

**Open Report on behalf of Richard Wills, Executive Director of Environment and Economy**

Report to:	<b>Overview and Management Scrutiny Committee</b>
Date:	<b>28 July 2016</b>
Subject:	<b>East Lindsey Local Plan</b>

**Summary:**

East Lindsey District Council is consulting on its draft Local Plan. This report sets out the key areas where Lincolnshire County Council wishes to engage in further discussion on the content of the Local Plan.

It is accompanied by a separate briefing note which outlines in particular the Council's view on the alignment between the principles in the Coastal Study of 2010 (which forms an important element of the evidence base in the draft Local Plan) and the objectives in the Strategic Economic Plan of 2015, which have been adopted by all upper tier and district authorities within Greater Lincolnshire.

**Actions Required:**

Members are invited to endorse the proposals made within the report, which will inform the position the County Council takes with regard to its engagement with its partners during public consultation on the draft East Lindsey Local Plan.

## **1. Background**

### **1.1 Introduction**

Lincolnshire County Council (LCC) is committed to supporting the economic, social and environmental wellbeing of communities throughout Greater Lincolnshire. A key part of this is achieved through working closely with Local Planning Authorities to ensure that planning policy achieves the best results for local communities, while contributing to the strategic objectives of major adopted pan-Lincolnshire plans such as the Strategic Economic Plan. Local Plans are an important tool to ensure the delivery of the Greater Lincolnshire growth ambition, including 25,000 new homes in the next 5 years.

In this spirit, the Council has sought to engage with East Lindsey District Council in the development of its Local Plan, but believes there are a number of outstanding areas where further debate is desirable if the draft Local Plan is to take account of

national policy developments since 2010, and if it is to be sufficiently robust for submission for the Examination in Public process.

The draft East Lindsey Local Plan is available on the East Lindsey District Council website via the following link: <http://www.e-lindsey.gov.uk/localplan>.

## **1.2 Engagement in developing the draft East Lindsey Local Plan**

In general terms, Lincolnshire County Council would have preferred a closer and more continuous engagement with the Local Planning Authority, comparable, for example, with the partnership approach achieved through the Central Lincolnshire or South East Lincolnshire Joint Planning Unit.

While there has been formal consultation on aspects of the draft Local Plan, such as the draft Core Strategy in 2013 and the housing topic paper in 2014, other elements, such as the coastal topic paper, were not formally made available to partners for comment, and some still do not appear to be available online.

Ordinarily, the County Council would seek to work closely with the Local Planning Authority on a range of service areas, particularly (but not exclusively) education, children's and adult services, infrastructure planning, highways and transport policy, property and land ownership opportunities, and flood risk management.

This could have been achieved by the establishment of working groups and the circulation of topic papers, especially on accumulating housing evidence through Strategic Housing Land Availability Assessments (SHLAA), Strategic Housing Market Area (SHMA) work, Whole Plan Viability and objectively assessed housing need. LCC has worked closely with South East Lincolnshire and Central Lincolnshire in providing housing and demographic expertise to assist in developing these aspects of those Local Plans. The Council would have expected to support the East Lindsey draft Local Plan in a similar manner.

Overall, since 2014 there has been little formal engagement on these matters. Indeed, forward notice of the imminence of public consultation on the draft Local Plan exists within the updated Local Development Scheme and recent Full Council papers, but is not indicated otherwise in the main section dedicated to the Local Plan.

## **1.3 Key Issues**

The County Council is keen to ensure that the draft Local Plan is supported by robust infrastructure planning. At present, the draft Local Plan does not appear to include a substantive Infrastructure Delivery Plan, and there is little consideration of traffic and transport assessment. In particular, detailed assessments that have been undertaken at key points in the transport network, as at Horncastle, have not been taken into account in arriving at draft conclusions regarding potential levels of growth and development.

The Council also notes that projected educational need in Horncastle requires further consideration. While there is capacity to extend secondary provision on the

existing sites there is no capacity within the primary provision and Horncastle is at the point where a new primary school would be required, which must be of a viable size (one form of entry or above).

Louth is in the same position with limited options for expansion of the existing primary schools. The allocation of 1162 dwellings in Louth provides for a sustainable pupil population but because the development is across many sites with low numbers of dwellings rather than one or two sites, securing an appropriate site will be challenging, along with agreeing five good s106 contributions to a new primary school provision. Present school premises will not be sufficient to accommodate the increase identified in the Local Plan, and new school provision needs to be carefully considered within the Local Plan.

Provision of such infrastructure, including addressing transport network capacity, could be restricted by the draft Local Plan's limitation of development in Horncastle to existing permissions, the principal concentration of new housing allocations being in Louth (1162 dwellings). While existing permissions may be sufficient for current rates of growth in Horncastle, the Council wishes to consider further if this assumption fully takes future requirements into account, and whether this level of growth is likely to help to support the necessary transport infrastructure for the town.

The scale and scope of the issues outlined above are concentrated in the coastal parts of East Lindsey. The County Council's view is set out in more detail in Appendix A (attached), but, in brief, the Council considers that the current draft Local Plan has not considered the principles of the coastal study fully in light of subsequent national policy developments, and places too great an emphasis on the provision of affordable housing to meet local need.

## **2. Conclusion**

The County Council wishes to support the ambitions for economic growth set out in the Strategic Economic Plan for Greater Lincolnshire, and considers local planning policy to be a critical enabling factor in achieving these ambitions.

The Council is therefore keen to work closely with its partners in supporting the development of Local Plans that are robust and effective in facilitating growth in all parts of the area.

The Council, therefore, wishes to be clear and open with its partners in setting out its position with regard to the current draft Local Plan for East Lindsey, and to engage in detailed discussions with a view to resolving any outstanding issues prior to submission of the draft Local Plan to the planning inspectorate.

## **3. Consultation**

### **a) Policy Proofing Actions Required**

n/a

#### 4. Appendices

These are listed below and attached at the back of the report	
Appendix A	Briefing Note: Alignment of Coastal Study Principles with Greater Lincolnshire Strategic Economic Plan.

#### 5. Background Papers

No background papers within Section 100D of the Local Government Act 1972 were used in the preparation of this report.

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