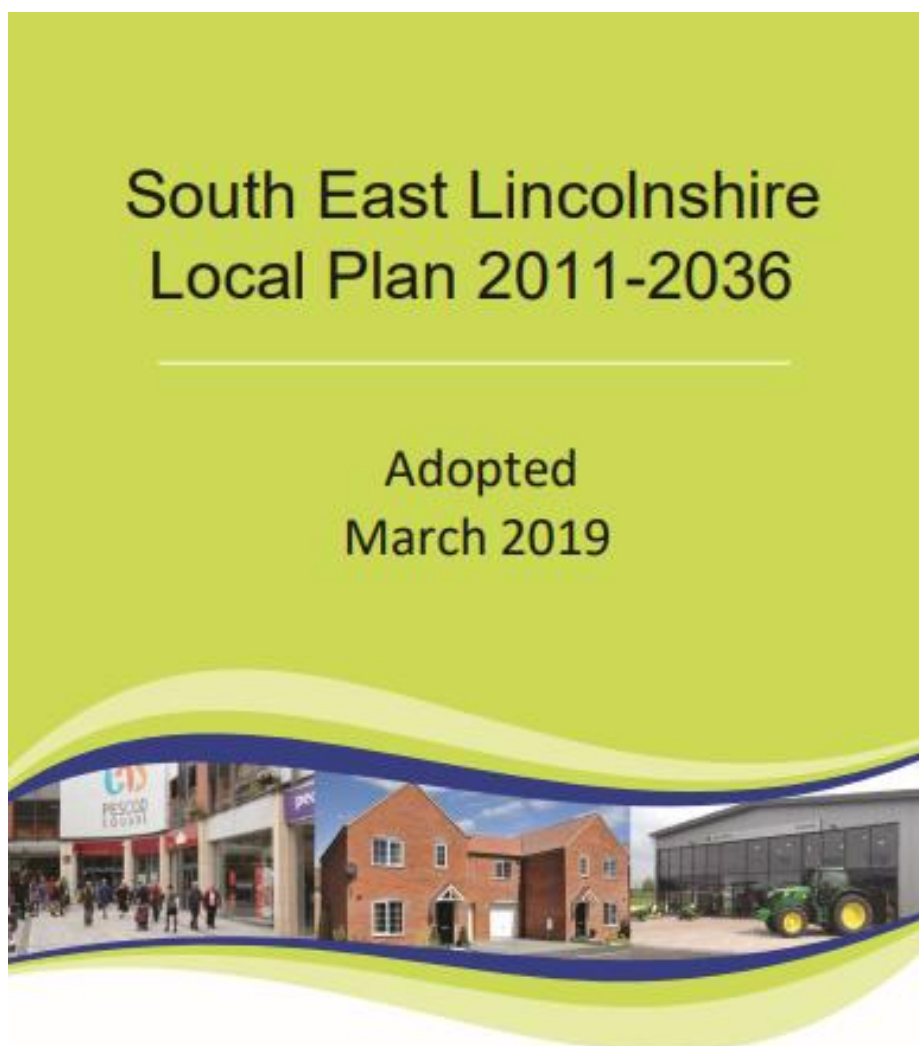


South East Lincolnshire Local Plan Review

Part One



South East Lincolnshire
Joint Strategic Planning Committee

Routledge Planning Associates Ltd.

rpc2016@hotmail.com

CONTENTS

1) Introduction	Page 3
2) Four years since Adoption The Economy Housing Major Sites National Planning Policy Further Planning Changes The Political Situation National Local Resources For a New Plan The Evidence Base	Page 4
3) Conclusions	Page 15

1. INTRODUCTION

- 1.1. This Part 1 Review follows on from a Scoping Report which considered the need to review the South East Lincolnshire Local Plan (SELLP) and the work that would need to be done.
- 1.2. The South East Lincolnshire Local Plan (SELLP) was produced under the auspices of the South East Lincolnshire Joint Strategic Planning Committee (the Joint Committee), which is a partnership of Boston Borough, South Holland District and Lincolnshire County Councils. They worked together to create a single Local Plan for South East Lincolnshire (the name for the areas of South Holland District Council and Boston Borough Council).
- 1.3. The SELLP developed in the following manner:
 - Jan-Feb 2016 – Draft Local Plan Public consultation
 - July-August 2016 - Preferred Sites Consultation
 - April - May 2017 – Publication SELLP Consultation
 - June 2017 – Submission of SELLP to Secretary of State
- 1.4. Between October 2017 April 2018, the independent examination of the SELLP took place, and around a year and a half later the Inspectors report was received in the winter of 2019.
- 1.5. The Plan was then Adopted by the Joint Committee in March 2019, seven and a half years after the Joint Committee had first met.
- 1.6. Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012, legally requires reviews of Local Plans at least every five years.
- 1.7. Paragraph 33 of the National Planning Practice Framework (NPPF) requires that:

“Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future”
- 1.8. Therefore, based on the adoption date, the Joint Committee must assess the South East Lincolnshire Local Plan and considered its performance and whether or not it is still fit for purpose, by the 8th March 2024.

- 1.9. The Scoping Report proposed a two-step approach, firstly a look at the bigger picture of what has happened over the 5-year period of 2019 to 2024. However, it is accepted that in order to meet the required review dates, in general only 4 years of data will be available to do that.

2. FOUR YEARS SINCE ADOPTION

- 2.1. Since 2019, economic activity has been heavily influenced by Covid and other issues, such as political changes, and the wider international impacts of the war in Ukraine. This has created a very difficult time in terms of the economy, house sales and employment activity, in which to consider the effectiveness of the Local Plan against.
- 2.2. In the work for the Joint authorities, Catriona Riddle identified 3 key triggers that may indicate that a Plan may need to be updated (apart from any specific issues. They were:
- a. Where Plans have been prepared in advance of any significant changes to national policy
 - b. Where weaknesses have been highlighted through national delivery tests (e.g. 5 Year land supply and Housing Delivery tests)
 - c. Where performance issues related to the overall strategy or strategic policies in the plan is highlighted through the annual monitoring process
- 2.3. Prior to looking at these in detail, it is worth considering the wider landscape.

THE ECONOMY

- 2.4. The BBC reported in 2019 that UK economy saw no growth in the final three months of 2019, as manufacturing contracted for the third quarter in a row and the service sector slowed around the time of the election.
- 2.5. 2018 had not ended well due to growing concerns about the potential for a global pandemic, and whilst the economy grew by 1.4% in 2019, this was marginally higher than the 1.3% rate in 2018. This was clearly going to be a difficult time for a new Local Plan to attract new investment and make a positive impact on the local economy.
- 2.6. Macro trends (on line economic research company) looked at Gross Domestic Product (GDP) in the UK from 1961 – 2023. They define GDP as the sum of gross value added by all resident producers in the economy plus any product taxes and minus any subsidies not included in the value of the products. Looking at this from 2018, gives the following picture of UK GDP growth rate:
- 2018 was 1.71%, a 0.74% decline from 2017
 - 2019 was 1.60%, a 0.1% decline from 2018
 - 2020 was -11.03%, a 12.63% decline from 2019
 - 2021 was 7.52%, a 18.55% increase from 2020

- 2.7. The Company Statista, reported that the UK's economy grew by four percent in 2022, after a growth rate of 7.6 percent in 2021, and a record eleven percent decline in 2020, due to the economic fallout caused by the Coronavirus (COVID-19) pandemic. During the provided time period, the biggest annual fall in gross domestic product prior to 2020 occurred in 2009, when the UK economy contracted by 4.5 percent at the height of the global financial crisis of the late 2000s
- 2.8. On this very broad canvas, one can clearly see that the last 4 years has in general terms been a very difficult time for the wider economy and economic activity in particular.
- 2.9. It is important to realise at this stage that whilst an important player in terms of development taking place in an area, the Local Plan can only operate within the broader economic climate. Therefore, when continuing with the review, we must recognise that these wider factors could be impacting on the 'performance' associated with the Local Plan
- 2.10. Even if it appears that the Plan has not helped to bring forward the developments required, it may be unfair at this point to lay any blame at the door of the Local Plan, given the wider economic situation.
- 2.11. However, based on the Council's own data, the table below indicates that there has been growth in both employment and retail floorspace over the last 4 years despite the generally gloomy national situation.

YEAR	19/20	20/21	21/22	22/23	Total
South Holland					
New Retail floorspace m ²	428	-29	0	775	1,174
New Employment floorspace m ²	6,421	6,891	5,769	9,420	28,501
Boston					
New Retail floorspace m ²	1,672	-264	-212	0	1,196
New Employment floorspace m ²	-78	3,802	5,276	3,191	12,191

- 2.12. On this basis, there does not appear to be grounds to be concerned over the economic delivery of the Plan so far.

HOUSING

- 2.13. The Government have repeatedly made it clear that the provision of housing is a top priority for Planning.
- 2.14. November 2017, saw the Government's first announcement that their target was to see, '300,000 homes a year by the mid-2020's. This became a 2019 Conservative manifesto promise, although it has never been clear where this top-down figure came from other, than the claim that experts agreed that such a figure would start to make in-roads into the affordability of housing problems.

- 2.15. On average, almost 250,000 homes were built in England in each year of the 1970's, but this was offset by a significant amount of demolition related to slum clearance, which resulted in a net increase of around 200,000 dwellings per annum.
- 2.16. The 1990's saw many fewer homes built but also fewer demolitions, making the overall average about 150,000 a year. This annual figure then rose until the 2007-08 financial crisis, recovering in the mid-2010's.
- 2.17. Gov.UK provides live tables on net additional new dwellings over the last 10 years. This is the headline figure for housebuilding, including houses being converted to flats or commercial buildings switching to domestic use, as well as new builds. It also factors in demolished houses to reduce the gross figure to a net one. It gives the following detail:

Year	East Midlands	England
2012-13	11,210	124,720
2013-14	12,710	136,610
2014-15	15,610	170,690
2015-16	17,650	189,650
2016-17	19,470	217,350
2017-18	21,450	222,280
2018-19	22,260	241,880
2019-20	20,980	242,700
2020-21	20,180	211,870
2021-22	22,100	232,820

- 2.18. Boston and South Holland both form part of the East Midlands Region. The table shows that regionally and nationally net new housing grew significantly year on year up to 2018/2019. 2019/20 saw the first reduction regionally, although the national picture managed a last slight increase of less than one thousand in 2019/20, before falling significantly in 2020/21.
- 2.19. What is also clear is that in the period since the Government announced a target of 300,000 dwellings per annum in 2017, production has not got close to those figures.
- 2.20. Worryingly, according to Eurostat database and statistics, construction costs increased by 36% in the 5 years from 2015, including a 9% increase in the first quarter of 2019, compared to the previous figure in the last quarter of 2018.
- 2.21. According to Home Building and Renovating magazine, building materials prices have continued to rise and were 25% higher in 2022 than they were in 2021, based on government figures. It is thought that this is largely due to the effects of high building demand amid labour and construction material shortages.

- 2.22. Overall, according to Building materials and component statistics, the average annual building materials prices for 2022 were 54.4% higher than they were in 2015. This includes a significance increase of 25% from 2021 to 2022.
- 2.23. Therefore, there is considerable reasons to be pessimistic in relation to any positive effect that the SELLP could have had on local house building rates compared to the impact of the national economic picture.
- 2.24. There are two main considerations in relation to the monitoring of house buildings. Essentially how many have been built in net terms, and is there a 5-year supply of dwellings that could come forward?
- 2.25. It is important to note at this point. that there was a significant under-provision of housing pre adoption of the Plan. However, this assumed under provision was built into the Plan as an additional requirement and is therefore accounted for.
- 2.26. As this work is about the performance of the Plan post adoption, that is what has been focused on. Since adoption, both Councils have been making good headway in reducing these deficits at a faster rate than planned for.
- 2.27. In terms of house building, the table below is based on the council's own monitoring of housebuilding. The table shows the number required, based on the Local Plan, the net number built (after subtracting any demolitions and the balance of what was built compared to the required figure.

YEAR	2019/20	2020/21	2021/22	2022/23	2023 Total-
SH Required	467	467	467	467	1,868
Built	512	549	667	726	2,449
Balance	+45	+82	+200	+259	586
BBC Required	310	310	310	310	1,240
Built	324	296	318	346	1,283
Balance	+14	-14	+8	+36	42
Plan Balance	+59	+63	+208	+295	+630

- 2.28. The table clearly shows that, except for one year, (where the greatest impact of covid was felt), both Councils have always exceeded their housing targets, quite considerably in the case of South Holland. This is a Joint Plan and, as it currently stands, the Plan has exceeded the required target at this point in time, by 630 units, a little over 80% of a full years requirements for the Plan.
- 2.29. Therefore, in relation to this major issue for the government, despite the circumstances, the Local Plan appears to be performing very well in supporting housing development.

2.30. In terms of future supply, the table below shows the situation for both Council's, in terms of the number of years of supply that they consider is available for the market to take up.

Council/Year	2019/20	2020/2021	2021/22	2022/23
South Holland	9.3 years	8.5 years	5.9 years	6.0 years
Boston	5.2 years	5.9 years	6.0 years	5.5 years

2.31. The Table clearly indicates that both Councils have exceeded the 5-year requirement in every year of the Plan. Once again, despite the circumstances and difficulties across the house building market, the situation across the SELLP area is very positive and gives no indication of a need to review the plan.

MAJOR SITES

2.32. The Plan highlights a number of sites, Sustainable Urban extensions, Prestige employment sites and other major development sites which are crucial to the delivery of the Plan.

2.33. Major sites tend to take significant time, organisation, and investment to bring forward. However, the following has already been achieved.

2.34. Within South Holland.

- Holland Park SUE: Permission for 312 dwellings largely completed, permission for 150 under construction.(H16-0464-14. H16-0116-22)
- Vernatts SUE: Permission agreed for 100 in full, 300 in Outline awaiting S106 (H14-1218-21)
- Holbeach West: Permission for 103 dwellings, under-construction (H09-0602-20), – Outline up to 650 – under consideration (H09-0468-16).
- Spalding South Western Relief Road (SWRR), a massive infrastructure project to be delivered over a considerable timeframe and in a series of sections. Section 5 at Vernatts. is currently under construction and will be completed by summer 2024, costing around £50m with a £20.13m grant from Homes England, showing significant investment in the area.
- Lincs Gateway: South section – several permissions and build out of offices, petrol station/services, hotel, pub, drive through restaurant, North section – various unimplemented permissions and a current application for erection of 70,000 square metres of buildings to comprise up to for Class B8 (storage or distribution) and ancillary Class E(g) (office) floorspace and provision of associated infrastructure (H16-0521-23)
- Holbeach Food Enterprise Zone: Detailed permissions granted for site circulation and infrastructure, two buildings for the University of Lincoln (The Institute of Technology and the Centre of Excellence), a “HUB” building provided by Lincolnshire County Council (including offices and workshops to let, meeting rooms, a café and a central reception for the wider South Lincolnshire Food Enterprise Zone), as well as Planning Permission for Offices and Workshops for a local business and an application for 12 small business uses is currently under consideration.

The decision has also been taken to extend the Local Development Order for 15 years.

- 2.35. Within Boston, of the 35 housing allocations within the SELLP, 26 of the allocations are built, active, permissioned or being investigated/progressed
- 8 are active. They have a total capacity of 876 units and have delivered at least 137 units with 218 commenced. 1 has commenced to preserve the permission for 60 dwellings but is currently inactive.
 - 1 has been developed with 61 affordable dwellings and another is partially developed with 79 dwellings.
 - 3 await planning permission, they will provide for 1252 units in outline and 200 under reserved matters. Decisions likely by end of 2023, early 2024.
 - Another 7 have planning permission for 405 dwellings, 196 outline and 209 full or reserved matters.
 - Of the 15 remaining allocations, 6 either have developer interest or are for sale.
 - 1 of the 2 Prestige employment sites has seen development and planning permission which accounts for around 8.4 of the 15.4 ha.
 - the SOS granted a DCO for the Boston Alternative Energy Facility that uses allocated and non-allocated land. If this is implemented the 18 ha allocation would have about 8 ha remaining
 - Another 3 allocation has seen development and planning permissions for about 5.4ha
- 2.36. Given the nature of the employment land supply and take up, it is understood that the Council are looking at the potential to boost the employment land offer by promoting Local Development Orders to increase the supply of attractive sites.
- 2.37. This would be a positive and proactive approach which could address any perceived problems far quicker and more economically than a partial Local Plan amendment could.
- 2.38. It is clear that there is considerable positive implementation of the Plan going on, despite the difficult situation of the last few years. Where problems may exist, the relevant Council is already showing proactive signs of addressing them.

NATIONAL PLANNING POLICY – (NPPF)

- 2.39. Significant changes in the Planning system post adoption of the Plan are major triggers for consideration of whether or not the Plan should be updated. Since the adoption of the Plan in March 2019, the NPPF was updated in July 2021.
- 2.40. When the SELLP was adopted in 2019, to have been found sound, it had to be compliant with the NPPF and deemed to contribute to the achievement of sustainable development. At that time the NPPF identified three elements of sustainable development, these being, Economic, Social and Environmental.

- 2.41. Since adoption of the Plan, possibly the most significant change has been the introduction of the standard methodology for assessing housing needs.
- 2.42. The updated NPPF now refers to these sustainability 'roles' as 'objectives'. However, they, and the associated text, remains substantially similar to the document against which the SELLP was tested and approved.
- 2.43. However, within Chapter 2 the NPPF now acknowledges that members of the UN have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. Minor edits have been made to phrasing, setting out clearly that the environmental objective is now to protect and enhance, and to improve biodiversity, where before the requirement was simply to contribute to these matters.
- 2.44. Within Chapter 3 on Plan Making, the main edits focus on the design quality of '*places*', rather than just the individual development. Additionally, a new insertion to paragraph 22 sets out that "*Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery*".
- 2.45. Chapter 4 covers decision making. It more clearly sets out the conditions in which the use of Article 4 directions to remove national permitted development rights are warranted. For non-residential uses, this should only be where an Article 4 is necessary to avoid wholly adverse impacts. In other cases, it should be limited to where Article 4 direction is necessary to protect local amenity or well-being of the area. In all cases, robust evidence is necessary.
- 2.46. In relation to Chapter 5, on Delivering a Sufficient Supply of Homes In regard to identifying land for homes, an amendment to paragraph 70 (previously 69) now states that neighbourhood planning groups should *give particular consideration* to the opportunities for allocating small and medium-sized sites.
- 2.47. An insertion into paragraph 73 (previously 72) also states that supply of large numbers of new homes should be supported by, '*a genuine choice of transport modes*'. Reference to the quality of '*places to be created*', is also noted again in paragraph 73, as well as ensuring that, '*appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes*', to meet the needs of different groups in the community.
- 2.48. Chapter 8 looking at promoting healthy and safe communities. Changes have been made to ensure pedestrian and cycle routes are attractive and well-designed. An insertion (paragraph 98) requires that local authorities, in regard to public service infrastructure, should work proactively and positively with promoters, delivery partners and statutory bodies to plan for the required facilities and resolve key planning issues before applications are submitted.

- 2.49. Similarly, Chapter 9, looking at promoting sustainable transport, reiterated that walking and cycling networks should be attractive and well-designed. Paragraph 110 (previously 108) sets out what should be considered when assessing sites for allocation or specific applications for development, adds a point which reads, *‘the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code.*
- 2.50. Chapter 11 on Making Effective Use of Land, sees an insertion made to paragraph 125 (previously 123) which relates to achieving appropriate densities at a development. The new text states that, *“area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently while also creating beautiful and sustainable places”.*
- 2.51. Chapter 12, Achieving Well-designed Places has undergone significant editing. A much bigger focus is placed on making ‘beautiful’ and ‘sustainable’ places, and the use of plans, design policy, guidance and codes is hugely encouraged. For example, Paragraph 128 (previously 126) sets out that *“all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences.”*
- 2.52. Another important insertion is paragraph 131, which sets out that important contribution trees make to the character and quality of urban environments. It requires that planning policies and decisions should ensure that new streets are tree-lined and that opportunities are taken to incorporate trees elsewhere in developments. It also sets out a requirement that appropriate measures are in place to secure the long-term maintenance of newly planted trees and existing trees are retained wherever possible. The importance of policies and guidance is reiterated at paragraph 134, which states development that is not well designed should be refused, *“especially where it fails to reflect local design policies and government guidance on design”.*
- 2.53. Chapter 14 is titled, Meeting the Challenge of Climate Change, Flooding and Coastal Change. Alterations here focus on making sure plans take into account all sources of flood risk. It is also encouraged to use opportunities provided by improvements in green infrastructure, and to make as much use as possible of natural flood management techniques. Development should be appropriately flood resistant and resilient, such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment (paragraph 166b”).
- 2.54. Chapter 15 on Conserving and Enhancing the Natural Environment, has been amended to make it clear that permission should be refused for major development applications within National Parks, the Broads and Areas of Outstanding Natural Beauty, other than in exceptional circumstances. A new insertion has been made as paragraph 198, that sets out that local authorities should, when considering applications to remove or alter a historic statue,

plaque, memorial or monument (listed or not), have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

- 2.55. Lastly, there has been a number of alterations to the Annexes, although these do not specifically change policy.
- 2.56. Whilst there has been a number of changes to the NPPF, quite a few may be seen as cosmetic rather than fundamental, or they affect interpretation rather than the overall direction of national policy.
- 2.57. Planning law requires that applications for planning permission must be determined in accordance with the development plan, unless material considerations indicate otherwise. Paragraph 2 of the NPPF states that the NPPF must be taken into account in preparing the development plan, and is a material consideration in planning decisions.
- 2.58. Therefore, the Council can apply any requirements of the NPPF when taking decisions on Planning applications, as the document is a material consideration, regardless of whether any changes are made to the Local Plan.
- 2.59. Issues such as Climate change, Biodiversity and the requirement for 10% of all homes to be Affordable Home Ownership and 25% of all affordable homes to be 'First Homes', can be addressed through non statutory Planning documents linked to NPPF changes and legislation, if these are considered to be needed.
- 2.60. Also, whilst changes to the 'Town and Country Planning Use Classes Order' allow greater flexibility in the use of commercial premises, and whilst that may impact on the aims of the Plan, as a change to legislation it is not an issue that the plan can address or prevent by way of policy, it is simply a consideration when dealing with planning applications.

FURTHER PLANNING CHANGES

- 2.61. In relation to other legislation, the Environment Act has introduced mandatory 10% biodiversity net gain (BNG). However, this can be taken into account in decision making without having to resort to updating the wording of specific policies in the Local Plan. The adoption of a 'Position Statement,' explaining how the Council will address this requirement could be produced, if needed.
- 2.62. The Government have also intimated that there may be far more changes to come. However, despite various discussions and consultations, the fact is that the future direction of Planning is still far from clear.
- 2.63. In the current circumstances, carrying out alterations to the Local Plan may not only weaken the apparent standing of the existing document, but would be setting out on a plan of action with any intended destination subject to potential change and uncertainty.

THE POLITICAL SITUATION

NATIONAL

- 2.64. Given the myriad of problems facing the current government, including their own longer-term existence, it is unlikely that the current situation and recent 'sound bites' provide a sound basis for a revised planning system, this side of a general election. Whilst there are numerous suggestions over their intended direction of travel, there is nothing to suggest a clear and consistent approach for Planners to take.
- 2.65. From a national perspective it seems a very uncertain time to try to define the future course of planning policy and to devote a huge amount of resources to creating a new plan at this time.

LOCAL

- 2.66. Locally, the existing Plan is a statutory joint venture between Boston and South Holland Council's, along with Lincolnshire County Council. Whilst South Holland also previously had a strategic Partnership with Breckland Council, this was brought to an end in May 2021.
- 2.67. In the summer of 2021, a new strategic partnership was formed between South Holland District Council, Boston Borough Council and East Lindsey District Council. It is understood that East Lindsey District Council are currently the lead authority in relation to Planning Policy matters.
- 2.68. However, East Lindsey District Council are currently carrying out a partial review of their existing Local Plan. This is ongoing and started with an 8-week consultation that ran from February to April 2021.

RESOURCES FOR A NEW PLAN.

- 2.69. As outlined above, the responsibility for the Planning Policy function across the three authorities' rests with East Lindsey. They currently have a planning team with one manager (theoretically shared with Boston), two senior officers, and one technical officer. Boston, have a single officer mainly carrying out monitoring work, and a degree of technical support, whilst South Holland have no Planning Policy staff currently.
- 2.70. There is a recognised lack of planning officers across the country in both the public and private planning sectors and recruitment is difficult for most local authorities
- 2.71. Given the current lack of planning resources across the Joint Plan authorities, and the current work load of the lead authority, carrying out a review of the South Lincolnshire Local Plan does not appear to be practicable or achievable in the near future without significant funding.

- 2.72. A summary of the Royal Town Planning Institute (RTPI) submission to the Comprehensive Spending Review (CSR), suggested that developing a Local Plan can be an extremely costly undertaking .
- 2.73. Estimates given to the RTPI suggests that developing a local plan can cost around £300,000 to £400,000, this simply is to cover developing an evidence base and consulting with the community, plus staff costs, costs for inspection, and legal fees. Additional to this local authority monitoring suggests the average spend on policy staff per LPA is now around £400,000 (having declined by 27% since 2009-10). Therefore, dependant on how many years it may take to develop the Plan, and whether a full or partial review is required, this is likely to be an extremely expensive exercise.
- 2.74. Given the very limited planning policy staffing across Boston and South Holland, embarking on a new Local Plan (in full or part) would require a substantial recruitment exercise. Currently acquiring planning staff is difficult enough, and relying on consultants and the add on costs of a recruitment agency would have a very significant impact on Council budgets.
- 2.75. Such funding is unlikely to be made available without a dire need for such work being identified and a strong business case being made. Even in those circumstances, recruitment of suitably qualified and experienced staff will be difficult.
- 2.76. Consideration also needs to be given to the new local political situation. Should the three partners consider, once the existing East Lindsey Plan update has been completed, a tripartite Local Plan or at least some form of Strategic Core Strategy, alongside the County Council, may be the best way forward.
- 2.77. Such a decision may well be for the future, but determining a review of the existing SELLP at this point would have a delaying impact on the possibility of a unifying strategic plan in the future.
- 2.78. In a very practical sense therefore, there are a number of significant problems one needs to consider when looking at the potential to bring forward a partial or full replacement of the existing plan at this time. One must consider:
- a. the current climate of budgetary cutbacks,
 - b. a lack of professional experienced staff across the country,
 - c. the work pressures currently on the most staffed element of the Planning Policy team across three authorities.
- 2.79. In the current circumstances I doubt whether the Council's could bring forward a replacement plan even if the evidence indicated that such a course of action was warranted, without significant financial and professional support from central government.

THE EVIDENCE BASE

- 2.80. Government guidance on Plan making makes it clear that Plans and the policies within need to be justified. This means that there must be evidence to underpin policies. Such evidence can be taken from a wide variety of sources, including the Authority Monitoring Report and planning application and appeal decisions.
- 2.81. The current SELLP web site lists 46 items at present. These reports cover both the process, and the practice. Technical reports predominate covering a huge swathe of issues, from economic to environmental, viability, housing, employment, retail etc, to biodiversity, flooding, green infrastructure, landscape and Historic character, etc.
- 2.82. At the time of the Local Plan examination, there was concern expressed from some quarters that the evidence base in relation to retail, and particularly that the evidence base related to Spalding was out of date and therefore the policy in relation to retail development within the town needed to be amended. At this point there was the South East Lincolnshire Town Centre & Retail Capacity Study of 2013 and an update paper in 2017.
- 2.83. As part of the Inspectors report, a major modification to the plan was agreed involving:
'A specific policy to ensure the viability of town centres and a commitment to review the retail section of the Plan.'
South Holland commissioned a new retail study in 2019, to update the retail data base and consider whether the existing policy in the Local Plan was fit for purpose. It is understood that the report concluded that whilst there was a climate of change in retail, the policy itself was still fit for purpose.
- 2.84. Many of the studies that informed the Plan are now quite old and are potentially out of date. The Strategic Landscape Capacity Study for South Holland District Council, was produced as far back as 2003. The 4th Lincolnshire Local Transport Plan, 2013 has been replaced by the 5th Transport Plan and the County are currently embarking on the 6th iteration of the document.
- 2.85. However, as of itself, this does not mean that the Plan should be reviewed. Many of the studies, such as those on Landscape character and historic assets may have changed marginally, or in terms of terminology, but those changes are unlikely to undermine the Plan.
- 2.86. In terms of other reports and studies, especially those in relation to various forms of economic activity, is that the last 5 years, for the reasons given earlier, they do not provide a good clear basis for predicting the longer term needs and potential of the area.
- 2.87. I would be concerned over commissioning many of these studies at a time when projecting future needs can be so uncertain and a time of further uncertainty is still ahead.

3. CONCLUSIONS

- 3.1. This work looks at the existing South East Lincolnshire Local Plan (SELLP) from a 'bigger picture perspective, and considers if there is a need to update the Plan or not. The main aim of this paper is to consider the wider economic and political landscape in the last 4 years, and now, and how the area has developed during that period, in order to consider the Plans overall performance during this time, and the potential to replace the Plan in whole or in part.
- 3.2. In general, as set out above, it appears that the area has developed well over this difficult period, with development levels exceeding Plan expectations despite a difficult wider economic picture.
- 3.3. In terms of the statutory situation and national guidance etc, it is considered that there is currently no clear direction or sets of guidance that the Plan is clearly not in accordance with. More importantly, it is considered that the future direction and requirements in terms of planning policy are far from clear.
- 3.4. Consideration has been given to the advice given to the Council's by Catriona Riddel and Associates in 2022. In the current climate one of the most insightful risks highlighted was that of any new Plan becoming quickly out-of-date as a result of forthcoming planning reforms.
- 3.5. The potential reforms highlighted in the report have not come about in the manner and time frame expected. Since Boris Johnson announced at the Tory Party conference in October 2021, that houses should not be built on 'greenfields', changes to the planning system have been expected.
- 3.6. In December 2022, the Government announced Plans to make housing targets advisory only through the NPPF, and commenced a consultation exercise in relation to this and other proposed changes. That consultation concluded on 2 March 2023 and generated over 26,000 responses.
- 3.7. However, having considered all of the responses they have decided to only announce changes in relation to onshore wind farms at this stage and have promised a further government response to accompany the changes to national planning policy set out in this consultation following Royal Assent of the Levelling-up and Regeneration Bill.
- 3.8. This accords with the view that changes to Housing advice within the NPPF are linked to overcoming MP's earlier threats to vote against the proposed 'Levelling up Bill.' However, the view seems to be, as the Government have made clear, that support for the Bill will predate the NPPF housing issue changes.
- 3.9. It had been hoped that the Levelling-up and Regeneration Bill (LURB) would be enacted in the spring of 2023, but it eventually received Royal assent in

October 2023. Currently it is unclear what impacts this complicated legislation will have.

- 3.10. Therefore, further changes to the NPPF have been pushed back and uncertainty not only remains, but grows. In the current climate, with so much uncertainty over potential changes to national guidance, the need to amend the Plan based on a clear defined change to national policy does not appear to exist.
- 3.11. There is also nationally uncertainty over how long the existing Government will survive in the difficult circumstances they are in, and therefore how much weight can be given to any of their announcements or amendments to the Planning system in the long term.
- 3.12. There are also political uncertainties locally. The new strategic partnership between South Holland District, East Lindsey District and Boston Borough Council, gives interesting possibilities in terms of more strategic planning approaches across the Partnership area, However, current work at East Lindsey limits those possibilities at present.
- 3.13. Whilst resources are not really a part of the Planning evaluation of the Plan, they have to be part of any realistic decision taking.
- 3.14. When looking at the resources available to support a full or partial replacement of the Plan, they appear to be very limited. The combined resources of Boston and South Holland amounts to a single planning officer. Recruiting good quality Planners is very difficult at this time, and there is a noted skill shortage within the sector. This brings into question whether or not bringing a team together to undertake any work required is actually a real possibility at this point. The alternative, relying on consultants, would be a very expensive proposition when amending as big a document as a Local Plan.
- 3.15. The budgets available to the Planning policy function are unknown, but assumed to be severely limited at present. Generally Councils are under significant financial pressures currently, such that a very strong business case would be needed to seek to access the level of funding that would need to be pumped into this area, should the Plan need replacing in whole or in part. This would have significant implications for other areas of the Council's activities.
- 3.16. As was noted above, the evidence base that informed the Plan is now quite old. However, that does not mean that the Plan and the direction of travel planned, is incorrect and needs changing. In fact, during a difficult period, the area seems to have maintained a degree of positive growth and development that may not have been expected.
- 3.17. There must also be concern that any evidence developed based on the last 5 years of activity, will not provide a strong basis for predicting future needs and directions of travel. In many ways one may see the evidence base that the Plan is based on as a more solid foundation.

- 3.18. Overall, it is considered that looking at this bigger picture, there are no grounds to require the SELLP to be amended, in whole or in part. The Plan is being implemented, the Plan is being followed and development is successfully taking place within the Plan area.
- 3.19. The Council, within its planning decision making process will need to take account of any emerging guidance that is not addressed within the Plan, or may superseded the guidance within it. However, that does not require the Plan to be amended at this stage.
- 3.20. The next step, in the following report, is to consider the actual Policies and aims of the Plan and whether it is still fit for purpose.