

Central Lincolnshire Policy 68 Sustainable Urban Extensions Evidence Report

Formerly Policy 67

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1. Introduction

- 1.1. The Central Lincolnshire Local Plan is being updated since the first Local Plan for Central Lincolnshire, an area covering the districts of City of Lincoln, North Kesteven and West Lindsey, was adopted in April 2017.
- 1.2. This Evidence Report (which is one of a collection) provides background information and justification for Policy S68, which relates to Sustainable Urban Extensions (SUEs).

2. Policy Context

National Policy and Guidance

- 2.1. Since the Central Lincolnshire Plan was adopted the National Planning Policy Framework (NPPF) was updated in July 2018 with subsequent additional changes being published in February 2019 and further changes made in July 2021.
- 2.2. Paragraph 11, of the NPPF states:

Plans and decisions should apply a presumption in favour of sustainable development.

For plan-making this means that:

- a) *plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas⁵, unless:*
 - i. *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
 - ii. *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

- 2.3. Paragraph 17 of the NPPF states:

The development plan must include strategic policies to address each local planning authority's priorities for the development and use of land in its area [Footnote: Section 19(1B-1E) of the Planning and Compulsory Purchase Act 2004]. These strategic policies can be produced in different ways, depending on the issues and opportunities facing each area. They can be contained in:

- a) *joint or individual local plans, produced by authorities working together or independently (and which may also contain non-strategic policies); and/or*

- 2.4. Paragraph 20, of the NPPF states:

Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision [Footnote: In line with the presumption in favour of sustainable development] for:

- a) *housing (including affordable housing), employment, retail, leisure and other commercial development;*

- b) *infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);*
- c) *community facilities (such as health, education and cultural infrastructure); and*
- d) *conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.*

2.5. The NPPF recognises the benefit of delivering growth on scale in paragraph 73 where it states:

The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

- a) *consider the opportunities presented by existing or planned investment in infrastructure, the area's economic potential and the scope for net environmental gains;*
- b) *ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*
- c) *set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;*
- d) *make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and*
- e) *consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.*

2.6. The Planning Practice Guidance (PPG) was first introduced in 2014 which offers 'live' government guidance. The PPG provides guidance to help in the implementation of policy in the NPPF.

2.7. There are a number of sections of the PPG that of relevance to this policy, including the following:

What sizes of site or broad locations can be considered for assessment?

Plan-makers will need to assess a range of different site sizes from small-scale sites to opportunities for large-scale developments such as village and town extensions and new settlements where appropriate.

It may be appropriate to consider all sites and broad locations capable of delivering 5 or more dwellings, or economic development on sites of 0.25 hectares (or 500 square

metres of floor space) and above. Plan-makers may wish to consider alternative site size thresholds. The National Planning Policy Framework expects a minimum proportion of the sites identified as suitable for housing to be no larger than one hectare, unless there are strong reasons why this cannot be achieved.¹

What can be considered by plan-makers when assessing whether sites / broad locations are likely to be developed?

Plan-makers will need to assess the suitability, availability and achievability of sites, including whether the site is economically viable. This will provide information on which a judgement can be made as to whether a site can be considered deliverable within the next five years, or developable over a longer period.²

How can the timescale and rate of development be assessed and presented?

Information on suitability, availability, achievability and constraints can be used to assess the timescale within which each site is capable of development. This may include indicative lead-in times and build-out rates for the development of different scales of sites. On the largest sites allowance should be made for several developers to be involved. The advice of developers and local agents will be important in assessing lead-in times and build-out rates by year.³

What constitutes a 'deliverable' housing site in the context of plan-making and decision-taking?

In order to demonstrate 5 years' worth of deliverable housing sites, robust, up to date evidence needs to be available to support the preparation of strategic policies and planning decisions. Annex 2 of the National Planning Policy Framework defines a deliverable site. As well as sites which are considered to be deliverable in principle, this definition also sets out the sites which would require further evidence to be considered deliverable, namely those which:

- have outline planning permission for major development;
- are allocated in a development plan;
- have a grant of permission in principle; or
- are identified on a brownfield register.

Such evidence, to demonstrate deliverability, may include:

- current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;
- firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;
- firm progress with site assessment work; or
- clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.

¹ PPG Paragraph: 009 Reference ID: 3-009-20190722

² PPG Paragraph: 017 Reference ID: 3-017-20190722

³ PPG Paragraph: 022 Reference ID: 3-022-20190722

Plan-makers can use the Housing and Economic Land Availability Assessment in demonstrating the deliverability of sites.⁴

How can plan-making authorities demonstrate there is a reasonable prospect that housing sites are ‘developable’?

Annex 2 of the National Planning Policy Framework defines what constitutes a developable site. In demonstrating that there is a ‘reasonable prospect’ plan-makers can use evidence such as (but not exclusively):

- written commitment or agreement that relevant funding is likely to come forward within the timescale indicated, such as an award of grant funding;*
- written evidence of agreement between the local planning authority and the site developer(s) which confirms the developers’ delivery intentions and anticipated start and build-out rates;*
- likely buildout rates based on sites with similar characteristics; and*
- current planning status - for example, a larger scale site with only outline permission where there is supporting evidence that the site is suitable and available, may indicate development could be completed within the next 6-10 years.*

A pragmatic approach is appropriate when demonstrating the intended phasing of sites. For example, for sites which are considered developable within 6-10 years, the authority may need to provide a greater degree of certainty than those in years 11-15 or beyond. When producing annual updates of the housing land supply trajectory, authorities can use these to provide greater certainty about the delivery of sites initially considered to be developable, and those identified over a longer time span.

Further guidance is provided in the plan-making chapter about how authorities can demonstrate that strategic matters can be delivered within a particular timescale. Plan-makers can use the Housing and Economic Land Availability Assessment in demonstrating the developability of sites.⁵

Local Policy

- 2.8. The 2017 Local Plan allocated eight Sustainable Urban Extensions as a key part of the spatial strategy. Policy LP28 set out the general requirements for SUEs coming forward and then SUE specific policies were also included to address SUE-specific requirements – Policy LP30 for the four Lincoln SUEs, LP39 for the two Gainsborough SUEs, and LP44 for the two Sleaford SUEs.
- 2.9. Many of the SUEs have been the subject of much joint working and many years of efforts to progress them and the work behind the SUEs and details of their progress at the time of the production of the 2017 Local Plan was set out in a number of SUE Topic Papers (available on the Central Lincs website).
- 2.10. These SUEs combined for approximately 14,700 dwellings expected in the plan period of 2012-2036 (see Policy LP48) as well as other facilities and infrastructure. This represented nearly 40% of the total growth planned between 2012 and 2036.

⁴ PPG Paragraph: 007 Reference ID: 68-007-20190722

⁵ PPG Paragraph: 020 Reference ID: 68-020-20190722

3. Context and Evidence

- 3.1. The Local Plan is planning to deliver 29,150 dwellings to meet its identified needs across Central Lincolnshire over the plan period of 2018-2040. In order to deliver this growth, the Local Plan is allocating various sites for residential development, including identifying eight urban extensions which were also allocated in the existing plan.
- 3.2. Sustainable urban extensions present an opportunity to deliver sustainable development whereby residential development is served by the necessary services, facilities, infrastructure, and employment opportunities to sustain a community. This approach is endorsed by national policy.
- 3.3. All of the SUEs have been part of the proposed housing land supply since the last local plan was being developed, but for some the journey started substantially before. For example discussions have been ongoing about the potential at the Western Growth Corridor for decades and it was identified for some mixed use development in City of Lincoln's 1998 Local Plan, and the Gainsborough Southern Neighbourhood SUE received an initial outline permission in 2011.
- 3.4. The housing requirement proposed in the Local Plan is a range of between 23,320 and 29,150 dwellings between 2018-2040. During this timescale the SUEs are expected to deliver approximately 14,000 dwellings which is between 48% and 60% of the overall target range. When compared against the 32,672 dwellings expected to be delivered in the plan period (see Housing Delivery Paper ref: HOU008) the provision from SUEs makes up about 42% of the development from all sources of supply expected to come forward in the plan period. Using any of these ratios, it is clear how important these eight sites are for Central Lincolnshire context.
- 3.5. Many of the SUEs are also expected to continue delivery beyond the end of the plan period in 2040. Details of the expected delivery timeframes, including this longer-term delivery, is set out in chapters 3-5 of the SUEs Topic Paper (ref. HOU011).
- 3.6. Beyond housing, the SUEs are expected to deliver in the region of 51 hectares of employment land, local centres, community facilities, sports facilities, schools, healthcare facilities, transport improvements, and more. These facilities are equally important to the delivery of sustainable growth in Central Lincolnshire. Details of the specific requirements are set out in Chapters 3-5 of the SUE Topic Paper and in Appendix 1 of the Central Lincolnshire Infrastructure Delivery Plan (ref. INF001a). The strategic nature of these sites are such that new communities are made and significant new infrastructure is delivered where these new communities need it – as well as being well located in relation to the main urban areas in Central Lincolnshire to support existing communities too.
- 3.7. This approach to including a number of strategic sites was included in the 2017 adopted Local Plan and was found to be sound. Of the eight SUEs, seven have at least an outline permission on part of the site, and three are under construction. All sites have made progress towards delivery to a varying degree. This approach continues to be a key building block for growth in Central Lincolnshire and it is both deliverable and sound.

4. Issues and Options Consultation

- 4.1. The first, formal stage of the Local Plan review was the Issues and Options consultation that took place in June and July 2019. In this consultation, proposal 8 related to Sustainable Urban Extensions which stated:

It is proposed that the Sustainable Urban Extensions remain allocated in the new Local Plan as important contributors to the strategy for Central Lincolnshire.

It is proposed that the policies for each Sustainable Urban Extension may be adjusted, and the amount and timing of growth accounted for from each Sustainable Urban Extension may be adjusted where recent evidence suggests that this is necessary

- 4.2. This was then followed by Question 8 which asked:

Do you agree that the Sustainable Urban Extensions in the 2017 Local Plan should be carried forward into the new Local Plan with policies updated to account for the latest situation on each Sustainable Urban Extension? If not, please provide details of any alternative proposals.

- 4.3. There were a number of comments received in response to the question and the key issues were summarised as follows:

- The SUEs should be taken forward taking into account the latest situation on each.
- An equal amount of development should also be built in rural areas.
- It would be beneficial to obtain greater confidence in delivery timescales to plan infrastructure.
- The SUEs should be retained but a more in-depth analysis of each one should be developed with a greater provision of evidence from the SUE developers of both short term and long term delivery required.
- As long there is robust evidence to demonstrate that SUEs meet the tests of Paragraph 67 of the NPPF in relation to being deliverable and/or developable. Expectations from the SUEs in the current plan are unrealistic and have not delivered as envisaged.
- Any changes to policies for SUEs should result in 'watering down' requirements.
- The principles of the SUEs are necessary for the delivery of growth, but a more sensible and realistic approach is needed in relation to their delivery with more growth coming from smaller and less problematic sites in tiers 1-4 of the hierarchy.
- The allocation of SUEs should be reviewed in response to the climate emergency.
- Allocations in urban areas are not exchanged for development in villages.
- It is preferred for alternative approaches to be found such as planning strategic growth at sustainable locations, such as Saxilby, avoiding piecemeal growth at these locations and instead master-planning the settlement to deliver real improvements such as a bypass or improvements to the station.
- Alternative sites, such as land to the east and west of Station Road, Branston, land at Waddington Lowfields, Land at North Hykeham, and Land south of the Maltings and at Boston Road in Sleaford could be allocated to help deliver in the short term.
- More attention is needed for providing better road networks and local healthcare provision for these extensions.
- The delivery of sites needs to be assessed and reserve sites (such as at Quarrington) should be allocated to provide options.

- Early engagement with land owners and developers on SUEs is necessary to ensure compliance with part 4 of paragraph 35 of the NPPF.
- More brownfield sites should be used.
- The network along the Fossedyke Canal and River Witham provide car-free, direct walking and cycling routes into Lincoln City Centre which could provide future residents access to open space and commuting routes. Opportunities should be taken to promote and invest in this network.
- 'Sustainable' is a meaningless term and further expansion is not sustainable as there is a finite amount of land.
- Concerns about the infrastructure and affordable housing not being delivered on the SUEs, otherwise the level of growth is not sustainable.
- The retention of the South East Quadrant is supported as a long term growth area, straddling Local Plan reviews.
- Support the retention of the South West Quadrant but should consider what parts of the SUE can come forward in advance of the Hykeham Relief Road.
- The retention of the Gainsborough Northern Neighbourhood SUE is supported and progress is being made towards approval of an outline permission the first phase for 750 dwellings. There is substantial evidence underpinning the development of this site and with the first phase being 'infrastructure light' a start can be made on the site in the short – medium term. The remaining 1,750 dwellings are anticipated to be delivered after the current plan period of 2036.
- The retention of the Gainsborough Southern Neighbourhood SUE is supported. An outline permission was approved in 2012 with a section 73 application live to enable a phased approach on the site to help it deliver in the short term. There are advanced discussions with a housebuilder nearing completion for the delivery of up to 390 dwellings. A Reserved Matters application is expected to be submitted soon on this phase 1. Anticipated start date of Autumn 2020 on the site, subject to approval of Reserved Matters.
- The retention of the Eastern SUE is supported as a Broad Location for Growth beyond the plan period.
- There is some concern that the Gainsborough SUEs will not deliver the expected growth rate.
- If policies for the SUEs are reviewed Lincolnshire County Council request that Policy LP28 includes a requirement for proposals for SUEs within a Minerals Resource Safeguarding Area be accompanied by a Mineral Resource Assessment to help demonstrate whether the minerals safeguarding element of the policy will be met.
- All SUE site specific policies should be strengthened in relation to heritage assets, particularly in relation to archaeology. Historic England happy to assist with wording.

4.4. The Issues and Options Consultation Report set out the next steps as:

Given that the SUEs continue to be an important part of the strategy and that a number of them are making progress towards delivery, it is proposed that they are retained in the Local Plan. We will continue to work with those bringing the SUEs forward to ensure that a realistic account is taken of delivery and timings of both housing and associated infrastructure in the plan, and to revise policies and the amount of development anticipated to be delivered within the plan period where necessary to ensure that they will be delivered sustainably in accordance with the Local Plan.

5. Regulation 18 Consultation

- 5.1. A Consultation Draft of the Local Plan was published for consultation between 30 June and 24 August 2021. During this eight week consultation comments were received on the plan, the policies within the plan, and supporting information and evidence.
- 5.2. There were a number of comments on this draft policy during the consultation and the issues raised can be summarised as follows:
- Various comments broadly supporting the policy.
 - Suggestions for changing the policy include:
 - To prepare and adopt a design code for each SUE.
 - Green infrastructure should be considered at the earliest stage to support Biodiversity Net Gain.
 - Use Integrated Water Management schemes rather than traditional Sustainable Drainage Systems.
 - Additional requirements should be added to achieve biodiversity net gains and minimising impacts of the natural environment.
 - Suggestion that further clarity required to ensure nature based policies within the plan also applies to all SUEs sites.
 - Comments about needing accurate assessments of availability, suitability, deliverability, developability and viability for these sites taking into account delivery rates and lead times.
 - Comments noting the NPPF clarifies that new urban extensions need to look for the longer time frame of at least 30 years rather than 15 to take into account delivery timescales.
 - Concerns over the lead-in times of SUEs. Suggestions made that smaller non-strategic sites should be allocated to ensure housing supply in the short and medium term which will diversify the range.
 - Objections raised on legal policy duties of NPPF paragraphs 8c, 174, 179 noting that SUEs will have impacts on the natural environment and suggests there should be further requirements placed in the policy to minimise the impacts by protecting and enhancing the ecological networks. Net gains in biodiversity must be achieved within SUEs.
 - Concerns that the housing supply does not meet the requirements of 10% of housing sites been on 1ha or less as set out in Para. 69a of the NPPF
- 5.3. All comments were carefully considered and some changes were made to the policy relating to design codes and biodiversity.

6. Proposed Approach in Draft Local Plan

- 6.1. The proposed policy provides an overarching policy for SUEs being developed to help ensure consistency across the SUEs in delivering a quality development and creates sustainable communities. It sets out the general approach to how SUEs should be brought forward and a number of key considerations and opportunities that need to be investigated prior to developing each site.
- 6.2. It is built on the existing adopted policy which is still generally fit for purpose subject to the minor amendments being made to bring the policy more up to date. It should be read alongside the specific policies for each SUE (policies S69, S70 and S71) as well as the wider policies of the plan which will also be applied where relevant to the SUEs.

7. Reasonable Alternative Options

- 7.1. As part of the Sustainability Appraisal process it was identified that there were no reasonable alternative options for this policy as this policy was considered to avoid unnecessary repetition within each of the SUE policies and to ensure consistency across the SUEs.

8. Conclusion

- 8.1. This Evidence Report demonstrates the rationale for the proposed policy as contained in the Proposed Submission Draft Central Lincolnshire Local Plan. This helps bring together relevant evidence that has informed this policy and how we have responded to comments received during the plan making process, as well as how the latest evidence and national guidance has been taken into account.