# **Central Lincolnshire Local Plan Initial questions from the Inspectors**

Note: references to 'the Committee' are to the *Central Lincolnshire Joint Strategic Planning Committee*.

#### **Summary of main issues**

 The Report on Key Issues Raised appears to summarise all (or most) of the issues raised in representations. However, Regulation 22 seeks a summary of the main issues. Can the Committee prepare a summary of what are considered to be the main issues arising from the representations. It would also be helpful if a focused response could be provided to each of the identified main issues.

### **Suggested modifications**

2. The Committee's letter of 29 June states that a schedule of suggested main and additional modifications has been prepared. Could this now be made available. It would be helpful if a column could be provided explaining why the Committee consider each of the suggested main modifications are necessary.

#### Consultation

3. The Report on Key Issues Raised (on pages 2 and 3) explains that some representors had concerns about consultation on the plan. This includes the availability of submission documents, procedures to consider comments, feedback on comments, length of consultation, venues used to view consultation documents and generally about a lack of publicity. Can the Committee provide a response to these concerns.

#### Objective assessment of housing need (OAN)

4. DCLG recently released its 2014-based household projections (2014-2039) for England. These update the household projections that were released in February 2015. The new projections are based on the 2014-based subnational population projections (SNPP) that were published by ONS in May 2016. The OAN figure in the plan uses the 2012 sub-national household projections released in 2015 as the demographic starting point. Can the Committee provide a comparison between the 2012 and 2014 based projections. Does this have any significant implications for the OAN and the housing requirement in the plan?

### **Housing supply**

5. Policy LP53 allocates 5 sites in medium and small villages (401 dwellings) and Policy LP4 allows 10-15% growth in the many other medium and small villages. Is any housing supply assumed from these '10-15% growth' settlements? If so, does it contribute to the windfall assumptions set out in the table on page 109 of the Plan?

# **Lincoln West Quadrant Sustainable Urban Extension (SUE)**

- 6. The CIL Viability Study (E0111A Appendix D) states that an application will be made for European Social Fund grants in the region of £24 million to support delivery of this SUE. The plan indicates 3,200 dwellings in the plan period and the viability study indicates 750-1000 units in first phase. The second phase is then said to be dependent on ground remediation and grants funding. The Evidence Paper for the Western Growth Corridor states that viability evidence supports delivery but all 'estimated costs' and 'how will it be delivered' in the infrastructure delivery table are marked 'TBC'. Is any firm evidence available on infrastructure costs, funding arrangements and deliverability within the plan period?
- 7. In respect of all SUEs, have the Council's proposed CIL rates been factored into viability assessments?

#### 5 year supply of housing land

- 8. Appendix 1 in the Five Year Land Supply Report sets out a list of sites which contribute to a five year supply. It would be helpful if this table could be expanded with a column added to indicate which sites are allocations and SUEs within the plan and which are windfalls. It would also be helpful to add columns to cover the period until the end of the plan period to help demonstrate that a rolling 5 year supply can be achieved (or do this in a separate table).
- 9. Table 5 indicates that a large component of the 5 year supply will be from sites that do not appear to have planning permission (emerging new allocations and windfalls). What evidence is there that each of these sites will be able to contribute to a 5 year supply?
- 10. The Five Year Land Supply Report sets out the record on completions since 2012/13 and concludes that some might argue that an additional 20% buffer is required due to persistant under-supply. In this context the PPG states that the assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle. Can the Committee provide an

analysis looking back over a longer period, including to before the economic down-turn, comparing annual delivery with the housing requirement before the base date for the submitted plan (2012). What bearing does this have on the application of a 5% or 20% buffer.

#### Alternative/additional sites advanced in representations

11. Can the Committee prepare a list of such sites (ie those where representors are seeking a different use to that proposed in the plan). It would be helpful if the list could include the representor, allocation in the plan, the allocation/use being sought and a plan/map showing the location of each site.

# **Employment land**

- 12. The Plan states that the Economic Needs Forecast results in a requirement for 23 ha of new employment land (3.5.10). The plan allocates significantly more land than this through strategic employment sites (111ha) and land within Sustainable Urban Extensions (42ha) a total of 153ha of land (Policy LP5). How much of this allocated land:
  - a) has an extant planning permission for employment use
  - b) lies within existing established employment area and/or a site/location which is already partially developed for employment use?

It would be helpful if the Council could provide a response to these questions by **15 August**.

Jeremy Youle and Matthew Birkinshaw Inspectors 26/7/16