

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

Email: laura.allen@e-lindsey.gov.uk

Website: www.e-lindsey.gov.uk

Date: Wednesday, 19 February 2025

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, 27th February, 2025** 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), Alex Hall, Daniel McNally, Paul Rickett and Terry Taylor

Independent Group

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

Labour

Councillors Roger Dawson and David Hall

Skegness Urban District Society (SUDS)

Councillor Mark Dannatt

PLANNING POLICY COMMITTEE AGENDA
Thursday, 27 February 2025

Item	Subject	Page No.
1.	<u>APOLOGIES FOR ABSENCE:</u>	
2.	<u>DISCLOSURE OF INTERESTS (IF ANY):</u>	
3.	<u>MINUTES:</u> To confirm the Minutes of the Meeting held on 17 th October 2024.	1 - 20
4.	<u>ACTIONS:</u> Actions from the previous Meeting(s).	21 - 24
5.	<u>GOVERNMENT REFORM OF THE PLANNING SYSTEM:</u> To receive a report from the Assistant Director, Planning and Strategic Infrastructure.	25 - 36
6.	<u>DATE OF NEXT MEETING:</u> The programmed date for the next Meeting of this Committee will be 27 th March 2025.	

Minutes of a Meeting of the Planning Policy Committee held in the Hub, Mareham Road, Horncastle, Lincolnshire LN9 6PH on Thursday, 17th October, 2024 at 6.00pm.

PRESENT

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

Councillors Mark Dannatt, Roger Dawson, David Hall, Daniel McNally, Paul Rickett, Daniel Simpson, Terry Taylor and Ruchira Yarsley

Councillor Ruchira Yarsley attended the Meeting as a Substitute.

Councillors Craig Leyland and Robert Watson attended the Meeting as Observers.

OFFICERS IN ATTENDANCE:

Phil Norman	- Assistant Director – Planning and Strategic Infrastructure
Greg Macrdechian	- Interim Local Plan Lead
Pranali Parikh	- Director Economic Development
Paul Jackson	- Executive Programme Manager
Elaine Speed	- Senior Democratic Services Officer and Civic Officer
Lynda Eastwood	- Democratic Services Officer

OTHER ATTENDEES:

Deborah Higton - The Environment Agency

10. APOLOGIES FOR ABSENCE:

The Chairman welcomed Councillor Craig Leyland and Greg Macrdechian, Interim Local Plan Lead, to the Meeting.

Apologies were received from Councillor Alex Hall.

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 Ruchira Yarsley had been appointed to the Committee in place of Councillor Travis Hesketh for this Meeting only.

11. DISCLOSURE OF INTERESTS (IF ANY):

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

12. MINUTES:

The Minutes of the Meeting held on 12 September 2024 were agreed as a correct record.

13. ACTIONS:

It was agreed that the Actions would be deferred to the next Committee Meeting.

14. PRESENTATION BY THE ENVIRONMENT AGENCY ON THE STATE OF THE COASTAL DEFENCES:

Deborah Higon, Lincolnshire Coast Flood Risk Manager at the Environment Agency (EA) presented Members with an update and presentation on the state of coastal defences.

A copy of the presentation is attached at Appendix A to the Minutes

Following which, Members were invited to put their comments and questions forward.

In response to a query relating to Zone B where the hard defences were located, Deborah Higon advised Members they were based from Mablethorpe to Skegness. Members were further advised that some areas in between Mablethorpe and Skegness were missing the concrete structures, however these areas had a more natural system with some form of hard engineering underneath.

Following a query with regards to the 20,000 properties protected by the hard defences and the grant in aid funding, Deborah Higon confirmed that only the properties that existed prior to 2012 and at the cut-off date were counted. New properties did not generate a grant in aid funding as they would not be at risk of flooding.

A query was raised on whether the coastal defence work may stop due to it being one of the biggest carbon emitters and also whether carbon reduction was classed as being more important than coastal defence work. Deborah Higon responded that it was not a reason for them not to continue with coastal defence work and they would look at ways to mitigate this.

A Member queried whether there was a planting regime in place along the coast to enable the natural defences and whether the EA was proactive in such schemes.

Deborah Higon informed Members that the EA was carrying out planting and highlighted that one of the best natural defences was the intertidal area as when built up with vegetation, would catch the sand and grow the beaches which was a great form of flood defence. Members were also informed that the EA was looking at changing the design profile of the beach.

A Member queried whether there was any work being carried out on The Wash barrier. Deborah Higton advised Members that the EA did not have much information on The Wash barrier and that it would be down to the developer to demonstrate that they were mitigating any impacts when putting any infrastructure into the tidal area.

Details relating to development in the Humber Estuary and what the long-term implications were was also discussed, with Members being informed that the EA was working closely with the Humber Strategy to demonstrate the impact of the mitigation.

Further to a comment made relating to the marram grass on Cleethorpes beach close to the leisure centre, Members were informed that this was a wide, shallow intertidal area which allowed the building-up of marram grass and salt marsh, providing a good way of managing flood risk.

A request was made for Deborah Higton to present to the Lindsey Marsh Drainage Board, to which she responded she would be happy to do.

At the indulgence of the Chairman, Councillor Craig Leyland queried why the agricultural land was not valued in the same way as developed land when it came to the grant in aid funding as this caused a structural disadvantage in Lincolnshire.

Deborah Higton advised that there was a difference in the rate of funding that the EA received and that it measured the outcomes. One of the measures was that properties were better protected instead of homes being protected which had attracted a greater rate of funding compared to the lower rate for agricultural land. It was something being seen across all rural areas in the country. The level of flood risk was also being looked at as many properties were at a significant risk which changed the amount of grant in aid funding along with the higher the level of deprivation.

Following a query with regards to whether tourism received any grant in aid, Deborah Higton advised that tourism was counted in to the economics but did not attract the same amount of funding as properties. Members were further advised that static caravans were not included in the property count as they could be relocated.

In relation to the 2012 cut-off for grant in aid, a Member queried whether the cut-off date applied to all categories. Deborah Higton responded that she understood it was just for properties rather than infrastructure but would check and report back.

A Member further commented that there was a big gap in the funding that was received contrary to funding what was needed in order to keep the North Sea where it was.

Further to a query on inland flood cells and whether the Lincolnshire coast operated as a single flood cell, Deborah Higton advised Members that the

Lincolnshire coast operated as a single flood cell and there were slight changes to the topography due to the area being so flat.

A Member queried whether wind turbines had created sandbanks of their own. Deborah Higton responded that the EA had not noticed any changes on the ground, but they were looking at more bathymetric data and trying to better understand the impact of changes in weather and what that might mean for the amount of erosion, sand losses and sand movement.

Following a question relating to S106s and whether sand could be brought in to where wind turbines were located, the Assistant Director – Planning & Strategic Infrastructure advised that they would have to look at the details in each case as they came in.

A Member further queried whether structures built out of natural rock on the seafront would reduce corrosion and be more cost effective. Deborah Higton advised that there was already natural rock on the seafront, buried under the sand, and that sand was the most cost-effective method. Members were informed that the EA would always look at alternative materials.

At the indulgence of the Chairman, Councillor Robert Watson commented that marram grass planting worked well and queried whether it would be considered to plant it continuously along the coast to help control the sand blowing on to the promenade, especially in Sutton on Sea. A query was also raised with regards to planting other species of plants to enhance the planting regime.

Deborah Higton replied that they would consider those suggestions during the upcoming planting scheme.

At the indulgence of the Chairman, Councillor Robert Watson further queried whether controlled structures were still a possibility to reduce sand loss. Deborah Higton explained that there was an issue with the defences at the rear of beach. The plan was to build on top of those concrete defences, however if that was not possible, the controlled structures would only be of benefit up until 2040. After that time, it would then be necessary to come up with an alternative plan to replace the hard defences.

Councillor Robert Watson further queried whether there were plans in place for any emergency renourishment in areas where storms had wiped out the sand.

Deborah Higton advised that there was a new beach strategy, and the EA were looking at the contingency plans for it. Sand recycling had also been considered. Furthermore, there was a working group looking at the trigger points and working with the local resilience forum around 'warning and informing' and encouraging people to sign up for flood warnings.

A Member commented that there was a need for the younger generation to be educated on coastal flooding.

Deborah Higton agreed with the comment and informed Members that her EA colleagues were working with the public, helping them with flood plans and attending public events. They had also attempted to go in to schools, however there was not a great take-up. Reference was made to the successful Hello Lamp Post scheme. Members were advised that posters had been put on lamp posts and included a QR code for people to scan to gain and share knowledge about the coast.

Further to a query on how closely the EA worked with ELDC on the production of the Local Plan, Deborah Higton informed Members that the EA had worked very closely with ELDC in the past and having already started conversations around the best way to engage, was intending to continue with that. The Assistant Director – Planning and Strategic Infrastructure agreed and advised Members that he would come back to the Committee to explain the next steps.

A Member queried how funds would be raised if they could not be raised by the partners.

Deborah Higton advised Members that £800m would be raised in grant in aid across 100 years. However, this would not be sufficient. Therefore, a partnership including District Council, County Council and the drainage boards would need to be developed in order to look at other opportunities.

Following a query with regards to how much farmland across East Lindsey was flooded at the beginning of 2024, Deborah Higton replied that this information had been mapped and would find out the figures.

N.B. Councillor Daniel McNally left the Meeting at 7:04pm.

At the indulgence of the Chairman, Councillor Craig Leyland raised a concern with regards to the funding and education for raising awareness of how serious the coastal flooding was for East Lindsey and the need to make this argument with the Government.

A discussion ensued relating to whether caravans on the coast could be replaced by housing, in order to secure more funding. A Member stated that the housing would be in a flood risk area and would not obtain planning permission, unless submitted with mitigation which would be very expensive and was a scenario that developers were keen to avoid.

N.B. Councillor Craig Leyland left the Meeting at 7:09pm and returned at 7:10pm.

Following a query on when the Strategic Flood Risk Assessment Phase 1 Report would be available to ELDC, the Assistant Director – Planning and Strategic Infrastructure advised that it was still expected, however could not provide a firm date.

In summing up, the Chairman reiterated the main issues and thanked Deborah Higton for her presentation.

15. DISCUSSION REGARDING AGENDA ITEMS AND FORMAT FOR FUTURE MEETINGS:

N.B. Councillor Terry Aldridge left the Meeting at 7:14pm and returned at 7:15pm.

N.B. Councillor Craig Leyland left the Meeting at 7:14pm.

The Chairman addressed Members with regards to the format for future meetings and the potential for holding a briefing or workshop instead of cancelling the scheduled Meeting when there was no substantive business.

A Member commented that historically, Members had relied on being presented with an Agenda instead of them being able to suggest items for the meeting.

A Member further commented that there were several subjects that would be useful to the Committee including Section 106 Agreements, renewable energy (covering the allocation of land areas), Members involvement in the decision-making of Tree Preservation Orders and an opportunity to revisit settlement scores. The Chairman commented that he was keen for the above items to be heard.

Following a request for an update on whether non-planning policy members would be able to attend the committee meetings, the Chairman confirmed he was agreeable with the request and would allow non-members, at his discretion, to join in the Meeting and discussions.

Members were advised that public meetings with a lack of substantive business would be cancelled and replaced with discussion sessions.

N.B. Councillor Paul Rickett left the Meeting at 7:24pm and returned at 7:26pm.

N.B. Councillor Craig Leyland returned to the Meeting at 7:27pm.

A discussion ensued with Members querying whether there was a place for an informal opportunity to meet and talk outside of the committee meetings, for example over Microsoft Teams. After a brief discussion, there were some reservations with regards to that suggestion.

A Member commented that the Planning Policy meetings needed to be transparent and that members of the public should be encouraged to attend.

Further suggestions were received including the opportunity of Planning Committee members to attend the meetings and to include the briefings as part of the Reserved Member Days.

A Member further commented that there was a lack of attendance at Planning Policy meetings by members of the public due to them being dis-engaged and highlighted that work was also needed to re-engage parish councils.

No further comments or questions were received.

The meeting closed at 7.35pm.

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Lincolnshire Coast

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Name: Deborah Higon

Job title: Lincolnshire Coast Flood Risk Manager

Date: 17th October 2024

Strategic approaches

- Third of Lincolnshire is below sea level
- 300km of raised defences for the coast and tidal rivers
- Climate change and ageing assets versus
- Growth and regeneration – the lowland area is part of the UK Food Valley



Lincolnshire Open Coast

At Risk

20,000

Properties Protected

25,000

Static Caravans Protected

35,000

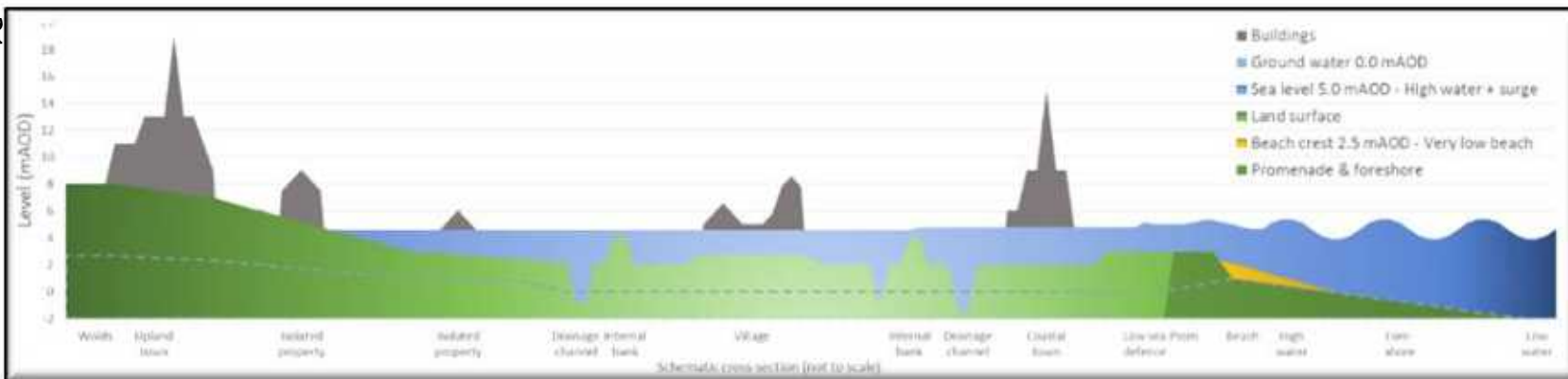
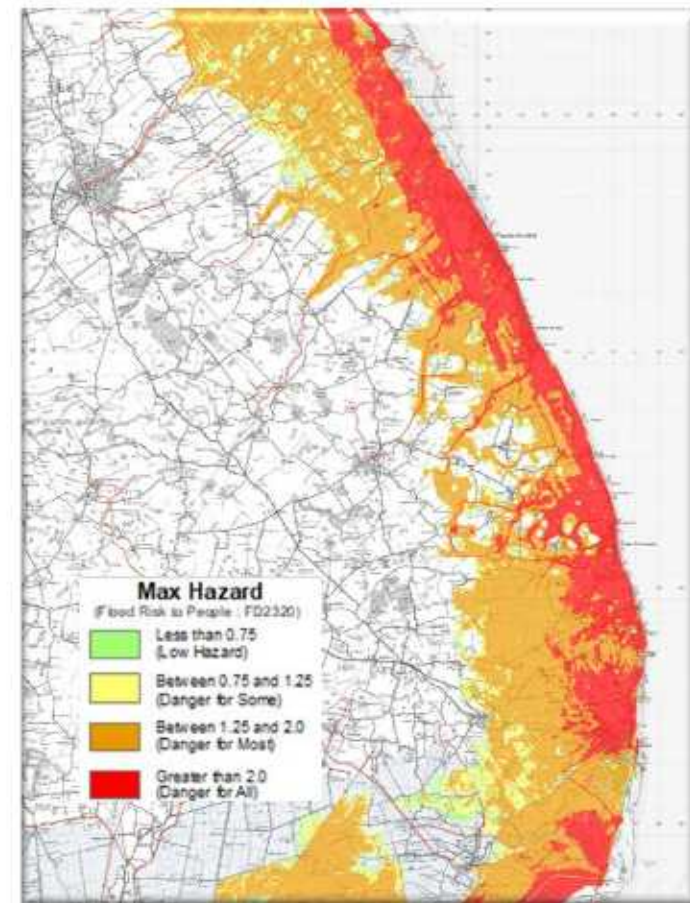
Prime Agricultural Land Protected with various environmental assets



Shoreline Management Plan

	Policy Unit N South of Humberston Fitties to Theddlethorpe	Policy Unit O Viking Gas Terminal (Mablethorpe) to Southern End of Skegness	Policy Unit P Seacroft to Gibraltar Point
0-20yrs (2005-2025)	Hold the Line Maintain/Replace	Hold the Line Maintain/Replace	Hold the Line Local activity only
20-50 yrs (2025-2055)	Hold the Line Maintain/Replace	Hold the Line Maintain/Replace	Hold the Line Maintain/Replace
50-100yrs (2055-2105)	Hold the Line Maintain/Replace	Pending Agreement Pending Agreement	Hold the Line Local activity only

Coastal inundation
on at least **14 days**
every month
(266 tides (2018))



Benefits

Community and economy reliant on the flood defence

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Properties



Commercial Properties



Static Caravans
£700m tourism industry



Prime Agricultural Land with
various environmental assets



Approved Strategy 2019

Preferred Option – Hold The Line

- Dune systems in Zones A & C will provide 0.5% SoP for 100 year lifetime of strategy
- The 'hard defences' that make up 55% of Zone B frontage will form part of the 100 year solution
- Control structures to reduce sand losses plus raising of hard defences in 2070 to keep pace with rising sea levels in Zone B.
- Carbon reduction (2,100,000T BAU to 850,000T)
- Approved strategy £800m

Progress to date:

- Approved beach management for 2021-2024
- Approved project to complete business case for transformation project (£17m)
- **Residual Life Assessment to validate asset condition assumptions in Strategy**



Residual Life Assessment

Study undertaken to provide:

- an estimated residual life of the sea defences in Zones A, B and C
- analysis to help plan future works as part of the Saltfleet to Gibraltar Point Strategy

• Four key criteria in **Zone B** to the assessing the overall residual life of structural elements :

- Geotechnical stability
- Overtopping
- Structural condition
- Undermining of structure
- **9 locations** identified to gain and indicative understanding of likely condition of the structures



Why have things changed? Residual Life

Initial engineering assessment (£2.2m) has told us:

- Wave walls have corroded the reinforcement with an estimated residual life of less than 5 years if exposed to direct wave action
- Structures at high risk of chloride induced corrosion.
- The beach is critical to prolonging the residual life of the concrete defences.
- Majority of assets are expected to provide current Standard of Protection until the end of useful life (16-20 years) providing:
 - The beach profile is retained
 - The asset maintenance regime is enhanced
- 44% Dune frontage- currently providing a high level of protection **but** dynamic and should continue to be monitored.



Impact on current strategy

The beach is everything

- Non-abortive investment in concrete assets to sustain standard of service to 2040
- Existing assets unlikely to form part of the long term solution after 2040

A review of strategic options that don't rely on the existing assets needs to be undertaken



Saltfleet to Gibraltar Point Strategy Approval (2019)

Beach Management (BAU 2021-2024)

- Nourish beaches to design profile to deliver standard of service.

Approved F/2021/0281

Possible extension to 2025/2026 or 2026/2027 for CAM development

Coast Asset Management (Sustain 2025-2039)

- Nourish beaches to design profile to deliver standard of service.
- Contract to establish delivery vehicle for
 - Incident management
 - Beach management
 - Asset Management

SOC

OBC

FBC

Defra Investment Committee

Lincs Coast 2100 +
(formally Enhancing Lincs Coast)
(Transformation 2040-2120)

- Validate preferred option
 - Asset investigations
 - Revise costs
 - Revise benefits
 - Geomorphological study
- Review Strategic options in light of validation evidence

SOC BCUR assurance for F/2021/0432

OBC

FBC



Key messages

- The beach is critical to prolonging the residual life of the hard defences.
- We need to review the Lincolnshire Coast Strategy options
- Our timeline horizon for transformation has changed from 50-100yr to 25-50yr and may look significantly different
- This change to the investment profile means we may be faced with a shortfall in Flood and Coastal Erosion Risk Management Grant in Aid funding
- Any revised strategic options will need to be developed in partnership due to the potential extent of change

3 options

- Deliver within GiA availability
- Do something different
- **Alternative investment with partners**

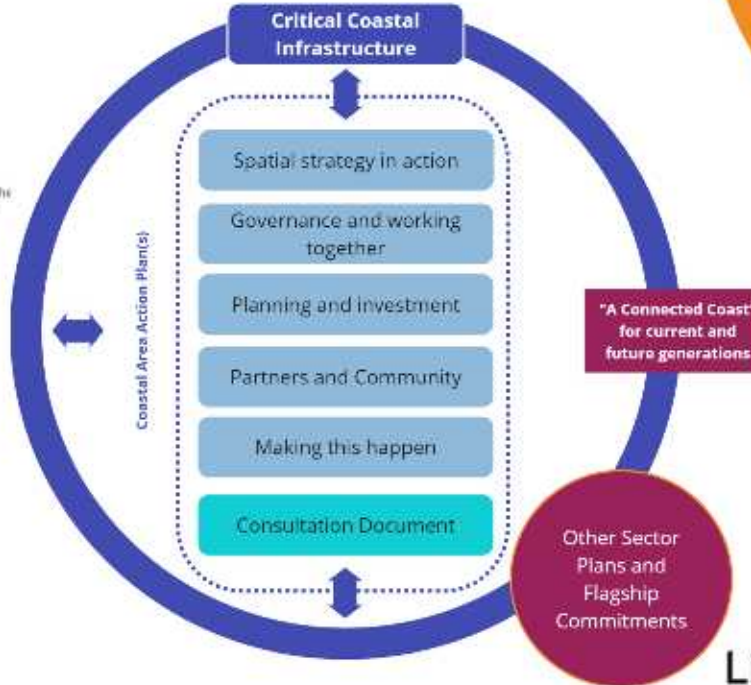
Lincs Coast 2100+ Main Workstreams

Coastal Vision/Mission

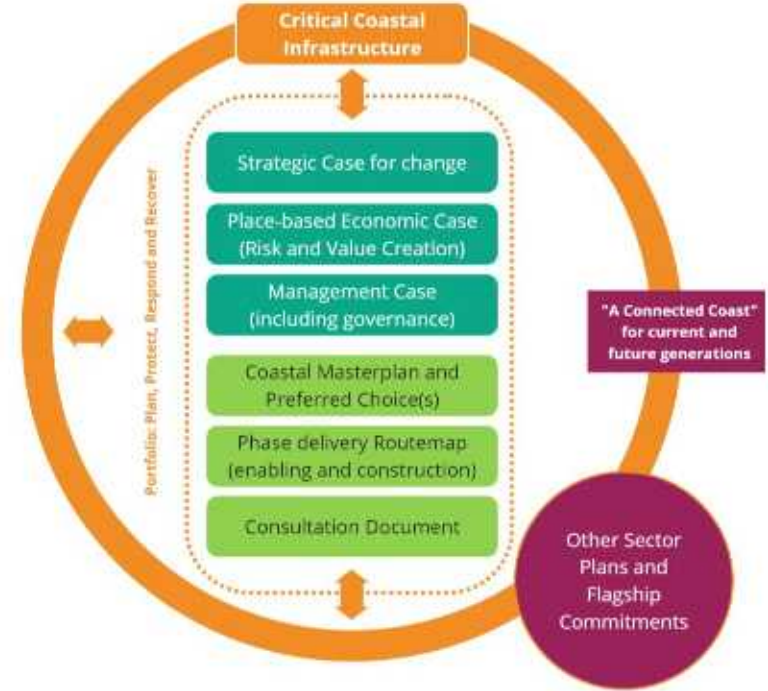


Indicative relationship between the SDF 2023 and the Coastal Vision

Area Action Plan



Investment Plan



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**ACTIONS FROM THE PLANNING POLICY COMMITTEE MEETING
HELD ON THURSDAY 17 OCTOBER 2024**

MIN NO:	ITEM:	ACTIONED BY:
14.	PRESENTATION BY THE ENVIRONMENT AGENCY ON THE STATE OF THE COASTAL DEFENCES:	
*	A request for the 'State of the Coastal Defences' presentation to be given to Lindsey Marsh Drainage Board.	<i>DEBORAH HIGTON/PHIL NORMAN</i>
*	In reference to the categories included in the Grant in Aid funding cut-off date, clarification to be provided on whether it applied to all categories or just properties.	<i>DEBORAH HIGTON</i>
*	Figures to be provided on how much farmland had flooded since the beginning of 2024.	<i>DEBORAH HIGTON</i>

**ACTIONS FROM THE PLANNING POLICY COMMITTEE MEETING
HELD ON THURSDAY 12 SEPTEMBER 2024**

MIN NO:	ITEM:	ACTIONED BY:
7.	REVISED NATIONAL PLANNING POLICY FRAMEWORK CONSULTATION (JULY-SEPT 2024):	
✓	<p>In reference to the settlement hierarchy, copies of background papers highlighting the process for how the hierarchy was agreed to be provided to Members.</p> <p>UPDATE: February 2025: The report on the "Settlement Hierarchy" was discussed in detail at the Planning Policy Committee in September 2023. See the link to review the report and Appendices.</p> <p>Housing Distribution Paper 14th Sept 2023 https://democracy.e-lindsey.gov.uk/documents/s70255/Housing%20Distribution%20-%2020230914.pdf</p> <p>Appendix A https://democracy.e-lindsey.gov.uk/documents/s70231/Copy%20of%20Appendix%20A%20Settlement%20Scoring%20Spreadsheet%20-%20Current%20230914.pdf</p> <p>Appendix B https://democracy.e-lindsey.gov.uk/documents/s70229/Copy%20of%20Appendix%20B%20Settlement%20Scoring%20Spr</p>	<i>ISMAIL MOHAMMED</i>

	eadsheet%20-%20New%20Transposed%20230914.pdf Appendix C https://democracy.e-lindsey.gov.uk/documents/s70232/Copy%20of%20Appendix%20C%20Settlement%20Scoring%20Spreadsheet%20-%20New%20Blank%20230914.pdf COMPLETE	
8.	EAST LINDSEY LOCAL PLAN UPDATE:	
✓	<p>In reference to the 61 representations received in the Issues and Options Consultation in Spring 2021, a list of the parish councils which had responded to be provided to Members, page 23 of the Agenda refers.</p> <p>UPDATE February 2025: The Outcome of the Issues and Options Consultation was discussed at the Planning Policy Committee in July 2021. See the link to review the report and Appendices.</p> <p>Issue and Options Consultation Feedback Report 22nd July 2021 https://democracy.e-lindsey.gov.uk/documents/s63641/Issues%20and%20Options%20Report%20210722.pdf</p> <p>COMPLETE</p>	<i>ISMAIL MOHAMMED</i>
*	A copy of the policy tracker, or the list of the policies included for future revision to be provided to Members.	<i>ISMAIL MOHAMMED/ PHIL NORMAN</i>

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

MIN NO:	ITEM:	ACTIONED BY:
31.	AUTHORITY MONITORING REPORT 2022-23	
✓	<p>(a) With reference to Table 15 'Industrial Estate and Business Park vacancy rates (surveyed Q2 - 2023)', page 27 of the Agenda refers regarding a query on the significant difference in the total and vacant figures for Louth between 2019 and 2020 and also those for North Somercotes.</p> <p>The Planning Policy and Research Service Manager to provide some clarification on the figures for the next meeting.</p>	<i>ISMAIL MOHAMMED</i>

	<p><u>Update April 2024:</u> This is in hand and an update will be given at a future Policy Committee meeting.</p> <p>UPDATE February 2025: Detailed assessment and review of the monitoring document has shown that there was a small error in the total vacancy figures recorded by the officers at the time for the North Somercotes Industrial Estate. Otherwise, there is no other explanation for the level of vacancy rate recorded in the Monitoring Report. Officer has reviewed the all the information in respect of the planning permissions granted and other related planning actions and it is not possible to amend these figures. COMPLETE</p>	
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Report To:	Planning Policy Committee
Date:	27 th February 2025
Subject:	Government Reform of the Planning System
Purpose:	To provide an update on the Government Planning Reforms and impacts to East Lindsey District Council and the review of the East Lindsey Local Plan
Key Decision:	No
Portfolio Holder:	Tom Ashton - Executive Councillor for Planning and the Built Environment
Report Of:	Phil Norman, Assistant Director - Planning and Strategic Infrastructure
Report Author:	Greg Macrdechian – Interim Local Plan Lead
Ward(s) Affected:	All
Exempt Report:	No

Summary

In December 2024, the Government released a series of National Planning Reforms including an updated National Planning Policy Framework (NPPF).

An English Devolution White Paper was also published on 16 December 2024, which outlines the Government's strategy to decentralize powers from Westminster.

The Government has set out a clear message that planning reform is key to its strategy for delivering growth. A Planning and Infrastructure Bill is expected this year and a number of working papers are being published to inform this.

This report provides a simple review of the content of the reforms and their impacts on the East Lindsey Local Plan (ELLP).

The Committee is being asked to note the contents of the report. It should be noted that there is large degree of uncertainty in the sector presently. Officers will keep the Committee updated on this and constantly review requirements, course correcting where necessary.

Recommendations

To note the contents of report, its implications and the outlined actions.

Reasons for Recommendations

To ensure any decisions made regarding the local plan review are informed with latest government guidance.

Other Options Considered

One option would take the Local Plan Review through to Regulation 19 before the transitional cutoff date of 12th March 2025 to allow the plan to be prepared under the previous NPPF. There has been a body of evidence produced to support this approach. However, due to both the increased housing requirement as a result of the New Standard method in calculating housing need, and the need to progress the Coastal Strategy given the current state of the sea defences, this option would not meet the objectively assessed housing need for East Lindsey.

1. Background

- 1.1** One of the main reasons behind the Government's reform agenda is to provide mandatory housing targets for councils to help to deliver the 1.5 million homes overall or 370,000 new homes per year within the Governments current administration. A new NPPF was published in December 2024, with the policies contained therein being applicable at the point of publication in most cases.
- 1.2** The Government have also introduced a Devolution White Paper with the intention of empowering local governments in England, with the goal of harbouring regional growth and improving public services through increased local autonomy. The government has made plain that two-tier local government areas such as Lincolnshire will be reorganised into unitary authorities to an ambitious timeframe.
- 1.3** The Government have consulted on a paper titled, the Planning Reform for Nature Recovery Working Paper which is a consultation document that looks to align planning reforms with nature recovery objectives and considers the role of ecosystems in climate resilience, public health, and biodiversity preservation.
- 1.4** This paper will look at all 3 elements of the Government Reform in general and in the context of the East Lindsey Local Plan Review especially in terms of housing delivery.
- 1.5** It should be noted that although the Planning Reforms in the NPPF contain changes to policy direct including Green Belt/Grey Belt these are not relevant to the Partnerships' Local Authorities so have not been included in detail this report.

- 1.6** It should also be noted that the Government has signalled further planning reform will take place with a Planning and Infrastructure Bill to be published this year. Legislation to inform a new local plan-making system is also expected. Transitional arrangements for current local plan-making are included in the new NPPF. Presently, there are significant unknowns in this regard.

2. Report

2.1 National Planning Policy Framework (NPPF) 2024

Housing Development and Targets

- 2.1.1** The government has set a goal to build 1.5 million homes over the next five years, using a revised Standard Method for calculating housing need. As was the case with the previous version of the NPPF, this is to be used when calculating Local Housing Need, itself the measure of housing need, which is used in the decision-taking context when locally adopted housing requirements within local plans reach their fifth birthday since adoption. It is also the minimum local housing need figure to be used when plan-making.
- 2.1.2** Previously, the Standard Method required the identification of a baseline drawn from the annual average projected household growth in the local authority's area over the next ten years, taken from the 2014-based household projections; and multiplying that by an 'adjustment factor' based on the Affordability Ratio for the area. This latter number is the ratio between median earnings and median house prices in the area. Where that ratio is more than four (i.e. average house prices are more than four times average earnings), the formula uplifts the baseline figure accordingly. The government have now published data tables displaying the results of the Standard Method calculation in each Local Authority.
- 2.1.3** With regard to household projections (which previously took account of suppressed household growth as a result of constrained supply), the baseline now increases by 0.8% of the current housing stock in the area and is no longer based on household formation, or household projections, but on existing housing stock in the area.
- 2.1.4** In respect of 5YLS there is a re-instated requirement to continually demonstrate a 5YLS, regardless of whether there is an up-to-date local plan. As the SELLP is over 5 years old the 5YLS should be calculated based on the new local housing need. In addition the 5% buffer has been re-applied in all cases.
- 2.1.5** Furthermore, the Government has made clear that councils that obstruct housebuilding or fail to maintain up-to-date housing plans may face strict sanctions, including the loss of planning powers to central government.

Impact on ELLP – targets, 5YLS, HDT

- 2.1.6** New Standard Method.
- 2.1.7** The NPPF places greater emphasis on what changes the New Standard Method bring to housing delivery in the East Lindsey District Council (ELDC) area. It also places stronger emphasis on robustly supporting strategic policies that should, as a minimum, provide for objectively assessed needs for housing.

- 2.1.8** The extant Local Plan target for ELDC is 558 with identified allocations meeting this figure.
- 2.1.9** The New Standard Method figure for ELDC is 1009 dwellings per year. The current ELDC LP figure is 558. There is therefore an uplift of 451 dwellings per year. These figures come into effect immediately.
- 2.1.10** There are 7 years remaining in the ELDC LP plan period, 2024/25 to 2030/31. Therefore, East Lindsey needs to provide an extra $451 \times 7 = 3,157$ dwellings across the remaining plan period. The LP is no longer providing for our objectively assessed housing need.
- 2.1.11** The five-year housing land supply is an assessment of the amount of deliverable housing sites against the housing requirement set out in the adopted Local Plan. This looks at all the current commitments (allocated and windfall sites) and assesses which ones are likely to be completed within the next 5 year. It then assesses them against the housing requirement in the Local Plan, along with any shortfall of deliver in previous years of that Plan period. With the change to the NPPF, if a plan is less 5 years old, the 5-year housing land supply should be demonstrate against the current plan. If the Plan is more than 5 years old then should be demonstrated against the figure in the Standard Method. The Council's 5 year housing land supply has been assessed against the Standard Method figure and now stands at 3.22 years; 3.08 years with a 5% buffer. Prior to the introduction of the Standard Method, the Council's 5-year supply figure was 5.36 years; 5.13 years with a 5% buffer.
- 2.1.12** The Housing Delivery Test is calculated over a three-year period and compares need with delivery. Owing to the changes to the Standard Method of assessing housing need, the need figure will include the new figure from 2024/25 onwards and will therefore affect any calculation including 2024/25.
- 2.1.13** East Lindsey hasn't been providing sufficient housing to meet the ELDC LP figure of 558 dwellings per year in all of the last 7 years, or the new standard method figure of 1009. Monitoring for the current 2024/25 year (up to the end of December 2024) shows ELDC is on target to achieve the ELDC LP figure of 558 but is very unlikely to achieve the new standard method figure of 1009. (April to December 2024). Although the Housing Delivery Test has previously been passed, as a consequence of this increase it is unlikely that the Housing Delivery Test will be met moving forward. The Local Plan contains allocations with a capacity for 3,828 dwellings, as of the end of December 2024, permissions have been granted for 2,718 of these, although not all are included with the 5-year supply as some of the sites will take longer to build out or are outline permissions. This means sites totalling 1,110 dwellings having no permission of any form. Contacts with owners / agents indicate some of these are being sold to developers, whilst others possibly won't be developed soon if at all.

2.1.14 What changes to New Standard Method means to East Lindsey District Council.

2.1.15 As a result of changes to the New Standard Method the calculation for the % Year Housing Land Supply for East Lindsey drops to just over 3% (3.08%) with a deliverable/5 Year Housing requirement calculated at 61.68%

2.1.16 An error has been identified within the housing stock baseline used to calculate the Standard Method figure for East Lindsey District Council as it is too high. When the Council was submitting the Housing Flows Reconciliation form for the year 2023/24, the Opening Stock figure was too high. After further research looking at previous returns, the start figure on the Housing Flows Reconciliation form for the year 2021/22 had been significantly increased from the Closing Stock figure for the previous year. The number had increased by 18,906 dwellings (from 69,448 to 88,394). Further research showed there was no indication where this figure has been derived from as the completions figure submitted for 2020/21 was 454. This was not spotted at the time the 2021/22 form was filled in although ELDC submitted an amendment on the form for the year 2023/24 with an explanation of why the Opening Stock figure was incorrect. As expected, this incorrect figure has had a significant impact on the calculation of the Standard Method figure for the East Lindsey.

2.1.17 This error has been carried over into the Housing Deliver Test 2023 spreadsheet, which shows East Lindsey with 2,375 completions for the year 2020/21. However, the figure that was submitted to Government was only 454 as previously explained. This is not only significantly higher than the actual completions, but the difference between these two figures is also higher than the unexplained increase in the Opening Stock figure in the 2021/22 Housing Flows Reconciliation form.

2.1.18 To date there is no indication of how these figures have been arrived at, but they present a misleading picture of the actual housing delivery, and therefore, the number of dwellings in the District, and significantly impact the New Standard Method Housing Figure Target set for ELDC. However, work is continuing on trying understand how this error has come about and conversations are taking place with relevant parts of Government to seek to address this issue.

Other notable points from the revised NPPF

2.1.19 Streamlined Planning Permissions: Reforms aim to expedite housing development by simplifying the planning process and reducing bureaucratic delays.

2.1.20 Mandatory Local Plans: Councils are required to maintain current local plans demonstrating a five-year housing supply, with penalties for non-compliance.

2.1.21 For plan-making, a three-month transition period (to 12 March 2025) for some (but not all) advanced plans to proceed under the former NPPF (December 2023).

2.1.22 Stronger emphasis on necessary infrastructure improvements including new or improved accessible green spaces.

- 2.1.23** Stronger emphasis on climate change and sustainability and planning's role in supporting the transition to net zero by 2050.
- 2.1.24** Councils now have the authority to ban new takeaways within walking distance of schools to promote children's health and combat obesity.
- 2.1.25** Introduction of the concept of nature recovery networks and emphasis on Biodiversity Net Gain and new developments protection of irreplaceable habitats, including ancient woodland and veteran trees.
- 2.1.26** Development is prioritised on previously used land to protect green spaces, though some Green Belt areas are designated for necessary development. This should be the starting point and focus on recycling previously developed land.
- 2.1.27** Nationally Significant Projects: The NPPF facilitates faster development of laboratories, data centres, and infrastructure projects by allowing ministers to designate them as nationally significant, thereby bypassing local councils.
- 2.1.28** Greater emphasis on high quality design and beauty in new development and encouragements of the use of design codes and guides and support for upward extensions and the use of airspace above existing buildings paragraph.
- 2.1.29** The NPPF contains a section on maintaining effective cooperation, updated in NPPF 2024. The Government has introduced changes to "strengthen the existing Duty to Cooperate requirement and introducing effective new mechanisms for cross-boundary strategic planning" ahead of formal strategic planning mechanisms that will be introduced through new legislation.
- 2.1.30** The NPPF places greater emphasis on effective strategic planning across authorities as playing a "vital and increasing role in how sustainable growth is delivered". That guidance is given immediately before reference to the duty to co-operate ("DTC") on strategic matters. This approach is a requirement that policy-making authorities ensure that plan policies are consistent with those of other bodies where a strategic relationship exists, and with the relevant plans of infrastructure providers, unless there is a clear justification to the contrary. It is fortified by the three following requirements:
- a) a consistent approach to planning the delivery of major infrastructure;
 - b) that unmet development needs from neighbouring areas are "provided for" in accordance with para 11(b);(strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas);
 - c) any allocation of designation across boundary areas, or which has significant implications for neighbouring areas, is appropriately managed by all relevant authorities.
- 2.1.28** Transitional arrangements for local plan making are covered later in this report.

2.3 Devolution White Paper

2.3.1 The English Devolution White Paper, published on 16 December 2024, outlines the UK Government's strategy to decentralize powers from Westminster to local authorities across England.

2.3.2 The key proposals include the following:

- a) **Expansion of Mayoral Powers:** The White Paper emphasizes strengthening and broadening the mayoral model of devolution. Mayors are recognized for their unique position to drive growth through decisive leadership and regional collaboration. To enhance their effectiveness, the government plans to equip mayors with additional tools and responsibilities.
- b) **Structural Reforms:** A significant overhaul of local government structures is proposed, aiming to replace two-tier local authorities with larger, single-tier councils. These new unitary councils would serve a minimum of 500,000 residents, intended to improve efficiency, capacity, and financial stability. While this could enhance the ability to undertake large projects and economic improvements, concerns have been raised about the potential distancing of local government from residents and the effectiveness in addressing smaller community issues.
- c) **Standardization of Devolution Processes:** The government intends to accelerate and standardize the processes by which powers, funding, and programs are transferred from Westminster to local areas. This approach aims to create a more uniform and efficient system of devolution across England.

2.3.3 It is difficult to gauge a true understanding of the impacts of the devolution reforms on ELDC although it would clearly delay any progress towards the implementation of a Local Plan. If ELDC was combined with another authority this would have consequential impacts on the delivery of the ELDC LP review due to a number of factors, these including potential changes in the housing and economic market areas; substantial changes to existing and commissioned evidence base; and the inevitable governance and constitutional changes involved with creating the unitary authority. Furthermore, if flooding responsibilities become a function of the unitary authority this will again have an impact on the Local Plan timeframe as well as the delivery of the action plan for both the Humber 2100+ strategy and the Lincs Coast 2100+ strategy.

2.4 Review of Local Plan

2.4.1 The new NPPF puts in place transitional arrangements to support the progress of advanced Local Plans. The latest date for plans to be submitted under the current regulations is December 2026.

2.4.2 MHCLG advise that a new plan-making system is expected to commence in Summer/Autumn 2025. A consultation on national policies for development management is expected in the Spring. Further details on the rollout of the new system will be forthcoming in due course.

- 2.4.3** The ELLP was adopted in 2018, and the start of a review is yet to be formally embarked upon.
- 2.4.4** The new NPPF and its policies apply from 12 March 2025 with regard to any ELLP review. This is because the plan will not have reached Regulation 19 (pre-submission stage) on or before 12 March 2025.
- 2.4.5** East Lindsey District Council has undertaken a partial review of the East Lindsey Local Plan 2018 in line with policy SP29 of the extant Local Plan. The Issues and Options Paper set out certain issues that were considered in the partial review and suggested potential options in relation to these. As part of this work the Council also undertook a call for land for sites exercise for both housing and employment land. This consultation was undertaken for an 8-week period between the 15th February 2021 and the 12th April 2021.
- 2.4.6** Although an evidence base is being developed to support this Local Plan review the March 2025 transitional deadline date to have a plan ready for Regulation 19 consultation will be difficult to achieve with the resource and remaining evidence to develop, notwithstanding this the evidence so far does not support the additional growth the plan would need to deliver for using the new Standard Methodology. This is coupled with the uncertainty over the exacerbated flood constraints effecting large areas of Lincolnshire Coast and the subsequent Lincs 2100+ strategy and action plan. It is therefore proposed to focus on the new plan-making system expected later this year. This does not preclude evidence gathering ahead of this and other preparatory work. The impact of local government reorganisation will also need to be factored in as this work progresses.
- 2.4.7** Local authorities have a statutory obligation to produce a local development scheme (LDS) and keep it up to date. The government wrote to authorities in December asking to receive an update on its timetable in light of the new NPPF. There is a requirement to notify government by 6th March 2025 in respect of this.
- 2.4.8** Further information on this was provided by MHCLG at a seminar in January. In cases where new plans are to look towards the new plan making system, they only require this confirmation and a commitment to embark on a new local plan in earnest upon publication of the new regulations. It is officer's intention to notify the government that this is the case in East Lindsey and await their reply. Officers will update Committee on any reply received from Government in due course.

3. Conclusion

- 3.1** This report has attempted to provide both a generic summary of the planning reforms that will be implemented over the course of 2025 with the introduction of new legislation later in the year. It has also looked at impacts of the new Standard Method for calculating housing need, 5YLS and implications on the local plan review.
- 3.2** In terms of how these reforms impact East Lindsey and the options highlighted at the start of the report, there is still little clarity on this. However, what is known is

that it is evident that the complex constraints and issues in East Lindsey mean that next steps on plan-making are far from straight forward. There are inherent risks with all the approaches outlined above. It is also evident that a long-term solution to the issue of flood risk is of paramount importance, irrespective of future growth.

- 3.2** The proposed increased housing numbers are at such a level that delivery under any option is unrealistic. As such, it must be accepted that the ability to demonstrate a 5-year supply of deliverable housing sites in East Lindsey will be lost in the short, medium and long term whatever approach the Council takes – the result being unplanned growth.
- 3.3** The tension between the coastal zone, the increased housing numbers and the likely inability of the market to deliver these mean that the most sensible way forward would be to engage with Government to seek support.
- 3.4** It should be noted that there is a significant amount of change and uncertainty in respect of planning and more broadly across local government. Officers will notify Government of its intentions to await new legislation before formally publishing a timetable for review of the new plan and will keep members up to date throughout the process.
- 3.5** A new position on the 5YLS will be provided in due course based on the new housing targets.

Implications

South and East Lincolnshire Councils Partnership

None

Corporate Priorities

None

Staffing

None at this time

Workforce Capacity Implications

None

Constitutional and Legal Implications

As outlined in the report in terms of whether the plan is out of date and the presumption in favour of sustainable development applying.

Risk of government intervention in respect of plan-making

Data Protection

None

Financial

It is estimated that the costs of taking a plan from inception to adoption would be in the region of £1,000,000 however, this will depend on several factors such as existing evidence base, fluctuation in legal costs, additional consultation etc.

These costs are a rough estimation at this stage and a full audit of resourcing, IT, evidence base etc will need to be undertaken before budget setting can be fully undertaken.

Risk Management

There is a significant amount of uncertainty around plan-making presently. A full risk assessment strategy would be part of any Local Plan review, however, some critical risks can be found below:

- Failure to retain/recruit sufficiently experienced officers to implement required programme of work.
- Failure to secure funding to resource the process.
- Failure to demonstrate a 5 year supply of deliverable sites and the presumption in favour of sustainable development applying.
- Adverse appeal findings on other/non-Local Plan sites if progress on the Local Plan review is delayed or stalled; and
- Government intervention if inadequate progress is made upon Local Plan Review.

Officers will keep up to date of forthcoming announcements and any response from Government and will respond/inform/course correct as necessary.

Stakeholder / Consultation / Timescales

Timetable to be produced in due course

Reputation

The plan being considered out of date or government intervention may have reputational consequences.

Contracts

None

Crime and Disorder

None

Equality and Diversity / Human Rights / Safeguarding

None

Health and Wellbeing

None

Climate Change and Environment Impact Assessment

None

Acronyms

None – in report

Appendices

None

Background Papers

No background papers as defined in Section 100D of the Local Government Act 1972 were used in the production of this report. Background papers used in the production of this report are listed below: -

Chronological History of this Report

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

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