

**EXAMINATION OF THE EAST LINDSEY CORE STRATEGY AND THE EAST LINDSEY
SETTLEMENT PROPOSALS DEVELOPMENT PLAN DOCUMENT****EXAMINATION IN PUBLIC****Response to Inspector's Matters, Issues and Questions****Made on Behalf of KCS Developments Ltd****Matter 4 – Individual Settlement Proposals****Issue: Are the proposals for individual settlements, including certain specific sites, justified, effective and consistent with national policy?****Introduction**

- 1.1 Barton Willmore is instructed by KCS Developments Ltd ('our Client') to submit responses to the Inspectors Matters, Issues and Questions Stage 2 following the submission of the East Lindsey Local Plan ('Local Plan') for examination. The Local Plan comprises two separate documents; the Core Strategy (CD107/CD108) which sets out the vision and strategic policies for growth and development in the district over the plan period and the Settlement Proposals Plan document (CD109/CD110) which contains site allocations and areas shown on the proposals maps which relate to the Core Strategy.
- 1.2 KCS Developments Ltd is a Leeds based development company who have a successful track record of promoting land through the Local Plan process and obtaining planning consents for residential developments throughout the Country.
- 1.3 Our Client's land interest in the district is land to the rear of Chestnut Drive, Louth (reference: LO311) which the Council identify as having a capacity for 275 dwellings and a potential affordable housing contribution of 30% (82 units). An outline planning application (Ref: N/092/01853/16) for the first phase of development of the site, which comprises 100 units was approved at planning committee on 15th December 2016, subject to the completion of a Section 106 Agreement. The decision notice was subsequently issued on 10th July 2017.

Louth

Question 12: The majority of the proposed development is expected to be delivered during the first five years of the plan period, but there are identified capacity issues in education. How and when will these be resolved? Is it necessary to phase development in Louth so that there are sufficient school places to serve new

residents? What impact will development on windfall sites, such as the additional development already proposed on site LO305, have upon capacity of education?

- 1.4 In terms of the specific pressure that delivering the majority of allocations early in the plan period will place on education facilities, this is noted, however, it is assumed that in order for improvements and expansions to take place at existing schools, this will require significant funding from the private sector, which would be secured through Section 106 Agreements.
- 1.5 Every planning application to bring forward the housing allocations will need to be considered this when submitted and any shortfall will be identified during the submission, through discussions between the applicant and the local planning authority. Applications will be considered on their merits and cumulatively with others to determine any Section 106 payments that may be necessary. In addition, trigger mechanisms can be included within Section 106 Agreements to assist with the release of financial obligations, which in turn would assist the Council in delivering the necessary improvements.
- 1.5 The National Planning Policy Framework (NPPF) states at paragraph 49 that local planning authorities should “boost significantly” the supply of housing. This should be achieved by identifying a supply of specific deliverable sites sufficient to provide five years worth of housing with an additional 5% buffer.
- 1.6 It is considered reasonable that the Council are proposing to deliver a large proportion of housing early in the plan period, particularly given their lack of 5 year housing land supply and past under delivery, as this will help to boost housing development, as required by the NPPF. Introducing phasing of proposed housing allocations may impact upon the Council’s ability to demonstrate a 5 year housing land supply.
- 1.7 By ensuring that the housing delivery comes forward early in the plan period, this in turn will help ensure significant levels of funding are secured to enable improvements to be made to schools.
- 1.8 In conclusion, it is not considered to be justified or necessary to phase the delivery of housing allocations.

Question 14: Are proposed amendments ADM55, 58 and 59 necessary to make the plan sound?

- 1.8 It is considered that the amendments as proposed would ensure that the Settlement Proposals document is effective and positively prepared, thus ensuring that the Plan is sound and meets the tests of paragraph 182 of the NPPF.