

Examination of the Central Lincolnshire Local Plan (CLLP)

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Dear Mr Hylton,

1. We have been appointed by the Secretary of State to conduct the Examination of the Central Lincolnshire Local Plan Review. We have commenced our preparation and at this stage have some initial questions where a response from the Joint Strategic Planning Committee ('the Committee') would be helpful.

Preliminary Matters

2. Thank you for your letter dated 4 August 2022 (Ref. EX001). After considering your request, we agree that if the Committee considers that it is necessary to consult on the proposed addendum to the Sustainability Appraisal, then this should be done as soon as possible.
3. We also agree that it would be helpful at this stage for the Committee to produce a list of suggested main modifications to the Plan. These should be made available to the Programme Officer and published on the examination website. The suggested changes will be discussed, where appropriate, at the relevant hearing session.

Initial Questions for Examination

Duty to Cooperate

4. The submitted draft *Statement of Common Ground* (Ref. STA007.1) has not been signed by all parties and finalised. Please could you confirm whether this has now been fully signed and finalised and the reasons for any delays?

Introduction, Context, Vision and Objectives

5. Does the Plan clearly differentiate between strategic and non-strategic policies, as required by paragraph 21 of the National Planning Policy Framework ('the Framework')?

Spatial Strategy

6. Paragraph 22 of the Framework states that where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery. Does this requirement apply to the Central Lincolnshire Local Plan Review, and if so, how is the Plan consistent with national planning policy in this regard?
7. What is the latest position regarding the possible future use of RAF Scampton? Is it clear to decision-makers, developers and local communities what scale and mix of uses are permitted by Policy S75? Is the approach set out by Policy S75 justified and effective?

Energy, Climate Change and Flooding

8. Are Policies S6, S7, S8, S9 and S11 justified, effective and consistent with current national planning policy?
9. What is the justification for the inclusion of Policy S19 in the Local Plan?

Housing

10. If one of the strategic aims of the Plan is to provide enough housing for the preferred economic growth scenario, what is the justification for expressing the housing requirement as a range? What are the reasons for not setting the requirement at 1,325 dwellings per annum?

Employment

11. The *Economic Needs Assessment Update* (Ref. ECO001) ('the ENA') encourages the Committee to supplement the analysis with a fuller consideration of past take-up and market evidence. The ENA also refers to economic volatility at the time of writing and strongly advises the Committee to closely monitor local economic trends, particularly as the economy recovers from the pandemic. How has the Committee taken these factors into account and does the Plan reflect appropriate, up-to-date evidence?

12. The ENA recommends making provision for around 11.7 hectares of employment land (gross). In contrast, the Plan allocates some 122 hectares of land. What is the breakdown of allocations by size, and how much of the allocated land has extant planning permission for employment uses?
13. What is the justification for the amount of employment land allocated in the Plan? Will the Plan ensure that there is a balance between jobs and housing so as to prevent unsustainable levels of out commuting from other areas?
14. It is our understanding that approximately 97 hectares of allocated employment land is undeveloped. Is the allocation of approximately 122 hectares of employment land deliverable?
15. The ENA estimates that over half of the total new jobs to be created over the plan period, under the recommended growth scenario, would be in non-B-class uses. The ENA also states that these other uses were excluded from its analysis of employment land requirements. How much employment land would these other uses require and how would this be provided for?
16. The ENA states that consideration has been given to the implication of future job growth for employment land provision without undertaking a full employment land review or attempting to satisfy the requirements of the Planning Practice Guidance in full. Is this approach justified and is the Plan adequately supported by the evidence base?
17. The submissions and representations to the Plan also refer to the Local Industrial Strategy for Central Lincolnshire. What is the status of this document, and does it form part of the Local Plan examination library?

SUEs, Regeneration Areas and Opportunity Areas

18. According to the *Sustainable Urban Extensions (SUEs) Topic Paper* (Ref HOU011), the delivery of the Sleaford West Quadrant SUE (NK/SLEA/015) is dependent on the completion of a Section 106 planning obligation relating to the provision of sustainable transport initiatives, health care, education, open space, a community centre, and off-site footpath improvements. What is the latest position regarding proposed development at this site and how does it relate to the Plan?
19. Similarly, there are several planning permissions on the Lincoln South East Quadrant SUE (NK/CAN/003) that have been granted subject to legal agreements being signed. Could the Committee please provide an update on these and confirm which parts of the site benefit from planning permission?
20. The SUE Topic Paper refers to the Lincoln South East Quadrant Broad Concept Plan and Design Code Supplementary Planning Document (December 2020). What is the status of this document, and does it form part of the Local Plan examination library?
21. What is the current status of the Gainsborough Northern Neighbourhood SUE (WL/GAIN/001)?

Site Allocations

22. Does the Plan (and the Council's brownfield register) identify land to accommodate at least 10% of the housing requirement on sites no larger than one hectare, as required by paragraph 68 of the Framework?
23. Where sites are allocated, is it clear to decision-makers, developers, and local communities whether the 'development requirements' constitute formal policy or supporting text? If intended as supporting text, will this provide a clear and effective means of determining planning applications?

Alternative (Omission) Sites

24. Some representors are seeking a different use of land to the one proposed in the Local Plan. Please can the Committee prepare a list of such sites that were put forward in response to the proposed Plan? It would be helpful if the list includes details of each representor, the proposed allocation/land use in the Plan, the allocation/land use being sought and a map showing their location.

Next Steps

25. In order to progress matters we would be grateful if the Committee could provide a written response to the above questions by **5pm on Friday 9 September 2022**. At this stage, it is not possible to confirm the exact dates for the forthcoming hearing sessions, as this will largely depend on the answers to the questions set out above. However, we have asked the Programme Officer to explore the potential for hearing dates in November and December 2022 and consider suitable venues. Please note that at least 6 weeks' notice will be required before the start of the first hearing.
26. We trust that the above questions are all self-explanatory, but should you have any queries please do not hesitate to contact us through the Programme Officer. We have asked the Programme Officer to upload this letter to the examination website, but we are not seeking representations from any participants at this stage.

Yours Sincerely,

Matthew Birkinshaw and Clive Coyne

Inspectors