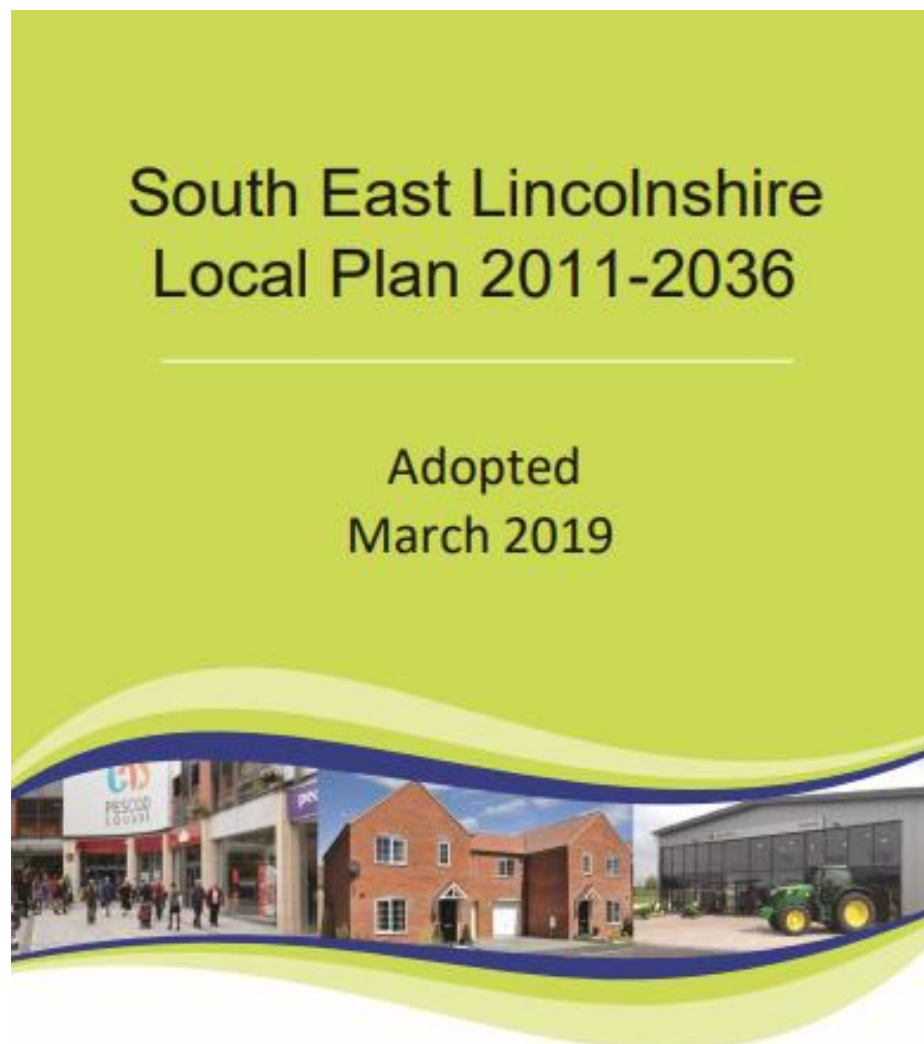


South East Lincolnshire Local Plan Review

Part Two



South East Lincolnshire
Joint Strategic Planning Committee

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1. Introduction

- 1.1. The Part 2 Review follows on from a Scoping Report (which considered the need to review the South East Lincolnshire Local Plan (SELLP)) and the Part 1 Report that considered the bigger picture of the last 4 years, the Local Plan and development within the Plan area.
- 1.2. The development history of the SELLP is given in earlier documents, together with the reasons for and basis of the Review. The important point to note is that, based on the adoption date, the Joint Committee must assess the South East Lincolnshire Local Plan and considered its performance and whether or not it is still fit for purpose, by the 8th March 2024.
- 1.3. The Scoping Report proposed a two-step approach. Utilising the Planning Advisory Service (PAS) Tool kit for Local Plan review, firstly consideration was given to the bigger picture of what has happened over the 5-year period of 2019 to 2023, in Part 1.
- 1.4. This Part 2 report considers the main (Part 1) element of the Toolkit which is to review the policies within the plan, but looks in more detail at the Plan itself/
- 1.5. In order to ensure that a suitably comprehensive review has been undertaken, the PAS Policy Matrix Review has been completed as a checking mechanism, and this is attached as Appendix D. However, the first step is to consider the Plan as a whole.

2. The Plan Policies`

- 2.1. Monitoring policies in a Local Plan is far from easy and straight forward. In terms of Policy Monitoring, it is accepted that simply considering what policies are used in terms of decision notices, does not provide a clear picture. For example:
 - a. Is a policy that is used regularly in refusal notices an indication that it is a good policy, or a poor policy as people have applied for permission not realising that it is contrary to policy?
 - b. Is a policy that is never used an indication that the policy is not needed, or an indication that people see the policy and realise that their proposal would be unlikely to be successful?
 - c. How do you monitor policies which may often be relied upon during negotiations to improve the proposal, but due to improvements, are never referred to in decision notices.

- 2.2. The SELLP set out an approach for monitoring all 36 policies using 86 different indices, The selection of these indices gives rise to three main concerns:
 - a. Monitoring would become a huge and resource intensive area of work as many of the indices are not easily measured as data is often not accurately collected or easily collectable.
 - b. In some cases it is unclear of what the results would mean, whether a score of x would indicate a successful, or failing policy
 - c. In many cases, it is often factors other than the local policy which will dictate the results
- 2.3. A table showing the proposed Local Plan monitoring measures is attached as Appendix A. There are several concerns over this list, notably:
 - a. There are 85 individual measures listed
 - b. Many of the measures listed do not have easily available data
 - c. It is unclear in many cases what a good or bad result is, meaning that one is simply measuring, not monitoring
 - d. The list requires significant work and data collection.
- 2.4. Overall, the proposed measuring approach is considered unworkable and in some cases, meaningless in terms of determining the quality of a policy or the plan as a whole.
- 2.5. Therefore, a different approach has been taken to considering the effectiveness or otherwise of the Local Plan policies. The Councils have tried a more streamlined reporting mechanism that provides information on the use of the Local Plan in a more succinct, efficient, easily understandable, and meaningful format.
- 2.6. This means that the Monitoring part of the Plan will need to be reviewed at some point, when other substantial parts of the Plan are in need of amendment. It is suggested that at this time a simple agreement to an amended monitoring approach by the Joint Committee should be sufficient.

APPEALS

- 2.7. It is accepted that the important test for any policy, is how well it is supported or not, through the appeal process. It is only at this time that policies are really challenged and put to an independent test.
- 2.8. Therefore, as a general overview of the effectiveness of the policies, I have considered what policies have been set aside at appeal, and consider whether those outcomes give rise to reasons to review policies which appear to be failing their intended effect on development throughout the District.
- 2.9. Table 1, below, shows the number of planning applications, and appeals and their outcomes, on a year-on-year basis. It is essential to note that a planning application may be received in one year, determined the following year, and any appeal may not be determined until the following year. Therefore, the columns are not cumulative and percentages of applications

to appeals have limited meaning. Also, as most applications are granted, small variations in numbers could make a significant variation in the percentage figures

- 2.10. However, some general sense of the success of the Plan and the way in which policies are being applied and decisions made, can be seen by looking at the overall operation of the system over time.
- 2.11. It is also important to note South Holland and Boston both have separate and independent Development Management teams and Planning Committees determining planning applications within their own areas and dealing with appeals. As that is a significant factor as part of this review of this area, the activities of both Councils will be considered separately.
- 2.12. In terms of South Holland, the general picture is that around 8% of applications were refused, with around 20% of those refused going to Appeal. Roughly 23% of appeals submitted were allowed.
- 2.13. Within Boston, again around 8% of applications were refused with a higher level of around 31% going to appeal. Of those, around 34% of the appeals were upheld.
- 2.14. Given the caveats made above, the variations here are not considered to be significant.

TABLE 1

South Holland		2018/19	2019/20	2020/21	2022/23	Total
Planning Applications	Received	1019	943	1079	871	3912
	Approved	903	801	1396	777	3877
	Refused	87	79	76	86	328
Planning Appeals	Received	24	21	12	11	68
	Dismissed	24	15	5	4	48
	Upheld	6	3	4	3	16
Boston						
Planning Applications	Received	492	484	519	478	1973
	Approved	415	417	438	410	1680
	Refused	58	37	42	21	158
Planning Appeals	Received	19	11	11	8	49
	Dismissed	4	12	8	5	29
	Upheld	3	8	3	3	17

- 2.15. Nationally, the data becomes even more difficult to translate to the local experience, due to the way it is broken down into different forms of applications and the use of quarterly monitoring over these time periods.
- 2.16. A paper was produced on planning appeals in England for the period 2017/18 (researchbriefings.files.parliament.uk/documents/SN06790/SN06790.pdf).

- 2.17. This showed that local planning authorities made decisions on around 431,000 applications in 2017/18, of which 12% (53,000) were not granted. Provisional statistics for 2017/18 indicated that there were 13,362 appeals received, around 25% of the refused applications. Around one-third of appeals decided in this period were allowed.
- 2.18. Again, given the caveats above, the performance by both districts, in relation to earlier national averages, are not so dissimilar to suggest that there are any significant issues in relation to the plan policies.
- 2.19. It is also worth looking more in depth at these appeals, to see if any lessons can be learned.
- 2.20. Appendix B gives details of all of the appeals determined within the denoted time frame, with comments and further explanation. In summary the table below looks at which policies were involved in appeals that were lost.

Policy Area	South Holland	Boston	Total
1) Spatial Strategy	3	4	7
2) Development Management	9	12	21
3) Design of New Development	9	11	20
5) Meeting Physical Infrastructure and Service Needs		1	1
20) Accommodation for Gypsies, Travellers and Travelling Showpeople	1		1
23) The Reuse of Buildings in the Countryside for Residential Use	1		1
29) The Historic Environment		1	1
30) Pollution	3	3	6
36) Vehicle and Cycle Parking		1	1

- 2.21. The table shows that the policies most involved in successful, upheld, appeals were policies 2 and 3. The appendix shows that these policies were often used in the same appeals as complimentary reasons for refusal. The results were similar across for both councils
- 2.22. These policies rely significantly on value judgements in terms of the interpretation of the policies against the details of the schemes and the material planning issues. It is considered that in relation to these policies, the considerations and the policies are correct, but too high an expectation may be placed on issues such as complying with the character and appearance of an area, or what an acceptable level of design may be.
- 2.23. The spatial strategy was the next most successfully challenged area, and demonstrates a more 'laissez faire' attitude to interpretation of village

development boundaries, where other factors may also be considered. This does not reflect that the policy is wrong, but rather that development boundaries need to be considered as part of a proposal, not as a totally determining factor.

- 2.24. Surprisingly, the only other policy that has been used in several appeals unsuccessfully, concerns Pollution. Although it appears that where the policy has failed to be upheld, is where it has been used to seek to prevent development based on its impact on the amenity of adjoining properties or the area in general. Again, the issue seems to be the weight that is accorded to amenity rather than the benefit of supporting development.
- 2.25. In most of the cases appeal decisions hinged on the interpretation of the policies against the details of the schemes and the material planning issues. The policies are generally considered appropriate and not undermined by the decisions.
- 2.26. In addition to the above, 5 appeals were upheld on legal grounds as the appeal related to a Certificate of Lawful use judgement, where legal facts rather than policy, have to be considered. There were also an enforcement appeal and an appeal against conditions applied, which are more a matter of judgement than the quality of any policy.
- 2.27. Overall, there is no indication through appeal decisions that the policies within the SELLP need changing or updating overall. It is interesting to note which policies are most used in terms of upheld appeals, and how few are challenged. It may be advantageous to consider whether additional training in relation to the weight that should be attached to various factors is needed, but this is an internal matter for both authorities.

POLICY AREA MONITORING

- 2.28. Rather than monitor, through a number of measures the operation of every specific policy, this report has used Council provided data to look at the main areas of monitoring in terms of the effectiveness of the Local Plan. However, it should be clear, as from Part 1 of the review, that a number of elements are involved in terms of physical outcomes referred to below, such as the operation of other Council departments and agencies, local enterprise and the political drive of the Council's supporting it.

The Economy

- 2.29. As set out in Part 1 of the review, the last 4 years has been a very difficult period for many people and businesses. Covid, the war in Ukraine, political upheavals etc have all created a very uncertain economic future. One area particularly that has felt the winds of change has been the retailing landscape, where online shopping has boomed, and the employment sector, where working from home has reduced the demand for office space and support service, such as Caf  s.

2.30. However, as Table 2 below shows, the two Councils have shown a degree of resilience through difficult times. Overall, both Retail and employment floorspace has grown. Whilst there must be some concern over the losses in Boston, both Councils have seen growth.

2.31. It is recognised in these areas; the simple figures will fail to tell the whole story. In looking to the future, it may be prudent to have more in-depth conversations with relevant bodies, in order to define any concerns over the Local Plan approach in relation to these areas.

Table 2 New Retail and Employment floorspace

Floorspace M ² /Year	2019/20	2020/21	2021/22	2022/23	Total
South Holland					
New Retail	428	-29	0	775	1,174
New Employment	6,421	6,891	5,769	9,420	28,501
Boston					
New Retail	1,672	-264	-212	0	1,196
New Employment	-78	3,802	5,276	3,191	12,191

2.32. An important consideration in relation to the health of town centres is the vacancy rates. These are shown below in Table 3. Historically we know that back in 2011, South Holland's vacancy rate was around 12% whilst Boston's was slightly lower at only 10%

Table 3 Vacancy rates

Retail vacancy rates in existing centres	2019/20	2020/21	2021/22	2022/23
South Holland	9%	Covid	12.5%	12.43%
Boston	21%	21%	13%	16%

2.33. On that basis, within Boston, the 2019/20 rate of 21% must be seen as a significant concern, and whilst it has gradually moved towards a more reasonable level, further consideration should be given to this issue.

2.34. The rates within South Holland have not varied significantly over the time period, which suggests that it may be due to the normal churn of the market. It is worth noting that the 2021/22 figure of 12.5% relates to 63 units which is only two more than those recorded in 2011, 2015 and 2019. Other years had a figure below 61 vacancies.

2.35. One significant caveat should be given at this point however. The closure of 2 or 3 small shops, would have a greater impact on the above figures, than the closure of a major shopping unit like a department store. However, the impact on the town as a whole, would be markedly different.

Housing

2.36. Concerns around the lack of house building, and the high costs associated with house and mortgages have been grabbing headlines over the last 5

years. The situation with the Plan area, in terms of house building, has however been reasonably successful.

- 2.37. The caveat raised in Part one, that there was a significant under-provision of housing pre adoption of the Plan, which was built into the requirement within the Plan, needs to be remembered. However, this work is about the performance of the Plan post adoption, and that is what has been focused on.
- 2.38. The first thing to note is that both Councils are still operating with the adopted housing requirements derived from the Strategic Housing Market Assessment (SHMA) Update Report for the two HMA's (March 2017) with an uplift of 5% applied to increase the potential supply of affordable housing.
- 2.39. This gives a requirement of 467 for South Holland and 310 for Boston.
- 2.40. Data from the Pegasus Groups initial data analysis utilising the Standardised Method, ([2022 Affordability Ratios – What do they mean for the Standard Method? - Pegasus Group](#)), gives the following information.
- 2.41. For South Holland, the requirements of 442 (2022-32) and 430 (2023-33) gives an average of 436, 31 below the Plans requirement.
- 2.42. For Boston, the Standardised Method figures are 259 (2022-32) and 252 (2023-33), an average of 256, 54 below the Plans requirement.
- 2.43. Therefore, whilst relying on the adopted Plan requirements, the Council are holding themselves to a higher delivery requirement than the standard method would.
- 2.44. As Table 4 below demonstrates, both Councils have delivered more homes since the adoption of the Plan, than would be necessary to maintain the expected level of development, despite the difficult situation that has endured.
- 2.45. Whilst development levels have been far more positive in South Holland than in Boston, where the required level was not reached in 2020/21, the development across the whole plan area must be seen in a positive light, with 630 more homes already built than required.

Table 4 House building

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

- 2.46. A second important consideration in terms of new homes, is not only the current supply, but the future supply. On this basis, the Government require local authorities to maintain a 5 year supply of homes that developers can bring forward over that time period. This is an important indicator of the health of the housing market in any local plan area.
- 2.47. Table 5 below shows that in relation the SELLP, both Councils have maintained a healthy supply throughout the last 4 years.

Table 5 Five year housing Supply

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

- 2.48. This suggests that in the near future, the production of homes, in accordance with the rates expected within the SELLP, is likely to continue. However, with a year or less of excess supply, Council's will be open to challenge as to the deliverability of all of the sites that these figures are based on. It is therefore important to keep this under close review.

Affordable Housing

- 2.49. Whilst the overall level of housing provision has been positive, the level of affordable housing has generally been far more difficult for Council's to achieve.
- 2.50. One thing to remember at this point is that many of the sites contributing to targets at this time probably negotiated the Affordable Housing requirement, prior to the Local Plan adoption.
- 2.51. In terms of South Holland, the overall target figures for affordable housing over the last four years are given below:
- 2019/20 - The overall target of 25% was not achieved (16%).
 - 2020/21 - The overall target of 25% was not quite achieved (22%).
 - 2021/22 - The overall target of 25% was achieved (61%).
 - 2022/23 - The overall target of 25% was almost achieved (24%).
- 2.52. Whilst performance has not generally met the targets, the exceptional level of achievement in 2021/22, and the closeness of achieving those goals in 2022/23, is encouraging.
- 2.53. In Boston, the performance in relation to affordable housing has been surprisingly strong:
- 2019/20 -The target of 20% was achieved (31%).
 - 2020/21 - The target of 20% was achieved (46%).
 - 2021/22 - The target of 20% was achieved (45%).
 - 2022/23- The housing target of 20% was achieved (45%).

OTHER AREAS

- 2.54. The Council's Monitoring Reports go on to look at the main indicators in relation to Environment, Historic and Natural, Sustainability, and Transport.
- 2.55. It is not the role of this report to go through all of these issues step by step but to take an overall perspective on the performance of those policies.
- 2.56. Reviewing those reports, no significant problems or issues are noted in all of the relevant areas. However, there are two points noted:
- a. Both authorities show a greater emphasis on greenfield site development to brownfield (PDL) land than some may find positive. However, this is to a degree explained by the take up of brownfield sites prior to the plan's adoption. This is not a surprising outcome.
 - b. The amount of land taken up, despite being a higher levels of flood risk seems concerning. However, the use of allocated sites at a higher level of flood risk is understandable given the nature of the areas and the pressures to find developable sites. These are generally sites that were carefully considered as part of the LP process in order to meet development targets.
- 2.57. Appendix C considers all of the policies, individually and assesses their suitability for moving forward. The policies are graded Red, Amber or Green according to their suitability for continued use. None of the policies are graded at Red, although several do receive an amber grade and this needs further consideration.
- 2.58. The main concerns that this review raises relates to:
- a. The Plan and the Local Development Scheme promises Supplementary Planning Documents (SPD) in relation to Developer Contributions and Parking Standards SPD, both of which have not been produced.
 - b. Repeatedly the Plan emphasises the importance of Masterplans for most of the major development sites. However, it is understood that these documents have not been completed yet.
- 2.59. Whilst all policies, once written are ageing, and some policies may already have served their purpose, or been overtaken by events, it is not necessary to re-write the Plan for this reason. If it was considered necessary to address such issues, a simple document could be produced asserting the Council's approach to those policies and giving reasoned justification for it.
- 2.60. Overall, the policies, whilst not perfect, are fundamentally consistent with current formal government guidance such that the significant investment that creating a new Plan would take cannot be justified.
- 2.61. Lastly, for the reasons set out in Part 1, there are currently many uncertainties over the future approach that national planning guidance may

take. To seek to amend policies at this time that may not sit ‘four square’ within the emerging system, based on inconsequential changes and soundbites, could lead to further amendments being required in the near future.

OTHER CONSIDERATIONS

- 2.62. The SELLP is based on a Strategic Vision and 12 Strategic priorities. If that Vision and those priorities are no longer consistent with the views and aims of the Councils, careful consideration needs to be given as to whether they can continue to rely on the SELLP, or not. That decision requires political consideration and it is not within the remit of this report to comment further.
- 2.63. It is noted that the last Local Development Scheme, was produced in 2017-2018. Within it, and at several points within The SELLP a ‘Developer Contributions Supplementary Planning Document’ was promised by June 2018, and within the SELLP, a ‘Parking Design Supplementary Planning Document’ was also promised.
- 2.64. I can find no trace of either document or a review of the Local Development Scheme. These are important issues that the Councils need to address, sooner rather than later.

3. Conclusions

- 3.1. Part 1, that looked at the bigger picture of development and changes over the last 4 years reached a number of significant conclusions. These were:
- In general, the area has developed well over this difficult period, with development levels exceeding Plan expectations despite a difficult wider economic picture.
 - In terms of the statutory situation and national guidance etc, it is considered that there is currently no clear direction or sets of guidance that the Plan is clearly not in accordance with. More importantly, it is considered that the future direction and requirements in terms of planning policy are far from clear, and setting out on amending the Plan at this stage is setting off into uncertainty.
 - In the current political climate any new Plan risks becoming quickly out-of-date as a result of forthcoming, but unclear, planning reforms promised by both of the main two political parties.
 - In the current climate, with so much uncertainty over potential changes to national guidance, the need to amend the Plan based on a clear defined change to national policy does not appear to exist.
 - The new strategic partnership between South Holland District, East Lindsey District and Boston Borough Council, gives interesting possibilities in terms

of more strategic planning approaches across the Partnership area, However, current work at East Lindsey limits those possibilities at present.

- Whilst resources are not really a part of the Planning evaluation of the Plan, they have to be part of any realistic decision taking. Currently at a time of Local Council's facing significant budgetary issues, resourcing a full or partial replacement of the Plan, appears to be unlikely.
 - Recruiting good quality Planners is very difficult at this time, and there is a noted skill shortage within the sector. This brings into question whether or not bringing a team together to undertake any work required is actually a real possibility at this point. The alternative, relying on consultants, would be a very expensive proposition when amending as complex a document as a Local Plan.
 - The budgets available to the Planning policy function are unknown, but assumed to be severely limited at present, as generally Councils are under significant financial pressures currently. Therefore a very strong business case would probably be needed to seek to access the level of funding that would need to be pumped into this area, should the Plan need replacing in whole or in part. This would have significant implications for other areas of the Council's activities.
 - Whilst the evidence base for the Plan is now quite old, it does not mean that the Plan and the direction of travel planned, is incorrect and needs changing. There is also concern that any evidence developed based on the last 5 years of activity, will not provide a strong basis for predicting future needs and directions of travel. In many ways one may see the evidence base that the Plan is based on as a more solid foundation.
 - The Council, within its planning decision making process will need to take account of any emerging guidance that is not addressed within the Plan, or may supersede the guidance within it. However, that does not require the Plan to be amended at this stage.
- 3.2. Overall, looking at this bigger picture, there were no strong grounds to require the SELLP to be amended, in whole or in part. The Plan is being implemented, the Plan is being followed and development is successfully taking place within the Plan area.
- 3.3. When considering the significant costs associated with reviewing a Plan, and the uncertain future of planning guidance in general, it was considered that there would need to be significant problems with the Plan policies to justify needing to undertake a review.
- 3.4. What this Policy review has demonstrated, is that whilst the policies may be showing their age and have some issues, nothing is so fundamentally wrong with them as to warrant amending the Plan.

- 3.5. However, there are a number of issues that do require attention. The virtual lack of a Planning Policy lead officer, and team, within the two authorities means that there are a number of work areas that are outstanding and need to be addressed. These are addressed above within the report, and at the end of the PAS matrix.
- 3.6. These issues are:
- Servicing the monitoring requirement of the Joint Planning Unit, and the legal requirement to hold meetings.
 - To allow the development of documents to address issues raised where further guidance/explanation may be needed.
 - To develop and complete the SPD requirements in relation to Developer Contributions and Parking.
 - To develop the required Masterplans in terms of the strategic sites where Masterplans are needed.
 - To develop a position statement in relation to Retail, following the evidence review,
 - To address the issue of Bio-diversity Net Gain, either as part of the Developer contributions strategy, or as a separate position statement
- 3.7. Whilst it is considered that these issues do need to be addressed, in the best interests of the SELLP and the proper planning of the area, they do not generate a need to amend the Plan.
- 3.8. Therefore, based on both Part 1 and Part 2 of this Review, it is considered that there is no current need to amend the Plan, in whole or in part.

APPENDIX A**Local Plan Monitoring table**

This table is based on the indicators set out in the Local Plan.

Monitoring Assessment of Policies

Indicator
1. The amount of services lost and/or gained within each settlement
2. Number of planning permission approved for non-countryside uses outside settlement boundaries
3. Number of planning applications refused on flood risk grounds
4. Number of planning permission refused due to inappropriate design
5. Number of planning applications refused owing to inappropriate design
6. Provision of new strategic flood mitigation infrastructure
7. Number of planning permissions granted contrary to Environment Agency advice on the grounds of flooding or water quality
8. Number of residential planning permissions granted in 'danger for some', 'danger for most' and 'danger for all' hazard zones
9. Number of infrastructure related planning conditions discharged
10. Number of infrastructure related obligations within a Section 106 Agreement delivered
11. Number of Section 106 Agreements signed per annum
12. Level of developer contributions funding secured per annum
13. Number of schemes where site specific viability assessment leads to developer contributions not being sought
14. Enterprises by Industry Total number of new businesses:
15. Land currently in B1, B2 and B8 use per annum
16. Total amount of additional (net and gross) employment floor space by type
17. Available allocated employment land with and without planning permission
18. Loss of employment land by type
19. Completion of masterplan
20. Total amount of additional (net and gross) employment floor space by type
21. Available employment land with and without planning permission
22. Expenditure in visitor economy per annum
23. Number of housing completions per annum for the Plan area and by LPA
24. Assessment of Five Year Housing Land Supply
25. Number of housing completions per annum for the Plan area and by settlement
26. Housing commitments derived from extant and submitted planning applications, by settlement per annum
27. Number of housing completions per annum by LPA
28. Number of housing completions on released Reserve Sites
29. Number of housing completions within the SUE per annum
30. Area of land in B1, B2 and B8 use within the sustainable urban extension per annum
31. Area of land in open space use (by type) within the SUE per annum
32. Length (kilometers) of the Boston Distributor Road delivered within each five year period (by phase)
33. Number of housing completions within the SUE per annum
34. Area of land in open space use (by type) within the SUE per annum
35. Length (kilometers) of the Boston
36. Distributor Road delivered within each five year period (by phase)
37. Number of housing completions within the SUE per annum
38. Length (kilometers) of the northern phase of the SWRR delivered within each five year period
39. Number of housing completions within the SUE per annum

40. Delivery of Peppermint Junction highway improvements
41. Number of homes completed by size to meet market and affordable housing needs per annum
42. Number of affordable homes completed per annum
43. Number of affordable and market homes completed on Rural Exception Sites
44. Net additional residential pitches for gypsies and travelers
45. Net additional transit pitches
46. Net additional residential plots for travelling showpeople
47. Number of HMOs and flat conversions refused
48. The mix of size of housing completed compared with the SHMA
49. Number of replacement dwellings completed in the countryside
50. Number of dwellings completed by converting redundant rural buildings to residential use
51. Amount of floor space for town centre uses within the town centre boundaries
52. Vacancy rates for retail use in the town centre boundaries
53. Amount of floor space completed for town centre uses by type, by centre and for the Local Plan area
54. Amount of floor space for retail use within the primary shopping frontages
55. Vacancy rates by unit in the primary shopping frontages
56. Total amount of floor space completed for town centre uses by type, by centre and for the Local Plan area
57. Amount of comparison goods floor space completed at Springfields Shopping and Festival Gardens
58. Number of applications refused owing to their impact on the natural environment
59. Number of hectares of mitigation where planning permission granted on protected sites
60. Number of hectares of restoration enhancement or connection of habitats and ecological networks
61. Number of hectares of Sustainable Alternative Natural Greenspace
62. Number and type of conservation features incorporated into buildings
63. Number of applications refused for not conserving or enhancing designated or undesignated assets
64. Number of planning applications refused for having an adverse impact on listed buildings or sites of special historic or archaeological interest
65. Number of planning permissions granted for demolition of listed buildings/buildings in conservation areas
66. Number of planning applications refused for having an adverse impact upon the dominance of church towers, spires and traditional windmills
67. Number of applications refused owing to environmental impact
68. Number of AQMAs in South East Lincolnshire
69. Number of contaminated sites developed
70. Number of planning permissions for renewable and low carbon energy
71. Number of developments that are designed to minimise and mitigate the impacts of climate change
72. Number of applications refused because they have an unacceptable impact on the criteria
73. Number of planning permissions for new community facilities and/or the enhancement of existing community facilities
74. Number, area and area/1,000 people by open space type
75. CO ₂ emissions per head
76. Number of AQMAs
77. Number of planning permissions granted with approved Travel Plan
78. Number of electric vehicle charging points provided in association with new development
79. Number of permissions granted with new or improved access facilities for the disabled
80. Length (kilometers) of the Boston Distributor Road delivered within each five year period (by phase)

81. Progress with funding applications for the delivery of the Boston Distributor Road
82. Number of Spalding Transport Strategy projects completed
83. Number of Council car parking bays in the Town Centres, by short stay (time limited), short stay unlimited and long stay (annual frequency)
84. Number of electric vehicle charging points provided in association with new development
85. Number of permissions granted with new or improved access facilities for the disabled

APPENDIX B**APPEALS REVIEW**

South Holland

2019/20 H16-0960-18	1, 2, 3	The inspector decided that the development did not harm the character and appearance of the area or the living conditions of the adjacent occupants and consequently does not conflict with the design and layout objectives of policies 2 and 3
H08-0939-19	2, 3, 23	Appeal against two conditions attached to the permission. As such the decision is based on whether they are reasonable and necessary. Owing to the size of the curtilage and distance between dwellings the inspector decided that part of one condition and the whole of another were not necessary.
H23-1154-19	N/R.	This is an appeal against the refusal of a certificate of lawful use or development. As such it is determined on the basis of case law rather than planning merits judged against planning policies.
2020/21 H09-0192-20	2, 3	The inspector concludes that the proposed development would not cause harm to the character and appearance of the area by reason of its layout on the appeal site. Consequently, the proposal accords with Policies 2 and 3 of the South East Lincolnshire Local Plan 2019, which seek to protect character and appearance.
H09-0369-20	2, 3, 30	This and the following ENF reference relate to the same case. In considering the refusal of planning permission and ground A in the ENF appeal, which considers the case for deemed planning permission, the inspector concluded that given the circumstances of the case a planning permission could be restricted to 10 dogs and personal to the appellants, rather than going with the land, as is normal. As such there would be no conflict with Policies 2, 3 or 30 of the South East Lincolnshire Local Plan, 2019 which seek to ensure, amongst other matters, that new development would not lead to unacceptable adverse effects on the amenities of the area, taking into account impact on residential amenity and impacts of noise, odour and securing suitable mitigation measures if required.
ENF-49-18- E09	2, 3, 30	This relates to an enforcement appeal. In relation to grounds C and D, the appeal failed, i.e. the use constituted a change of use and insufficient evidence was available to prove a lawful use. In relation to ground A the appeal was successful as outlined above.

H05-0326-20	2, 3, 30	The inspector found that the proposal is consistent with the policies of the SELLP. He also found that the material considerations advanced by the Council and objectors are of insufficient weight to determine that the proposal should be decided other than in accordance with the development plan.
H16-0352-20	2, 3	The inspector found the development proposed would not be harmful to the character and appearance of the area and would not unacceptably affect the living conditions of 147 Hawthorn Bank and as such accords with Policies 2 and 3 of the South East Lincolnshire Local Plan.
H05-0584-20	2, 3	The inspector concludes that the proposed development would not cause harm to the character and appearance of the area. Consequently, the proposal accords with Policies 2 and 3 of the South East Lincolnshire Local Plan 2019, which seek to protect character and appearance.
2021/22 H18-0918-20		This is an appeal against the refusal of a certificate of lawful use or development. As such it is determined on the basis of case law rather than planning merits judged against planning policies.
H18-0919-20		This is an appeal against the refusal of a certificate of lawful use or development. As such it is determined on the basis of case law rather than planning merits judged against planning policies.
H18-0920-20		This is an appeal against the refusal of a certificate of lawful use or development. As such it is determined on the basis of case law rather than planning merits judged against planning policies.
H14-0730-21	2, 3	The inspector concludes that the proposal would respect the character and appearance of the area. As such, it would accord with Policies 2 and 3 of the South East Lincolnshire Local Plan 2011-2036, which together seek to ensure, among other things, that development respects local character.
2022/23 H06-0892-21	1	The application is to remove a habitation clause from a planning permission granted in 1980. The local plan does not have a policy relating to agricultural dwellings and so it was considered against policy 1. The inspector concluded the condition was no longer necessary and as such did not consider there was a conflict with policy 1 because it seeks to direct development to particular locations and this development already existed.
H09-0087-22	1, 20	The application relates to providing a Gypsy and Traveller site. The application was refused because sufficient applications had been granted to meet the need in the local plan. The appeal evidence showed the use needed to be located in the countryside and as such complied with policy 1D. The evidence for sites with planning permission suggests they are occupied. Policy 20 does not resist development over and above the identified need. The applicants lived outside the district when the GTAA was being evidenced and represent a need from immigration. The GTAA does not account for migration and is not a recent document.

		As such the inspector concluded the development meets an additional need for pitches, which is permissible under the terms of policy 20. Also, it complies with the criteria as set out in the policy. Therefore, the development accords with LP policies 1 and 20 in terms of need and the location of the development.
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Boston

2019/20 B/18/0075	Policy 1	The Inspector acknowledged the proposal was in some conflict with the thrust of the policy but considered that the proposed layout, which reflected an agricultural holding, existing boundary landscaping and the site being previously developed land outweighed these. In addition the site is a small/medium size and thereby complies with para 68 of the NPPF, which stresses the importance in meeting housing need. As such the Inspector considered the proposal met the three aspects of sustainable development: economic, environmental and social.
B/18/0136	Policy 2	This appeal allows 25 existing caravans that were being used for tourist accommodation to be used instead to house agricultural workers for up to 10 months and for a temporary period of 3 years. The inspector assessed the impact of a change of use from tourism to agricultural occupancy on the character and appearance of the area and concluded changes were not substantial.
B/18/0267	Policies 2 and 3	The proposed dwelling is on land, which also provides a garage and parking area for existing users and would be retained. The Inspector was not persuaded that noise and disturbance, including head light glare would unacceptably harm the outlook from the dwelling and as a result the proposal complied with the policies.
B/18/0293	Policies 2, 3 and 29	The Inspector considered the design and size of the dwelling preserved the character and appearance of the conservation area and provided a suitable living environment. In addition as there was no car parking space further pedestrian activity would be unlikely to cause undue noise and disturbance. The Inspector noted that a parking space could be provided in the future, but this did not change this opinion. Finally, owing to the size of the dwelling and the number of occupants the living conditions to a neighbouring dwelling would not be substantially harmed.
B/18/0346	Policies 1, 2, 3 and 5	The Inspector was informed the council did not have a 5 year land supply and consequently invoked the tilted balance despite assessing the scheme against the recently adopted local plan policies, a plan that was agreed by another Inspector as providing a 5 year land supply. Consequently, permission was allowed because although the site is outside the settlement

		boundary the Inspector considered it was sufficiently enclosed by other development to not create an awkward and alien encroachment into open countryside. In addition although floor levels would rise as a result of flood risk issues living conditions of neighbouring properties would not be harmed so as to dismiss the appeal. Finally the Inspector did not consider the need to travel to services an issue as they were close enough to bicycle and further development may encourage facilities to be provided in the village.
B/18/0434	1, 2 and 3	The inspector acknowledges conflict with policy 1 and although allowing the appeal does not consider the development undermines the settlement strategy. The proposal is a linear development in a village with a ribbon pattern and as such does not harm the character and appearance of the area. There is no conflict with policies 2 and 3.
B/18/0456	2 and 3	The Inspector concludes the indicative layout for 5 dwellings shows the site can be suitably developed and as a consequence the scheme complies with the 2 policies.
B/18/0472	2 and 3	This is for the replacement of an outbuilding that will provide a double garage, a garden store of similar size with a bedroom, shower room and sitting room above. It will be ancillary to the main dwelling. The Inspector considered the impact of the dwelling on neighbouring properties, as well as contrasting it against an earlier refused and dismissed scheme, and concludes the scheme complies with the 2 policies.
2020/21 B/19/0441	1, 2, 3	The inspector agreed the proposal does not comply with the spatial strategy. However, he concluded that occupants would have reasonable access to facilities and as such complies with Policies 2 and 3. Overall he considered it would add to the councils housing delivery, especially small sites that are delivered quickly and as a result the conflict with Policy 1 was considered minor.
B/20/0262	2, 3, 30	This relates to a two story extension and its impact on neighbouring properties. The Inspector assessed the impact of the extensions on an adjacent dwelling and on the character of the area and concluded the scheme would not harm the living conditions of the neighbouring residents.
2021/22 B/20/0040	Enforcement appeal.	The notice was quashed because the inspector considered correcting it would provide injustice to both the appellant and the Council. Also it does not specify the alleged breach clearly enough.
B/20/0438	2, 3, 36	The loss of off-street parking for the existing dwelling by the construction of the proposal and its impact on a neighbouring property would have limited harm that does not override the benefit of an extra dwelling to the supply of housing and the local economy. The inspector said the policies are not out of date but considered this balance of issues provided sufficient material considerations to decide contrary to the local plan policies.

B/21/0011	2, 3, 30	The inspector acknowledged the site was in the countryside but considered it would meet a local need as Policy 1 supports, based on the contents of a six year old housing paper prepared during the local plan's preparation. This had more weight than the loss of openness and verdancy, which would be local and of limited impact, and contrary to policies 2 and 3. Policy 30 was not considered relevant.
2022/23 B/21/0102		This is an appeal against the refusal of a certificate of lawful use or development. As such it is determined on the basis of case law rather than planning merits judged against planning policies.
B/21/0291	2, 3, 30	The issues to be considered are character, appearance, the effect on neighbour's living conditions and whether the proposed dwelling provides appropriate living conditions for the occupants. The inspector concluded that the design would not harm character and appearance of the area and its relationship with adjoining property did not harm the living conditions of those occupiers or the living conditions of the future occupiers of the appealed dwelling. As such the proposal did not conflict with policies 2, 3 and 30.
B/19/0444/CD1		This appeal relates to a condition requiring approval of boundary treatment required to mark the curtilage. The appellant proposed no boundary treatment and so the issue was whether this would satisfy the condition. The use of surrounding land had since been approved for residential use as part of the dwelling and so the inspector concluded no boundary treatment was required. No policy was quoted.

APPENDIX C**South East Lincolnshire Local Plan – Policy Review**

Page	Policy	Title	Notes	RAG
19	1	Spatial Strategy	Sets out an areas suitability for development in levels, Sub-regional centres, main and minor service centres, and areas of development restraint in terms of other Service Centres and Settlements, and Countryside. It is possible that in future these may need to be adjusted due to changing circumstances, but it still appears coherent and justifiable at present.	
24	2	Development Management	Essentially an overarching policy covering all major Development Management issues. It provides a framework to be used in assessing the sustainable development attributes of all development proposals. In essence, it is a compendium of the sustainable development considerations contained in other policies in the Local Plan. No apparent reason to amend at present,	
28	3	Design of New Development	The Government have encouraged Local Design Guides and this policy setting out the main issues to be considered may need to be re-evaluated if any such guide does not align with it. However, it is so all embracing that any issue is likely to be one of emphasis rather than omission.	
31	4	Approach to Flood Risk	This policy relies heavily on SFRA and NPPF guidance in relation to the approach to be taken to Flood risk. However, in view of the importance, a special paper laying out any required changes would be a more efficient and economical approach with justification coming from the prime documents of the SFRA or NPPF No fundamental change needed at present	
35	5	Meeting Physical Infrastructure and Service Needs	Both of these policies focus on the needs for new infrastructure brought about by new development and how to capture it through developer contributions. They could face challenges due to the lack of the promised SPD in terms of Developer contributions. Careful consideration is needed to address this outstanding issue. However, currently the potential problem relates to the lack of the SPD, rather than the actual policy. This is not considered to be a basis to review the Plan in whole or part at this time.	
37	6	Developer Contributions		

43	7	Improving South East Lincolnshire's Employment Land Portfolio	These policies are interlinked. The first looks at the strategic approach across the whole Plan area with the variety of notable employment sites, the second in more depth considers the Prestige sites proposed. The policies look at how and where the Plan will deliver around 17,600 new jobs in the area. They are to some degree inaccurate due to the various changes to the Use classes Order and on-going development. Consideration should be given to some form of Paper or Note providing an updated explanation of the policies, over and above the standard monitoring report. Clearly the data given in the policy was bound to change over time, however it is considered that this does not fundamentally undermine the policies.	Yellow
51	8	Prestige Employment Sites	As above and for similar reasons this should be considered as an area for further work to better explain the policy in the emerging circumstances, rather than a need to amend the policy.	
54	9	Promoting a Stronger Visitor Economy	There are no apparent problems with this policy at present	Green
57	10	Meeting Assessed Housing Requirements	Sets the overall minimum housing need for the District at present. Not so much a policy as a statement of intent. No need to amend at present, especially in view of generally strong performance in terms of housing within the Plan area through a difficult few years nationally.	Green
60	11	Distribution of New Housing	Sets the intended distribution of the above housing numbers based on Policy 1 and 10. No need to amend at present, especially in view of generally strong performance in terms of housing within the Plan area through a difficult few years nationally	Green
67	12	Reserve Sites	Provides for a tranche of housing sites which can be brought forward if the sites in the previous policy fail to deliver. There appears no reason for review at present	Green
69	13	South West Quadrant Sustainable Urban Extension (Sou006)	These are individual policies related to significant sites and the way that they should develop. Masterplans are promoted for all of the sites. It is likely that not all sites will develop exactly as proposed for a variety of reasons. This does not mean that the Plan, in whole or in part requires review.	Yellow

71	14	South of the North Forty Foot Drain Sustainable Urban Extension (Wes002)	However, consideration should be given to reviewing these policies in depth and developing some form of Master plan/Business Plan, as promoted by the policies to address any issues that may be uncovered.	
72	15	Vernatts Sustainable Urban Extension		
77	16	Holbeach West Sustainable Urban Extension		
82	17	Providing a Mix of Housing	This policy looks at the general need for a variety of housing types across the Plan area, with no specific requirements. As such, no amendment is needed.	
84	18	Affordable Housing	This policy basically sets out the affordable housing need at the time of the Plans inception. A number of terms have changed and new guidance given in relation to Housing. Work is needed to clarify the Council's views and requirements in relation to this area, However, if justified by the national changes and provided as an updated interpretation of the policy to help developers meet the need, no formal change to the plan is required. .	
88	19	Rural Exception Sites	Given the above advice, consideration should be given to including this policy in the work recommended above.	
89	20	Accommodation for Gypsies, Travellers and Travelling Showpeople	The policy protects existing sites, provides for new sites and has a criteria based policy to meet additional needs which may arise during the Local Plan period. It appears fit for purpose.	
92	21	Houses in Multiple Occupation and the Sub-Division of Dwellings	Policy covers issues to be considered in determining applications for houses in multiple occupation or the sub-division of dwellings Whilst it may be superfluous given the general DM Policy 2, it raises no issues to require amendment/replacement.	

94	22	Replacement Dwellings in the Countryside	A criteria based policy allowing for replacement dwellings within the Countryside. Whilst some of the criteria seem overly onerous and unlikely to be applied, and given the overall DM Policy 2, the need for the policy appears limited. However, it raises no issues to require amendment/replacement.	
97	23	The Reuse of Buildings in the Countryside for Residential Use	Similar to the above, a criteria based Policy on conversion of buildings to residential. Given GDPO allowances and the overall DM Policy 2, the need for the policy appears limited. However, it raises no issues to require amendment/replacement.	
99	24	The Retail Hierarchy	A general policy defining the retail hierarchy. With changes to the UCO and GDPO the importance of the hierarchy and therefore this policy is reduced. However, it raises no issues to require amendment/replacement.	
103	25	Supporting the Vitality and Viability of Boston and Spalding Town Centres	Basically, an enabling policy supporting the town centres, it raises no issues to require amendment/replacement.	
106	26	Primary Shopping Frontages	Given UCO and GDPO this policy appears generally redundant, but it raises no issues in itself as to require amendment/replacement of the Plan. .	
107	27	Additional Retail Provision	This policy was based on a retail study, the age of which the inspector considered was such as to need review. A new study was carried out which essentially said that the policy and retail approach within the Plan was sound. Since then, Covid has seen as step change to online retailing and a significant impact on town centres. It is considered that a Paper should be produced that clarifies the role of this policy and the position the Council will take in terms of new retail proposals.	
111	28	The Natural Environment	Whilst the policy is generally sound, in terms of protecting recognised resources, it is clearly out of date in terms of the issue of Biodiversity net gain (BNG). It is considered that a Paper should be produced that clarifies the role of this policy and the Council's approach to BNG in order to address the need to create and improve natural habitats.	

117	29	The Historic Environment	The policy still appears sound and does not require that the Plan should be amended in whole or in part.	
124	30	Pollution	The policy still appears sound and does not require that the Plan should be amended in whole or in part at present.	
127	31	Climate Change and Renewable and Low Carbon Energy	The current policy appears to be suitable, however there appears to be changing guidance and emphasis in terms of on-shore wind and other issues. Application of the policy will require careful consideration of the most recent and up to date guidance available. However, this does not require that the Plan should be amended in whole or in part at present,	
130	32	Community, Health and Well-being	Whilst the protection elements of the policy appear sound and the promotion of new facilities laudable, the requirement for new provision needs to be addressed as part of the work recommended in terms of Policies 5 and 6 and the issues of developer contributions.	
137	33	Delivering a More Sustainable Transport Network	This is essentially a listing policy of types of transport route and specific schemes that will be protected, promoted and supported. Whilst it will gradually appear dated as schemes are progressed and completed, and new research is done and new Local Transport Plans produced, that does not mean that the Plan should be amended in whole or in part to reflect that.	
141	34	Delivering the Boston Distributor Road	Whilst part of this is now completed (Q1) the aim to complete further stages remains and the policy appears sound. Consideration should be given to any cross over with the work needed to address developer contributions.	
143	35	Delivering the Spalding Transport Strategy	Like the above policy, whilst progress has been made, this does not require the amendment of the policy, or the Plan. Consideration should be given to any cross over with the work needed to address developer contributions.	
146	36	Vehicle and Cycle Parking	Whilst the policy generally appears sound, it states that negotiation on parking requirements should be in accordance with the Parking Standards SPD, which it is understood has still not been produced.	

APPENDIX D**PAS POLICY MATRIX REVIEW**

	Matters to consider	Agree / Disagree	Extent to which the local plan meets this requirement
A	PLAN REVIEW FACTORS		
A1.	The plan policies still reflect current national planning policy requirements.	AGREE	This was addressed in Part 1. Overall it is considered that the policies in general still reflect the requirements of the NPPF, PPG, Written Ministerial Statements and the National Model Design Code. Whilst some minor issues were identified it is considered that these can be fully addressed through additional guidance. More importantly, in the current political climate it is very uncertain what changes may actually be made in the near future.
A2.	There has not been a <u>significant</u> change in local housing need numbers from that specified in your plan (accepting there will be some degree of flux). .	AGREE	The Plan is still operating under the adopted housing requirements, which are both higher than the requirements based under the standardised method (see Housing sub section).
A3.	You have a 5-year supply of housing land	AGREE	See this report and data based on the Monitoring reports
A4.	You are meeting housing delivery targets	AGREE	See this report and data based on the Monitoring reports
A5.	Your plan policies are on track to deliver other plan objectives including any (i) affordable housing targets including requirements for First Homes; and (ii) commercial floorspace/jobs targets over the remaining plan period.	AGREE	See this report and data based on the Monitoring reports

A6.	There have been no significant changes in economic conditions which could challenge the delivery of the Plan, including the policy requirements within it.	AGREE	Despite difficult circumstances due to Covid, the housing and economic performance for both authorities has been relatively strong. Due to the Boston Alternative Energy Facility progressing, in depth consideration of the impact of that on the employment portfolio for the district needs to be carried out and any possible mitigation measures, if needed, put in place.
A7.	There have been no significant changes affecting viability of planned development.	AGREE	As set out in Part 1, whilst viability issues have been difficult due to inflation and difficult economic circumstances, the Plan has continued to deliver for both authorities. However, there is concern that the Developer Contributions SPD that was promised in the LDS and SELLP, has not been delivered. This leaves a significant area of uncertainty in this area.
A8.	Key site allocations are delivering, or on course to deliver, in accordance the local plan policies meaning that the delivery of the spatial strategy is not at risk.	AGREE	See this report and data based on the Monitoring reports
A9.	There have been no significant changes to the local environmental or heritage context which have implications for the local plan approach or policies.	AGREE	See this report and data based on the Monitoring reports
A10.	No new sites have become available since the finalisation of the adopted local plan which require the spatial strategy to be re-evaluated. .	AGREE	See this report and data based on the Monitoring reports. Currently no sites have come forward that requires the spatial strategy to be re-evaluated.
A11.	Key planned infrastructure projects critical to plan delivery are on track and have not stalled / failed and there are no new major infrastructure programmes with implications for the growth / spatial strategy set out in the plan.	AGREE	Based on discussions with both Council's, whilst delivery has had some difficulties, but success has been achieved in other funding applications, nothing has been so significant as to undermine the strategy
A12.	All policies in the plan are achievable and effective including for the purpose of decision-making.	AGREE	Whilst the policies are showing some issues of age there is nothing strategic that undermines the Plan.

A13.	There are no recent or forthcoming changes to another authority's development plan or planning context which would have a material impact on your plan / planning context for the area covered by your local plan.	AGREE	None known. Given the political uncertainties at present, potential changes elsewhere, is not considered to be sufficient reason to seek amendment in whole or part to this plan.
A14.	There are no local political changes or a revised / new corporate strategy which would require a change to the approach set out in the current plan.	AGREE	Political changes are ongoing with a new strategic partnership, which may have implications for any future plan, but not the existing one.
ASSESSING WHETHER OR NOT TO UPDATE YOUR PLAN POLICIES		YES/NO	
A15.	You AGREE with all of the statements above	YES	<p>If no go to question A16.</p> <p>If yes, you have come to the end of the assessment. However, you must be confident that you are able to demonstrate and fully justify that your existing plan policies / planning position clearly meets the requirements in the statements above and that you have evidence to support your position.</p> <p>Based on the answers you have given above please provide clear explanation and justification in section A17 below of why you have concluded that an update is not necessary including references to evidence or data sources that you have referenced above. Remember you are required to publish the decision not to update your local plan policies. In reaching the conclusion that an update is not necessary the explanation and justification for your decision must be clear, intelligible and able to withstand scrutiny.</p>
A17.	<p>Decision: Update plan policies / No need to update plan policies (delete as necessary)</p> <p>Reasons for decision on whether or not to update plan policies (clear evidence and justification will be required where a decision not to update has been reached):</p> <p>See Part 1 and Part 2 reports alongside relevant monitoring Reports.</p>		

	<p>Other actions that may be required in addition to or in place of an update of plan policies</p> <p>Need to consider the future development of Planning Policy teams to address a number of issues.</p> <p>To service the monitoring requirement of the Joint Planning Unit, and the legal requirement to hold meetings..</p> <p>To allow the development of documents to address issues raised where further guidance/explanation may be needed.</p> <p>To develop and complete the SPD requirements in relation to Developer Contributions and Parking.</p> <p>To develop the required Masterplans in terms of the strategic sites where Masterplans are needed.</p> <p>To develop a position statements in relation to Retail, following the evidence review,</p> <p>To address the issue of Bio-diversity Net Gain, either as part of the Developer contributions strategy, or as a separate position statement</p>
Date of assessment:	December 2023
Assessed by:	Routledge Planning Consultancy
Checked by:	
Comments:	