

## Draft formal response Central Lincolnshire Local Plan Submission Draft

### Over Policy Approach in CLLP

consider that the approach of the CLLP reflects the overall vision and objectives of West Lindsey, there is clear synergy between the plan and the corporate plan themes of 'our Place' and 'Our People' as detailed within the corporate plan and other key policies and strategies. The Central Lincolnshire Local Plan strikes a positive balance between enabling growth and economic prosperity, whilst recognising the special characteristics of the district and the need to respond to both urban and rural communities, as well as providing protection for those unique and valuable features both in terms of landscape and heritage.

### Chapter 1 - Introduction, Context, Vision & Objectives

This chapter and the policies within, support the delivery of West Lindsey District Council's strategic aims and broader vision for the district identified in the Council's Corporate Plan (2019 – 2023); providing a statutory spatial planning framework to promote sustainable growth, prosperity and economic development as well as enabling the delivery of housing to meet identified need.

### Chapter 2 – Spatial Strategy

The approach to the spatial strategy reflects that of the adopted Central Lincolnshire Local Plan which has proven clear, appropriate and justified previously by enabling growth and maintaining a 5year land supply. The policies within this chapter also on balance afford the appropriate protections to those areas within the district where unplanned housing growth would impact negatively on the identity of communities, and place additional strain on infrastructure.

Both Policies S1 and S2 provide a positive approach to, and appropriate framework for, meeting identified housing need across the District and more widely across Central Lincolnshire. The distribution of growth has remained unchanged from the current Local Plan and this is supported by West Lindsey as it has been found to operate well in terms of delivering housing in appropriate and sustainable locations. As such the site allocations detailed within policies S76 to S82 are considered justified and deliverable. The sustainable urban extensions detailed in Policy S76 located in West Lindsey all have the benefit of outline permission and are either seeking reserve matters approval or already delivering housing and associated infrastructure.

It is recognised and supported by the Council that the Local Plan now allocates housing sites of 10 or more. This is considered a positive change to the Plan as smaller housing sites better reflect the rural nature of the District and provide an opportunity for smaller communities to grow proportionately in a planned way. Equally, the policy continues to provide appropriate flexibility to allow appropriate, small scale and sustainable development outside of the allocations, whilst providing appropriate safeguards and a clear assessment criteria for developers, communities and planning officers to assess the appropriateness of applications.

### Chapter 3 – Climate Change

The introduction of the Climate Change Chapters as part of the Central Lincolnshire Local Plan review is wholly supported by West Lindsey District Council. The policies within this chapter accord with West Lindsey District Council's own Climate Change, Environment and Sustainability Strategy adopted in summer 2021 and will support the aspirations of the District achieving net zero carbon by 2050. It is considered that the adoption of the draft Central Lincolnshire Local Plan with the

inclusion of all of the policies within Chapter 3 of the Local Plan will deliver positive outcomes for the communities across West Lindsey and seek to safeguard the district for future generations.

It is considered that policies S6, S7 and S8 provides a positive framework in which to assess new development across Central Lincolnshire. It is strongly asserted within the Council that any new development in the District strives for excellence in terms of energy efficiency, sustainability and where possible achieves carbon net zero. The Council welcomes the requirement that all development must provide Energy Statements to confirm that both the design principles and energy consumption requirement have been met is the correct. Equally, whilst it is accepted that there may be circumstances where all requirement can't be met, the fact that this is dealt with by exception is the correct approach. The inclusion of the value zones acknowledging the function of the different housing markets across the District is too an appropriate approach, it essentially presents the current Building Regulation standards as the very minimum that should be achieved, encouraging all areas to achieve more, whilst acknowledging viability challenges in some areas. The purpose of this policy seems to be seeking to reduce the number of homes that will require future retrofit initiatives and overall support the reduction in the Countries demand for energy. In this fact Wets Lindsey District Council supports this policy direction.

In relation to meeting the needs of the Countries energy demands, the Council recognises the need for renewable energy and supports the extensive evidence and rationale on which Policy S14 has been based upon. It is considered that the policy strikes the correct balance in its approach, providing a positive framework against which specific renewable energy applications maybe assessed upon. Moreover, the policy recognises the National position on Wind Turbines specifically and accords with it through the utilisation of a two-stage assessment approach. The Council recognises there is an on-going need to review the approach to energy generation and considers that Policy S14 provides a positive framework in which to do this.

It is acknowledged by West Lindsey District Council that Lincolnshire County Council is the Minerals Authority for Lincolnshire and as such are responsible for making decisions on applications in this regard. However, in the broader context of what the Central Lincolnshire Local Plan is trying to achieve and indeed what West Lindsey District Councils' own Climate Change, Environment and Sustainability Strategy it is considered appropriate that there is a policy within the Local Plan which resists the extraction of fossil fuels within the Districts Local Planning Authority Areas.

#### Policy S22 – Affordable Housing

The approach taken in Policy S22 is supported, providing a positive policy framework to enable the delivery of housing both in rural and urban areas that meets identified need and is reflective of the housing markets across the district. It is acknowledged that the policy in relation to First Homes exception sites is provided within the NPPF and whilst it is disappointing that national policy has sought to impose such development on rural communities, it is acknowledged that Policy S22 seeks to provide clarity on the areas of the application which may be assessed under the adopted Local Plan.

#### Policy S39 - Market Rasen and Caistor Town Centres

The inclusion of a policy which deals exclusively with development in Market Rasen and Caistor is wholly supported, having been positively prepared and justified. The context provided in the supporting text recognising the important role in which these towns play in West Lindsey, supporting rural communities as well as highlighting some of the challenges they now face is very important. As such, the policy itself provide a positive framework in which to assess future

development proposals to ensure both towns are in the best position to thrive throughout the plan period and beyond.

#### Policy S40 - District, Local and Village Centres

This policy is considered of great importance, specifically to rural communities. The last two years have demonstrated clearly the need for local facilities and amenities. This policy clearly promotes future development of such facilities and seeks to, where possible ensure the protection of existing village centres, recognising the import role they play in terms of the creation of sustainable places, being the heart of the community and also providing invaluable facilities for vulnerable members of society. It is acknowledged that the recent update to the Use Class Order has the potential to put some existing facilities at risk of conversion without planning permission and it is acknowledged that this policy seeks where possible to mitigate against this.

#### Policy S52 – Universities and Colleges

This policy refers to the Riseholme Campus being shown on the policies map, however the area is not showing up on the submitted policies map. Please add the area based on the area mapped in the Adopted Central Lincolnshire Local Plan 2017.

#### Chapter 11 - Natural Environment

Being a predominately rural district and having the benefit of an Area of Outstanding Natural Beauty the policies contained within this chapter are considered very important and are supported. It is considered appropriate both in terms of protecting existing green and blue infrastructure and promoting the creation of more across the District. The inclusion of policies specifically relating to Biodiversity and Geodiversity are also supported and the approach very much aligns with the vision and objectives of the Council's recently adopted Climate Change, Sustainability and Environment Strategy.

#### Policy NS73 – Gainsborough Riverside Regenerations Area

The Council welcomes the inclusion of the Non-strategic policy which highlights this area as a priority area for improvement and regeneration. The criteria in which applications would be assessed are fully supported and accord with both West Lindsey's broader approach to the regeneration of Gainsborough and those detailed within the Gainsborough Neighbourhood Plan. It is considered that this policy supports and promotes the aspirations of the District Council for the town.

#### Policy S75 – RAF Scampton

It is considered that the update to this Local Plan policy, following the Regulation 18 consultation, means that the policy is robust and appropriate; drawing out both the key issues and opportunities for the site. The policy emphasises the historic importance of the site and affords positive protection to the heritage as future uses are explored. The Council fully supports the requirement of a masterplan prior to development to further safeguard the base and ensure that future development proposals are both sustainable, viable and appropriate and relate positively to the existing community.

#### Policy S80 – Housing Sites in Large Villages

Site allocation WL/WELT/008A phasing in the supporting text is incorrect. The text states the site to be phased back after WL/WELT/001 and WL/WELT/007. However, this should be phased back from WELT/003 which is the adjacent site with an existing permission. Furthermore, following consultation with LCC highways the categorisation is incorrect, it is deemed R (red) category and should in fact be A (amber) category. Access should be available from WL/Welt/003 but also from Eastfield Lane. It is acknowledged that Eastfield Lane does require road widening and the culverting

of ditches which is reliant on agreement with 3<sup>rd</sup> party land owners in order to achieve this requirement.

#### Appendix 2: Car Parking Standards

The inclusion of car parking standards within the Central Lincolnshire Local Plan is supported and a welcome addition. As a rural district it is acknowledged that privately owned vehicles remain an important part of life and the appropriate provision for parking is important and should be appropriately factored into the design and layout of new housing developments to support principles of place making.

#### Viability

The evidence base used to support the development of the Local Plan Policies is correct and reflective of the operation of the current housing markets in West Lindsey. It is considered the approach taken to value zones and affordable housing contributions is appropriate and strikes a balance between enabling delivery of housing and supporting growth, whilst also protecting the interests of the communities in West Lindsey by securing contributions to the necessary infrastructure, including affordable housing. The value zones are supported by robust evidence developed alongside the Local Plan, but also very clearly align with established housing markets and actual delivery across the District. It is considered that this approach will ensure large numbers of new houses developed will meet the highest energy efficiency standard and will thereby reduce the number of houses that will require retro-fitting in the future.