

The public and press are welcome to attend.

Tel: 01507 613471

If you would like any further information or have any special requirements in respect of this Meeting, please contact Laura Allen, Democratic Services Officer on 01507 613471

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Date: Wednesday, 6 March 2024

Dear Councillor,

### **Planning Policy Committee**

You are invited to attend a Meeting of the **Planning Policy Committee** to be held at **the Hub, Mareham Road, Horncastle, Lincolnshire LN9 6PH** on **Thursday, 14th March, 2024** at **6.00 pm**, for the transaction of the business set out in the attached Agenda.

The public and the press may access the meeting via the following link <https://bit.ly/ELDCYT> where a livestream and subsequent recording of the meeting will be available or by attending the Meeting.

Yours sincerely



Robert Barlow  
Chief Executive

#### **Conservative**

Councillors Tom Ashton (Chairman), Sid Dennis, Alex Hall, Daniel McNally and Paul Rickett

#### **Independent Group**

Councillors Terry Aldridge (Vice-Chairman), Travis Hesketh and Daniel Simpson

#### **Labour**

Councillors Graham Cullen and Roger Dawson

#### **Skegness Urban District Society (SUDS)**

Councillor Mark Dannatt

**PLANNING POLICY COMMITTEE AGENDA**  
**Thursday, 14 March 2024**

<b>Item</b>	<b>Subject</b>	<b>Page No.</b>
1.	<b><u>APOLOGIES FOR ABSENCE:</u></b>	
2.	<b><u>DISCLOSURE OF INTERESTS (IF ANY):</u></b>	
3.	<b><u>MINUTES:</u></b> To confirm the Minutes of the Meeting held on 01 February 2024.	<b>1 - 24</b>
4.	<b><u>ACTIONS:</u></b> Actions from the previous Meeting(s).	<b>25 - 26</b>
5.	<b><u>ENERGY INFRASTRUCTURE PROVISION:</u></b> To receive a report from the Planning Policy and Research Service Manager.	<b>27 - 40</b>
6.	<b><u>DATE OF NEXT MEETING:</u></b> The programmed date for the next Meeting of this Committee will be Thursday 25 April 2024.	

Minutes of a Meeting of the Planning Policy Committee held in the Hub, Mareham Road, Horncastle, Lincolnshire LN9 6PH on Thursday, 1st February, 2024 at 5.00 pm.

**PRESENT**

Councillor Tom Ashton (Chairman)  
Councillor Terry Aldridge (Vice-Chairman)

Councillors Mark Dannatt, Roger Dawson, Alex Hall, Travis Hesketh and Daniel Simpson.

Councillor Terry Taylor attended the Meeting as a Substitute.

Councillor David Hall attended the Meeting as an Observer.

**OFFICERS IN ATTENDANCE:**

Simon Milson	- Planning Policy and Research Service Manager
Kay Turton	- Senior Planning Officer
Andrew Sweeney	- Housing Development Manager
Elaine Speed	- Senior Democratic Services Officer and Civic Officer
Lynda Eastwood	- Democratic Services Officer

**33. APOLOGIES FOR ABSENCE:**

Apologies were received from Councillors Sid Dennis, Daniel McNally and Paul Rickett.

It was noted that, in accordance with Regulation 13 of the Local Government (Committees and Political Groups) Regulations 1990, notice had been given that Councillor Terry Taylor had been appointed to the Committee in place of Councillor Sid Dennis for this Meeting only.

**34. DISCLOSURE OF INTERESTS (IF ANY):**

At this point in the Meeting, Members were invited to declare any relevant interests. None were received.

**35. MINUTES:**

The Minutes of the Meeting held on 14 December 2023 were agreed as a correct record.

**36. ACTIONS:**

The actions were noted as complete or in hand.

### **37. UPDATE ON EAST LINDSEY DEVELOPMENT COMPANY:**

The Chairman welcomed Andrew Sweeney, Housing Development Manager who was in attendance to provide Members with an update on the Council's Development Company.

Members received a presentation 'Invest East Lindsey Limited – Housing Development Programme', a copy is attached at Appendix A to the Minutes.

The key areas were highlighted as follows:

- Key Housing Drivers
- Targeted Activities
- Council Assets and Constraints Identified
- Other land
- Current Development Activity, including sales, challenges along the way, successful outcomes and potential pipeline.

Members were invited to put their comments and questions forward.

- A Member commented that it was reassuring to see a 16% profit had been achieved during difficult times and the social benefit of bringing forward stalled sites was encouraging.
- A Member asked whether the calculation for 16% profit could be explained. The Housing Development Manager explained that the figure was based on capital outlay and the sales income generated that took into account land cost, fees, construction costs and any sundry costs in comparison with the sales income and this was a gross profit. The net profit would be approximately 13% to 14% if corporation tax had to be paid, however this would depend on the trading figures for the caravan activities that was part of the company. Currently there were no trading accounts within the company available at present. It was further highlighted that Invest East Lindsey (IEL) can make a much lower percentage in profit than a traditional developer due to the constraints that IEL worked within.
- A Member queried whether the development company insisted on solar panels being installed on new properties. The Housing Development Manager confirmed that on the current scheme it had not as it was the first project and he was conscious of the expenditure and the need to generate a profit, however for future schemes it was likely to be mandatory in terms of the renewables on properties.
- The Chairman stated that during a discussion, the subject of 'lifetime homes' which were pre-engineered to be easily adaptable had been highlighted and queried whether this type of build was being incorporated in future development. In response, the Housing Development Manager advised Members that these homes were

originally designed in the early 2000s or earlier, and a Section 73 application was submitted whereby some modifications were made within that to bring the properties up to a more contemporary design. It was highlighted that the space standards in those properties was quite generous, however nowadays the lifetime home standards were adopted as part of the building regulations so would have to comply with most of the requirements. It was highlighted that the properties were not for wheelchair standard design houses, but they would be lifetime homes.

- At the discretion of the Chairman, Councillor David Hall queried the biodiversity net gain on these sites, particularly in relation to the Council's commitment to zero carbon.

In response, the Housing Development Manager informed Members that because of the historic nature of the site, this had not been calculated for these properties, however it was likely something that would have to be done on future schemes, for example the Tetney site if that was developed by Invest East Lindsey.

The Planning Policy and Research Service Manager added that biodiversity net gain was a very new concept and was only becoming mandatory from 12 February 2024 on major developments and confirmed that the site referred being such a legacy permission it would not have been part of the original permission or a need for it. After April 2024 it would then be factored into minor developments as well.

Members were further advised that the Council was setting up land banks in conjunction with the Local Wildlife Trust which were specified projects that could be funded or be bought into to provide an element of biodiversity or net gain if this could not, as a starting point be achieved on the development site. Furthermore, the government had set up a mechanism whereby biodiversity and net gain credits could be bought, however on a sliding scale of costs the cheapest option would be to make the biodiversity net gain happen in the location where the site was with the most expensive option being the credits.

There were no further comments or questions received.

The Chairman thanked the Housing Development Manager for the informative update.

*N.B. Andrew Sweeney, Housing Development Manager left the Meeting at 5.26pm.*

### **38. LOCAL PLAN SETTLEMENT PATTERN:**

The Senior Policy Officer presented Members with a report on the Local Plan Settlement Pattern, pages 19 to 32 of the Agenda refer.

It was highlighted that a number of reports relating to the methodology behind establishment of the Local Plan settlement pattern had been presented at previous meetings of this Committee. This report brought together the previous decisions of the Committee and Appendix A set out the resulting Settlement Pattern, proposed for inclusion in the Local Plan review. This would be subject to consultation at a future date as part of consultation on the wider Local Plan review.

Members were referred to the background of the report detailed at Paragraph 1, pages 20 to 21 of the report refer.

The Planning Policy and Research Service Manager highlighted the table at Paragraph 2.6 of the report to Members that detailed the changes as a result of the updated scoring, showing a reduction in the large and medium villages and an increase in the number of small villages.

As a result of previous discussions and work undertaken, this had resulted in looking at allowing more developments in medium villages in terms of housing development, so a reduction in number would in effect make sure that the medium and large villages were the most sustainable. Those villages that did not have the services and facilities to support that additional development were now small villages and would be caught under the SP4 policy which was more restricted in terms of housing provision.

The Chairman asked for clarification on Policy SP4 in relation to small settlements and the current restriction for two units of infill. The Planning Policy and Research Service Manager responded that further to discussions with Members there was a desire to be slightly more flexible within the SP4 policy in small villages and over the years quite a number of the infill plots had been taken up where some of those had shown that there was a potential for more than two.

Members were invited to put their comments and questions forward.

- Further to the changes to the settlement pattern referred, a Member asked for clarification whether this would put an end to development in small villages.

In response, the Planning Policy and Research Service Manager explained that the Local Plan policies were a starting point when making decisions on planning applications and all material planning considerations had to be taken into account. Policy SP4 had been written so it allowed very small amounts of development in a small village with infill sites. It was a very restrictive level of growth and would be contained within the new SP4 going forward. So there was not an absolute 'no' in planning terms, and as a planning authority the Council was heading in the direction of trying to be more flexible than it had in the past.

- A Member highlighted that the findings from contacting parish councils to ascertain the accuracy of the services and facilities in each settlement seemed to reflect quite a significant loss of facilities and queried whether it was possible to chase up on the villages that had not responded to this.

The Planning Policy and Research Service Manager advised Members that there was a 36% return rate for parish councils and 37% for elected Members and that a significant period of time had been allowed for responses to be returned. Members were further informed that over the last few years there had been a decrease in the services and facilities within these settlements and although there was not much the Council could do as part of the local plan to bring those businesses back there was a methodology that set out how these were counted. However, it was a natural fact that those settlements were losing facilities because they were not used or supported within the village.

In response, the Member raised his concern in regards of village facilities, for example a village hall, and considered that something should be put in place to support community centres and other warm spaces. The Planning Policy and Research Service Manager stated that a lot of community halls remained in villages and were usually multi-functional and because of the loss of facilities, the halls had become the focal point within some of the villages. However, in terms of what the Local Plan could do, and alongside national policy it was always supportive of new businesses and local development. In terms of the query, it was what the Local Plan could do in terms of protection of these facilities, which was very little if it was demonstrated there was no need for them. Therefore, it would have to be a wider Council initiative in terms of supporting these community facilities.

The Chairman added that he understood that there were fairly robust policies under certain national policy that guarded against things like village halls being lost and turned into houses, for example and a threshold whereby it had to be demonstrated that the community use had become completely unviable and that no one would take them on for that use. The Planning Policy and Research Service Manager advised Members that communities could register facilities as community assets, and this was outside of the Planning system so provided a level of protection and this was administered by the Council.

- A Member queried whether the Council was at the stage with the emerging plan where the revised settlement scores would now be considered the updated appropriate categories for the villages and if this should now be applied to planning decisions.

In response, the Planning Policy and Research Service Manager advised that pending the recommendations contained within the report being approved by Committee, these scores would be used for the review of the Local Plan and the policies within this. However, for

current applications in terms of what planning officers and Planning Committee used for making decisions, the Local Plan and the policies in the plan were still the starting point as adopted and advised Members that there had been a very recent Inspector's decision which categorically confirmed that. The Member asked that he be sent a copy of the reference to this decision.

The Member responded that the Local Plan was more than five years old and outdated and highlighted that the data from the informal consultation with parish councils should be taken into account in planning decisions and as the emerging plan progressed with its review it was more reasonable for officers and the Planning Committee to take this updated information into account in their decisions.

The Planning Policy and Research Service Manager referred the Member to a legal opinion that he forwarded to him on the subject that related to that exact question which confirmed that was not the case and added that he was not in a position to comment what officers and Planning Committee took into account. If further clarification was required on how planning applications were signed off in relation to material planning considerations and weighting, the Member was advised to contact the Development Management Lead.

Following a discussion, it was acknowledged that the comments made were important and it was agreed that it would be helpful for the Planning Policy and Research Service Manager to get an updated legal opinion on where the Council stood in relation to the scoring and using the updated evidence correctly.

- A Member highlighted that establishing a settlement proposal was historically on the back of sustainability, however considered that the lack of facilities in some of the settlements was not an indication that they were unsustainable and sited cluster settlements as an example.

A further concern was raised that the number of medium sized villages had been significantly reduced and he was not convinced looking forward that this was futureproofing and considered the Council was backing itself into a corner. The Chairman assured Members that the Committee had exhausted all areas with this and went through the scoring system and where the threshold should be with a working group set up by the Committee 18 months ago.

It was further queried how a means could be found to quantify how facilities in one settlement supported residents in another. It was acknowledged how many facilities and services had been lost over the years, however it was considered that the Local Plan was being much more flexible in the remaining medium settlements and more flexible for the ones that had dropped down from medium to a small village. A query was further raised whether the top line hamlets were being scored correctly due to the facilities that they had, and in view of the



tweaks whether those that scored 11 would better reflect those slightly more sustaining facilities. The Member felt that there was sufficient services and facilities required to achieve a score of 11 to support a small amount of development as a small village.

In response, the Planning Policy and Research Manager stated that to some extent it was in the hands of Members as to what level of points they considered to demonstrate which settlements were sustainable for an increase in population. For example, whether having a public house, a community hall and a church and a cemetery made a sustainable location for a family to live in, looking at how much of their daily needs for survival they could get within that village and whether this was sufficient from a sustainability point of view to allow small amounts of growth under SP4 if it became a small village.

- A Member commented that it had just been demonstrated how an element of flexibility needed to be built in, but his concern was more around the movement from medium to small villages and considered that what happened was when information was presented at a Planning Committee or to officers, flexibility was being eliminated when considering borderline cases and stated that most people who lived in small villages used their cars for shopping in the towns and further afield. In terms of flexibility a Member suggested that over the next plan period an amount of 6 to 8 points either way be allowed. In response, a Member queried whether allowing an element of flexibility would complicate a planning decision.

The Planning Policy and Research Service Manager advised Members that the Local Plan needed to be clear to the reader and that they understood what kind of development was going to happen in what locations although understood that it could be construed as rigid. However, it was important that policies were manageable, useable and were understood to allow officers and Planning Committee to make decisions. It was also important during examination of the Plan, that the Inspector knew what development was going to happen where over the plan period and to be able to demonstrate that the policies clearly articulated that. Caution was raised in relation to potential repercussions of allowing flexibility around the edges of the categories where the thresholds are and what that could mean on the ground for those settlements as at the moment small villages had a good level of protection in terms of lots of expansion and trying to keep them as small villages based on the services and facilities. Going forwards into the Local Plan they would still have that protection but there would be a certain increase in flexibility as discussed. With regards to introducing an element of flexibility +/- points each year into a policy it would be impossible to write a policy to be robust and would be very complicated to interpret and apply.

- A Member stated that in his opinion the points system was irrelevant to the types of villages, citing his own village of Halton Hologate as an

example. Following a brief discussion, it was confirmed that this was correctly categorised as a small village.

- The Vice-Chairman highlighted that a number of villages had major problems with mains drainage. Anglian Water Authority stated that this was sustainable, however it was clear that this was not the case as a lot of drainage systems went back to Victorian times and after heavy rain drains lifted and sewage came out. It was proposed that if the settlement scores were accepted an addition be made that requested officers took note of this when looking at planning applications.

In response, the Planning Policy and Research Service Manager stated that it was not possible to instruct an officer or Planning Committee to take this into account as a material planning consideration. To find a way forward, this suggestion could be taken away to look at what the implications were in terms of the weight of evidence and write advisory notes to them, however he would strongly advise caution about making recommendations as to how planning officers and Planning Committee made determinations on planning applications as part of the Meeting.

The Planning Policy and Research Service Manager responded that a wider level of consultation and public involvement was important and was relevant in terms of the weight that could be attributed to any sort of emerging evidence.

- The Chairman proposed that the threshold on small villages to hamlets be decreased from 12 to 11 points. The Senior Policy Officer responded that if Members were happy with this there was no reason the threshold could not be lowered. The implications for those settlements would have to be considered, but if it was felt by Members that those settlements had the right amount of facilities, and whilst considering the physical size whether putting more development in there would be appropriate there was no reason the proposal could not be moved.

The Planning Policy and Research Service Manager clarified that he would seek legal advice again on the weight to be attributed to emerging evidence and in particular settlement patterns and would report back to Committee.

- A Member commented that he did not feel strongly with regards to the question of where the threshold should be, however considered that Committee was being arbitrary and queried whether there was a downside to this whereby a precedent was being created and Committee would be interminably debating whether any of the other thresholds should be moved.

In response, the Planning Policy and Research Service Manager stated that there had to be a paper trail showing how Committee had

arrived at its conclusions on moving from 12 to 11 and this would be presented as part of the evidence for the examination process of the plan. It was not considered moving the threshold from 12 to 11 was a significant change and from the discussion recorded by Committee there was sufficient evidence to present as there was no set methodology from government and each Council would have a different way of doing it.

Following which it was seconded that the proposal for the threshold on small villages to hamlets be decreased from 12 to 11 points.

Upon being put to the vote, the proposal was carried.

*N.B. Councillor Daniel Simpson voted against the proposal.*

*N.B. Councillor Roger Dawson abstained from the vote.*

No further comments or questions were received.

The Chairman thanked the Senior Policy Officer for her hard work on the report.

Following which, it was

**RESOLVED**

- That the spreadsheet, attached to this report as Appendix A as the Settlement Pattern for inclusion in the Local Plan review be agreed.
- That the threshold on small villages to hamlets be decreased from 12 to 11 points.

**39. DATE OF NEXT MEETING:**

The date of the next Meeting was confirmed as Thursday 14 March 2024 commencing at 6.00pm.

The meeting closed at 6.33 pm.

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# INVEST EAST LINDSEY LTD HOUSING DEVELOPMENT PROGRAMME



## APPENDIX A

### Key Housing Drivers

- Undertake a mixed portfolio of development to address unmet housing need in the Council's administrative area.
  - To facilitate the re-use and disposal of the Council's surplus land.
  - To correct market failure in the delivery of housing and employment land.
  - Intervention on stalled sites, enabling works, etc.
  - To generate income for the Council by trading at a profit in land, buildings and services.

# INVEST EAST LINDSEY LTD HOUSING DEVELOPMENT PROGRAMME



## Targeted Activities

- **ELDC assets – Tetney, Spilsby, coastal sites** – a mix of allocated housing & potential surplus land. Good housing potential on some sites.
- **Stalled sites** – with extant planning consents – often low viability for regional private developers. IEL could develop if accepting of lower margins. Opportunities exist – lower margins open to the impacts of economic change. e.g. low affordability of mortgages, loan rates, etc.
- **Land Acquisitions** – development sites purchased solely by IEL or as part of larger developments - opportunities exist on smaller sites but IEL in competition with larger developer's bids and sales on larger sites.

# INVEST EAST LINDSEY LTD HOUSING DEVELOPMENT PROGRAMME



## Council Assets

- Evaluation of assets with housing potential.
  - Site capacities and financial viability
  - Initial planning consultation.
  - Strategic value (in the context of ELDC Asset Transformation programme)

## Constraints identified

- Flood risk
- Financial viability
- Low sustainability – location, access to services, transportation.
- Loss of facilities – parking, etc.

# INVEST EAST LINDSEY LTD HOUSING DEVELOPMENT PROGRAMME



## Other land:

- Opportunities explored on sites at Ingoldmells, Sutton on Sea and Chapel St Leonards.
- Chapel site evolved as more viable development and taken forward with Bowbridge

Start made on site during 2021.

- Other opportunities explored include Lindum Group on sites in Alford and Tattershall, sites in Horncastle and other locations. Land prices and building cost increases however has impacted on financial viability.



# INVEST EAST LINDSEY LTD HOUSING DEVELOPMENT PROGRAMME



## Current Development Activity

### Draycott Way – Chapel St Leonards

- Previously stalled site.
- Started by Hugh Bourne/Keir in mid 2000's.
- Existing planning approval activated with a start on site.



# INVEST EAST LINDSEY LTD HOUSING DEVELOPMENT PROGRAMME



## Current Development Activity

### Draycott Way – Chapel St Leonards

- 28-unit development Draycott way, Chapel St Leonards
- Final completion - January

### Sales

Status	Value
Sales completions (14)	£2.735m
Sales STC (10)	£1.742m
Unsold stock (4)	£0.735m
<b>Total Sales Value (forecast)</b>	<b>£5.212m</b>



# INVEST EAST LINDSEY LTD HOUSING DEVELOPMENT PROGRAMME



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**Completed Homes**



# INVEST EAST LINDSEY LTD HOUSING DEVELOPMENT PROGRAMME



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Completed Homes

# INVEST EAST LINDSEY LTD HOUSING DEVELOPMENT PROGRAMME



# INVEST EAST LINDSEY LTD HOUSING DEVELOPMENT PROGRAMME



## Draycott Way – Chapel St Leonards

### Challenges:

- Impact of Covid, Brexit, Energy costs on resources – availability of trades, materials shortages, increased build costs and contractors cashflow.
- Economic change – mortgage availability, cost of living, impact on sales.
- Market competition – greater flexibility of larger volume housebuilders to incentivise sales.
- Aftercare service – resource demanding, IEL resource availability limited.



# INVEST EAST LINDSEY LTD HOUSING DEVELOPMENT PROGRAMME



## Draycott Way – Chapel St Leonards

Successful outcomes:

- Delivery of first ELDC built homes since before the transfer of the ELDC housing stock in 1999
- Delivery of a stalled development previously part developed by Kier.
- Sales of 24 of 28 new homes expected by the end of 2023/24 year end.
- Generation of an expected 16% profit despite price increases and delays.

# INVEST EAST LINDSEY LTD HOUSING DEVELOPMENT PROGRAMME

## Potential Pipeline:

### Humberstone Road, Tetney

- ELDC land with housing allocation in Local Plan - Potential for c35-40 homes (includes 10 affordable rent/SO)
- ELDC application for outline planning submitted – Sale to Invest East Lindsey to be considered.
- Options on delivery also to be considered given current housing market conditions.





# INVEST EAST LINDSEY LTD HOUSING DEVELOPMENT PROGRAMME



## Potential Pipeline:

Other work currently in progress

- Review and re-appraisal of previous work completed.
- Identification of surplus assets.
- Options on delivery:
  - Acquisition and development.
  - Acquisition partial development and plot sales.
  - Sale for full development by third parties.
  - Enabling of sites for sale for third party development.
- Working with consultants and contractors to assist in costs and designs for feasibility work.

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**ACTIONS FROM THE PLANNING POLICY COMMITTEE MEETING  
HELD ON THURSDAY 01 FEBRUARY 2024**

<b>MIN NO:</b>	<b>ITEM:</b>	<b>ACTIONED BY:</b>
<b>35.</b>	<b>MINUTES:</b>	
✓	The Minutes of the Meeting held on 14 December 2023 were agreed as a correct record.	<i>NOTED</i>
<b>36.</b>	<b>ACTIONS:</b>	
✓	The actions were noted as complete or in hand.	<i>NOTED</i>
<b>37.</b>	<b>UPDATE ON EAST LINDSEY DEVELOPMENT COMPANY:</b>	
✓	A copy of the presentation 'Invest East Lindsey Limited – Housing Development Programme' to be circulated to Members. <b>COMPLETED – A copy of the presentation was circulated to Member on 12/02/2024.</b>	<i>SIMON MILSON</i>
<b>38.</b>	<b>LOCAL PLAN SETTLEMENT PATTERN:</b>	
✓	Secure legal advice as to the status of emerging evidence, in particular the settlement scoring and hierarchy, and how much weight (if any) can be attributed to it in the decision-making process”.	<i>SIMON MILSON</i>
<b>39.</b>	<b>DATE OF NEXT MEETING:</b>	
✓	The date of the next Meeting was confirmed as Thursday 14 March 2024 commencing at 6.00pm.	<i>NOTED</i>
	<b><u>ACTIONS FROM THE PLANNING POLICY COMMITTEE MEETING HELD ON THURSDAY 14 DECEMBER 2023</u></b>	
<b>30.</b>	<b>AFFORDABLE HOUSING:</b>	
✓	The Strategic Housing Manager to provide information to Committee on what amount of money the Council had received in commuted sum payments. <b>March 2024 - COMPLETED</b>	<i>STUART HORTON</i>
<b>31.</b>	<b>AUTHORITY MONITORING REPORT 2022-23</b>	
*	(a) With reference to Table 15 'Industrial Estate and Business Park vacancy rates (surveyed Q2 - 2023)', page 27 of the Agenda refers. A query was raised on the significant difference in the total and vacant figures for Louth between 2019 and 2020 and also those for North Somercotes. The Planning Policy and Research Service Manager to provide some clarification on the figures for the next meeting. <b>March 2024: This is in hand and an update will be given at a future Policy Committee meeting.</b>	<i>SIMON MILSON</i>
✓	(b) With reference to the Policy Monitoring Indicators at Section 10, SP2 'Sustainable Development' page 58 of the Agenda refers. It was queried whether the baseline figures for 2016 needed to be reviewed to be more realistic, as the figure was set before the Local Plan was adopted in 2018 and was at the time a high volume of applications were coming through at that time.	<i>SIMON MILSON</i>

	The Planning Policy and Research Service Manager to look at the queries relating to this. <b>March 2024: - COMPLETED</b>	
✓	(c) With reference to SP15 'Widening the Inland Tourism and Leisure Economy', page 68 of the Agenda refers. Further to the negative indicator, it was queried whether the baseline was reasonable. The Planning Policy and Research Service Manager to look at the queries relating to this. <b>March 24: COMPLETED</b>	<i>SIMON MILSON</i>
✓	(d) In relation to the remarks at SP16 'Inland Flood Risk', the Chairman stated that the Council's potential management actions and suggested approach did not sit comfortably with him. It was queried whether this response could be tweaked. <b>March 24: COMPLETED</b>	<i>SIMON MILSON</i>



# East Lindsey

DISTRICT COUNCIL

REPORT TO:	Planning Policy Committee
DATE:	14 <sup>th</sup> March 2024
SUBJECT:	Energy Infrastructure Provision
KEY DECISION:	N/A
PORTFOLIO HOLDER:	Cllr Tom Ashton
REPORT AUTHOR:	Simon Milson
WARD(S) AFFECTED:	Infrastructure provision affects all development provided for by the Local Plan for East Lindsey. It therefore has the potential to affect all wards
EXEMPT REPORT?	No

## SUMMARY

This report gives a summary of the current national and local Planning policy position in relation to energy generation infrastructure.

## RECOMMENDATIONS

*That the contents of this report are noted by Members. Whilst no decision is required as part of this report, it is expected that any discussions will inform the direction of the ongoing Local Plan review and relevant issues may be brought back to future Policy Committee meetings for further discussion.*

## REASONS FOR RECOMMENDATIONS

*This report is intended to provide an update to Members on the current policy position in relation to the provision of infrastructure.*

## OTHER OPTIONS CONSIDERED

N/A

### 1.0 Policy Context

#### National Strategic Infrastructure Projects

- 1.1 Starting at the top, the National Strategic Infrastructure Projects (NSIP) are the largest construction and engineering projects that have a national significance. These are not decided by the Council, instead the application for Planning Permission is made directly to the Planning Inspectorate. The Inspectorate then makes a recommendation to the Secretary of State as whether to approve or refuse consent. The Council are consulted during the application process. There is also a requirement for pre-application engagement before the submission of the planning application. There is an interactive map of all NSIP projects that can be found using the link in the footnote.<sup>1</sup>
- 1.2 There are 6 National Policy Statements (NPS) concerned with Energy Infrastructure. They cover fossil, renewable, nuclear power generation and the network infrastructure needed to supply and support it.<sup>2</sup>
- 1.3 A detailed summary of the NSIP process can be found in section 2 of this report.

#### The National Planning Policy Framework

- 1.4 The National Planning Policy Framework December 2023 (NPPF)<sup>3</sup> sets out a presumption in favour of sustainable development. In paragraph 8 it sets out 3 objectives to achieving sustainable development: Economic, Social and Environmental. The explanation of the Economic objective finishes by saying it includes “identifying and coordinating the provision of infrastructure”. However, the NPPF overall makes little reference to conventional energy/electricity generation plant and infrastructure. It is instead chiefly setup to support renewable and low-carbon energy generation.
- 1.5 In paragraph 20 the NPPF states the following about strategic policies in local plans, with specific mention of infrastructure for energy in item b)
- “Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for:*
- a) housing (including affordable housing), employment, retail, leisure and other commercial development;*
- b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);***

<sup>1</sup> <https://infrastructure.planninginspectorate.gov.uk/projects/>

<sup>2</sup> <https://www.gov.uk/government/collections/national-policy-statements-for-energy-infrastructure>

<sup>3</sup> [https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF\\_December\\_2023.pdf](https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf)

*c) community facilities (such as health, education and cultural infrastructure); and  
d) conservation and enhancement of the natural, built and historic environment,  
including landscapes and green infrastructure, and planning measures to  
address climate change mitigation and adaptation.”<sup>4</sup>*

- 1.6 The NPPF in Section 14 sets out the approach to climate change, flood and coastal flood risk. This section has the most references to renewable and low carbon energy generation.
- 1.7 The NPPF in paragraph 158 sets out the approach that Local Plans should take to climate change and planning for future resilience of infrastructure and possible relocation of vulnerable infrastructure.

*“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. **Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.**”*

- 1.8 The NPPF goes on to make various references to renewable and low carbon energy production. It states in section 160 criteria that plans should:
- “To help increase the use and supply of renewable and low carbon energy and heat, plans should:*
- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, and their future re-powering and life extension, while ensuring that adverse impacts are addressed appropriately (including cumulative landscape and visual impacts); ...”*
- 1.9 Alongside the above, the NPPF provides further policy in relation to factors such as heritage, landscape, biodiversity, best and most versatile agricultural land etc, all of which are also relevant when considering energy projects and which must be considered as part of the overall planning balance. The NPPF is also read in conjunction with the Planning Practice Guidance which provides further insight and information.

### **The East Lindsey Local Plan (2018)**

- 1.10 The East Lindsey Local Plan (Local Plan)<sup>5</sup> forms the starting point for decision making when considering planning applications, with the NPPF being a material consideration. The Local Plan should be read as a whole, meaning policies are linked and when read together should provide the framework to allow sustainable development to be supported. Alongside the Local Plan, there are a number of Neighbourhood Development Plans (NDP) that must also be taken into consideration.

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<sup>4</sup> Bold formatting added

<sup>5</sup> <https://www.e-lindsey.gov.uk/localplan2018>

Where an NDP is post-examination stage it begins to gain weight in decision making and when fully 'made' it sits alongside the Local Plan as part of the Development Plan for that local area<sup>6</sup>.

1.11 The Local Plan is underpinned by evidence in the Infrastructure Delivery Plan (IDP) and Water Cycle Study (WCS). These assessed the level of current infrastructure provision and whether the proposed development in the Local Plan could be accommodated. These documents will be refreshed as part of the review. However, they still form part of the evidence base for the adopted Local Plan and should support the level of development it proposes over its lifetime.

1.12 When looking at the Local Core Strategy, initially Chapter 2 "A Sustainable Pattern of Places, Growth and Housing" places an emphasis in its opening text in section 2.9 on ensuring the availability and capacity of existing infrastructure and whether it needs improving.

29. In addition to the settlement pattern, other factors affect decisions and shape the strategy for the location of growth. These also affect the choices about specific sites. These include:

- Sites protected for their biodiversity or geodiversity importance;
- National and local landscape designations;
- Designated and non-designated heritage assets and their settings;
- Physical constraints such as areas liable to flooding;
- Local housing needs;
- Access to services, public transport, etc;
- Climate change factors, such as flooding;
- Existing land use (for example, where development would result in loss of existing uses such as commercial land or land used for community facilities);
- The availability and capacity of existing infrastructure and the scope to improve or expand infrastructure to meet demands arising from new development;
- Access to employment, schools, shops and health facilities.

1.13 **Strategic Policy 27** of the Local Plan covers Renewable and Low Carbon Energy and is shown below. The opening text gives a supportive approach to various different types of technologies and goes on to set out that this will only occur when it will not impact adversely on a range of factors. It continues in paragraphs 14.2 and 14.3 to recognise the sensitivity of the landscape, including the Wolds Area of Outstanding Natural Beauty and its setting, and sets out how impacts should be considered. It references the Council's Landscape Character Assessment as being an important consideration that judgements will be based on.

1.14 Paragraphs 14.4 and 14.5 go on to look at how small and large scale can contribute, but again being mindful of the impacts. It also introduces locational requirements and further environmental considerations.

1.15 Paragraphs 14.6 and 14.7 continue to set out key constraints that need assessing, including landscape, biodiversity and historic assets. 14.6 makes reference to assessing the need to assess the impact on the economy and tourism. 14.7 considers grid connections and recognises that the structures used can have significant impacts that also need to be assessed. It makes reference to the

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<sup>6</sup> <https://www.legislation.gov.uk/ukpga/1990/8/section/70>



potential impact of power lines, with reference to the AONB, and a presumption should be for the unless justification is given and it can be shown what steps have been taken to minimise the impact on the landscape.

- 1.16 Paragraph 14.8 recognises the interest in solar power generation but also the impacts large scale farms can have. It raises the need to prioritise the best use of land and protect against the loss of high-grade agricultural land. Paragraphs 14.9 through to 14.11 looking at wind energy generation and setting out the strategy and appropriate locations. 14.10 and 14.11 set out specific impacts for wind farm development that should be assessed. The final 3 paragraphs set out how considerations will be balanced and how the policy helps to provide sustainable development that will support the transition to a low carbon future.
- 1.17 Clause 1 of the policy sets out 3 types of development where development will be supported where impacts are considered to be acceptable when weighed against the benefits.
- 1) Large-scale renewable and low carbon energy development,
  - 2) development for the transmission and interconnection of electricity,
  - 3) infrastructure required to support such development.

It goes on to set out the 7 key impacts in a-g that should be considered.

- 1.18 Clause 2 of the policy supports wind energy developments where they follow the strategy and are located in the appropriate areas, again subject to the abovementioned criteria.
- 1.19 Clause 3 of the policy recognises the importance and sensitivity of the Wolds Area of Outstanding Natural Beauty. It only supports development in exceptional circumstances and provides 3 subclauses to moderate the impacts.
- 1.20 Clause 4 (incorrectly numbered as 3) sets a presumption that connecting cables will be placed underground or make use of existing or replacement infrastructure along existing routes.
- 1.21 Clause 5 (incorrectly numbered as 4) gives support to small scale and micro renewable energy development, providing it is properly weighed against the impacts.

**Strategic Policy 27 (SP27) – Renewable and Low Carbon Energy**

**1. Large-scale renewable and low carbon energy development, development for the transmission and interconnection of electricity, and infrastructure required to support such development, will be supported where their individual or cumulative impact is, when weighed against the benefits, considered to be acceptable in relation to:**

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- a) residential amenity;**
- b) surrounding landscape, townscape and historic landscape character, and visual qualities;**
- c) the significance (including the setting) of a historic garden, park, battlefield, building, conservation area, archaeological site or other heritage asset;**
- d) sites or features of biodiversity or geodiversity importance, or protected species;**
- e) the local economy;**
- f) highway safety; and**
- g) water environment and water quality**

**2. Wind energy developments will be supported in the areas shown on the policies map, provided where their individual or cumulative impact is, when weighed against the benefits, considered to be acceptable in relation to the criteria a) to g) set out at Clause 1 above.**

**3. Development within or affecting the setting of the Lincolnshire Wolds Area of Outstanding Natural Beauty, and landscape areas defined as highly sensitive within the East Lindsey Landscape Character Assessment, will only be permitted in exceptional circumstances, where the development is in the public interest and considering the following:**

**a) The need for the development, including any national considerations, and the impact of permitting it, or refusing it, upon the local economy; and**

**b) the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and**

**c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be satisfactorily moderated.**

**3. The presumption will be for connecting cables to be placed underground, or use made of existing or replacement infrastructure (of the same size and scale) along existing routes to carry any additional base load cabling.**

**4. Small scale and micro renewable energy development will be supported where their individual or cumulative impact, when weighed against the benefits, is not considered to have an unacceptable impact on residential amenity; the context and setting of any areas of cultural**

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**or historic importance or heritage assets; and local landscape character and visual qualities.**

- 1.22 **Strategic Policy 28** of the Local Plan covers Infrastructure and is shown below. The policy is also combined with S106 Obligations. The supporting text includes general references to various different kinds of infrastructure that is required to aid future sustainability and sets the strategic picture for delivering such development.
- 1.23 Paragraph 15.5 sets out that significant adverse impacts from new infrastructure schemes will be avoided. It goes on to say that impact assessments will be required to look at alternative options, and sets out that major infrastructure schemes include proposals for the transmission of resources across the District such as gas, electricity, telecoms and highways.
- 1.24 Paragraph 15.14 briefly references Electricity distribution and sets out that the providers have not identified any significant issues with delivery in the future.
- 1.25 It can be seen that clause 1 of the policy opens with a supportive statement but with a number of caveats to consider. The policy goes on in Clause 2 to require developments to assess and minimise

impacts. Clause 3 is a general statement of support where there is a specific benefit to local communities. Clauses 4 and 5 look more generally at contributions and capacity.

### **Strategic Policy 28 (SP28) – Infrastructure and S106 Obligations**

**1. Infrastructure schemes will be supported provided they are essential in the national interest; contribute to sustainable development, and respect the distinctive character of the district.**

**2. Infrastructure schemes should be accompanied by an impact assessment that shows how the proposal impacts on the landscape or local setting of the area, including individual and cumulative effects. It should identify what steps have been taken to minimize its effects and the alternative options that have been considered.**

**3. The Council will support the delivery of infrastructure where it contributes to sustaining local communities.**

**4. Developer contributions on major schemes (10 or more dwellings or major other development) will be sought towards the delivery of infrastructure where it is shown to be necessary for the development to proceed.**

**5. The Council will only support proposals for development where it has been shown that adequate capacity is available, or can be provided by the utility providers to meet the additional loads associated with serving the development.**

- 1.26 As with the comment about the NPPF, the Local Plan must be read as a whole, and thus whilst a snapshot of the energy policy is given above, there are other policies that are likely to be relevant in the determination of any proposal.
- 1.27 **The level of review for strategic policies 27 and 28**
- 1.28 Officers consider that the approach set out within the Local Plan policies provides the components of a supportive environment for all infrastructure provision, providing its impacts can be mitigated. This would indicate that the Local Plan is still in line with National Policy and could be considered up-to-date for decision making purposes.
- 1.29 Strategic Policy 27 covers Renewable and Low Carbon Energy Generation. It sets out support for such technologies and provides a strategy for the delivery of wind energy development, whilst ensuring that the District's key features and assets are protected. This is broadly in line with paragraph 158 of the NPPF.
- 1.30 Strategic Policy 28 of the Local Plan covers Infrastructure. It opens with a supportive statement but with a number of caveats to consider. Clause 2 goes on to require developments to assess and minimise impacts. This is broadly in line with paragraphs 20 and 160 of the NPPF.

## 2.0 Nationally Significant Infrastructure Projects (NSIP)

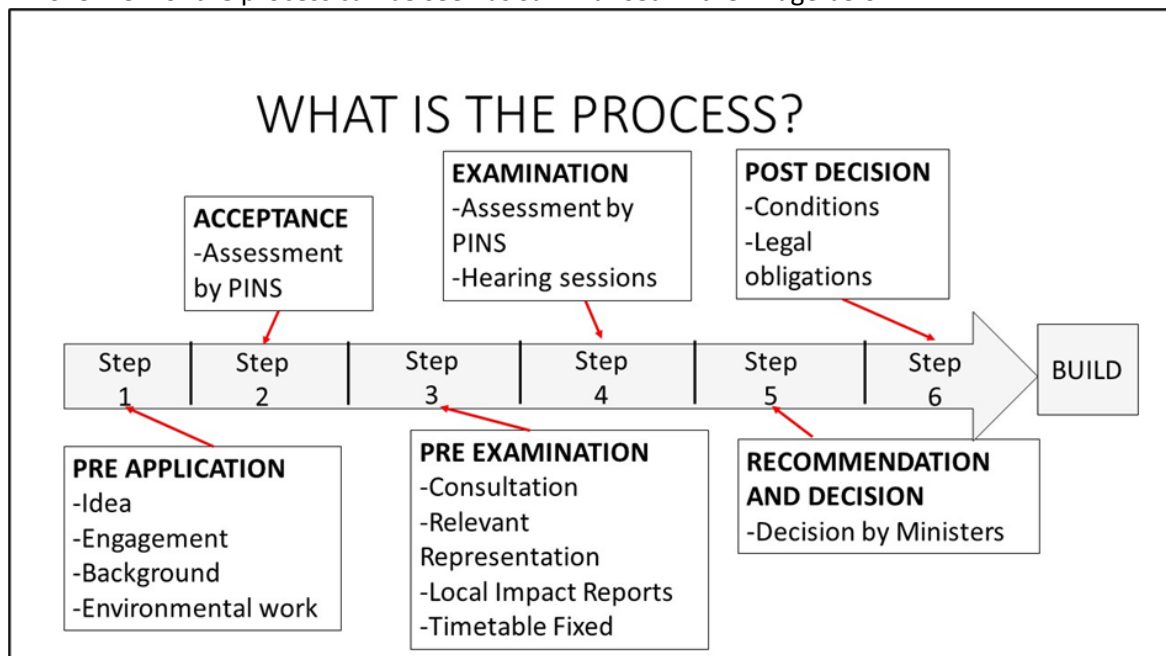
2.1 The following sections provide Members with a high-level overview of the NSIP process, and how the Council responds to such proposals. Across the Partnership there is an array of experience of such projects, including where proposals are located within the Partnership area, and those which are not but where the Council is engaged as part of the process.

2.2 NSIPs result from the Town & Country Planning Act 2008, with the aim of creating a streamlined, simplified and consolidated consenting process for larger schemes – they can also include land acquisition and other consents. Resulting permissions are granted by the Secretary of State as a Development Consent Order (DCO) following examination by the Planning Inspectorate (PINS - Examining Authority).

2.3 The Council, as Local Planning Authority, is a statutory consultee in the process, as is Lincolnshire County Council. Any comments we make must be taken account of by the decision-maker, as must any other comments made by statutory/non-statutory bodies and the public. The Council may also be notified about projects located within other Districts but where it is considered there may be a direct or in-direct impact from the proposal. As such, the level of involvement can vary from a “no comment”/no participation approach, through to being a key party within the Examination process.

### 2.4 What is the process?

2.5 An overview of the process can be seen as summarised in the image below:



2.6 The process is intended to be front loaded, with developers required to undertake pre-application engagement and consultation. This can mean projects are talked about or discussed for at least a year before formal submission and in some cases, this can be numerous years. At this stage, proposals may be typically discussed on a ‘commercially sensitive’/confidential basis, until such time as the developer commences more widespread consultation and engagement.

- 2.7 Throughout the pre-application state it is common for “non-statutory” consultation to be undertaken in advance of statutory consultation. This is an early engagement stage and there is no requirement for Councils to respond, albeit these are the earliest opportunity to provide comments. This is intended to identify issues early and enable opportunity for the developer to seek to respond to issues in advance. Often at this stage, there will only be a minimal level of information available, as further technical work is ongoing. Often the developer will host a website and use other means of enabling all parties’ various ways to respond. At this stage, typically the level of consultation and engagement will be widespread, as the precise location and detail of proposals are unknown – for example ‘corridors’ or ‘search areas’ may be used as part of the consultation which are then narrowed down and refined as the proposals develop and are shaped.
- 2.8 If the proposals progress, they may then move into a formal consultation stage. This is a statutory requirement. This is often accompanied by receipt of more technical information, including a Preliminary Environmental Issues Report (PEIR). This is often when the first technical documents are shared widely for comment.
- 2.9 Following the above consultation, the developer may formally submit to PINS. Once the application has been submitted, PINS will review and if accepted PINS will undertake further consultation on the scheme where it will seek the views of the Council as Local Planning Authority. At this stage, the detail of the scheme and its impacts will be clearer, and often an array of technical reports are placed in the public domain. At this stage, any party may make a Relevant Representation and register as an Interested Party. This stage usually takes at least 3months from acceptance.
- 2.10 From this point on, PINS set a very strict process with various timescales which must be met. They may undertake various requests for more information, clarifications, or views from interested parties, the Council(s) and other consultees as well as the Applicant.
- 2.11 More detail on the process, and emerging documents in relation to projects registered with PINS can be found on the PINS website<sup>7</sup>. As set out earlier, the above website also provides an interactive map which shows projects which PINS are aware of which have been agreed can come forward through the NSIP process.
- 2.12 It should also be noted that it is possible for projects to request that they are considered by PINS as an NSIP, even where they fall below the established thresholds. Reasons for such requests include projects that cross multiple local authority boundaries or ones that require multiple consents. Often, they will see the support of the Council for this approach at an early stage. In most cases this is considered reasonable as it allows proposals to be considered on a more coordinated basis, as opposed to each authority reaching its own decision which can often cause more complexity and result in time, cost and burden to all parties including the Council.
- 2.13 How can Members engage in the process?**

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<sup>7</sup> <https://infrastructure.planninginspectorate.gov.uk/application-process/the-process/>



- 2.14 Members can make comments at the pre-application stage and acceptance stage directly to the Developer and/or PINS. At the earlier stages in the process (particularly the non-statutory consultation stage), it is easier to make more wide-ranging comments as this is prior to detail and specific impacts being set out more fully.
- 2.15 Comments on particular proposals can be ‘passported’ as part of any formal response from the Council (as Local Planning Authority). Such comments can be made via the Portfolio Holder.
- 2.16 However, the Council’s response must be guided and influenced by the usual planning remit – i.e., established planning policy, material considerations, and with regard to the evidence presented. Therefore, comments will often be more refined or focused, particularly as the proposals progress through the process<sup>8</sup>
- 2.17 It must however be remembered that there can often be numerous stages of consultation and engagement, particularly at pre-application stage where the Developer may undertake multiple rounds depending on how the proposals are revised and refined and following outcomes from background technical work.
- 2.18 It should also be noted that the Council does not host the relevant information on its website. At non-statutory stage, this will be done by the developer. From the statutory stage, this will be done via PINS and often by the developer as well.
- 2.19 How are responses to formal consultations made by ELDC?**
- 2.20 Responses to formal consultations are an Executive function, which is Delegated to the Assistant Director – Planning to return on behalf of the Council. A Planning Officer is assigned to the project, and will undertake a review of the available information, and relevant planning policies. They will then compile a response on behalf of the Council (as Local Planning Authority) which is reviewed prior to being issued. This will typically include specific references to key policies or requirements of our Local Plan, as well as local supporting evidence.
- 2.21 This is much in the same way as comments are made on proposals that fall outside the Councils usual planning remit – such as comments on Minerals & Waste proposals which are handled by LCC and where the Council is only a consultee. Where necessary, Planning Officers may bring in additional technical expertise to support the process and enable informed comments to be made. On projects such as this it is not uncommon to enter a Planning Performance Agreement (PPA) with the Applicant/Developer to secure contributions towards appropriate resourcing, so that the Council is not left carrying this burden. Noting specifically that the Council receives no formal fee for an NSIP proposal.
- 2.22 If Members wish to relay comments, they can do so via the Portfolio Holder, or the Planning Officer. Where they may be summarised or attached as necessary. Members must however be aware that

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<sup>8</sup> <https://infrastructure.planninginspectorate.gov.uk/application-process/participating-in-the-process/>

we are required to have regard to the relevant policies, evidence and considerations. If Members wish to make wider statements on behalf of communities or groups, they are encouraged to do so via the wider, direct to the Developer or PINS process which is open to all. This is important as it enables the Developer to understand specific issues and attempt to work with those groups/individuals to try and find solutions or at least better understand and comment on the issues raised.

- 2.23 For example, on the Boston Alternative Energy Facility, the project team spent considerable time working with the local fisherman and river users to allay their concerns and ensure that the submission contained sufficient information for the Examiner to make an informed judgement on issues pertaining to river use.
- 2.24 As the process moves forward, Planning Officers prepare various documents as required by the process including Review of Consultation, Local Impact Reports, Statements of Common Ground, and will also discuss particular issues and requirements of the draft DCO and any S106 elements.
- 2.25 To engage in this process, a ‘fleet of foot’ approach is required as often there is a need to respond to queries raised by PINS or to additional information provided by the Developer within short timescales – this is particularly relevant once the Hearing sessions commence as part of the formal Examination. As set out earlier, the timescales and procedures are very strict and set by PINS, and thus the Council has no control.<sup>9</sup>

## **CONCLUSION**

- 3.0 Members are advised to note the policy position set out, and the high-level approach to NSIPs as set out in the above report.

## **EXPECTED BENEFITS TO THE PARTNERSHIP**

N/A

## **IMPLICATIONS**

### **SOUTH AND EAST LINCOLNSHIRE COUNCIL’S PARTNERSHIP**

*The report sets out the policy position only. There are no direct implications arising from this report.*

## **CORPORATE PRIORITIES**

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<sup>9</sup> <https://infrastructure.planninginspectorate.gov.uk/legislation-and-advice/advice-notes/advice-note-two-the-role-of-local-authorities-in-the-development-consent-process/#1>



*none*

**STAFFING**

*none*

**CONSTITUTIONAL AND LEGAL IMPLICATIONS**

*none*

**DATA PROTECTION**

*none*

**FINANCIAL**

*none*

**RISK MANAGEMENT**

*Any relevant risks have been highlighted and addressed in the above report. No outstanding unmanaged risks remain.*

**STAKEHOLDER / CONSULTATION / TIMESCALES**

*None prior to Committee*

**REPUTATION**

*none*

**CONTRACTS**

*none*

**CRIME AND DISORDER**

*none*

**EQUALITY AND DIVERSITY/ HUMAN RIGHTS/ SAFEGUARDING**

*none*

**HEALTH AND WELL BEING**

*none*

**CLIMATE CHANGE AND ENVIRONMENTAL IMPLICATIONS**

*none directly arising from this report*

**ACRONYMS**

None

<b>APPENDICES</b> <i>(If none then insert the word 'None' and delete the below text/boxes).</i> Appendices are listed below and attached to the back of the report: -	
None	

<b>BACKGROUND PAPERS</b> <i>(If none then insert the wording 'No background papers as defined in Section 100D of the Local Government Act 1972 were used in the production of this report.' Also delete the below text/boxes.)</i> Background papers used in the production of this report are listed below: -	
<b>Document title</b>	<b>Where the document can be viewed</b>
<i>No background papers as defined in Section 100D of the Local Government Act 1972 were used in the production of this report.</i>	

<b>CHRONOLOGICAL HISTORY OF THIS REPORT</b>	
None	
<b>Name of body</b>	<b>Date</b>

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