



Central Lincolnshire Local Plan Examination

Matter 3 – Spatial Strategy and Distribution of Development

Hearing Statement

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MATTER 3 – SPATIAL STRATEGY AND DISTRIBUTION OF DEVELOPMENT

Issue 1 – Settlement Hierarchy – Policy S1

Question 1: The Settlement Hierarchy Methodology Report states that the categorisation of settlements is a continuation of the hierarchy in the existing Central Lincolnshire Local Plan (2017). Is this appropriate and justified? If not, what changes are necessary to rectify any issues of soundness?

2.1.1 Gladman is supportive of the principle of directing the greatest levels of growth towards the most sustainable towns and villages across Central Lincolnshire. The Settlement Hierarchy Methodology Report (STA006) states that since adoption of the Central Lincolnshire Local Plan (CLLP) in 2017, the settlement hierarchy has '*largely proved to be satisfactory*', however it does accept that a few anomalies have come to light.

2.1.2 As noted in Gladman's representations submitted to the Regulation 19 consultation and discussed further below, Gladman feel that the approach which has been carried forward from the CLLP remains too crude an approach. Notwithstanding this, Gladman also note that the figures used for dwelling numbers for each of the settlements are as of 1st April 2018. Given that this data is now four years out-of-date, it is not possible that it takes into consideration completions since 2018, which could change the position of settlements in the hierarchy.

Question 2: Is the continued use of settlement size (by dwellings numbers) a reasonable and appropriate way of categorising settlements? How were other factors such as services, facilities and public transport provision considered?

2.1.3 Gladman accept that considering the number of dwellings within a settlement is a good starting point for establishing the settlement hierarchy, however, to solely use this approach to inform the settlement hierarchy is too crude an approach. The methodology does not take into consideration the availability of services and facilities and means that some settlements, such as Bassingham which is categorised as a Medium Village, which have a greater provision of services and facilities are placed

lower down the settlement hierarchy. Indeed, by way of example, the Inspector's Report to the adopted CLLP suggested that:

'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.'

2.1.4 Appendix 1 in the Central Lincolnshire Local Plan Review Services and Facilities Methodology Report 2020 (STA012) shows the broad range of facilities and services available in Bassingham compared to other settlements. For instance, it demonstrates that Bassingham, has a doctor's surgery whereas the Large Villages of Witham St Hughes, Heighington and Dunholme do not. As such, Gladman contend that using just the number of dwellings in a settlement and not taking into consideration any other factors is an inappropriate method because it can lead to more sustainable settlements, such as Bassingham, being directed a lower amount of overall growth.

2.1.5 The recognised lack of any significant technical constraints, national designations and its demonstrably sustainable status owing to the range of services and facilities it provides both point to the fact that, were it not for its number of existing dwellings, Bassingham would be designated in a higher tier of the settlement hierarchy. It should therefore be classified as a Large Village, with a level of growth commensurate to its status.

Issue 3 – Distribution of Development – Policy S2 and S28

Question 2: What is the justification for the proportion of new housing directed to smaller, rural settlements? Is this sufficient to ensure the long-term sustainability of rural villages beyond the Lincoln Strategy Area, Sleaford and Gainsborough?

2.1.6 The spatial strategy identifies eight tiers in the settlement hierarchy which range from the 'Lincoln Urban Area' at the top down to 'Countryside' at the bottom. The strategy as set out in Policy S2 proposes directing growth of 3,498 homes, 12% of the overall

housing requirement 'elsewhere' which includes everywhere in Central Lincolnshire except for Lincoln, Gainsborough and Sleaford.

- 2.1.7 We are supportive of the hybrid approach adopted by the proposed strategy, which follows that of the adopted CLLP, in so much as it directs growth to a range of tiers across the settlement hierarchy.
- 2.1.8 In principle we support the Council's approach which seeks to focus development towards the most sustainable locations and in particular support the identification of Welton as a 'Large Village'. Whilst Gladman recognise the important role Lincoln and the main towns should play, the emerging plan should not place too much of an over reliance on these locations at the expense of other sustainable settlements within the plan area. Paragraph 2.4.1 of the draft Local Plan indicates that some 142,000 residents reside in the smaller settlements, which equates to 47% of the area's population.
- 2.1.9 Whilst we do not make the case that it should therefore mean 47% of all development is located in the smaller settlements, Gladman contend that just 12% of overall growth directed towards these settlements is insufficient to ensure the long-term sustainability of rural villages.
- 2.1.10 Gladman consider that some smaller settlements, particularly those identified as Large and Medium Villages, such as Bassingham, Saxilby and Scothern, have sufficient capacity to accommodate more housing than what is currently being allocated.
- 2.1.11 For example, Saxilby has a wide range of local facilities and services including a train station, primary school local convenience stores, doctors surgery, church and pubs making it a suitable location for further growth .
- 2.1.12 As a 'Medium Village' Scothern has a number of day-to-day services available. Scothern also benefits from being located only circa 5 miles to the north of Lincoln City, which is easily accessible via the 11a bus service and the A158, making it one of the more accessible settlements for commuters into Lincoln and a sustainable location for further future growth.

- 2.1.13 Directing greater levels of development towards the Large and Medium Villages will further assist in ensuring the vitality of existing services and facilities within the rural areas, which equate to 47% of the area's total population.

Issue 5 – Housing Development in or adjacent to Villages – Policy S4

Question 3: What is the justification for allowing some residential development adjacent to the Lincoln Urban Area, Main Towns and Market Towns, but not villages, especially Large Villages which benefit from a good range of services?

- 2.1.14 Policy S3 allows proposals on sites outside of but immediately adjacent to the development footprint to be considered on their individual merits against the policies in the Local Plan. Gladman is supportive of this policy however can find no justification for the discrepancy as to why it only applies to the Lincoln Urban Area, Main Towns and Market Towns. This seems further unjustified when considering that many of the Large and Medium Villages are inherently sustainable and suitable for accommodating sustainable development.
- 2.1.15 We do not suggest that a development deemed suitable in terms of scale directly adjacent to the developed footprint of Lincoln would necessarily be suitable directly adjacent to the development footprint of a Medium, or even Large Village. Given though Policy S3 allows such proposals to be considered on their individual merits, Gladman cannot see a justified reason why the same allowance could not be afforded to development proposals on the edge of Large and Medium Villages, instead of the arbitrary, unevidenced figure which Policy S4 provides.
- 2.1.16 Gladman can only assume the reason behind the difference between policies S3 and S4 relates to concerns over unacceptable scale. As such, we suggest that a more appropriate approach would be to introduce wording to this affect:

Proposals on sites outside of but immediately adjacent to the developed footprint of a settlement which is of a scale that is proportionate to the size of the settlement and the level, type and quality of day to day service provision currently available and commensurate with the ability of those services to absorb the level of development, in

combination with any planned allocation in this Local Plan, will be considered on their individual merits against the policies of this Local Plan and any applicable policies in a made Neighbourhood Plan.

Question 4: What is the justification for the additional requirements for exception sites under Policy S4?

- 2.1.17 Gladman support, in principle, Policy S4 which allows unallocated greenfield sites immediately adjacent to the development boundary where they provide First Home exception site in accordance with the NPPF or is exclusively for a rural affordable housing exception site. We would advise caution, however, in relying on such an approach as development which is solely affordable housing or First Homes may lead to viability issues, especially when taking into consideration other policies in the plan. As such, we suggest that the policy is amended to include an element of market housing which would ensure viability.
- 2.1.18 Gladman consider that the policy as it is currently worded '*proposals on unallocated sites not meeting these criteria will not generally be supported unless there are clear material planning consideration that indicate otherwise*', is too inflexible and inhibits development in sustainable settlements which require greater growth to support and sustain the vibrancy of the rural areas.