



Prosperous Communities  
Committee

Thursday 29<sup>th</sup> July 2021

**Subject: Draft Local Plan Consultation Response**

Report by:	Assistant Director of Planning and Regeneration
Contact Officer:	Rachael Hughes Planning Policy Manager rachael.hughes@west-lindsey.gov.uk
Purpose / Summary:	To agree the formal response by West Lindsey District Council to the Central Lincolnshire Local Plan Review Consultation

**RECOMMENDATION(S):**

**Members consider the content of the consultation response as drafted and contribute further observation and commentary within the Prosperous Communities Committee meeting as appropriate.**

**Members agree and endorse the proposed consultation submission in relation to the Reg.18 Public Participation stage as identified within the indicative timetable contained with the Local Development scheme (September 2020).**

**Members delegate authority to the Assistant Director for Planning and Regeneration (in consultation with the Chairman of the Prosperous Communities Committee) to submit the final version of West Lindsey District Council's formal response to the Central Lincolnshire Local Plan Reg. 18 Draft Local Plan Consultation incorporating any additional comments expressed and agreed throughout the debate.**

## IMPLICATIONS

**Legal:** Any legal matters arising from the Review of the Central Lincolnshire Local Plan will be addressed by the Central Lincolnshire Local Plan Team and appointed legal representatives

**(N.B.)** Where there are legal implications the report **MUST** be seen by the MO

### **Financial : FIN/37/22/JA/A**

There are no direct financial implications associated with this report. Any future financial implications arising from the local plan will be assessed through the annual budget setting process and built into the MTFP accordingly.

### **Staffing : N/A**

**(N.B.)** Where there are staffing implications the report **MUST** have a HR Ref

### **Equality and Diversity including Human Rights :**

The revised Local Plan will be supported by an equality analysis as part of the formal Local Plan process which will address any equality or human rights issues which may arise from the policies in the Local Plan

### **Data Protection Implications : N/A**

**Climate Related Risks and Opportunities:** The Local Plan as drafted has a number of policies which are designed to support Central Lincolnshire and the individual Districts to promote zero net carbon development across the area. It is considered that these policies accord with the Council's recently adopted Sustainability, Climate Change and Environment Strategy. <https://www.west-lindsey.gov.uk/my-services/my-community/sustainability-climate-change-and-environment/sustainability-climate-change-and-environment-strategy/>

### **Section 17 Crime and Disorder Considerations : N/A**

**Health Implications:** Whilst policy references have been updated within the draft Local Plan, the key elements of the Local Plan Policy which deal with Health and Wellbeing remain the same and are contained within new policy reference S53.

**Title and Location of any Background Papers used in the preparation of this report:**

Central Lincolnshire Joint Strategic Planning Committee Paper with resolution to begin the review

- <https://democracy.n-kesteven.gov.uk/mgAi.aspx?ID=66522>

Local Development Scheme (Sept 2020)

- <https://www.n-kesteven.gov.uk/central-lincolnshire/about-central-lincolnshire/>

Central Lincolnshire Local Plan Consultation Documents (30/06/21 – 24/08/21)

- [Local Plan consultation](#)

Prosperous Communities Committee – West Lindsey District Council formal response to Reg. 18 Consultation Issues and Options (2019)

- <https://democracy.west-lindsey.gov.uk/ieListDocuments.aspx?CIId=176&MIId=2349&Ver=4>

**Risk Assessment :**

**Call in and Urgency:**

**Is the decision one which Rule 14.7 of the Scrutiny Procedure Rules apply?**

i.e. is the report exempt from being called in due to urgency (in consultation with C&I chairman)

Yes

No

X

**Key Decision:**

A matter which affects two or more wards, or has significant financial implications

Yes

X

No

## **Executive Summary**

Since the Issues and Options consultation in June and July 2019, which West Lindsey District Council submitted formal comments for consideration, the Central Lincolnshire Local Plan Team and officers at the Central Lincolnshire Districts have been developing the evidence base for the new Local Plan.

West Lindsey District Council in the role of consultee has an opportunity to provide comments on the Consultation Draft Local Plan which consists of a number of questions endorsing or not draft policies and provides opportunities for comment and additional evidence as necessary.

As this is only a review, many of the policies remain largely unchanged since the Local Plan was adopted in 2017, however there have been some changes of note, specifically the change in layout and policy numbering to aid in navigation. Other areas of note are;

- Reduction on the housing requirement figure from 1540 to a range between 1060 and 1325
- Approach to housing growth in medium and small villages due to the ability to allocate sites for 10 or more dwellings
- Expansion of the retail hierarchy to include important local and rural centres
- Addition of a suite of policies focussed specifically on mitigating the impact of Climate Change and moving Central Lincolnshire towards carbon neutrality for all new development subject to planning permission

This is the second of three consultations on the Local Plan review which gives West Lindsey District Council an opportunity to comment, shape and inform the final draft to be submitted for examination.

Prosperous Communities Committee as West Lindsey District Council's Policy Committee are requested to consider the Consultation Draft Local Plan paper and provide where appropriate responses to the issues raised.

The Chair and Vice Chairs of Prosperous Communities Committee; Cllr. Bierley, Cllr. J McNeill and Cllr, Coulson were invited to a briefing on 02<sup>nd</sup> July 2021. During the briefing an overview of the Consultation Draft Local Plan was provided and key policy areas considered. Along with the briefing and with the support of Officers an initial consultation response has been drafted on behalf of West Lindsey District Council which can be found in appendix A for the Committee to consider, agree and endorse for submission.

# **1 Introduction**

- 1.1 As Members of Prosperous Communities Committee are aware since 2009 the council's statutory local planning function has been delivered by a separate local planning authority (established by parliamentary order) known as the Central Lincolnshire Joint Strategic Planning Committee (CLJSPC), supported by a team of officers.
- 1.2 This CLJSPC is made up of members from the four contributing councils, including three members (plus one reserve) from West Lindsey. Members currently serving on this committee for West Lindsey are; Cllr. Bierley, Cllr. Fleetwood, Cllr. Cotton and reserve member Cllr. G McNeill.
- 1.3 The CLJSPC committee's role is to oversee the production and review of the local plan through to adoption and make decisions on new planning policy requirements. That means the approval and adoption and subsequent review of the local plan lies with the CLJSPC.
- 1.4 The current Local Plan adopted in April 2017 was developed in accordance with legislation and national policy in the National Planning Policy Framework (2012) and includes a detailed policy framework for Central Lincolnshire.
- 1.5 Following a resolution by CLJSPC on 14<sup>th</sup> January 2019 to review the Local Plan to align with current national policy, specifically aligning housing growth figures with Government methodology and more locally establish a policy position for RAF Scampton following the closure announcement in July 2018. The subsequent Issues and Options consultation took place during June and July 2019 and since then the Central Lincolnshire Local Plans Team in conjunction with lead officers at each of the partner authorities have been developing the evidence base for the new Local Plan.
- 1.6 Over the past two years, since the Issues and Options Consultation CLJSPC Committee members have continued to be briefed and provided a general steer on a number of policy considerations.
- 1.7 One of the main changes in relation to Policy since the Issues and Options consultation in June 2019 is the introduction of a suite of policies relating directly to Climate Change and the overarching aim to deliver carbon neutral development across Central Lincolnshire. The thrust of these policies very much align with West Lindsey's wider corporate objectives detailed within the Sustainability, Climate Change and Environment Strategy, specifically land use, buildings and transport.
- 1.8 This consultation is the first time the draft new plan has been published for public scrutiny following the Issues and Options consultation and the addition of specific policies in relation to tackling Climate Change. As such this consultation is an important opportunity for West Lindsey Members to review the proposals held within the plan, as well as test

public opinion and obtain feedback from the development industry and other stakeholders.

- 1.9 Whilst this is the first time that the draft plan has been published, this consultation is not the only time Members and the public will be able to comment. There is a further consultation planned for spring 2022, where the final draft will be published and available for comment before being submitted for Examination in Public in summer 2022.
- 1.10 A link to the current Local Plan review timetable can be found in the background papers section of this report. However it must be noted that the review is running behind the current published Local Development Scheme. This is in part due to the impact of Covid 19 and also the introduction of the Climate Change work which due to its technical nature has been developed with the support of specialist climate change consultants.

## **2 Content and Structure of the plan**

- 2.1 The content and the structure of the Consultation Draft Local Plan 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 Show-people
15. Ministry of Defence Establishments

- 2.2 The change in structure provides a more thematic approach to the structure than that provided in the 2017 Local Plan. It is anticipated that this approach will make the document easier to navigate.
- 2.3 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. Appendix 1 provides a list of policies in the last plan and their new reference number for ease of reference.
- 2.4 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 Committee in March 2021 and largely consistent with the Vision and Objectives of the 2017 Local Plan

- 2.5 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.

### **3 Headlines of the Consultation Draft Local Plan**

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

#### **Housing Requirements**

- 3.2 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.
- 3.3 This approach requires the identification of sites to deliver a total of 29,150 dwellings from 2018 to 2040. 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.

#### **Settlement Hierarchy and site allocations**

- 3.4 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.
- 3.5 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.
- 3.6 Many of the sites being allocated in these villages in Policies S80 and S81 already have permission or are allocated in a made neighbourhood plan.
- 3.7 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.

### **Retail Hierarchy**

- 3.8 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.

### **Climate Change**

- 3.9 Possibly 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.
- 3.10 Further to the steer provided by 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 CLJSPC 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.
- 3.11 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.
- 3.12 For Policy S6 one of the key challenges for Central Lincolnshire is the challenging viability conditions 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.
- 3.13 Whilst the evidence has identified that it is technically feasible to deliver this ambition, 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 and other associated infrastructure whilst remaining viable when taking into account the industry-standard inputs for viability calculations.
- 3.14 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.
- 3.15 It suggests that additional contributions or higher standards of building can be achieved in some 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).

- 3.16 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. CLJSPC's ambition in relation to Climate Change is acknowledged, however given this challenging and very new topic, specific questions have been asked on this policy, set out under paragraph 3.1.7 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.
- 3.17 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).
- 3.18 It is important to note that 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.
- 3.19 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.
- 3.20 As a very new policy area for Central Lincolnshire, views will be particularly welcomed from Members, the public and stakeholder on this policy.

#### **4.0 Current Position**

- 4.1 The second stage of the Central Lincolnshire Local Plan Review – Draft Local Plan consultation started on 30 June 2021 and runs until 24 August 2021. As with the last consultation, whilst the layout and policy references have changed, much of the plan has not been changed. Only those areas where policies have needed to be reviewed to address changes to national policy and local circumstances have been updated.
- 4.2 As such this consultation provides a further opportunity for Prosperous Communities Committee in capacity of consultee to comment on proposed changes detailed in the Draft Local Plan Consultation Document.

- 4.3 Cllr. Bierley and Cllr. Coulson as Chair and Vice Chair of Prosperous Communities Committee with the support of Officers have provided an initial consultation response on behalf of West Lindsey District Council. Key messages in relation to the consultation are:
- a. General support for the updates and additions featured within the Central Lincolnshire Local Plan
  - b. Positive response to the introduction of Theme 3: Climate Change, although some concern in relation to the implementation and enforcement of requirements without the support of Building Regulations
  - c. Support for greater clarity in the role of Neighbourhood Planning and the communities scope for influence
  - d. Acknowledgement of the important role biodiversity and green infrastructure play in terms of improving the quality of both developments and health and wellbeing and welcome those linkages.

\*The full consultation response can be found in appendix 1 of this report.

- 4.4 It is important for members to note that whilst West Lindsey District Council will submit a single formal response all Councillors and Parish and Town Councils are able to submit their own consultation responses throughout the duration of this consultation period and indeed future consultations in relation to the Local Plan review.

## **5.0 Next Steps**

- 5.1 A focus on the Local Plan and associated policies will continue to be featured in the Member Bulletin (released every Friday) until the close of the consultation on 24<sup>th</sup> August 2021.
- 5.2 Members will be able to add further comments to this formal consultation submission until Friday 6<sup>th</sup> August. The final formal submission will be made week commencing 09<sup>th</sup> August 2021, with agreement from the Chair of Prosperous Communities Committee.
- 5.3 Following the close of the first consultation period a full assessment of responses will be made and these responses will be used to help inform any further refinement to policy, which will again be consulted on in early 2022, with further opportunity for councillor, resident and stakeholder comment.
- 5.4 As detailed in paragraph 1.10 the current Local Plan review timetable can be found in the background papers section of this report. However it must be noted that the review is running behind the current published Local Development Scheme. Therefore further updates on the timetable and opportunities to comment will continue to be provided to Members throughout the review period.