



South East Lincolnshire Joint Strategic Planning Committee

Report To:	South East Lincolnshire Joint Strategic Planning Committee
Date:	27 th May 2026
Subject:	Joint Local Plan for Boston Borough Council and South Holland District Council
Purpose:	To seek endorsement from the Committee to commence work on the next Joint Local Plan for Boston Borough Council and South Holland District Council
Report Of:	Phil Norman, Service Director – Planning and Strategic Infrastructure
Report Author:	Paul Feehily, Interim Programme Manager
Ward(s) Affected:	All
Exempt Report:	No

Summary

The Government has an ambition to achieve full coverage of up-to-date local plans across the country as soon as possible. In late March 2026 the Government introduced Regulations to commence the new plan-making system which had been provided for by the Levelling-up and Regeneration Act 2023. The Regulations replace the former plan making system and introduce new processes, timetables and ways of engaging with local communities, including 'Digital First' principles to collect, analyse, share and disseminate information.

The plans are required to be produced following best practice programme management principles to ensure transparency, accountability and rigorous adherence to delivery timelines.

This report seeks endorsement to begin work on the preparation of a new Joint Local Plan for Boston and South Holland under the new plan making regulations.

The new timetables for preparing plans are demanding and we must have notified Government of our intention to commence the Local Plan no later than the end of December 2026.

Appended to this report is a Project Initiation Document (PID) that sets out the proposed governance structure, resources, timetable and evidence requirements to carry out a new Local Plan. If Committee endorses the PID this will activate the work programme for officers and put in train a process of engagement with Members of Joint Strategic Planning Committee ahead of and alongside future rounds of public and stakeholder engagement.

Recommendations

1. Endorse commencing work on the preparation of a new Joint Local Plan for Boston Borough Council and South Holland District Council under the new plan making system;
2. Note the Government's principal changes to the local plan making system and the progress to date in getting ready to work on a new Joint Local Plan for Boston Borough Council and South Holland District Council;
3. Note the Project Initiation Document (PID) V1 at Appendix 1 as the general framework for the councils' work programme between now and plan adoption;
4. Note the proposed governance structure required to oversee plan delivery, manage resources and mitigate risks associated with the Joint Local Plan's preparation; and
5. Endorse working to a submission date of no later than December 2026 for the Joint Strategic Planning Committee's 'Notice of Intention' to commence its Local Plan.

Reasons for Recommendations

It is now a legal requirement that local planning authorities without up-to-date local plans prepare new local plans under the new mandatory requirements set out by Government. Not having an up-to-date plan in place will lead to problems of unregulated development happening across the two councils' areas, planning-by-appeal, and missed opportunities to guide major infrastructure investment decisions. The mandatory timetable to deliver a new local plan is challenging and work must start immediately to ensure the two councils are able to meet their obligations in delivering a new Joint Local Plan for their communities, which guides development and protects the built and natural heritage in the most effective, sustainable manner. Not meeting Government requirements on plan making could lead to intervention and the reputational and legal risks associated with that.

Other Options Considered

The preparation of a Local Plan is a legal requirement and failure to comply could lead to Government intervention. Therefore, not commencing and progressing a Joint Local Plan is not an option that officers could advise Members take.

The preparation of a single Joint Local Plan for the whole of the South East Lincolnshire Councils Partnership area has been considered as an alternative to East Lindsey preparing its own Local Plan and South Holland and Boston councils theirs. Proceeding with this option however is considered likely to raise significant challenges for the partnership and require Secretary of State intervention to support it which appears unlikely to be forthcoming given other Government priorities.

1. Background

- 1.1 Local Plans establish how land will be used and developed, setting out priorities for housing, employment infrastructure, design and environmental standards. In planning for housing, the government's Standard Method provides the initial benchmark for determining local housing need. Local Plan policies must contribute to climate change mitigation and adaptation, avoid inconsistency with national development management policies, and align generally with any operative spatial development strategy relevant to an area. Once adopted Local Plans serve as the principal basis for making planning decisions, directly shaping the future growth, development, and sustainability of communities.
- 1.2 A new plan making system has been introduced by Government under the Levelling-up and Regeneration Act 2023. Regulations issued in late March 2026 consolidate and put into effect the Act's requirements. The changes compress the timelines for plan production to a mandatory 30-month period. The clock starts ticking once authorities' initial preparation work has passed through the first of a series of Gateways managed by the Planning Inspectorate (PINS) on behalf of Government.
- 1.3 Officers have been working through the new legal requirements and initiating pre-commencement work under the changed system. The first key deadline to meet is the end of December 2026. This is the latest date by which councils must submit to Government their Notices of Intention to commence their Local Plans. There then immediately follows a 4-month period leading up to Gateway 1 when councils must prepare self-assessments as to their 'state of readiness' to carry out a legally compliant plan making process all the way through to adoption. This self-assessment will need to include certain material that shows how we are meeting the Government's requirements. For example, we should include a published plan making timetable, (see PID V1 in Appendix 2), our formal submission of our notice of intention to commence plan-making, a plan-scoping consultation, the gathering of baseline information, proof of our programme management approach, (also referenced via the PID), commencement of visioning work and a strategic environmental assessment.

2. Report

Local Plan Objectives

- 2.1 The new Joint Local Plan for Boston and South Holland will replace the existing local plan for the Borough and District. It will need to focus on how and where we accommodate future growth in a sustainable manner. Members will be involved in visioning work, setting out how they wish to see the future shape of the area develop

over the years of the plan period. The plan's objectives will be firmed up through this visioning exercise and will form the basis for upcoming stakeholder engagement.

- 2.2 While there are commonalities across both plan areas in the Partnership, (with East Lindsey about to embark on their next Local Plan), leading to significant opportunities to share resource and streamline effort, both areas also have their own specific set of challenges that require particular focus and attention. The most obvious of these is in relation to the issues of coastal flood risk affecting East Lindsey and the presence of large areas of National Landscape. These create potential uncertainties around the plan-making process for East Lindsey that are not shared by Boston and South Holland to the same degree. As these issues may impact on deliverability, remaining separate creates head room for both plans to progress without risking the delivery of the other. This is the principal reason why the idea of potentially moving to one joint local plan for the whole partnership area has not been pursued. This is coupled however with the reluctance of MHCLG to proactively engage in supporting a process by which the Secretary of State could brought about joint working under an enlarged strategic planning committee.
- 2.3 Failure to have an up-to-date plan at the end of the mandatory 30-month timeline risks Government intervention while its absence, perhaps more importantly, risks unregulated housing development and renewable energy projects, via planning-by-appeal, taking place across the Partnership's communities where they would expect to see Council exercising leadership in the development management process. It also risks missing out on being able to shape and influence key infrastructure investment decisions.

Programme Management Approach

- 2.4 To meet the rigorous 30-month statutory timeframe mandated by Government governance must be robust, open to scrutiny and follow programme management best practice principles. Appendix 1 shows the governance structure that the programme of local plan delivery across the Partnership will follow.
- 2.5 The Senior Leadership Team under the Chief Executive's chairmanship has assumed the role of Local Plans Programme Board for the Partnership's two Local Plans. The Board will meet monthly to ensure that decision-making regarding project commencement and control, budget, staffing, inter-departmental dependencies (e.g. IT, Communications, Procurement, Legal, Finance etc.) is managed at the highest level and the programme given appropriate corporate visibility.
- 2.6 The Programme Board will ensure that the Partnership manages two distinct but closely aligned workstreams. The programme management structures that have been set up beneath it are practical arrangements by which officers will drive the process of plan making and be held accountable for delivery. This includes a series of project teams that will drive the technical and policy development stages of the plan, each focussed on a particular theme or issue. This work will primarily, but not exclusively, fall to staff in Planning Policy Team, although project team leaders will invariably come from the policy team.
- 2.7 Members should note that the team will be engaged in progressing work on two plans at the same time. The budget model is also being developed. It will explore the need for further technical, professional support, either through external consultancy

or by securing interims to work in-house to supplement current capacity in the team. This is a vulnerability that will need to be closely managed as the plans progress.

The Role of Members

- 2.8 The role of Members of Joint Strategic Planning Committee will be to broadly oversee the plan's progress against the publicly available timetable, provide a steer on political priorities relating to emerging evidence and technical analyses, visioning, guide messaging in relation to upcoming public and stakeholder engagement activity, and help shape emerging policies. Plan adoption is ultimately a matter for the Joint Committee, although its longer term status will require review in the light of pending local government reorganisation. In councils with traditional planning committees, (i.e. those not formed via parliamentary procedure and Statutory Instrument as is the case with this committee), ultimate decisions around policy and plan adoption are taken at Full Council.
- 2.9 It is likely that Members will need to meet both formally and informally as the plan develops. In full committee they will take decisions where these relate to strategic vision, engagement and policy direction. Informal workshops or sub-group sessions on the other hand will enable free discussion to unlock ideas that can be shared as a means of shaping practical next steps and providing officers with a steer on how to develop their work.
- 2.10 In the early stages of the plan making process issues for Members' consideration will include agreeing the Joint Plans' scope, following stakeholder input in a scoping consultation exercise, and the formulation of a vision-led strategy. The Committee will consider outputs from the various evidence base work referred to above that will be reporting back through Spring 2027 and beyond.
- 2.11 Joint Strategic Planning Committee will form an essential component of the Joint Plans' project management. Political oversight of progress against the planned schedule of work will be key to ensuring Government-set deadlines are met and intervention avoided. Policy development based on evidence and set within the tighter strictures of the latest legislation will require Members' insights, responses and approvals. Between now and December, the Committee's focus will be on ensuring we have a workable timetable that meets Government's requirements. The PID attached here at Appendix 2 will ultimately form the council's public facing commitment to the plan making process, (a replacement of the former Local Development Scheme that previously had this function).

Work to Date

- 2.12 While much work is to be done in relation to commissioning studies and analyses of new evidence the Planning Policy team is not starting from scratch. The following existing work will feed into the new plan, most of which is relevant to the whole partnership area, showing the benefit of joint working and shared commissioning which will continue as much as possible under the new plan making arrangements:

- Sport and Recreation/Open Space finalised in 2025 for partnership area
- Playing Pitch Strategy finalised in 2025 for partnership area
- Local Wildlife Site reviews for the partnership area under a Service Level Agreement.

- 2.13 An overview of these items will be provided at the meeting. There is also a specific, separate agenda item on the Conservation Areas work mentioned above which will be presented to Members.
- 2.14 Additional specific workstreams that address Boston's and South Holland's issues, challenges and opportunities will be identified by the project teams. Updates will be provided to Committee as this work progresses.

'Digital First' and Our Digital Readiness

- 2.15 A new requirement of Government is that councils preparing local plans under the new system must ensure that their plan making processes are fully digital, following what Government refers to as a 'Digital First' approach. Doing so allows for improved public accessibility to information for consultation purposes and meets Government's more exacting data standards.
- 2.16 At present this is an area of risk for the Partnership. Recent experience of introducing new IT into planning has shown that improving technology can be expensive and far from straightforward. The need to be 'digitally ready' is a challenge that will need appropriate technical, systems, training and procurement assistance. While the motivation of avoiding Government intervention if we fail to upgrade our digital readiness is strong, it should also be recognised that, more positively, the opportunity to do so will improve the attractiveness of the emerging local plan as a document with which people will want to and can get involved. It will also make it far easier for the Policy Team to receive, analyse and act upon consultation responses. Having machine readable documents online, with integrated, seamless consultation opportunities will mark a vast improvement on the council's previous offer and the public's engagement with the important process of shaping the future of their area and their experience of local plan consultation.

Key Risks

- 2.17 The PID at Appendix 2 identifies several critical risks to the programme. The most challenging of these is securing sufficient staff capacity to do the work. Programme level risks will be managed by Programme Board at its monthly meetings through reporting from the Service Director - Planning and Infrastructure as Senior Responsible Officer (SRO) for the programme.
- 2.18 Cumulatively these programme risks fold into one high level, strategic risk that requires acknowledgement by Members. If any of these programme risks, singularly or cumulatively, come to pass then the chance of overall 'Local Plan Delivery Failure' happening becomes more acute. This would have serious implications in terms of reputational damage for the council, potential challenge and legal liability, not to mention the increased likelihood of Government intervention. Conversely, the recommendations in this report and the adoption of the accompanying PID are the primary means by which the risks can be mitigated.
- 2.19 The prospect of Local Government Reorganisation and a new Unitary council being formed during this new plan's preparation should be acknowledged. Plan adoption in 'Month 30' will be around 18 months after the new Council's vesting day. It will be for the new council therefore to pick up where Boston and South Holland leave off and

complete the plan. While the temptation to not commence the new Local Plan and simply sit back and leave it to the new council might exist, and is to an extent understandable, succumbing to it is not advisable. Government has made it clear that LGR is not and cannot be used as a reason not to start work on a new Local Plan where one is needed, as is the case here. The risk therefore is that the focus and energy that LGR will inevitably require of both members and staff crowds out the time and effort needing to be spent on the Local Plan. As mentioned above, any slippage in local plan delivery will give rise to serious implications for the current council and, indeed, for the Partnership as a whole.

- 2.20 Irrespective of the potential penalties associated with not progressing a new Local Plan, Members are reminded that engaging in the process positively and proactively will allow them the opportunity to leave a legacy that directs the future of their district and avoids it being left vulnerable to speculative development pressures. Any new council that comes into being after April 2028 would likely take a considerable period of time to get a new Local Plan in place. Members of the Joint Strategic Planning Committee already having made a substantive start on a plan for a significant part of the new council's geography will therefore put it in a much stronger position going forward. This will undoubtedly help avoid the sort of opprobrium Government has recently meted out to relatively new unitary councils such as Buckinghamshire for not having made sufficient progress on their plans.

Strategic Partners

- 2.21 The end of the former Duty to Cooperate has not ended the need for local planning authorities to collaborate but now a new emphasis has been placed on cross-boundary strategic level planning. In areas where there is a Combined Authority (CA) it is this new tier of local government that becomes responsible for preparing Strategic Development Strategies (SDS's). A SDS is a statutory document that sets out a strategic framework for the development and use of land within the CA's boundary. It focuses on strategic matters that cross local council borders, such as major housing delivery targets, large scale infrastructure and sub-regionally significant economic hubs. The primary goal of an SDS is to ensure that growth is coordinated across a wide area. The relationship between an SDS and a Local Plan is hierarchical and governed by the principle of 'general conformity'.
- 2.22 The Greater Lincolnshire Councils Combined Authority (GLCCA) has been granted powers to produce a SDS but as it is still in its early stages. This creates a phasing challenge but does not prevent South Holland and Boston beginning work on their Joint Local Plan. Indeed, there is a strong argument to suggest that progress on the Local Plan ahead of the SDS will place the councils in a strong position when it comes to engaging with the CA on SDS production. They will already have formed an early view on strategic vision and policy direction by the time the CA has its SDS team up and running. This will help inform the emerging SDS, while the SDS, in taking a cross-border, strategic approach.
- 2.23 Until the SDS is formally adopted local planning authorities still must talk to their CA and neighbouring councils to ensure their plans are not contradictory. Once adopted, in cases of conflict between an SDS and a Local Plan, the local planning authority will need to review and update its Local Plan to bring it into general conformity.

- 2.24 As the plan progresses other strategic partners will become more involved in the process. Lincolnshire County Council, a partner in this joint committee, is responsible for the Local Transport Plan and the Minerals and Waste Local Plan for the area. It is also responsible for education, particularly in relation to the location of any new schools, or changes in class sizes, arising immediately from new development or from shifts in long-term demographic trends. Working alongside the County Council to agree new infrastructure and service investment priorities will be key to ensuring the Local Plan is found sound at examination.
- 2.25 Our other partner in the South East Lincolnshire Councils Partnership, East Lindsey District Council, remains an important player for the Joint Local Plan. Even though as partners we will continue to prepare our own local plans, the Planning Policy Team, wherever possible, will streamline work across all three councils. We will share data and analysis on matters of cross-boundary interest.
- 2.26 In addition there are other Councils where there are shared interests and cross boundary talks will be important. Other key partners will include the Environment Agency, Internal Drainage Boards and various other statutory and non-statutory consultees.

3. Conclusion

- 3.1 It is a mandatory requirement that councils must have up-to-date local plans in place. New regulations map out for councils how they must go about doing so and the consequences of not doing so. The requirements are exacting, not least of which is the compressed timetable in which a plan must be delivered to adoption, and will no doubt prove challenging for us as work progresses.
- 3.2 A significant start has been made in relation to being ready for the end of the year when we must have submitted our Notice of Intention to commence work on the new Boston and South Holland Joint Local Plan. Members will be involved throughout the plan making process. This committee therefore will lead in shaping the future of the district on behalf of their communities, providing opportunities for public and stakeholder engagement along the way to further inform and develop their thinking and development of policy.
- 3.3 The recommendations in this report therefore provide the basis for embarking on a new Joint Local Plan for Boston and South Holland in the ways outlined in this report and in the attached PID.

Implications

South and East Lincolnshire Councils Partnership

All three councils within the South and East Lincolnshire Councils Partnership are embarking on the new plan making process at the same time. For South Holland and Boston councils, they will prepare a Joint Local Plan. For reasons outlined in this report Boston and South Holland will continue to prepare its own Local Plan separate from that of the other two councils. Wherever possible work that can be shared across the partnership during the plan making process will be, but it will be important that the specific characteristics of Boston and South Holland's area are reflected through the collection and analysis of geography-specific evidence.

Corporate Priorities

Local Plans are significant, mandatory documents which contain the spatial interpretation of a council's priorities and as such cut across all priorities.

Staffing

Resource requirements, including staff, are being considered as part of the project and programme management of the project.

Workforce Capacity Implications

There is substantial work to be undertaken in delivering a new Local Plan in a condensed period as now mandated by Government. The capacity and resilience of the existing resource will be subject to review.

Constitutional and Legal Implications

Local Plans must be prepared under the new plan-making system introduced by Government that are legally compliant with Government's stated requirements in the Levelling Up and Regeneration Act 2023 and the associated enabling regulations issued in March 2026.

Data Protection

None

Financial

Budget allocated in MTFS and to be updated in context of new regulations.

Risk Management

Failure to deliver a Local Plan in the timelines required by Government, or in the way set out in legislation and regulations, could lead to Government intervention, while the absence of an up-to-date Local Plan gives rise to the risk of uncontrolled development that can negatively impact on communities and the environment.

Stakeholder / Consultation / Timescales

No consultation undertaken.

Reputation

The risk of Government intervention and unplanned growth resulting from a lack of an up to date local plan.

Contracts

None

Crime and Disorder

None

Equality and Diversity / Human Rights / Safeguarding

None

Health and Wellbeing

None

Climate Change and Environment Impact Assessment

Not undertaken

Acronyms

None

Appendices

Appendix 1 Programme Management Governance Hierarchy for Local Plan Delivery

Appendix 2 Project Initiation Document V1 (PID)

Background Papers

No background papers as defined in Section 100D of the Local Government Act 1972 were used in the production of this report.

Chronological History of this Report

A report on this item has not been previously considered by a Council body.

Report Approval

Report author: Paul Feehily, Interim Programme Manager
paul.feehily@sholland.gov.uk

Signed off by: Phil Norman, Service Director – Planning and Strategic Infrastructure
pnorman@sholland.gov.uk