

SUBJECT: CENTRAL LINCOLNSHIRE LOCAL PLAN CONSULTATION DRAFT

DIRECTORATE: COMMUNITIES AND ENVIRONMENT

REPORT AUTHOR: TOBY FORBES TURNER, PLANNING POLICY MANAGER

1. Purpose of Report

- 1.1 To update the Executive on the Central Lincolnshire Local Plan (CLLP) Consultation Draft and to recommend a formal response on behalf of the Council.

2. Executive Summary

- 2.1 The next version of the CLLP has been produced for public consultation starting 30th June through to 24th August. Once adopted, the CLLP will replace the current Local Plan which was adopted in April 2017.
- 2.2 There are a total of 83 Policies contained within the Draft Plan with key policies including those related to climate change, housing, biodiversity, retail and employment (see Appendix 1). Following this round of consultation the Draft Plan will be subject to one further round of statutory consultation prior to being submitted to the Planning Inspectorate for public examination which is estimated to take place in early 2022 with the plan hopefully adopted later in 2022.

3. Background

- 3.1 In January 2019, the Central Lincolnshire Joint Strategic Planning Committee (CLJSPC) took the decision to undertake a review of the Central Lincolnshire Local Plan. The decision to review the Local Plan was based on a number of factors including significant changes to National Planning Policy, revisions to how housing needs figures are calculated for Local Plans and changes to the types of homes that should be planned for in development plans. These changes cumulatively taken, meant significant elements of existing Local Plan are effectively not in conformity with national policy and open up the risk to challenge to the Plan particularly around the issue of 5 years housing land supply.
- 3.2 The first public facing stage of the review took place in June 2019 with the Issues and Options public consultation where the general principles and wider themes for the new Local Plan were consulted on for a period of 6 weeks.
- 3.3 This is therefore the second time the draft new plan will be scrutinised in a public consultation. This consultation is an important opportunity to test the proposals in the plan with the public, the development industry and other interested bodies – this includes consultation on a number of new policies and ambitions, possibly most notably around tackling climate change.

4. Content and Structure of the Plan

- 4.1 The structure of the Consultation Draft Local Plan has changed from the current Local Plan and is now thematic for ease of reading and navigation by users. The structure is as follows:

1. Introduction, Context, Vision and Objectives
2. Spatial Strategy
3. Energy, Climate Change and Flooding
4. Housing
5. Employment
6. Retail: City and Town Centres, and District, Local and Village Centres
7. Tourism and Visitor Economy
8. Transport and Infrastructure
9. Design and Amenity
10. Built Environment
11. Natural Environment
12. SUEs, Regeneration Areas and Opportunity Areas
13. Site Allocations
14. Gypsies, Travellers and Travelling Showpeople
15. Ministry of Defence Establishments

- 4.2 Many of the policies remain largely unchanged but a number have been revised following changes to the context since the Local Plan was adopted in 2017 or from experience of using the plan over the last four years.

- 4.3 The plan retains coverage and protection for the things that are valued in Central Lincolnshire whilst ensuring positive policies to help shape development to enhance the area in accordance with the Vision and Objectives brought before the CLJSPC in March 2021 and largely consistent with the Vision and Objectives of the 2017 Local Plan.

- 4.4 In an effort to assist neighbourhood planners with understanding which policies are strategic (a key part of the basic conditions for developing a neighbourhood plan), policies are now prefixed with a 'S' for Strategic or 'NS' for Non-strategic. This is one of a number of steps being taken to try and assist communities in developing their own neighbourhood plans in clarifying expectations of the relationship between the Local Plan and the neighbourhood plans.

4.5 Headlines of the Consultation Draft Local Plan

- 4.6 The new draft Local Plan does include a number of areas of substantial change from the plan adopted in 2017. The key areas of change are as follows:

Housing Requirement

- 4.7 The new Local Plan proposes a housing requirement range of between 1,060 and 1,325 dwellings per year. The lower figure of this range is the nationally derived Local Housing Need figure based on the standard formula taking account of population projections and affordability of housing. This figure is updated annually and will be subject to change prior to submitting the Local Plan. The upper end of the range is informed by evidence developed in the Housing Needs Assessment

(2020) and Economic Needs Assessment Update (2020) as a figure that will support anticipated job growth in Central Lincolnshire.

- 4.8 This approach requires the identification of sites to deliver a total of 29,150 dwellings from 2018 to 2040. The geographic breakdown and planning status of development identified to meet this requirement is set out in Tables 1 and 2 and in Figure 1 on pages 159-160 of the Consultation Draft Local Plan (see Appendix 2).
- 4.9 This requirement is below the requirement in the 2017 Local Plan which was 1,540 dwellings per year, or 36,960 dwellings from 2012-2036.
- 4.10 Housing sites in the Lincoln Urban area are set out in Policy 76 of the Plan, pages 163-164 with the majority either being carried over from the current Local Plan or sites with existing planning permission.
- 4.11 Settlement Hierarchy and site allocations
The settlement hierarchy remains largely unchanged from the adopted Local Plan with the same tiers and thresholds being used to define the tiers of the hierarchy. Lincoln, and the wider Lincoln Strategy Area sits at the top of the hierarchy as the principal urban area within Central Lincolnshire and (subject to approval) will see approx 64% of total homes and employment land for Central Lincolnshire being delivered here. The current adopted plan figure is 64%
- 4.12 The approach to housing growth in Medium and Small Villages has changed, where allocations of 10 or more dwellings have been considered in the Consultation Draft Local Plan. The decision on whether or not to allocate sites in these villages has been based on the overall sustainability credentials of each settlement as well as the suitability of sites being put forward. This approach was approved by the CLJSPC at its meeting in September 2020.
- 4.13 Policy S4 sets out the framework for how sites not allocated in the Local Plan should be considered, including support for neighbourhood plans to allocate sites and expectations for when additional development on small sites might be considered acceptable. This approach replaces the growth percentages from the 2017 Local Plan.
- 4.14 Retail hierarchy
The retail hierarchy has been expanded to include important local centres and rural centres which perform an important local role in providing services to the population. This will help to protect these services from being lost in an increasingly challenging environment. The retail hierarchy is set out in Policy S34 on page 74 of the Plan.
- 4.15 Climate Change
Arguably the biggest challenge facing the world at present is that of climate change. The declaration of a climate change emergency by the Government and also declarations and commitments to act by the Central Lincolnshire Authorities identifies this as an important matter that must be dealt with now.
- 4.16 Further to the steer provided by the CLJSPC in March 2020, consultants were appointed to understand the challenges within Central Lincolnshire and to identify

what the Local Plan can do to address this matter. At the Committee meeting on 15 March 2021 some of the key findings of the evidence were provided to the Committee along with the proposed approach for the Local Plan. Following the approval obtained at this meeting, Policies S6-S19 in Chapter 3 of the Local Plan set out the proposed policies for addressing this.

- 4.17 These policies include two areas of particular note – the requirement to deliver net zero carbon homes in Policy S6, and a framework for considering the delivery of large scale renewable energy infrastructure in Policy S13.
- 4.18 For Policy S6 one of the key challenges for Central Lincolnshire is the challenging viability condition in many parts of the area. Officers and consultants have investigated the ability to deliver net zero carbon homes from both a feasibility and viability perspective. This evidence has identified that it is feasible to deliver this ambition, and also perhaps the most efficient way of achieving this taking into account general performance and lifetime costs of delivering energy efficient homes. However, it has highlighted that, whilst in many areas it will be viable to achieve these standards, in some areas with lower sales values experienced, it will be challenging to deliver net zero carbon homes whilst remaining viable when taking into account the industry-standard inputs for viability calculations. However, it has also shown that it could be possible in the right conditions.
- 4.19 The Whole Plan Viability Assessment sets out the details of the inputs and outputs of calculations, identifies value zones and what can reasonably be achieved in each zone in terms of contributions from development when using the inputs generally accepted in such an assessment.
- 4.20 It also goes one step further to look at scenarios using different evidence based assumptions which suggest that additional contributions or higher standards of building can be achieved in many cases, demonstrating that in significant steps towards achieving net zero carbon can be delivered in the Local Plan, ahead of Future Homes Standards (a new standard for energy efficient homes that the Government is progressing for new homes being built in 2025, to be included in building regulations).
- 4.21 Officers are mindful of the Committee's ambition on climate change and the very clear steer provided, and so have proposed an ambitious, yet robust, position in the Consultation Draft Local Plan. Given this challenging and very new topic, specific questions have been asked on this policy, set out under paragraph 3.1.7, p.26 of the plan. It is hoped that responses to the consultation will assist in underpinning this position or highlighting further challenges that need consideration before the policy is finalised.
- 4.22 Policy S13 seeks to address the delivery of renewable energy generation infrastructure. The policy identifies the criteria that must be satisfied for any proposal for renewable energy infrastructure in areas identified as being suitable in principle for such infrastructure to be erected – this is considered to be particularly important for wind turbines (with Map 2 in the draft plan showing the areas not considered to be suitable for wind turbines of 40m plus due to constraints).
- 4.23 The sieving exercise that led to Map 2 will help to ensure that no wind turbines are located where they will result in safety or significant amenity issues or where they

will have other widespread unacceptable impacts. But this does not mean that they can necessarily be developed elsewhere as detailed assessment of impacts will need to be undertaken and the criteria listed in the policy will need to be satisfied if they are to be approved under this policy.

- 4.24 This approach provides a good level of certainty for the conditions and locations where such wind turbines could be acceptable and adequate protection from any unwanted impacts, when considered against the benefits they provide from the generation of renewable energy.
- 4.25 As a new policy area for Central Lincolnshire, views will be particularly welcomed on the proposed approach the Local Plan is taking on climate change during the consultation.
- 4.26 Key Policies of Interest for Lincoln
Given there are 83 policies contained within the Draft Plan it is perhaps useful to members to identify some of the draft policies of particular significance and potential impact for Lincoln.
- 4.27 Affordable Housing including First Homes
The Draft Plan's approach to affordable housing (AH) provision has been informed by the Central Lincolnshire Housing Needs Assessment and the Central Lincolnshire Whole Plan Viability study. Levels (percentages) of AH being sought for qualifying sites have been set against where the respective site is located in terms of viability zone (see p.52 of the draft plan and policy S21 p.54)
- 4.28 The majority of Lincoln is located in Zone B (where 20% AH will be sought) with a smaller area of Lincoln falling within Zone A (where 25% AH will be sought). For context, the current Local Plan AH ask is 25% and 20% on Sustainable Urban Extensions. Consideration needs to be given to the practical application of this approach in terms of mapping exact areas from a Development Management perspective.
- 4.29 The introduction of the Government's First Homes initiative in May 2021 has meant the Draft Plan has responded accordingly in setting out a proposed approach (see policy S21 p.55) which proposes a lower cap of £140,000 (national PPG requirement is £250,000) after the 30% market discount has been applied. This lower cap recognises the substantially lower income levels experienced in Central Lincolnshire compared to national levels and is supported in the Central Lincolnshire Housing Needs Assessment Report.
- 4.30 CMT received a detailed report on 13 July on First Homes including proposals for suggesting eligibility criteria and adjusting the discount cap in response to the Draft Local Plan.
- 4.31 Employment
Policies S27-S32 (p.65) continue to build on the policies in the current adopted plan whilst at the same time acknowledging the current difficulties and impact of Covid 19 on Central Lincolnshire. Policies are designed to protect existing employment sites, encourage new inward investment and ensure adequate certainty, yet flexibility, for the longer term outlook in the local economy.

4.32 Retail including Lincoln City Centre

The importance of planning policies being in place which support retail and the city centre has become particularly important given the impact of the pandemic over the last 18 months. Policies S34-S35 (p.74 & p.77) are of specific relevance to the City with the City's primary shopping areas and city centre areas being identified and supported.

4.33 Changes to the Use Class System (which sets out what types of development do or do not require planning permission) has meant it has become harder to 'protect' city centre uses e.g. retail/leisure from being converted into residential development albeit a range of city-centre uses is welcomed to support the night-time economy.

4.34 Accessibility & Transport

The concerted emphasis toward moving away from the car and instead priority given to sustainable modes of travel such as public transport, walking and cycling is given strong emphasis in the Draft Local Plan in policies S46-S47 (p.98-100).

4.35 Parking Standards

There is a factual error in the Draft Plan as in para. 8.4.4 it refers to a City of Lincoln Council parking SPD having been prepared. This is not the case as the SPD has not yet been written but instead is in early stages of preparation.

4.36 Historic Environment

The role which the built (and natural) historic environment's play in the City are vitally important in maintaining Lincoln as a 'world class' destination and place to live. Policies S56 & S57 (p.117-123) set out the Local Plan's approach to areas such as listed buildings, conservation areas, archaeology and views of Lincoln.

4.37 Natural Environment/Biodiversity/Trees

The Local Plan has a significant role to play in promoting access to, and supporting the role of the natural environment. The natural environment can also help mitigate climate change, support mental health and well-being and create quality spaces for people to live and work in. Policies S58-S65 (p.126-141)

4.38 Sustainable Urban Extensions & Regeneration & Opportunity Areas in Lincoln

Policies S67 (p.147) and NS71 (p.153-155) set out the continued support for the Sustainable Urban Extensions in the City and updated Regeneration and Opportunity Areas.

4.39 Lincoln Housing Allocations

Policy S76 (p.165-166) sets out the proposed housing allocations for the City, the vast majority of which are either carried over from the current plan or have planning permission.

4.40 Consultation Process

The Draft Local Plan will be consulted upon in accordance with the adopted Statement of Community Involvement, commencing 30 June through to 24 August 2021.

- 4.41 There is a statutory requirement for this stage of consultation to be run for no less than 6 weeks – and this is the standard length of consultation used in plan-making, including in Central Lincolnshire. However, with the Lincolnshire school holidays commencing on 22 July, part of the consultation will therefore take place during school holidays.
- 4.42 To help ensure that adequate opportunity is provided to allow for responses to be submitted the consultation period has been extended to 8 weeks. It is considered that this additional two weeks should allow sufficient flexibility for people to respond in addition to the timeframe prior to the holiday starting.
- 4.43 As with previous consultations, an online portal will host all of the consultation material, allowing comments to be submitted online. Emailed submissions and hard copy submissions will also be accepted.
- 4.44 The online portal will also host the necessary evidence and background documents for scrutiny of respondents, and policies maps will be available to show the geographic representation of the plan. All consultation material is available at: <https://central-lincs.inconsult.uk/CLLP.Draft.Local.Plan/consultationHome>
- 4.45 Hard copies of the plan and response forms will be available at council receptions. Additional request for hard copies of documents will also be considered.
- 4.46 Emails or letters will be sent out to statutory consultees and all people who have registered their interest on the Local Plan Consultation Database to notify them of the consultation. A press release will also be issued to bring the consultation to the attention of the wider public.
- 4.47 In respect of submitting the City Council's formal response to the Draft Local Plan consultation, the process involves submission of a response form via the dedicated Central Lincolnshire consultation on-line website. The deadline for submissions is 24th August.
- 4.48 In order to meet the consultation deadline, this report has been prepared for the 26th July Executive meeting with a proposal to endorse broad support for the Draft Plan. In order to allow for any additional officer comments to be made around any practical or issues of technical detail (as opposed to in principle support) delegation is sought to Kieron Manning, Assistant Director for Planning for comments to be made on the Draft Local Plan.
- 4.49 Next Steps
Following the consultation, all comments will be scrutinised and considered and the plan will be amended where needed. Once the plan has been finalised taking account of consultation findings, it will then be brought back for the approval of the CLJSPC before it is subject of a further statutory stage of consultation prior to the plan being submitted to the Secretary of State for examination.

5. Strategic Priorities

5.1 Let's drive economic growth

The Local Plan continues to support sustainable levels of growth and regeneration for the City and Central Lincolnshire area and will provide a positive planning policy approach to help stimulate local economic growth.

5.2 Let's reduce inequality

The Local Plan sets a target for and supports the provision of affordable housing across Central Lincolnshire thereby helping reduce housing inequality across the City.

5.3 Let's deliver quality housing

The Local Plan sets ambitious be deliverable targets for the provision of new houses across the City through specific site allocations and supports the provision of affordable housing across Lincoln.

5.4 Let's enhance our remarkable place

At the heart of the Local Plan sits the vision of 'a prosperous, stronger and sustainable Central Lincolnshire' and this vision and the policies contained within the plan will help to achieve enhancing the City through growth and regeneration.

6. Organisational Impacts

6.1 Finance (including whole life costs where applicable)

The Local Plan contains policies that will have longer term financial implications for the City and Council as a whole most notably housing growth including affordable housing, infrastructure provision, employment and regeneration. The financial implications will be incorporated into the Medium Term Financial Strategy as the Local Plan is applied.

6.2 Legal Implications including Procurement Rules

None arising from this report

6.3 Equality, Diversity and Human Rights

The Public Sector Equality Duty means that the Council must consider all individuals when carrying out their day-to-day work, in shaping policy, delivering services and in relation to their own employees.

It requires that public bodies have due regard to the need to:

- Eliminate discrimination
- Advance equality of opportunity
- Foster good relations between different people when carrying out their activities

The Local Plan is accompanied by an Integrated Impact Assessment that assesses the potential impact of proposals (strategies, policies, programmes, projects, plans or other developments) on issues that previously may have been assessed separately, such as economic, environmental, sustainability, equal opportunities and health and wellbeing.

7. Risk Implications

7.1 (i) Options Explored

Not supporting the Draft Local Plan could result in the Plan being delayed or in a worst case scenario not being adopted which could weaken the Council's ability plan for the City's growth in a sustainable manner.

7.2 (ii) Key risks associated with the preferred approach

None

8. Recommendation

8.1 That the Executive endorses the officers recommendation to provide broad support to the Draft Central Lincolnshire Local Plan.

8.2 That authority be delegated to Kieron Manning, Assistant Director for Planning, for any final technical comments to be made on the Draft Local Plan prior to submission deadline of 24 August 2021.

Is this a key decision? No

Do the exempt information categories apply? No

Does Rule 15 of the Scrutiny Procedure Rules (call-in and urgency) apply? No

How many appendices does the report contain? 1

List of Background Papers: None

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