omit the commercial area on the policies map.

Main Towns (Policy LP50)

202. As with allocations throughout the Lincoln Urban Area, for clarity and effectiveness **MM/69** is needed to remove sites that have been completed, and amend site descriptions that are unclear or refer to references from existing local plans. A MM is also required to amend the indicative dwelling capacity from 450 to 245 on site Ref CL4686. This is because a Local Development Order ('LDO') has now been approved with a revised estimated dwelling capacity. In addition, land adjacent to site Ref CL4691 has planning permission for housing and so the allocation should be enlarged accordingly. As a consequence of this change the site area and indicative dwelling figures

⁶¹ CL4652 – land at Usher Junior School, CL703 – Land at Yarborough School, CL705 – Moorland Infant and Nursery School and CL706 – Ermine Community Infant School.

need changing (**MM/69**), and the geographical illustration of the site should be shown on a revised policies map.

203. Lea is a village in its own right and has its own unique character and appearance. However, the village is physically connected to Gainsborough. When leaving Gainsborough and travelling south along the A156 there is an unbroken row of houses down the north-bound side of the road. This continues into Lea and there is no visible break in development. A similar relationship occurs to the north of the town which has merged with Morton. The built-up area of Gainsborough therefore includes, without any meaningful separation, the adjoining villages of Lea to the south and Morton to the north.
204. Because of this relationship the Committee has sought to allocate land for housing in Lea and Morton in order to contribute towards Gainsborough's housing needs. This is a reasonable and justified approach given the geography of the area. No sites were identified as being suitable in Morton due to the risk from flooding, but one site is proposed on land south of Willingham Road in Lea (Ref CL3044).
205. This does not mean that future development in Lea will be considered in the same way as Gainsborough. Despite having an allocation Lea is defined as a Medium Village with a 15% growth rate. The allocated site would represent approximately a 14% increase and any significant future growth would be subject to the tests under Policies LP2 and LP4. To make this clearer, and to ensure the effectiveness of the plan, further reasoning concerning the application of Policies LP2 and LP4 should be provided. The Key Diagram should also be amended to make the distinction that whilst Lea contains an allocation, for the purposes of Policy LP2 it is not part of Gainsborough. (**MM/2, MM/6, MM/46 and MM/52**)
206. In considering the suitability of the site in Lea LCC highways have assessed the allocation and raised no objections in principle subject to providing a crossing to enable pedestrians to reach the footpath on the opposite side of the road. Although the site assessment process identified known waste-water capacity issues, no objections have been raised by Severn Trent Water or the Environment Agency either. Ensuring that adequate drainage could be provided on the site would be a matter for the detailed design at the planning application stage. Similarly, no concerns regarding healthcare provision have been raised by any of the relevant authorities. As a result, having regard to available infrastructure capacity the site would be developable in the plan period. With an indicative capacity of 68 dwellings the allocation would not be out of scale in this location.
207. The submitted evidence demonstrates that the site was once likely part of the parkland associated with Lea Hall, and that a track runs along the western site boundary to the neighbouring Grade I Listed Church of St Helen. However, Lea Hall has been substantially demolished and the site does not form part of a registered park or garden. It is also located on the opposite side of Willingham Road to the Church of St Helen and is separated from it by mature trees. Whilst the effect of a proposal on the significance of neighbouring heritage assets would be a matter for the detailed layout, scale and design of a scheme to consider, in principle new residential development would not harm the setting of the church. Given the size of the site there is nothing to

indicate how or why any important features such as pedestrian links or mature trees and landscaping could not be retained as required in the design process.

208. The site is also part of an Area of Great Landscape Value that stretches to the south and east of Gainsborough. Nevertheless, this does not prevent development from coming forward. Instead, Policy LP17 requires proposals to respond positively to landscape and townscape features and take account of views in to, out of and within development areas. The plan therefore provides a robust framework to help ensure that development of the site respects its surroundings, including the setting of the village. In summary, the allocation is justified, sound and developable.

Market Towns (Policy LP51)

209. For the reasons identified above, and consistent with other settlements, a MM is required to amend descriptions, site areas and dwelling capacity figures to reflect the most up-to-date position in Caistor and Market Rasen. Site Ref CL1356 has also been completed and should be deleted. (**MM/69**)

210. In total around 640 new dwellings are allocated in Market Rasen. Although this is a significant number of new houses, Market Rasen is a Tier 3 settlement. Given the size of the town, which has roughly 2,085 existing houses⁶², the level of residential development proposed is proportionate to its size, role and function. The scale of development proposed through the allocations will not change its position in the hierarchy of settlements behind Gainsborough and Sleaford, which are both considerably larger and have a much wider range of services and facilities.

211. To the north of Market Rasen site Ref CL1364 is allocated for around 200 dwellings. Part of the reason for this is because the northern half of the site falls within Flood Zone 3, owing to the proximity of Brimmer Beck. Other parts of the site also fall within Flood Zone 2. The capacity was therefore reduced to allow for mitigation and in order avoid the areas at risk of flooding.

212. However, during the hearings the Committee and site promoters confirmed that masterplanning work submitted with a live planning application demonstrated that up to 300 dwellings could be achieved on the site without encroaching onto the northernmost field adjacent to Brimmer Beck. This is a reasonable position and was the only reason why the site was limited to around 200 dwellings in the Submission Local Plan. Accordingly, to ensure that Policy LP51 is effective and reflects the latest position **MM/69** is required to increase the indicative dwelling capacity. In the event that further investigations by the EA indicate that dwelling numbers need to be limited, or certain parts of the site restricted from new development, then other policies in the plan would ensure that the effects of flooding would be mitigated.

Large Villages (Policy LP52)

213. Cherry Willingham is situated to the east of Lincoln and falls within the LSA. Five sites are proposed for allocation, two with planning permission to the

⁶² Document E018

west of the village which will provide 59 dwellings, and three sites to the east of the village which shall provide around 373 additional dwellings.

214. The edge of the easternmost allocations would run broadly in line with the eastern edge of the village north of the railway line, and would represent a logical 'rounding-off' to the settlement. There would be no impact on the Green Wedge to the north-east which separates the village from Reepham, and a generous gap would remain between Cherry Willingham and Fiskerton. In summary, no harmful coalescence with neighbouring settlements would occur.
215. By allowing development on sites CL1179, CL4433 and CL1181 there would inevitably be some intrusion into the open countryside. Given the flat, open, fields that surround the village new housing would be clearly visible, especially from the public footpath to the west of the village. But this would not be dissimilar from a similarly sized expansion to the west of the village, which is also surrounded by predominantly flat, agricultural land. Along the immediate western boundary the urban influence of Lincoln is limited and new residential development of the scale proposed would inevitably have a visual impact too. As a result, the eastern edge of the village is not an unsuitable or unsound location for additional growth in Cherry Willingham. The application of Policy LP26 should help to ensure an acceptable standard of design, including in terms of layout, landscaping and boundary treatments.
216. In Scotter two sites are allocated either side of North Moor Road. The rationale for their location has been to position new housing downstream of the settlement. This is to avoid any increased risk of flooding to the rest of the village in the absence of any deliverable flood alleviation schemes. This is a logical approach to shaping future growth of the village. Moreover, sites CL1456 and CL4674 relate well to the village with housing on two sides. They are also within walking distance of services and facilities in the village and no objections have been raised from either the highways or education authorities. The scale of development proposed (around 93 dwellings) is appropriate, and there is no evidence to suggest this would exceed infrastructure capacity subject to providing appropriate mitigation and upgrades.

Medium and Small Villages (Policy LP53)

217. As identified above, the plan only seeks to include allocations in Tiers 1-4 with the exception of sites at Hemswell Cliff and Lea. The site at Lea is included under Policy LP50 as contributing to Gainsborough's housing needs.
218. The 4 other sites under Policy LP53 have been included because they have planning permission. However, the effect of this approach is that the sites will continue to count towards the relevant growth level for each village even if the permission lapsed. By comparison, housing permissions on any other sites would only be counted as long as they remained extant. There is no sound justification for making this distinction and, in any case, specifically allocating sites runs counter to the general approach taken by Policies LP2 and LP4 in these villages. The sites with planning permission should therefore be deleted.
219. The reason for the exception at Hemswell Cliff is because the existing Business Park has been identified as a national Food Enterprise Zone. In order to complement the level of employment growth expected in the village, and to

promote a balanced, mixed and sustainable community the plan includes a site for 180 dwellings. Any further growth would be subject to the requirements of Policy LP4. Due to the unique circumstances and the levels of growth promoted by the LDO this approach is appropriate. Although it has been cited as an example to justify allocating housing in other locations, such as Bassingham and Riseholme, the position elsewhere is not directly comparable. However, this position should be made more explicit throughout the plan to avoid any confusion by **MM/2, MM/6, MM/46, MM/69** and **MM/70**.

Conclusions on residential allocations

220. The plan has taken forward the most suitable options for allocating new housing sites having regard to the assessments in the IIA, PS.EVR48-54 and the Committee's professional judgement. Although the justification for not taking forward certain omission sites could have been clearer, subject to the recommended main modifications the proposed allocations represent the most appropriate strategy for new housing over the plan period. The other residential allocations are justified, have been subject to a robust site selection process and are sound.

Issue 7 – Whether there is a reasonable prospect of a five-year supply of deliverable housing sites on adoption, and whether the policies and allocations in the plan will ensure that the housing requirement is met.

Five-Year Housing Land Supply

Housing Requirement

221. Policy LP3 aims to facilitate the delivery of 36,960 new homes over the plan period (2012-2036), or **1,540 dpa**. This is reflected in the housing trajectory as amended by **MM/67** to take account of the latest position regarding sites, including those which have been added and/or deleted through MMs. This is the starting point for calculating the five-year requirement.

222. To put the housing requirement into context, 1,540 dpa is similar to the annual rates of delivery achieved across Central Lincolnshire between 2001/2 and 2007/8. During this pre-recession period output ranged from roughly 1,438 to 1,989 dpa. Based on past performance it is therefore a positive, but attainable requirement.

223. The Framework states that LPAs should include a 5% buffer to the five-year requirement to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery the buffer should be increased to 20%.

224. The Committee's Hearing Statement⁶³ compares housing delivery across Central Lincolnshire against relevant targets. This dates back to 2001/2 and includes targets against the *Lincolnshire Structure Plan*, the *East Midlands Regional Plan* and the submission *Central Lincolnshire Local Plan*. In

⁶³ Hearing Statement Matter 6

summary, it demonstrates that since 2006/7 there has been a persistent under-delivery of housing, peaking at 967 dwellings in 2011/12. A 20% buffer is therefore applicable, at this point.

225. The under-delivery of housing across Central Lincolnshire since the start of the plan period in 2012 has resulted in a shortfall of some 2,425 units. It is general practice to apply the 20% buffer to the annual average housing requirement as adjusted to recover the shortfall. The implications of using this methodology are set out in Document ED022.

226. The next factor to consider is how the shortfall should be addressed, either within the next five years (the 'Sedgefield' method), or over the remainder of the plan period (the 'Liverpool' method). The PPG advises that local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period 'where possible'.

227. However, the CLLP seeks to deliver around 40% of its planned housing delivery on SUEs, or around 14,700 dwellings. By their very nature these are large sites, several of which require significant new infrastructure. Many have also taken a significant period of time to progress and are the result of several years' worth of dialogue with key stakeholders. When taking this into account, and considering the fact that the SUEs are intended to start delivering the bulk of new housing mid-way through the plan, the circumstances in Central Lincolnshire justify seeking to meet the shortfall over the longer-term (the 'Liverpool' method). Furthermore, seeking to address the shortfall over the first five years would result in a housing requirement of around 2,532 dpa. Bearing in mind that the highest annual output since 2001/2 was 1,989, based on the best past performance in recent years this is likely to be unrealistic. To provide clarity to decision-makers it is necessary to confirm this approach in the plan through **MM/8**.

228. In summary therefore, the housing requirement as defined in the plan is 1,540 dpa. Added to this are the shortfall (spread over the plan period) and a 20% buffer. This results in a five-year housing requirement of **10,141** dwellings, or **2,028 dpa** at this point.⁶⁴

Components of Supply

229. The Committee has identified sites which it considers can provide 12,712 dwellings over the next five years, equating to 6.27 years' worth of supply⁶⁵. This includes sites with planning permission at 31 March 2016, sites with planning permission since 31 March 2016, allocations and windfall sites in Lincoln and the rural areas.

SUEs

230. Due to their size and complexity SUEs can take longer than smaller sites to start delivering new housing. For some sites this could take several years. However, in broad terms, each of the SUEs identified in the CLLP are capable of delivering housing within the plan period. In particular, none of the

⁶⁴ Document ED022 – Scenario 4

⁶⁵ Documents ED022 and Appendix 1 of E007D as corrected by E007E

participants at the public examination provided any evidence of site specific constraints or infrastructure requirements that would prevent or very seriously delay any of these developments.

231. That being said, in some cases the Committee's position on the rate and timing of delivery is optimistic. This is considered below.
232. The WGC is expected to deliver 275 units within five years. This is based on a relatively 'infrastructure-light' first phase and having a local developer in place. Even so, at the time of the hearing sessions no planning applications had been submitted. Selling the first houses in 2018/19 as suggested by the Committee is therefore very optimistic.
233. However, discussions regarding the WGC have been on-going for several years and a significant amount of work has already been done, for example in respect of flooding and site access. This reduces the likelihood of a drawn-out planning application process. A local developer is also involved and confirmed at the hearing sessions that the site is viable and deliverable, potentially avoiding the need for lengthy negotiations over the sale of the land. Thus, the delivery of some new houses on the first phase over the next five years is realistic.
234. The SEQ is slightly further progressed and an outline planning application for the first phase was submitted in 2016. It also has a developer involved who confirms that the site is deliverable. Reserved matters approval would still be required and conditions would need to be discharged. It would also take time to increase output to the levels envisaged by the Committee. Nevertheless, we have no reasons to suggest that the site cannot start delivering residential development within five years.
235. At the NEQ outline planning permission for the first phase has been granted. Based on updates at the hearing sessions final bids from interested developers were expected in late 2016 with reserved matters applications anticipated to follow early this year. Detailed designs would then need to be progressed, submitted and approved. Realistically this is a process which is highly unlikely to yield any completions in 2017/18. On the other hand, given that planning permission is in place, and the first phase relates to a relatively unconstrained parcel of greenfield land, there is a good prospect of it being deliverable in a timescale which reflects the anticipated construction of the LEB. No delivery has been attributed to the SWQ, which is at a much earlier stage and requires construction of part of the LSB to access the main site. This is reasonable.
236. In Gainsborough the Southern Neighbourhood also has the benefit of planning permission. Despite being secured in 2011 no reserved matters applications have been submitted and there is no developer in place. It is therefore highly unlikely that the site will deliver houses in 2017/18 as envisaged by the Committee. Nevertheless, the site promoters have been working with an experienced infrastructure provider since 2015. The role of the infrastructure provider is to deliver serviced land for housebuilders to take forward on a plot-by-plot basis. This is intended to speed-up delivery of the site as there would be fewer constraints to overcome. The Committee has also referred to the increasing confidence in Gainsborough, which has Housing Zone status. When taking these factors into account, and in the absence of any site specific

evidence which points to the site being undeliverable, it is reasonable to assume that some housing delivery will take place over the next five years.

237. At the Gainsborough Northern Neighbourhood the scope of an outline planning application for Phase 1 has been agreed with the local planning authority and is expected to be submitted this year. Whilst progress is still at a reasonably early stage, the first phase is expected to come forward for around 150 units on a relatively unconstrained area of predominantly flat, arable land. Delivering the majority of this modest first phase is therefore realistic, albeit time needs to be factored in to allow for a planning application to be approved, a developer secured and followed-up by reserved matters approval.
238. In Sleaford 'Handley Chase' also has outline planning permission and an application for reserved matters has been submitted for 32 units. At the hearing it was suggested that the approach was to enable the initial infrastructure to be put in place and open the site up to housebuilders. But other developers would also need to secure reserved matters approval for subsequent phases. Even with a detailed masterplan, the Committee's figures for delivery are therefore optimistic.
239. Finally, the Sleaford West Quadrant has a resolution to grant outline planning permission subject to the completion of a Section 106 Agreement. The site is therefore progressing. Subject to allowing time to secure a housebuilder, progress and approve a reserved matters submission and discharge conditions, some delivery on the site over the next five years is to be expected.
240. In summary, when taking into account the size and complexity of the SUEs, and considering that developer intentions and preferences about timing may change, the anticipated supply from the SUEs is optimistic to some degree. However, predicting exact delivery rates is not an exact science. Moreover, as part of this examination very little site specific analysis of the SUEs has been provided which points to any insurmountable obstacles to their delivery. The Topic Papers confirm that a substantial amount of work has already been undertaken with key stakeholders in bringing the sites forward, and those without planning permission are at an advanced stage. In general terms therefore, aside from the SWQ, the first phases of the SUEs are expected to start delivering some new residential development over the next five years.
241. In terms of other sites, the Committee confirms that an outline planning application has been submitted for new residential development at the former CEGB Power Station on Spa Road, Lincoln (site Ref CL525). However, the *Central Lincolnshire Plan Viability and Community Infrastructure Levy Study*⁶⁶ states that:

"...The biggest constraint and abnormal cost for this site is the need to relocate the existing EON / Western Power cabling and kit which would involve a five year lead in time to move, and requires some 80% of the £5.226m costs upfront to facilitate... Given the site's complications and abnormal works required to clear this site for development, delivery is not

⁶⁶ Document E011A

expected to take place in the first five years of the plan, and this scheme should be considered as part of the medium to longer term strategy"

242. At the hearing it was suggested that discussions are on-going regarding funding, and that there is a small area of the site close to the main access which could be developed without the need for the pylon and sub-station to be relocated. But no details have been submitted. Based on the information available it is not a site likely to be deliverable within the next five years.
243. The Committee's figures also include 150 units coming forward in the same year (2019/20) on land to the rear of 283-335 Newark Road, Lincoln (Ref CL704). Although the timing of their delivery could change, the scheme relates to a block of apartments which has the benefit of planning permission. Even accounting for a phased delivery over a 2-3 year period, there is nothing to indicate that the planning permission cannot be implemented and the 150 apartments delivered within five years.
244. Finally, land at Mill Lane, Billingham (Ref CL1101) has been identified as delivering 25 units in 2017/18. This is unlikely given the time required to secure planning permission and make a start on site. Nevertheless, the site is allocated in the CLLP and is only expected to provide around 65 dwellings. In the absence of any site specific assessment we find no reasons why this relatively modest allocation cannot be delivered in five years.

Windfall Allowance

245. The Committee's calculations for the purposes of the five-year supply include a windfall allowance of approximately 748 dwellings. This includes 75 units per year in the City of Lincoln, and 112 per year in the rural areas.⁶⁷
246. The Framework states that local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that sites have consistently become available. In this case the Committee confirm that 75 is the lowest number of dwellings that have come forward on sites of less than 25 units in Lincoln over recent years. There is no reason to doubt that this number at least will be achieved.
247. The plan includes a flexible approach to development in Tiers 5-7 by removing settlement boundaries. Comparing data from previous local plan periods is therefore unlikely to give a true reflection on windfall rates in the rural areas. However, there are a significant number of settlements in Tiers 5 and 6 spread over two local authority areas which, in principle, can each grow by 10-15%. As modified Policy LP2 also allows infill housing to come forward in hamlets. When considering the wide scope for new housing to come forward across the villages and rural areas of Central Lincolnshire following the removal of settlement boundaries, adopting a windfall rate of 112dpa for the purpose of this assessment is reasonable.
248. Furthermore, no windfall allowance has been included for non-allocated sites in Gainsborough, Sleaford, Market Rasen or Caistor. Development is explicitly supported in both Main Towns and the Committee confirms that developer

⁶⁷ Inspectors' Note: The windfall allowance is only applied to Years 2-5 to avoid double-counting commitments

interest is on the rise, with sites referred to at the hearing sessions which have come forward recently. Appropriate infill, intensification and renewal of the urban areas in the Market Towns are also supported by Policy LP2. It is therefore highly likely that additional development will be realised in the five-year period. On this basis the overall windfall allowance of 748 dwellings over the next five years is a conservative one.

Conclusion on Five-Year Housing Land Supply

249. The Committee's anticipated lead-in times and rates of delivery on some of the SUEs are too optimistic given the size and complexity of the sites. However, a significant amount of work over a number of years has gone into their preparation, some of which have planning permission, active developers and/or applications progressing. No persuasive evidence has been provided to indicate that some residential development cannot be delivered in five years.
250. Similarly, it is possible that there may be other sites that do not deliver to the levels anticipated. But this has to be balanced against the conservative windfall allowance for Lincoln and the rural areas. Given that the plan removes settlement boundaries and allows a flexible approach to Categories 5, 6 and 7 this is a figure which could easily be exceeded, especially during the first five years before growth levels in some villages are exhausted. Unallocated sites in the Main Towns are also highly likely to come forward, especially given the Housing Zone status in Gainsborough.
251. In conclusion, the Committee's supply identifies land sufficient for 12,712 new houses over the next five years. Even applying more conservative estimates to delivery on the SUEs, we are satisfied that the deliverable supply would exceed the five-year housing requirement of 10,141 dwellings. As a result, based on the evidence provided there is a good prospect that there will be an up-to-date supply of specific deliverable sites sufficient enough to provide five years' worth of housing against the requirements of the plan upon adoption.

Future Supply

252. The Housing Trajectory is included on page 110 of the Plan. This sets out how new residential development will come forward over the plan period from sites with planning permission, allocations and from windfall sites. The preceding table on page 109 breaks the totals down by location and considers the growth against the spatial distribution of housing in Policy LP3.
253. Both are now out-of-date and should be amended to reflect the latest position (**MM/66**). As a result of MM/66 the table on page 108 would identify a total of **38,475** dwellings. This exceeds the housing requirement of **36,960**.
254. In terms of allocations the plan identifies sites sufficient to provide around 22,485 new dwellings over the plan period. Over 14,000 dwellings are expected to come forward from the planned SUEs, a number of which have outline planning permission already. The main component of the growth envisaged from the SUEs is therefore likely to be developed in years 6-10.

255. Policy LP54 includes broad locations for future growth. These sites are not included in the trajectory but have been identified as able to accommodate some 5,750 dwellings if delivery exceeds the housing requirement. Additional capacity on the SUEs is also identified beyond the plan period.
256. An allowance of 3,621 dwellings from windfall sites is also included in the growth assumptions on page 109. This comprises around 2,452 units within the LSA and approximately 1,169 'elsewhere'. Lincoln is the main city in the sub-regional area. Policy LP2 seeks to significantly strengthen its role by making the Lincoln Urban Area 'the principal focus for development' in Central Lincolnshire. Over a plan period of 24 years it therefore is not unreasonable to expect some new housing to come forward on unallocated sites.
257. In summary, the policies and allocations in the plan identify a supply of sites and broad locations for growth for years 6-10 and 11-15. In addition, as discussed above the windfall assumptions are conservative. The plan therefore makes adequate provision, through identifying a range of different sites, to ensure that there is a reasonable prospect of maintaining a rolling five-year supply over the plan period.

Issue 8 – Whether the plan makes adequate provision to meet the needs of gypsies and travellers and travelling showpeople.

Need

258. The Committee's evidence relating to gypsy and travellers is contained within Document PS.EVR56 and the 2013 *Central Lincolnshire Gypsy and Traveller Accommodation Assessment* (GTAA)⁶⁸. In summary, it identifies a need for 72 residential pitches from 2013-33 across Central Lincolnshire.
259. Rather than providing a simple annualised requirement the assessment breaks down the 20-year period down into segments. From 2013-18 there is a need to provide 16 pitches. This is the same for 2018-23. Thereafter the requirement increases. There is also a need for 4 emergency stopping places and 1 plot for travelling showpeople.
260. Since publication of the GTAA the National Planning Policy for Traveller Sites (PPTS) has updated the definition of 'gypsies and travellers' and 'travelling showpeople'. Previously included within the definition were those who had ceased to travel temporarily or permanently for reasons of health, education or old age. Although representors suggest that the change may have reduced the need for new pitches, we have seen nothing to substantiate this. Other than the GTAA there is no evidence at this time which sets out an alternative assessment of accommodation needs in Central Lincolnshire. However, this change will need to be taken into account as part of any review of local housing needs.

Supply

Residential Pitches

⁶⁸ Document E004

261. Policy LP56 allocates 3 sites which will provide between 14 and 17 residential pitches. The allocations are intended to represent specific, deliverable sites sufficient to provide five-years' worth of supply against the target of 16 pitches from 2013-18. Thereafter the plan identifies that 5-10 pitches would come forward on each of the SUEs, which have the scope to provide roughly 30-60 pitches in total⁶⁹. It is expected that these pitches would come forward in years 6-10 and 11-15.
262. The first allocation at Westrum Lane, Brigg (site Ref CL4738) has been granted planning permission for 6 pitches. The principle of this extension is therefore justified. The second allocation seeks an extension to an existing site at Washingborough Road, Lincoln (site Ref CL4675). This comprises a relatively flat, square parcel of land benefitting from an existing access on the edge of Lincoln. Although the northern half falls within Flood Zone 2 sufficient land is available to locate pitches outside this area. Other constraints include the presence of local wildlife site designations within and adjacent to the site, but there is nothing to indicate that the allocation would have any significant adverse effects on interests of nature conservation. However, to ensure that this objective is met Policy LP56 should be amended by rewording the requirement that 'Any wildlife lost should be mitigated', which is unclear and imprecise. **(MM/72)**
263. It is apparent that there is strong local concern regarding the third allocation at Trent Port Road, Marton (site Ref CL1337). Marton is defined as a Tier 5 Medium Village. It is therefore a location where new residential development is acceptable, and proposals of up to 9 dwellings would be supported in principle under Policy LP4.
264. The *Settlement Hierarchy and Growth Distribution Study*⁷⁰ identifies 312 dwellings in Marton and Policy LP4 allows 10% growth. This equates to roughly 31 additional houses. In this context between 3 and 6 residential pitches would be proportionate in scale to the level of growth permitted by other policies in the plan. The allocation would not dominate the village, nor would it not lead to isolated pitches in the countryside. From Trent Port Road potential future occupants would be able to walk to the primary school and bus stops in the village.
265. The PPTS states that policies should seek to promote peaceful and integrated co-existence between sites and the local community. In seeking to achieve this objective there is inevitably a fine balance to be struck between identifying a site where potential future occupants feel part of an existing community whilst protecting the living conditions of nearby residents.
266. In this case the site extends to approximately 1.9ha and only the parcel of land to the south is adjacent to an existing residential property. As a result, the layout, siting and orientation of the pitches could be arranged in a way that contains the majority of development to the rear of the site which has been used by caravans in the past. This would be a matter for the planning application process to consider against the criteria in Policy LP56. In addition,

⁶⁹ Inspectors' Note: Although in the case of the Gainsborough Southern Neighbourhood and Sleaford South this would require schemes coming forward separately to the approved outline planning permissions.

⁷⁰ Document E018

only between 3 and 6 pitches are proposed. It would therefore be a relatively modest development. When taking all of these factors into account, neither the scale of development nor proximity to existing housing indicates that the allocation is unsound. Containing pitches to the rear of the site, away from Trent Port Road and in Flood Zone 1 would also reduce the risk of flooding.

267. With regard to access Trent Port Road gradually narrows from east to west. In places it is only wide enough for a single vehicle. Nevertheless, LCC highways have not objected to the use of the site for 3-6 pitches. Trent Port Road is reasonably straight with good forward visibility and only serves a limited number of houses, a graveyard and provides access to the river. The entrance into the site has also been used by caravans in the past without anything to suggest that large amounts of hedgerow needed removing. As a result, the provision of up to 6 pitches would be unlikely to give rise to any highway safety concerns arising from the frequency or volume of traffic movements.

268. In terms of utilities this is not an isolated site and there are existing houses along Trent Port Road, including immediately adjacent to the proposed allocation. It has also been used as a caravan site in the past. Accordingly, there is nothing to indicate that the site cannot be provided with electricity and water to service potential future occupiers. Such a limited number of pitches would also be able to accommodate surface and foul water drainage on site, such as the use of septic tanks for example, if they were the preferred drainage solution.

269. In considering whether or not the allocation is sound it is important to note that all proposals, including on allocated sites, would also have to meet the requirements set out in Policy LP56. This provides a robust framework for decision-makers to consider planning applications and take into account factors such as the living conditions of residents, access and drainage in the final design. However, the term 'acoustic privacy' is ambiguous and should be deleted. Instead the policy should provide a reference to Policy LP26 which thoroughly covers issues relating to living conditions. **(MM/72)**

270. During the examination the Committee confirmed that the allocations are not intended to represent an 'indicative' number of pitches that can be exceeded, and that figures in Policy LP56 should be expressed as a maximum. This was consulted upon as part of changes to Policy LP56 (MM/72). However, this is contrary to the approach to other residential allocations in the plan. Moreover, should a planning application come forward on any of the allocated sites that exceeded the figures in LP56, or should future applications seek to expand sites further, then this would be for the development management process to determine. Specifying the figures in Policy LP56 as a 'maximum' is not necessary in order to make the plan sound.

271. In addition to the allocations there are strong concerns regarding the provision of gypsy and traveller sites on the SUEs. However, these are large sites, close to urban areas, transport infrastructure and services. They are intended to provide a variety of uses to create new mixed and balanced communities. As such, they are ideally placed to include residential pitches which can be considered upfront as part of the masterplanning process.

272. Furthermore, whilst it has been suggested that providing pitches on the SUEs will affect viability, no evidence has been submitted to substantiate such concerns. Similarly, there is nothing to suggest that 5-10 pitches could not be provided somewhere on the SUEs without compromising their deliverability or market attractiveness. Reasonable alternative strategies have been tested through the IIA and including pitches on the SUEs is appropriate.

273. In terms of their location relative to demand, the GTAA identified that the greatest demand for pitches was in West Lindsey. A specific site has been allocated in West Lindsey and additional provision will be made through SUEs in the area. Although the CLLP also relies on sites within North Kesteven and the City of Lincoln, it has sought to meet the housing needs of the area across Central Lincolnshire, rather than specifically at a local authority level. This includes the needs arising for gypsies and travellers, and is a sound approach to take.

Emergency Stopping Places and Travelling Showpeople Plots

274. No sites have been identified to meet the needs for the 4 emergency stopping places identified in the GTAA. This is because if the stopping places are identified and provided before the shortfall in permanent pitches is met, the GTAA advises there is a risk that they will become used as permanent residential sites, with the resultant management issues that would occur. The problems likely to arise from identifying and providing the stopping places at this stage therefore outweigh their benefit. Accordingly, in this particular case relying on stopping places to come forward from windfall sites is justified, especially given the small number of places that have been identified.

275. Similarly, because only 1 plot is required for travelling showpeople it is expected that this would be provided on a windfall basis, rather than allocating a very small site. Subject to a modification which makes it clear that Policy LP56 also applies to travelling showpeople, the policy provides an appropriate framework to consider such sites over the plan period. **(MM/72)**

Conclusion

276. Subject to the recommended main modifications the plan makes adequate provision to meet the needs of gypsies and travellers and travelling showpeople.

Issue 9 – Whether the strategy for job growth and employment, including the employment allocations and policies concerning employment sites is sound.

Employment Land Requirements

277. Using the baseline forecast the ENA⁷¹ expects 11,894 full-time equivalent (FTE) jobs to be generated across Central Lincolnshire between 2012 and 2036. Despite being at the lower-end of the forecasts in the ENA, this is a reasonable and attainable growth target and represents roughly an 11% increase aggregated over the 3 authorities. However, it is not currently set

⁷¹ Document E008

out in policy. A MM is therefore necessary to define the level of jobs growth in Policy LP3 rather than referring to an "*appropriate amount of employment land*" which is unclear and ambiguous. **(MM/4)**

278. The ENA converts the 11,894 FTE jobs into a requirement for additional employment land. In summary, it states that there will be a need for around 45.9ha of additional land in Use Classes B1, B2 and B8 over the plan period. It also forecasts that there will be a reduction in the demand for general industrial land within Use Classes B1c and B2, leaving a net requirement for approximately 23ha of employment land.⁷²
279. In contrast, Policy LP5 allocates roughly 111ha on Strategic Employment Sites (SEs) and around 42ha of employment land on SUEs (ESUEs). Even allowing for choice and competition in the market for land, the possibility that some sites may not come forward and that some sites may be redeveloped for other uses, this is significantly more land than is required.
280. The reasons for this are twofold. Firstly, several of the SES already have planning permission. Secondly, in order to ensure that the SUEs provide a mix of uses all but one of the allocations includes provision for employment land. This is consistent with one of the Framework's Core Planning Principles which seeks to promote mixed use developments. It is a reasonable and justified approach.
281. To ensure internal consistency a MM is required to Policy LP5 to specify that the SUEs should provide a mix of job creating uses, with an 'approximate' figure for each site **(MM/12)**. This flexibility has resulted in the overall figure for "employment land" increasing, because the 9ha envisaged for leisure uses at the Western Growth Corridor has been included in the figure in Policy LP5. Despite this increase, in practice these changes could result in less employment land coming forward for typical Class B1/B2/B8 uses.
282. In the event that a substantial amount of the employment land in Policy LP5 is developed there could be a mismatch between the need for workers and available housing. This could result in employees having to commute into Central Lincolnshire from outside the plan area, leading to a likely increase in car usage and more unsustainable travel patterns.
283. However, Policy LP54 includes a trigger mechanism to address such a scenario. In the event that the net increase in jobs since 2012 has, on average, been above 496 FTE jobs per year,⁷³ and house completions have been around 1,540 dpa, then the broad locations for future growth would be considered. This would only apply post-2026 to ensure that the allocations in the plan are prioritised. Thereafter the 'reserve' locations for growth have the capacity to provide around 5,750 new dwellings. Through Policy LP54 the plan therefore contains an adequate mechanism in the event that the take-up of land results in higher jobs growth and an increased need for new housing. Alternatively, either a full or partial review may be required.

⁷² Inspectors' Note: 45.6ha – losses of 23ha = roughly 23ha to allocate

⁷³ Inspectors' Note: 11,894 / 24 years = 496 FTE jobs per year

284. Given that some of the reserve sites represent large-scale development opportunities, they will inevitably take time to deliver the required housing. Nevertheless, the reserve sites at Gainsborough, Sleaford and Lincoln reflect the spatial distribution of development in the plan. In addition, only one is a new SUE and the remainder range in size from 350 – 1,900 dwellings. Larger sites could also be delivered in phases, as many of the allocated SUEs are doing. As a result, there is nothing to indicate that the reserve sites in Policy LP54 are unsound. Their size and location are appropriate, and they accord with the aims and vision of the plan.

Strategic Employment Sites (SEs) and Existing Employment Areas (EEAs)

285. A total of 7 SEs are allocated through Policy LP5. All either have planning permission already or form part of an LDO, such as the Agri-Food Enterprise Zone.

286. In addition to the sites allocated for new employment land provision, a total of 21 EEAs are identified. Across these sites only proposals for development falling within predominantly Use Classes B1/B2/B8 will be supported. By adopting this approach Policy LP5 will help support small and medium-sized businesses by safeguarding a supply of suitable premises and land. It will also help to provide existing occupiers with the confidence to invest and expand.

287. A number of criteria were used to determine whether or not existing employment sites should be identified as EEAs.⁷⁴ This included considering the market attractiveness of sites, with a requirement that they should be generally of a good quality and represent popular locations for business. As a consequence, Policy LP5 does not include sites where there is no reasonable prospect of them being used for employment purposes. This is consistent with paragraph 22 of the Framework.

288. An example of this is site Ref E14 – land at Waterside South. It has been suggested that a lease for the buildings is due to expire shortly and that any potential renewal would unlikely extend beyond the plan period. A more flexible approach is sought in the event that a key employer is lost from the site. However, there is no evidence to suggest that existing occupiers are about to vacate the premises, that the buildings are no longer suitable for their needs or that the site would be unsuitable for other businesses in the area. The identification of the site as an EEA is appropriate and justified.

289. The former Sunblest Bakery site on Deacon Road, Lincoln also forms part of an EEA (site Ref E11 – Outer Circle Road). Despite being situated on the opposite side of the road to the main part of the EEA the site has a clear association with the industrial estate. Access can be taken from Deacon Road and there are established commercial and industrial operators opposite to the south. Moreover, although the site has been vacant for a number of years, no specific marketing evidence has been provided to substantiate comments regarding a lack of demand for typical 'B' use classes. Including the site as part of E11 is therefore appropriate and justified.

⁷⁴ Document PS.EVR5

290. Finally land at Long Leys Road (site Ref E10) forms part of a wider allocation in the existing *City of Lincoln Local Plan* which is limited to only Class B1 uses. However, identification of the site as an EEA suitable for B2 and B8 purposes reflects some of the existing uses on site, which includes a builder's depot and storage yard. Furthermore, whilst the principle of development in Classes B1/B2/B8 is supported by Policy LP5, this is only where proposals are of a scale that respects the character of the area and/or neighbouring land uses. In the event that a scheme came forward for development within Classes B2 or B8, the plan therefore provides an appropriate policy framework to consider its relationship with surrounding residential uses. The allocation is appropriate and justified.

Local Employment Sites (LES)

291. Proposals for new development falling within Classes B1/B2/B8 on existing, but unallocated Local Employment Sites (LES) are also supported by Policy LP5. This provides occupiers of local, unallocated sites with confidence to invest by supporting the principle of further economic development. For clarity, and in order to be effective the second bullet point should be amended to specify that proposals should not harm the character of the locality and/or the amenities of neighbouring occupiers. **(MM/13)**

Other Employment Proposals

292. As currently worded Policy LP5 states that other employment proposals in locations not covered by SES, ESUE, EEA and LES categories will be 'considered on their merits'. This is different to new proposals in the categories above where Policy LP5 expressly *supports* economic development.

293. The Committee confirms that it is not the intention of Policy LP5 to make this distinction. Moreover, the Plan's vision states that "*villages will not be left behind, with appropriate and sensitive development being permitted to ensure they remain sustainable, thriving local communities*". To ensure that economic development is promoted in other locations, including rural settlements, Policy LP5 should therefore be amended to specifically support proposals, subject to meeting certain criteria **(MM/14)**. This ensures that Policy LP5 is consistent with the Framework which seeks to promote sustainable development in rural areas.

294. In order to be effective further changes are also needed to the bullet point list used to consider 'other employment proposals'. The first criterion refers to searching for other appropriate sites in existing 'settlements'. This is unclear, and requiring applicants for small, local employment proposals to consider alternative sites across the whole of Central Lincolnshire would be prohibitive and unreasonable. A MM is therefore required to specify that proposals should consider allocated sites or those within the built-up area of the settlement where they are located. Subject to meeting this requirement there is no need for the final criterion which effectively repeats the same test (i.e. to demonstrate that proposal cannot be located on an allocated site). Finally, to ensure that the policy is effective it is necessary to ensure that proposals are commensurate with the scale and character of an existing settlement, and do not harm the character of the locality and/or the amenities of neighbouring occupiers. **(MM/14)**

Loss of Employment Sites and Buildings to Non Employment Uses

295. Policy LP5 seeks to protect allocated sites and allow the redevelopment and reuse of unallocated land and buildings where appropriate. This is set out in the supporting text which confirms that in addition to the strategic employment sites there are a number of existing employment areas which are of such importance to the local economy and have the potential for expansion that that they are protected. However, as drafted the policy text under the heading 'Loss of Employment Sites and Buildings to Non Employment Uses' is not particularly clear what it relates to. In order to be effective a MM is required to confirm that it relates to sites not allocated as either a SES or EEA (**MM/15**).
296. The Committee also confirmed that where a proposal seeks to reuse or redevelop a non-allocated employment site it is not the intention of Policy LP5 to require proposals to meet all of the listed criteria. Instead, proposals should be considered on their merits having regard to the evidence provided against each bullet-point. Again, this is unclear and an additional paragraph is required under the supporting text to explain the approach. (**MM/11**)
297. The first bullet point requires decision-makers to consider whether or not a proposal would affect economic growth and employment opportunities in the 'catchment' area of a building. However, this would be difficult to determine. In addition, a storage and distribution premises may have a regional or national 'catchment'. The first bullet should therefore be amended to refer to the area where the relevant building is located.
298. Furthermore, as drafted Policy LP5 requires a 12 month period of marketing on terms that reflect the lawful use and condition of the premises. In light of the evidence that we have read and heard in this particular case, 12 months is an unnecessarily long period of time and should be reduced to 6. That being the case, to ensure that robust evidence is provided and that the exercise meets the aims and objectives of the policy the text should be amended to specify that marketing should be proportionate. Finally, as a result of the additional supporting text at paragraph 3.5.9 there is no need for the concluding sentence which confirms that evidence of marketing is not in itself sufficient justification for the loss of employment workspace. (**MM/15**)

Conclusion

299. Subject to the recommended main modifications the strategy for job growth and employment, including the employment allocations and policies concerning employment sites are sound.

Issue 10 – Whether the plan makes adequate provision for new infrastructure, and whether the approach to accessibility and transport and community facilities is sound.

Infrastructure

300. Policy LP12 states that planning permission *will only be granted* if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet all the necessary requirements arising from a proposed

development. It also requires that consideration is given to the timing of infrastructure provision through phasing.

301. Although it has been suggested that Policy LP12 should set out what types of infrastructure it relates to, appropriate examples are provided in the supporting text. Calls for the policy to introduce a hierarchy of infrastructure by importance to local areas are also unnecessary, and could quickly become out-of-date as development comes forward. The plan therefore includes an adequate basis upon which new development can be managed in a way that does not undermine existing infrastructure.
302. Where new facilities are necessary as part of a development Policy LP15 confirms that they should be provided within or adjacent to the site in the first instance. Appropriate criteria are included which make it clear to developers and decision-makers when off-site provision may be considered acceptable as an alternative. This approach is reasonable.
303. In addition to Policy LP12 the City of Lincoln Council, North Kesteven District Council and West Lindsey District Council are also progressing draft CIL charging schedules alongside the CLLP. These will help to finance some of the infrastructure required to support the planned levels of growth including the LEB and secondary and 6th form education.
304. Reference is also made to specific infrastructure needed to facilitate strategic developments over the plan period. For example Policies LP28, LP30, LP39 and LP44 set out the infrastructure requirements for the SUEs. The route of the LEB and proposed Sleaford Link Road are also safeguarded. However, with regard to the latter, on-going work since publication of the submission version Local Plan has identified that alternative, more cost-effective options may be available. A MM is therefore required to provide further flexibility to Policy LP47 by safeguarding the route unless it is confirmed that the Link Road is no longer required and/or deliverable. **(MM/64)**

Accessibility and Transport

305. Policy LP13 provides an overarching framework for accessibility and transport. Although the broad transport objectives are justified, the requirement that *all* development proposals must contribute towards them is not. For example, it would be unreasonable and impractical for a small infill development within a hamlet to contribute towards strategic transport objectives in larger urban areas. A more proportionate approach is therefore required as proposed by **MM/24** which introduces the caveat 'where necessary'.

Community Facilities

306. Policy LP15 seeks to protect existing community facilities such as leisure facilities, libraries, public houses, places of worship, community halls or any registered asset of community value. This is consistent with paragraph 70 of the Framework. Amongst other things it requires planning policies to guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs.
307. However, as written LP15 only refers to loss from redevelopment. In order to remove any ambiguity that could undermine the effectiveness of the policy

MM/25 is necessary to specify that this also includes proposals for demolition or change of use (i.e. any form of development that results in the loss of the community facility).

Conclusion

308. Subject to the recommended main modifications the plan makes adequate provision for new infrastructure in order to support the levels of growth envisaged, and the approach to accessibility and transport and community facilities is sound.

Issue 11 – Whether the strategy for the visitor economy, tourism and retailing is sound.

Visitor Economy and Tourism

309. Policy LP7 supports development that delivers high quality, sustainable visitor facilities. However, the approach to requiring such uses to be within existing settlements does not take into account the location of some facilities, which may already be located in rural areas. In this regard Policy LP7 is not positively prepared or effective. **MM/17** is therefore necessary to make it clear that development should be in settlements, unless it relates to an existing visitor facility which is seeking redevelopment or expansion. This is consistent with the Framework which requires planning policies to support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development.

310. Elsewhere Policy LP8 supports a range of uses associated with the Lincolnshire Showground such as conference facilities, expansion of the agricultural college functions, employment and a hotel. Given the strategic importance of the showground as one of the key agricultural show venues in the UK this is justified. It will also assist in promoting the agri-food sector which is a priority for the area.

Retailing

Hierarchy of Centres

311. Policy LP6 supports a hierarchy of centres starting with Lincoln City Centre, then the town centres of Sleaford, Gainsborough, Market Rasen and Caistor. A series of District Centres are also illustrated on the policies map along with new Local Centres proposed as part of the SUEs.

312. The general approach is to direct proposals for main town centre uses to the Tier 1-4 settlements and ensure that they are appropriate in scale and nature to the size and function of the relevant centre. Within the Lincoln Central Mixed Use Area a flexible approach allows for a range of uses from retail to leisure to residential development, including student accommodation. In the rural settlements the plan seeks to promote primarily convenience shopping and services to meet local needs. This approach is consistent with the Framework which requires plans to pursue policies to support the viability and

vitality of town centres, define a hierarchy of centres that is resilient to change and promote customer choice and a diverse retail offer. It is therefore sound.

Sequential and Impact Tests

313. To ensure that the remainder of Policy LP6 accords with national policy **MM/16** is necessary to define that the sequential test applies to 'main town centre' uses, rather than retail and 'other' uses. For the same reasons the MM needs to make it clear that the impact test will be required for any retail, leisure or office proposals where they meet the relevant thresholds. Similar changes are needed to Policies LP42 and LP46 to refer to main town centre uses in Gainsborough and Sleaford. (**MM/53** and **MM/63**)
314. Where an impact assessment is required Policy LP6 sets out local floorspace thresholds. These are based on evidence contained in the *Central Lincolnshire City and Town Centre Study*.⁷⁵ The approach to District and Local Centres is reasonable and appropriate.
315. The plan deviates from the study in respect of Lincoln. The City and Town Centre Study recommended that an impact test should be carried out where proposals exceed 500 sq. m, regardless of location. In contrast Policy LP6 states that an impact test should be required for proposals greater than 500 sq. m unless they fall within 1km of Lincoln City Centre, where a 2,500 sq. m threshold applies. Given the size, role and function of Lincoln, which is the principal city in the sub-region and has a healthy retail core, this approach is justified. However, the plan does not define a 'City Centre' boundary. To be effective **MM/16** is therefore necessary to amend Policy LP6a. by referring to the Primary Shopping Area ('PSA') as illustrated on the policies map.
316. **MM/16** is also required to specify that in locations not covered by a-c (i.e. outside of the Lincoln PSA, District Centres and Local Centres) proposals over 500 sq. m would also require an impact assessment. However, an unintended consequence of this MM is that all proposals would be required to conduct an impact assessment. This is not meant to be the case. For consistency with national policy the MMs included in the Appendix to this report therefore confirm that this applies to any 'edge-of-centre or out-of-centre' proposals. It is also necessary to remove 'is located' under a-d as this is superfluous.

Primary Shopping Areas

317. The main shopping area in Lincoln extends along High Street and continues over the railway line, which, for the majority of the time does not pose a significant physical barrier to pedestrians. Main town centre uses dominate on both sides of the street all the way to St. Marks, a modern development incorporating national retailers anchored by a large department store. Although the area to the west is dominated by car parking and contains a different retail offer focused around bulky goods, it is still part of the same broad area where retail development is concentrated. The proposed PSA boundary is therefore justified, and reflects the position on the ground. The

⁷⁵ Document E019

PSAs for Gainsborough and Sleaford also reflect the main retail cores of each town centre.

Meeting Retail Needs

318. In seeking to promote competitive town centre environments the Framework states that local plans should allocate suitable sites to meet the needs for a range of uses in town centres. This is to ensure that the needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability.
319. As identified above, the specific SUE policies each include the requirement that proposals should incorporate a range of shops, services and facilities as part of new local and/or district centres. This ensures that the needs of each new community will be met in full. The WGC also includes a requirement to provide leisure uses, with the supporting text to Policy LP30 confirming that the site has the potential for a regional leisure centre.
320. Apart from the requirement to provide new retail and community facilities on the SUEs, no sites are allocated in Lincoln to meet future retail needs. However, Policy LP33 confirms that the PSA will remain the focus for comparison shopping in the City. As a result, should land at the St. Mark's Retail Park come forward for redevelopment then the plan provides an appropriate framework to support town centre uses. By encompassing the retail park within the PSA the plan allows for the future expansion of retailing in this location, and there is no need for a specific site allocation. Given that the site legitimately falls within the PSA imposing a cap on potential new retail development would be unjustified, and there is no requirement to protect one part of the shopping area over another in national policy. This approach is reasonable, and by extending the PSA the plan has identified an area suitable for expansion to meet future comparison retail needs.

Conclusion

321. Subject to the recommended main modifications the strategy for the visitor economy, tourism and retailing is sound.

Issue 12 – Whether the policies and designations concerning Green Wedges, Local Green Spaces, other Important Open Spaces and sports and recreation facilities are sound.

Green Wedges

322. Green Wedge designations are included in the existing City of Lincoln, North Kesteven and West Lindsey Local Plans. The latter also includes 'Settlement Breaks' which perform a similar function. The CLLP consolidates these designations into a series of Green Wedges under Policy LP22. Their main aims and objectives are to prevent the physical merging of settlements, create continuous links to the open countryside beyond urban areas, provide an accessible recreational resource and conserve and enhance local wildlife to create wildlife corridors.

323. Existing designations have all been reviewed through the *Central Lincolnshire Green Wedge and Settlement Breaks Review*⁷⁶. This evidence sets out, in a clear and transparent manner, why certain areas should be included within a Green Wedge, and why some should not.
324. To the north of Lincoln the primary role of the Burton to Nettleham Green Wedge is to prevent Nettleham and Riseholme from merging with Lincoln and to protect the character and setting of Lincoln, and the Riseholme Historic Park and Garden. Including land up to and including the University of Lincoln's Riseholme Campus is therefore justified. However, areas to the north of Riseholme and to the west of Burton do not fulfil these criteria. They are separated from Lincoln by intervening tracts of Green Wedge and are not required to prevent coalescence with the City or to protect the character of the Historic Park and Garden. As a result, their removal is warranted.
325. The eastern edge of the Burton to Nettleham Green Wedge is bounded by the A158 and Greetwell Lane. Although it has been suggested that the Green Wedge should extend further east it is not the intention of the plan to introduce a policy which is similar in effect and purpose to a Green Belt. The likelihood of potential coalescence between Nettleham/North Greetwell/Cherry Willingham would also be prevented by other policies of the plan. In particular Policy LP26 includes the requirement that proposals should not result in visual or physical coalescence. No changes are required to make the plan sound in this location.
326. To the north-east of Lincoln the villages of Dunholme and Welton are separated by a relatively narrow stretch of land which is defined in the *West Lindsey Local Plan First Review* as a 'Settlement Break'. The gap narrows along Ryland Road to the north of Dunholme and the existing fields either side of the road provide an important degree of separation between the opposing villages. The inclusion of this area as Green Wedge is therefore essential to maintaining a physical and visual break between the settlements. Although there may be parts of the gap which are narrower, for example north of Honeyholes Lane, this does not justify amending the Green Wedge and eroding what continues to be an important strategic gap between Dunholme and Welton.
327. It emerged during the examination that the Green Wedge as illustrated on the policies map for Dunholme and Welton goes beyond the area considered in PS.EVR22. Rather than running along Dunholme Beck the Green Wedge on the policies map continues to the east. Nevertheless, although this is an omission in the evidence report, the same justification as the remainder of the Green Wedge applies. Due to the proximity of the settlements to one another, the lack of any built development and the open nature of the fields east of Ryland Road this area also makes a positive contribution to the physical and visual break between Dunholme and Welton. Accordingly, its inclusion as part of the Green Wedge is justified.
328. East of Lincoln the Committee has proposed the removal of land at Greetwell Hollow (Parcels J1 and J2). Although local residents have raised strong

⁷⁶ Document PS.EVR22 and Appendix

concerns regarding this omission, the areas do not prevent the coalescence of settlements and do not penetrate into the urban area. Moreover, despite forming part of the Greetwell Hollow SSSI, LGS and LWS no evidence of any linkages to neighbouring open spaces has been provided. Based on the evidence provided neither J1 nor J2 therefore perform a role as a Green Wedge and their removal is necessary.

329. To the south of Lincoln the Waddington to Bracebridge Heath Green Wedge extends up to Urban Street and includes a parcel of land bounded by development on 3 sides. As part of the previous Local Plan process the Inspector found that:

"The site...forms part of a structural Green Wedge running up the eastern side of Lincoln, incorporating the Lincoln Cliff at its foot. I accept that is an important strategic policy. However, the site is of marginal value in that context, being unused contaminated land on the very edge of the urban area. Its loss would not have a significant material effect on the setting of the City or the appearance of the Green Wedge. Because of its former use it makes no significant recreational or wildlife contribution. There has been an informal footpath use along the western boundary of the site but, at my site visit this appears to have been fenced off."

330. However, despite finding that the site was only of marginal value and made no significant positive contribution to the setting or appearance of the Green Wedge, the Inspector did not recommend any changes to the plan in the interests of soundness. Instead, it was concluded that *"In my view, the objector's proposals are not yet at the stage where the benefits can be fully evaluated, and I consider that the Local Plan satisfactorily reflects the position in North Kesteven at the present time. I therefore see no reason to modify the plan at this stage."*

331. Although the site is bounded by school buildings and playing fields it remains relatively open. From the footpaths within and adjacent to the site views of the Lincoln Cliff are possible and the site has not been disconnected from the swathe of countryside that opens up to the south. As such, based on the evidence provided and observations from visiting the site, it forms part of a wider green lung that penetrates into the city and the boundary in this location is logical, appropriate and reasonable.

332. To the south-west of Lincoln the Green Wedge forms part of a chain of lakes that are an important strategic landscape and wildlife link around Hykeham Pits. In this location it prevents the merging of Lincoln and North Hykeham, provides a recreational resource, a green lung into the City and a strategic network of wetland habitat. An exception is the northern part of Zone E3 which used to be part of a landfill site. The Committee's evidence⁷⁷ concludes that *"the land is publically inaccessible and cannot be easily viewed from outside the GW along Whisby Road or Station Road due to grass embankments. Based on the evidence gathered through this review, this part of Zone E3 doesn't meet the GW criteria and could be considered for removal"*. We agree that the suggested removal of this area from the Green Wedge

⁷⁷ Document PS.EVR22

adjacent to the North Hykeham Energy from Waste facility is therefore necessary.

333. However, based on representations and observations from site inspections the area of landfill referred to in Document PS.EVR22 continues to the south. In this location the former landfill site is equally inaccessible to the public and is also largely screened from view. The land has also been clearly raised as a result of landfill activity and is bounded to the south and east by a combination of housing and employment allocations (CL2098 and E18). The same reasons for removing the area of land from the Green Wedge to the north therefore also apply. In order to ensure that Policy LP22 is sound an amendment to the policies map is required in this location.
334. In response to the MM consultation it has been suggested that the amended boundary proposed at Hykeham Pits goes too far, and that land to the north and west should also be excluded from the Green Wedge. However, the exact line of the Green Wedge is invariably going to be a matter of judgement, and the Committee has sought to distinguish the boundary to an area that was licensed for landfill activities. For the purposes of the designation the boundary is therefore based on a reasonable judgement in this particular case.
335. It is also pertinent to consider that where proposals fall within the Green Wedge the plan does not place a blanket restriction on new development. Instead, Policy LP22 limits new development to proposals that do not conflict with the aims and objectives of the Green Wedge, or, where it is essential to be located in the Green Wedge and the benefits would override any impact.
336. Although this indicates when a scheme may be acceptable, further clarity is needed to ensure that the policy is effective. Additional supporting text should therefore be included to confirm that whilst the purpose of the Green Wedges is to protect open and undeveloped areas, it is not intended that they operate as an absolute restriction on all development. For example, there are existing uses within the Green Wedges which should not be unduly restricted, including house extensions, agricultural and forestry development or outdoor sport and recreation uses. There are also instances where development needs to be located in a Green Wedge, such as works by a utility company to fulfil their statutory obligations (**MM/27**). It is not the intention of Policy LP22 to require applicants to provide compensatory land in such scenarios, nor is the policy unsound by including such a test.
337. As consulted upon MM/27 referred to 'sport and recreation uses'. However, in referring to examples of types of development that *may* be acceptable in the Green Wedge this should have referred to outdoor sport and recreation – i.e. not activities suited to being located within an urban area. We have amended the MM to clarify this. As drafted the MM provides sufficient clarity that operational works required by utilities companies, for example, may also be acceptable.

Local Green Spaces

338. Paragraphs 76-77 of the Framework confirm that Local Green Spaces are not appropriate for most open areas, and should only be used where the area is reasonably close to the community it serves, holds a particular importance and is local in character (i.e. not an extensive tract of land). Sites put forward by

local communities have been assessed against these criteria in the *Central Lincolnshire Local Green Spaces and other Important Open Space Evidence Report*.⁷⁸ It includes a robust methodology and ensures that sites have been considered on a sound, transparent and consistent basis.

339. Where sites have been rejected reasons have been given against the criteria in Document PS.EVR23. One site that has not been assessed, because it was not put forward until the proposed submission stage, is 'Waterhills' in Caistor. However, this area encompasses a large tract of land bounded by Canada Lane and existing properties on North Street. As a result, it does not meet the criteria for designation and the plan is not unsound by failing to identify it.
340. Where sites are included because they hold a particular local significance, for example because of their beauty, this invariably involves a matter of planning judgement on behalf of the Committee. Nevertheless, based on the details provided none of the sites included for this reason are unjustified. Land at The Manor Paddock in Fiskerton contributes to the rural character at the centre of the village and provides important views across the site to the Grade I listed Church of St. Clements of Rome and the Grade II listed Manor House and Barn. Despite being a matter of judgement, its inclusion is based on clear reasoning.

Important Open Spaces (IOS)

341. Areas of Important Open Space ('IOS') are different to Local Green Spaces and have not been identified by local communities. The sites are all taken from the adopted Local Plans in West Lindsey, North Kesteven and the City of Lincoln. The CLLP consolidates a range of sites from play areas to open spaces and designates them as IOS. However, this is not currently made clear in the plan. For clarity additional supporting text should be included as proposed by **MM/28**.
342. Although the IOS designations have not been subject to the same criteria-based evaluation as Local Green Spaces, they have been tested through local-plan examinations already. Using this as a starting point the Committee carried out a desk-based exercise to determine whether there had been any material change in circumstances, for example, if a site had been redeveloped. This is a reasonable and proportionate approach to take. The precise use of sites across a number of settlements is also set out in the *Central Lincolnshire Open Space Audit and Provision Assessment*.⁷⁹ This differentiates between public parks and gardens, amenity greenspace, space for children and young people, allotments and outdoor sports facilities etc. It provides further justification for the designations and an up-to-date assessment of their current use.
343. In Keelby a relatively narrow parcel of IOS stretches from Riby Road behind properties on Woodlands Avenue towards allocated site CL1305. Although the area is within separate, private ownerships, the Committee maintains that the undeveloped gap makes a positive contribution to the character and appearance of the area, and that there have been no material changes in

⁷⁸ Document PS.EVR23 including Appendix

⁷⁹ Document E055

circumstances since identification of the site as IOS in the *West Lindsey Local Plan First Review*. Based on the information provided we have seen no compelling evidence to reach a different view and the designation is justified. The exception to this is two small parts of the site to the south and south-west corners which benefit from planning permission for new development. In order to be effective the Policies Map should be amended to remove both parcels of land from the area of IOS as illustrated on the Inset maps accompanying the MM consultation.

344. In Skellingthorpe land bounded by Ferry Lane and High Street is also designated as IOS. Although the site is bounded by dense boundary tree planting, it is still visible from parts of High Street. A public footpath also runs diagonally across the field. From both High Street and the footpath the area of open space provides views towards St. Lawrence's Church and makes a positive contribution to the rural character and setting of the village. Its inclusion as an area of IOS is justified.
345. Land comprising the Clayton Sports and Social Club in Lincoln is also designated as IOS. Although the site is within the ownership of a housebuilder, is no longer occupied throughout and several buildings have been removed, part of the site remains in use. Moreover, no robust evidence has been provided to substantiate comments that there is no longer a demand for the site, or to justify that adequate compensatory provision could be provided elsewhere. Based on the information provided the designation is therefore appropriate.
346. There are, however, some areas where the areas of IOS are not justified. The designation to the west of Horsley Road/Greystones Road in Gainsborough includes two very different areas of land. To the south are a number of pitches associated with a sports ground. The area to the north is not part of the same site, is not integral to any wider green infrastructure network and in its current condition does not contribute positively to its surroundings. As an area of overgrown grassland on the edge of a housing estate the Policies Map should also be amended to remove this area from the IOS designation.
347. The designation adjacent to Wolsey Way in Lincoln includes a relatively thin parcel of land between properties on Larkspur Road and Hurstwood Close/Westholm Close. This area is separated from the adjacent King George's playing fields by a fence and row of trees. The site is largely overgrown, has no formal access and is within private ownership. Whilst we appreciate this is important to some local residents, it serves no recreational purposes nor does it make a positive contribution to its surroundings. As an area of private land there is also no formal access to the countryside or area of open space proposed to the north, which is on the other side of Wolsey Way. The Policies Map should therefore be amended to remove this parcel of land.
348. The identification of a site as IOS does not preclude appropriate new development from coming forward. Instead, Policy LP23 provides a list of criteria for assessing development proposals within them. Part a. states that sites will be safeguarded unless it can be demonstrated that there is an identified over provision of that particular type of open space, and the site is not required for alternative recreational uses. Alternatively part b. requires suitable alternative open space to be provided or the enhancement of existing

areas serving the community. However, as worded this would apply to all sites, including privately owned ones identified for their contribution to the character of the area, or the setting of a village. For effectiveness a MM is required to combine parts a. and b. and make it clear that this relates to publically accessible areas of open space (**MM/29**).

Sports and Recreation

349. Policy LP24 confirms that the authorities will seek to reduce public open space deficiency, improve the quality and access to public open space, and ensure that new developments make appropriate new provision. The relevant standards for new development are set out in Appendix C of the CLLP.

350. However, this refers to the amount of land in hectares per 1000 population. A change is therefore needed to Policy LP24 to clarify that it relates to new residential development. For the same reasons the reference to major development in Appendix C should also stipulate that this relates to residential proposals (**MM/30**). As a result of this change reference to the Town and Country Planning Act (Development Management Procedures) Order is superfluous and should be removed.

Conclusion

351. Subject to the recommended main modifications the policies and designations concerning Green Wedges, Local Green Spaces, other Important Open Spaces and sports and recreation facilities are sound.

Issue 13 – Whether the approach to Lincoln's Universities and Colleges is sound.

352. The submission CLLP states that Lincoln's universities and colleges play an important role in raising skills, and that the further development of the University of Lincoln, Lincoln College and Bishop Grosseteste is pivotal. The approach of Policy LP32, which supports on-going development of higher and further education establishments in Lincoln, is therefore appropriate.

353. However, by only referring to higher and further education in Lincoln the plan omits reference to the University of Lincoln's Riseholme Campus. As identified at the hearing sessions, the Riseholme Campus is an integral part of the teaching, education and research carried out by the University and one cannot successfully exist without the other. The consequence of Policy LP32 is that the plan offers no support for continued improvements to the facilities on offer at Riseholme.

354. Given that the University of Lincoln is identified as playing such an important role to the area through the supporting text, both socially and economically, the failure to allow for development and growth at the Riseholme site is not sound. This is a backwards step from the existing *West Lindsey Local Plan First Review* which allows education, teaching and research. A MM is therefore needed to ensure that the plan offers the same in-principle support that will enable the University to continue to expand and grow its education, teaching and research functions (**MM/45**).

355. Policy CRT6 of the current *West Lindsey Local Plan First Review* allows for the expansion and alteration of existing educational uses at Riseholme provided that there are no unacceptable impacts on heritage, traffic and the living conditions of local residents. MM/45 is different in that it supports education, teaching and research subject to meeting 'wider planning policies'. Although this does not list the specific matters to be considered, the policy is not ambiguous. It provides a clear indication that decision-makers should support new buildings for education, teaching and research subject to meeting other policies relating to pertinent planning issues.
356. MM/45 also makes reference to the made Riseholme Neighbourhood Plan. However, the Local Plan has not relied upon the Neighbourhood Plan to set strategic policy. Instead, the MM seeks to introduce in-principle support for education, teaching and research at Riseholme to reflect its importance to higher and further education in Central Lincolnshire. Reference to the Neighbourhood Plan simply directs a decision-maker to consider the 'wider planning policies'. This provides further clarity and would not be undermined by listing Riseholme as a Hamlet rather than a Small Village in the settlement hierarchy. The campus is also illustrated on the policies map for the area by virtue of its inclusion within the Neighbourhood Plan. As a result, no changes to the inset maps submitted with the CLLP are required in this respect.
357. In addition to education, teaching and research uses the University is also seeking a substantial residential development to help cross-subsidise development of the Lincoln Institute for Agri-Food Technology ('LIAT'). At the examination it was suggested that the draft Local Plan is unclear how such proposals should be considered, and that a mixed-use allocation would give confidence to investors and release capital to deliver the LIAT.
358. However, although the University states that redevelopment of some of Riseholme Park is essential to realise a capital receipt to leverage funding for Phase 2 of the LIAT, we have seen no compelling evidence to show that this could only be facilitated by new residential development of the scale proposed. Furthermore, Policies LP2 and LP4 (as amended) clearly set out how decision makers, developers and local communities are expected to consider proposals for residential development. For the reasons given above this approach is justified, and based on the methodology used by the Committee Riseholme is defined as a Tier 7 Hamlet with no housing allocations.
359. There is no reason to depart from this strategy in order to correct any issues of soundness at Riseholme. Although there is an exception at Hemswell Cliff, this is to complement job growth as part of an Enterprise Zone. Hemswell Cliff is also a Medium Village, and is therefore materially different to Riseholme. The circumstances are not comparable. Given that the plan makes provision for Agri-Food Enterprise Zones at Hemswell Cliff and the Lincolnshire Showground, it has taken a positive approach to supporting this sector and identified suitable sites.

Conclusion

360. Because the plan seeks to promote additional teaching, research and education by Lincoln's Universities and Colleges it should make similar provisions at the Riseholme Campus, which has links with existing facilities in

the City. However, this only needs to extend to education-based development. We are not persuaded that development of the LIAT, or the effectiveness of the plan's approach to supporting and growing the agri-food sector has to be underpinned by a residential allocation at Riseholme. This would be contrary to the spatial distribution of housing set out in Policies LP2 and LP4 and is not justified or necessary in the interests of soundness. In conclusion, subject to the recommended main modification the plan's approach to Lincoln's Universities and Colleges is sound.

Issue 14 – Whether the plan makes adequate provision for the development of Ministry of Defence land and assets.

361. Large areas of Central Lincolnshire have been, and continue to be, used by the Ministry of Defence ('MoD'). In recognition of this Policy LP57 supports the principle of defence-related development within, or adjoining MoD sites.

362. The Plan also recognises that the MoD is committed to making the most efficient use of existing land and buildings. Appropriate redevelopment is therefore also supported in principle. This is consistent with the Framework which seeks to make the most efficient use of existing land and buildings.

363. However, it is not the Committee's intention that this relates to all sites, for example former MoD sites that have been abandoned for a significant period of time. It is therefore necessary to amend LP57 to ensure that the second part of the policy refers to the redevelopment or change of use of currently, or recently operational MoD land and facilities (**MM/74**). For clarity and effectiveness additional supporting text should also be included to assist decision-makers and clarify what the policy is intended to refer to. (**MM/73**)

364. Furthermore, as drafted Policy LP57 does not take into account the location of sites, which could be isolated with limited access to services and facilities. Although there would be benefits to redeveloping brownfield land, bringing forward sites for new housing in remote rural areas could be contrary to the spatial distribution of housing that the plan seeks to deliver. A MM is therefore needed to introduce a presumption against significant increases in population on MoD sites unless the proposal accords with the overall spatial strategy and settlement hierarchy (**MM/74**).

365. While determining what constitutes a 'significant' increase would require some degree of planning judgment, it is sufficiently clear to allow decision-makers to determine the suitability of large-scale residential-led redevelopment proposals. For the same reasons the policy should also require proposals to demonstrate that the new community can access higher level services (such as jobs), either within the development or nearby by sustainable modes of transport. (**MM/74**).

366. Subject to the recommended main modifications the plan makes adequate provision for the development of Ministry of Defence land and assets.

Issue 15 – Whether policies relating to health, well-being and accommodation needs are justified, consistent with national policy and are sound.

Health

367. The *Joint Health and Wellbeing Strategy for Lincolnshire*⁸⁰ sets out the health priorities for the area from 2013-2018. This states that estimated levels of obesity are higher in Lincolnshire than both the England and the East Midlands averages, and that generally in Lincolnshire, adults are less active. The requirement for development proposals to promote, support and enhance physical activity and mental health and wellbeing is therefore relevant, and justified.
368. In order to achieve this Policy LP9 requires schemes of 25 dwellings or more, or on sites of over 0.5ha to submit a Health Impact Assessment ('HIA'). This is a recognised way of considering health matters and the PPG⁸¹ advises that a HIA may be a useful tool to use where there are expected to be significant impacts. The threshold of 25 dwellings is consistent with this advice and ensures that HIAs are used on larger schemes where significant impacts are more likely. It also uses the same threshold as sites considered for allocation.
369. During the hearing sessions the Committee confirmed its intention to publish guidance on the use of HIAs. However, this is not set out in the plan. To ensure that there is a consistent approach to the preparation and use of HIAs across the authorities, and for the effectiveness of the policy, this should be referred to in the plan. **(MM/18)**

Technical Housing Standards – Access and Water

370. The SHMA identifies that the majority of people limited by long-term disability do not live in communal establishments. This leads to the conclusion that there is an on-going need to provide a sufficient supply of adapted homes. The SHMA also identifies that the largest projected population increases will occur from ages 65-90+.
371. To ensure that specific housing needs are met through appropriate stock Policy LP10 requires schemes of 6 or more dwellings to provide 30% of housing at higher Building Regulation Part M4(2) standards, unless the characteristics of the site indicate that this would be inappropriate or impractical. Based on evidence in the SHMA this is justified. A lower threshold of 4 or more houses is also required in the Small Villages to ensure that dwellings with higher access standards are delivered in the rural areas. Both scenarios have been tested by the *Central Lincolnshire Local Plan and Community Infrastructure Levy Viability Study* and will not render the vast majority of schemes unviable.
372. The submission version Local Plan also includes the requirement that where possible higher accessible homes should be located close to any existing or proposed local centres and transport connections. Although this is appropriate it excludes other areas such as town and district centres. **MM/20** is therefore needed to refer to the hierarchy of centres in Policy LP6.
373. With regard to water, both Anglian Water and the EA have confirmed that the whole of Central Lincolnshire falls within an area of serious water stress where drought is a serious concern. The specific local circumstances therefore substantiate the requirement in Policy LP14 that proposals must meet the

⁸⁰ Document E035

⁸¹ ID: 53-004-20140306

standard of 110 litres of water per occupier per day. This requirement has not been explicitly tested through the Local Plan viability report in the same way as the higher access standards. However, the Committee's Hearing Statement refers to a DCLG publication⁸² which puts the cost at only roughly £9 per dwelling. In the context of the overall cost of constructing a new house this is highly unlikely to make schemes unviable. There is no evidence to the contrary.

Meeting other Accommodation Needs

374. It has been suggested that the plan is not effectively prepared because it does not make provision for self-build plots or allocate land for specific types of housing such as bungalows. However, there is nothing in the SHMA or other evidence-based documents that point to a specific demand for self-build plots in any particular area of Central Lincolnshire. The SHMA recognises that whilst West Lindsey could see increases in self-build through the Right to Build Vanguard, the project is only in its infancy and the extent to which needs can be met through this type of development are unclear.
375. Even in the event that this position changes, Policies LP2 and LP4 confirm that growth on non-allocated sites in appropriate locations in the Lincoln Urban Area, the Main Towns and the Market Towns will be considered favourably. They also support appropriate infill in the Large Villages, and, the removal of settlement boundaries in Tiers 5 and 6 provide opportunities for smaller sites to be developed in the rural areas. Furthermore, the introduction of infilling in Hamlets ensures that further opportunities for individual plots will be supported in even the smallest settlements. The plan therefore adopts a flexible approach that will support opportunities for self-build housing everywhere except the countryside.
376. It is also important to note that Policy LP10 expects developers to provide housing solutions that contribute towards meeting the housing needs of the area as identified in the latest SHMA. As a result, should a specific need arise for a particular type of housing, such as self-build plots or bungalows, the plan enables decision-makers to ensure that the right housing comes forward in the right places. Because the SHMA is not the only source of local evidence a MM is required to widen the scope of documents that can be taken into account. This reflects the supporting text to Policy LP10 which refers to other appropriate evidence such as the Joint Strategic Needs Assessment and the Lincolnshire Extra Care Strategy. **(MM/19)**
377. Subject to the recommended main modifications policies relating to health, well-being and accommodation needs are justified, consistent with national policy and are sound.

⁸² Housing Standards Review – Cost Impacts (DCLG, September 2014)

Issue 15 – Whether the plan provides sufficient measures to protect, preserve and enhance the built and natural environments.

Design Principles and the Historic Environment

378. The historic core of Lincoln is centred around the uphill area which contains the Cathedral and the Castle. Policy LP29 seeks to protect the dominant views of this area from new development, which is justified. However, the policy wording and supporting text do not refer to the Castle. As suggested by Historic England a MM is therefore needed to rectify this. (**MM/36**)
379. Policies LP38 and LP43 are very similar in seeking to protect the setting and character of Gainsborough and Sleaford. Although the shared approach is reasonable, the first criterion of each policy requires development proposals to preserve and enhance the character, setting and appearance of the relevant conservation areas. This is contrary to the statutory test which requires that special attention is paid to the desirability of preserving or enhancing the character or appearance of conservation areas⁸³. Both policies should be amended by deleting criteria a). (**MM/47** and **MM/54**).
380. Similarly, when considering the effect of a proposal on the character and appearance of an area Policy LP26 requires development to respect and enhance local distinctiveness. This is unclear for decision-makers. In some cases it may not be possible to respect a certain characteristic and also enhance it. As a result, to ensure that the policy is effective a modification is necessary to specify that proposals must take into account the character and local distinctiveness of an area, and enhance or reinforce it as appropriate (**MM/32**). For the same reasons a similar change should be made to Policy LP25 (**MM/31**). The requirements of Policy LP26 apply to development proposals across Central Lincolnshire and do not need to be location specific.
381. In considering character and appearance issues Policy LP31(d) refers to the attractiveness of the 'Lincoln area'. This is ambiguous and could cause some confusion with the indicative built up area of Lincoln which is used elsewhere in the plan. Use of the word 'area' should therefore be removed. (**MM/44**)
382. Finally, the approach to listed buildings in Policy LP25 is justified. However, the tests relating to proposals which result in substantial harm to, or the loss of, listed buildings is not consistent with the Framework. This should be rectified by **MM/31**.

Amenity Considerations

383. The second half of Policy LP26 is concerned with living standards. In order to align the requirements with national planning policy it is necessary to amend the wording so that it relates to the living conditions of all existing and future occupants of land and buildings. To ensure that the policy is effective it should also confirm that a proportionate approach shall be taken to considering proposals against criterion 'm' to 'u' (**MM/33**). For example, not all schemes will have an impact on air quality from odour, fumes, smoke or dust.

⁸³ Section 72(1) Planning (Listed Buildings and Conservation Areas) Act 1990

384. The final part of Policy LP26 refers to existing 'bad neighbour' uses. It states that proposals should not prejudice their on-going operation, and, should provide a satisfactory standard of living for potential future occupiers. Although this is reasonable, as drafted this only relates to proposals 'adjacent' to such uses. In order to be effective, consideration should be given to existing sites that may be within the vicinity of a development proposal. Issues such as noise or smell are not necessarily confined to adjacent land and buildings. **MM/33** is therefore required to consider sites within the vicinity of 'bad neighbour' uses. Finally, because it would be difficult for decision-makers to accurately determine the 'normal' use of a site, this requirement should also be removed as part of the same modification.

Areas of Great Landscape Value (AGLV)

385. In addition to the Lincolnshire Wolds AONB the accompanying Policies Maps identify Areas of Great Landscape Value ('AGLV'). Policy LP17 confirms that seeking to protect and enhance the intrinsic value of landscapes, including key local views and vistas, are particularly important in the AONB and AGLV. This is consistent with advice in the PPG that "*Local Plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes but also the wider countryside.*"

386. Neither the policy nor the supporting text refer to specific AGLVs. Nor does the plan define why they are important, or what features should be protected. Nevertheless, amongst other things the Landscape Character Assessments⁸⁴ used to justify the areas provide evidence of relevant key features, which areas are sensitive to change and opportunities for enhancement. It is therefore unnecessary to duplicate this in the plan, especially in the event that landscape character assessments are updated.

387. Criticisms of Policy LP17 suggest that it has an overly restrictive approach to development within the AGLV. This is not the case. All proposals are subject to the same criteria under Policy LP17, namely; that they protect and enhance landscape character, landscape setting and key views. The policy then reinforces that particular emphasis should be given to such considerations where sites are located in an AGLV. This is a reasonable and sound approach to adopt to development in these areas. Policy LP17 does not place a blanket restriction on development coming forward. For example, SUEs in Gainsborough fall within an AGLV.

Biodiversity and Geodiversity

388. Amongst other things paragraph 117 of the Framework directs local planning authorities to identify and map components of local ecological networks. In this case a Biodiversity Opportunity Mapping Study has been prepared for Central Lincolnshire and maps areas for landscape-scale habitat improvements. Policy LP21 confirms that development proposals should create new habitats, and links between habitats, in line with the Biodiversity Mapping evidence. It also requires the preservation, restoration and re-creation of priority habitats, ecological networks and priority species set out in

⁸⁴ Documents E036 and E037

the Lincolnshire Biodiversity Action Plan and Geodiversity Action Plan. This is consistent with the Framework.

389. Paragraph 117 also advocates that local planning authorities should plan for biodiversity at a landscape-scale across local authority boundaries. The plan has followed this approach by producing a joint local plan between the City of Lincoln, West Lindsey District and North Kesteven District.

390. However, at present Policy LP21 states that "*proposals for major development should adopt a landscape scale and ecosystem services approach to biodiversity and geodiversity...*" This is not the intention and a MM is required to avoid confusion and misinterpretation. Instead, it is proposed that major development should adopt an ecosystem services approach, whilst large scale major development (such as the SUEs) should adopt a landscape scale approach. **MM/26** clarifies the difference and gives certainty to what is required for proposals on the SUEs. A consequential change is also required to the supporting text to reflect this (**MM/23**).

Conclusion

391. Subject to the changes identified above the plan will provide a robust framework which includes sufficient measures to protect, preserve and enhance the built and natural environment where appropriate.

Issue 16 – Whether the policy on sustainable development is justified and consistent with national policy.

392. The first part of Policy LP1 confirms that the three districts will take a positive approach to development and will work proactively with applicants. This is reasonable. The second part of the policy broadly repeats the second part of paragraph 14 of the Framework in relation to decision-taking. It is unclear whether there is any positive benefit in translating this national policy on decision-taking into a development plan policy. However, its presence does not make the plan unsound.

Overall Conclusion and Recommendation

393. The CLLP has a number of deficiencies in respect of soundness which mean that we recommend non-adoption of the plan as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

394. However, the Committee has requested that we recommend MMs to make the plan sound and capable of adoption. With the recommended main modifications set out in the accompanying Appendix we conclude that the CLLP satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the Framework.

Jeremy Youle and Matthew Birkinshaw

Inspectors

This report is accompanied by an Appendix containing the Main Modifications (including annexes A to E)