

Inspector's Matters, Issues and Questions (MIQs) Stage 2 – Settlement Proposals DPD and housing land supply

FINAL DRAFT

Revised version dated 14 August 2017. The revisions are shown in blue and relate only to Matter 3.

Matter 1 – Structure of the Plan

Issue: With its proposed content and structure, will the plan be effective in delivering the development required by the Core Strategy?

1. Other than for housing, does the Settlement Proposals DPD allocate/designate all of the uses required by the Core Strategy? Are all the allocations/designations expressed on the Policies Map? The Council should prepare a table to summarise the uses required by the Core Strategy and where these are allocated/designated in the Settlement Proposals DPD. This includes (but might not be limited to):
 - Gypsy & Traveller accommodation (20 stopping/transit pitches; 13 permanent pitches; and 2 show and circus people plots).
 - Employment floorspace (in the 7 towns, Core Strategy page 61).
 - Convenience and comparison retail floorspace (at least in Louth, Horncastle and Alford).
 - In the case of protected green space, is it clear to which spaces Policy SP25 of the Core Strategy applies?
2. The DPD provides specific details of each of the housing sites proposed to be allocated, but no such detail is provided for any other type of allocation e.g. employment, Gypsy & Traveller; retail. Why is this? Should similar referencing and details be provided for these other types of allocation?
3. What is the status and purpose of the text in the analysis tables for each settlement? Is the text intended to be prescriptive, or is it for guidance? Should this be clarified by providing distinct "policies" and "supporting text/reasoned justification"? (Note that some of the text needs redrafting for clarity e.g. infrastructure section of analysis table for SIB303 in Sibsey).

What is the purpose of the tables for the settlements in which no allocations are proposed e.g. Binbrook, Huttoft, Partney, Tetford, and some of the coastal settlements? If the tables are necessary for these settlements, why are they not also necessary for the medium and small villages?

4. Paragraph 2.9 of the document explains why no housing allocations are proposed in Binbrook and Tetford (AONB), but not why none are proposed in Horncastle, Huttoft and Partney. Is the approach in these latter towns justified and, for clarity and completeness, should the paragraph be amended to explain it?
5. Are proposed modifications ADM41 and 42 additional/minor amendments or are they necessary to make the plan sound?

Maps

(Where necessary, please refer to the responses to the Stage 1 Core Strategy questions concerning the Policies Map under Matter 1).

6. Does the Key to the Settlements Maps issued on 15 June 2017 represent the most up to date version? Is this Key needed to ensure that the plan policies are accurately illustrated geographically? If so, the change should be made upon the adoption of the plan, but Inspectors cannot recommend Main Modifications to the Policies Map. (Note proposed amendment ADM46).
7. With particular regard to the following matters, do the Settlement Maps and the revised Key provided on 15 June provide a clear and comprehensive geographical illustration of the policies in the plan?
 - What policy does the purple striped area towards the south of the map for Coningsby/Tattershall illustrate? Is this policy shown on the Key? Is the map otherwise accurate (ADM49)?
 - What policy does the black striped area on the map for Friskney illustrate? Is this shown on the key?
 - What policy do the purple/maroon lines on the maps for Coningsby/Tattershall; Woodhall Spa; North Somercotes; and Saltfleet illustrate? Are these Local Wildlife Sites? If so, is the colour on the key correct?
 - In several cases, including in Hogsthorpe; Holton Le Clay; Mareham Le Fen; North Thoresby; and Spilsby, there is no clear distinction between the boundaries of the various allocated housing sites. Should this be rectified to clarify the illustration of these policies?
 - In Horncastle, if the town centre boundary is represented by a solid red line as shown on the key of 15 June, what policy does the broken red line on this map represent? Should this be on the Key?

- Is the map for Huttoft sufficiently clear? What policies do the annotations on the map represent?
- On the maps for Louth, should the size of the reference numbers for the housing allocations be increased for clarity? Why are some of the sites shown as sports and recreation facilities (blue) on page 76 then shown as protected open spaces (green) on page 77? Are proposed amendments ADM56 and 57 intended to address some of these issues? Which map is correct?
- Is it necessary to alter the map for Mareham Le Fen (ADM61) to make the plan sound?

Matter 2 – Site Selection

Issue: Have the sites proposed to be allocated in the plan, particularly for housing and Gypsy & Traveller accommodation, been chosen on the basis of a robust assessment process?

1. Is the plan based on up to date evidence regarding the location of locally designated nature conservation and geological sites? Why are the various sites referred to by the Lincolnshire Wildlife Trust and the Greater Lincolnshire Nature Partnership not included on the maps? What is the status of these sites in respect of whether or not they are formally designated? Does their status mean that they should have been taken into account in proposing site allocations? Have they been? Is it sufficient to make reference to them by way of amending the plan text at this stage, or should any proposed allocations be revised in their light? Should the relevant sites now be mapped?

(The relevant proposed modifications are: ADM47 - Burgh Le Marsh; ADM48 – Coningsby; ADM52 – Horncastle; ADM53 – Legbourne; ADM54 – Louth; ADM60 – Manby; ADM69 – Spilsby; ADM70 – Stickney; ADM72 – Tetney; ADM73 – Woodhall Spa; ADM75 Chapel St Leonards; ADM77 – Mablethorpe; ADM78 – Saltfleet; and ADM79 – Skegness).

2. Are the sites selected for housing and gypsy and traveller accommodation justified when compared to other reasonable alternatives? The Council should prepare a summary of the site selection process for each type of development. This should include:
 - What evidence has informed the site selections? Where relevant, how has detailed evidence provided by site promoters been taken into account, such as Landscape and Visual Impact Assessments and site specific Flood Risk Assessments?

- Where relevant, how has the potential impact of development upon designated and non-designated heritage assets (including sites of archaeological interest) been assessed and taken into account? Will the plan ensure that such assets are conserved in a manner appropriate to their significance as required by paragraph 126 of the NPPF?
 - How have the results of Sustainability Appraisal and infrastructure planning been taken into account?
 - Where sites are similarly suitable, was the process for selecting one over another robust? This has been questioned in Sibsey, for example.
3. How have the dwelling numbers proposed on individual sites been determined? Have specific density assumptions been made? In many cases, the capacity of each site shown in the analysis tables has been reduced from a higher figure. Where did the higher figure come from, and what factors have caused the capacity to be reduced in the plan?
 4. Having regard to paragraphs 115 – 116 of the NPPF, is it justified to make no specific housing allocations in the AONB settlements (Binbrook and Tetford)? Has the potential impact upon the landscape been weighed against the potential benefits of housing development? If housing development could still come forward on windfall sites in these settlements, how is this preferable to making a considered allocation?
 5. In the majority of settlements, including in some with sizeable housing allocations such as Louth, the plan indicates that the state of water recycling/treatment facilities is red or amber on a scale of green to red. What does this mean? What effect will this have upon the delivery of development in relevant settlements?
 6. Should the document identify “Gateway Sites” as referred to in Policy SP10 of the Core Strategy? If not, how will these be identified?

Matter 3a – Housing Land Supply

Issue: Will the Core Strategy and Settlement Proposals DPD deliver the housing requirement for 2017 to 2031 (including for affordable housing) for the period 2017 to 2031? Do the plans meet the requirements of paragraph 47 of the NPPF in respect of housing delivery? ~~and paragraph 10 of the Planning Policy for Traveller Sites (PPTS) in respect of delivering the relevant development?~~

In responding to the questions below, please have regard to the questions and answers for the Stage 1 Core Strategy, Matter 8. These concern what the five-

year supply requirement should be. Please also have regard to the Council's revised evidence on housing supply available as documents ED033 to ED041.

Total Housing Supply for the plan period

1. Will the policies in both plans ensure that the overall housing requirement for 2017 to 2031 can be met, taking into account under-delivery since 2011? What is the supply from coastal commitments, inland commitments and allocations as of 2017? Is there likely to be any supply from 'windfall' development, including for example through policies SP3 5 and SP4?
2. Is the supply of housing sufficient in both the inland and coastal areas to meet relevant plan targets?
3. Should the shortfall in housing delivery between 2011 and 2017 be recovered over the next 5 years ('Sedgefield') or over the remaining plan lifetime ('Liverpool')?

Five year supply of housing sites

1. What should the five year requirement be, including a 5% or 20% buffer as appropriate?
2. Will both plans help to ensure that there will be a five year supply of deliverable sites for housing upon its adoption; and a rolling five year supply thereafter (assuming both a 5% and 20% additional buffer to ensure choice and competition in the market for land)? Which sources of supply will ensure sufficient delivery, including allocated sites? Are the sources of supply for each five year period set out in a supporting document? Are proposed modifications ADM43, ADM44 and ADM7 (the latter amending the Core Strategy) necessary to make the plan sound? Is ADM45 an additional/minor modification or is it necessary to make the plan sound?
3. The analysis tables indicate that the majority of sites are expected to be developed within the first five years of the plan period. Is this realistic? Would there be any impediment to development coming forward in this way in respect of infrastructure provision etc?
4. How will the supply of sites be monitored and managed to ensure a rolling five year supply of specific deliverable sites throughout the plan period? Should the plan include a trajectory for the expected rate of delivery of market and affordable housing for the plan period?

5. No housing allocations are proposed to be made in Horncastle, Huttoft and Partney due to the number of existing commitments being adequate to meet the requirement. Should the maps for these settlements show the commitments to be relied upon (as appears to have been done in the coastal settlements)? Are these commitments listed somewhere? Would there be any benefit in allocating some or all of these sites in the plan?

Supply of affordable housing

1. The Core Strategy sets a requirement for 2825 affordable dwellings to be delivered in the period 2016-2031. How many affordable dwellings will the plan deliver in this period against this requirement and from what sources?
2. Is it necessary to consider an increase in the total housing requirement in order to deliver the necessary amount of affordable housing?

Matter 3b – Supply of Gypsy and Traveller Accommodation

Issue: Will the Settlement Proposals DPD meet the requirements of paragraph 10 of the Planning Policy for Traveller Sites (PPTS) in respect of delivering the relevant development?

6. Is the plan consistent with paragraph 10 part a) of the PPTS? Will the sites identified in the plan be delivered within the first five years of the plan period? How will this be monitored and managed? Are any contingency plans necessary/in place?

Matter 4 – Individual Settlement Proposals

Issue: Are the proposals for individual settlements, including certain specific sites, justified, effective and consistent with national policy?

Alford (Town)

1. Please refer to MIQs for Stage 1 Core Strategy, Matter 9, Q3 as necessary. What progress has been made with the Neighbourhood Plan for Alford? Does the Council remain confident that the 161 homes required by the Core Strategy will be delivered? In the absence of an analysis table for this town, does the Core Strategy provide sufficient strategic guidance for the preparation of the Neighbourhood Plan?

Burgh Le Marsh (Large Village)

2. The Sustainability Appraisal (SA) indicates that some of the sites proposed to be allocated would have negative impacts upon its various objectives, including biodiversity, landscape, access to services and safe and inclusive communities. Given that Table A requires only 95 homes in this settlement, why is it proposed to allocate land for 200 homes when negative effects are referred to in the SA? How have the conclusions of the SA been taken into account? Please refer to the specific sites to be allocated, particularly BLM320. Were alternative options to allocating several sites around the village considered, such as making a larger allocation at site BLM18?
3. Is the proposed Gypsy and Traveller site consistent with policy SP12 of the Core Strategy in respect of safe access to the nearest settlement? Has sufficient account been taken of the effect on the surrounding countryside? Is the site deliverable having regard to the conditions imposed upon the extant planning permission? Have the legal requirements concerning publicity and public consultation been met in respect of the proposal to allocate this site in the plan?

Coningsby/Tattershall (Town)

4. C&T305: Does the boundary of this site require amendment to facilitate the development proposed by the site promoters? Would such an amendment be justified?

Friskney (Large Village)

5. FRIS317: Has sufficient account been taken of the potential impact that development might have upon adjacent heritage assets in making this allocation? Will the "policy" ensure that a detailed proposal has regard to this constraint? Is suggested amendment ADM50 necessary to achieve soundness in this respect? Does the amendment itself (as shown in the plan) require rewording to correct a typographical error?

Hogsthorpe (Large Village)

6. Was an additional primary school classroom provided in 2015 as suggested in the analysis table? Does sufficient primary school capacity now exist to serve the development proposed in the plan? Should the infrastructure section of the analysis table be updated to reflect this?
7. HOG309: Is proposed amendment ADM51 an additional/minor amendment or is it necessary to make the plan sound?

Holton Le Clay (Large Village)

8. Why are site allocations not being delegated to the Neighbourhood Plan in preparation, as they are in Alford?
9. Site HLC206: The site owner has not indicated that they wish to develop the site. What steps have been taken to ascertain that it is deliverable?

Legbourne (Large Village)

10. Is the scale of development proposed sufficient to secure the necessary funds to increase primary school capacity?
11. LEG303: Is the "policy" wording sufficiently detailed to ensure the protection of Grade 1 Listed All Saint's Church, including the views to it if they are significant?

Louth (Town)

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 the capacity of education?
13. Is the proposed Gypsy & Traveller site on Brackenborough Road deliverable having regard to alternative consented uses on the land?
14. Are proposed amendments ADM55, 58 and 59 necessary to make the plan sound?

Mareham Le Fen (Large Village)

15. Site MLF328: is it essential for "major drainage infrastructure changes" to take place before this site can be developed or would it be sufficient for any future scheme to ensure that surface water run off rates did not exceed greenfield rates? It is suggested that the latter was acceptable in a recent planning application for 9 dwellings on the northern part of the site. How has account been taken of the drainage evidence provided by the site promoter in reaching the conclusions in the plan? If major infrastructure works are essential, who is to be responsible for these? When will they occur? Is the site genuinely developable within the first five years of the plan period as

stated in the plan? Is proposed amendment ADM62 an additional/minor amendment or is it necessary to make the plan sound?

- 16.Site MLF303: Are the conclusions of the Sustainability Appraisal and/or the Plan correct in respect of the impact of development upon the landscape; greenfield land; employment; and access to services? What status should be afforded to the SA in the assessment of any future planning application and does the plan itself provide an adequate framework for considering the impact of development when applications are submitted?

Marshchapel (Large Village)

- 17.How has the sequential test for flood risk (required by paragraph 100 of the NPPF) been applied in determining that housing development in Marshchapel, stated by the Environment Agency to be in Flood Zone 3, is appropriate? Are proposed changes ADM63, 64, 65 and 66 sufficient to justify the allocations? Should the policy refer to the special provisions which the EA suggests should be applied to single storey development?
- 18.MAR217: Has adequate account been taken of biodiversity, the loss of agricultural land and the residential amenities of neighbouring properties in allocating this site? Have alternative sites been considered?
- 19.MAR226: Could the presence of heritage assets and/or sites of archaeological interest act as potential constraints upon development of this site? Should this be referred to in the analysis table/policy? Is it sufficient to rely upon the absence of comments from the County Archaeologist and Council's Conservation Officer to determine that these matters are not constraints?

North Thoresby (Large Village)

- 20.NTH308: Should the table/policy provide more direction in respect of the heritage assets likely to be affected by development and how they should be protected?

Partney (Large Village)

- 21.Given that sites for a small number of dwellings have been allocated in other settlements, why does the plan not allocate a small site for housing in Partney?

Sibsey (Large Village)

- 22.What is the status of the Sibsey Village Design Statement? Why does it advocate only small scale development? Why is it "out of conformity" with

national policy in advocating this? Has sufficient regard been had to the reasons for advocating only small scale development in setting a requirement for 239 dwellings here?

23. Where is the listed Trader Mill in relation to the sites proposed to be allocated in this settlement? Do any of the sites represent one of the surrounding fields historically associated with the working of the mill? If so, would their development for housing affect the significance of the asset? How has the significance of this asset been taken into account in preparing the plan for this settlement? Is proposed amendment ADM68 necessary to make the plan sound?
24. SIB304: Why has the estimated capacity of this site been reduced from 34 to 5 dwellings? Does this reduction have the potential to prejudice the comprehensive development of the wider site or adjacent land if this is needed after the present plan period? Has consideration been given to whether improvements are needed to highways and drainage infrastructure and whether this could be achieved by the allocation of a larger site or sites?
25. Was consideration given to allocating more land on the western side of the road as an alternative to site SIB303 to the east? Would there be any benefit in such an approach?
26. SIB303: Does the boundary of this site require amendment as suggested by the site promoter? Is the proposed amendment (ADM67) justified?

Spilsby (Town)

27. How much housing is expected to be delivered in Spilsby during the plan period? The sum of the allocations proposed amounts to 431 dwellings, but the commentary suggests that Site 310 (comprising sites 301, 303, 304, 305 and 306) could deliver 600. How does this compare to the requirement for development in the settlement? The commentary suggests that the need is for 229 homes, while Table A gives the need as 264. Is it justified to allocate more development than is needed in this settlement to achieve a comprehensive development when no similar approach has been taken elsewhere (e.g. as suggested in Sibsey?). Has the impact of this additional development, together with any other development coming forward as windfalls, been taken into account in Sustainability Appraisal and infrastructure planning?
28. Has the potential effect of development across site 310 upon the area's archaeological interest been assessed? Can the Council be confident that the extent of the proposed allocation is justified and deliverable in this respect?

29. Is it intended that any of the sites forming part of site 310 could come forward alone? It is specifically stated that sites 301; 304 and 306 could not. On this basis, why are the sites treated individually, with separate housing capacity figures, rather than as a single allocation? Will this approach be effective in achieving a comprehensive development?
30. Is it intended that a new doctors' surgery will be delivered as part of the overall scheme represented by Site 310? When is this likely to be delivered and how? Should the development be phased to ensure that this facility is in place to serve the housing development? Should the table/policy be more specific about the mix of housing types, facilities and infrastructure that this large site is expected to deliver?
31. What will be done to address the shortage of primary school places? In light of the present shortfall, is the scale of development proposed deliverable within the timeframe suggested by the plan i.e. all within the first five years of the plan period?

Tetford (Large Village)

32. Is proposed amendment ADM71 necessary to make the plan sound?

Tetney (Large Village)

33. Site TNY320: What is proposed to resolve the access issue to this site? In the absence of a resolution, is the site deliverable within the first five years of the plan period as the plan suggests?

Woodhall Spa (Large Village)

34. Is proposed amendment ADM74 necessary to make the plan sound?

COASTAL SETTLEMENTS (no Table A housing allocations)

Mablethorpe/Sutton/Trusthorpe (Coastal Town)

35. Is the proposed allocation of a Gypsy & Traveller site on an unused part of the Industrial Estate compatible with that adjacent use?

36. Is proposed amendment ADM76 necessary to make the plan sound?

Skegness (Coastal Town)

37. Is proposed amendment ADM79, regarding secondary shopping frontages, necessary to make the plan sound?