



# Statement on Matter 6 Housing Land Supply

Examination of Central Lincolnshire Local Plan

On behalf of Mr R Sykes

9274

Project : 9274  
Site address : Land between 27 and 33  
West Bank, Saxilby,  
Lincoln, LN1 2LU  
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Date : 10 October 2016  
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## 1. Introduction

- 1.1 This statement provides our comments in relation to Matter 6 – Housing Land Supply. In doing so, we also comment on the Council's latest housing land supply assessment as set out in the Five Year Land Supply Report for 1 April 2017 to 31 March 2022, published in September 2016.
- 1.2 The Inspector will be aware that we have made representations on the Central Lincolnshire Submission Draft Local Plan and Policies Map.

## 2. Policy and guidance

- 2.1 The guidance in paragraph 47 of the NPPF means that the Central Lincolnshire Joint Strategic Planning Committee should ensure the Local Plan meets the full, objectively assessed needs for market and affordable housing over the plan period.
- 2.2 We consider that the amount of dwellings expected to be delivered through the site allocations process in all settlements should be increased to provide flexibility and a certainty that the overall minimum housing requirement will be achieved.
- 2.3 It should also be acknowledged that whilst paragraph 3-033 of the PPG states that the examination of the Local Plan is intended to ensure a five year supply will have been thoroughly considered and examined prior to adoption, the requirement in paragraph 47 of the NPPF is that the five year supply position must be updated annually. Therefore, even if the Inspector were to conclude that a deliverable five year supply of housing land could be demonstrated at September 2016, there is likely to be a new position around the time the LP is eventually adopted with a new base date (1<sup>st</sup> April 2017). This will include confirmed completion figures for 2016/17 (and therefore a revised annual requirement taking into account the backlog), and a revised position on all sites over a new five year period.

### 3. The Council's five year supply position

- 3.1 Paragraph 4 of the Land Supply Report states that the Council considers its five year housing land supply to be 12,712 dwellings. On an annualised delivery rate of 2,418 dwellings, this equates to a 5.26 year supply.
- 3.2 Our assessment of the Council's position is as set out in the following table, which applies a 20% buffer to the 5 year requirement plus backlog:

	<b>Requirement</b>	
A	Local Plan housing requirement (1 <sup>st</sup> April 2012 to 31 <sup>st</sup> March 2036)	36,960
B	Average per year (A/24 years)	1,540
C	Five year net Local Plan housing requirement (B X 5)	7,700
D	Net housing backlog 1 <sup>st</sup> April 2012 to 31 <sup>st</sup> March 2017 (7,700 requirement – (3,735+1,113 (estimated)) completions)	2,852
E	Annual backlog once spread over 5 years (D / 5 years)	570
F	Five year requirement including the backlog (C + E)	10,552
G	Supply that must be demonstrated (G + 20% buffer)	12,662
H	Annual average (G / 5)	2,533
	<b>Supply</b>	
I	Five year supply from 1 <sup>st</sup> April 2016 to 31 <sup>st</sup> March 2021	12,712
J	Five year supply (I / H)	<b>5.02 years</b>

- 3.3 As can be seen from the above, if the 20% buffer is applied to the requirement plus backlog figure, only 50 dwellings (i.e. 12,712 – 12,662) would need to be removed from the supply for the Inspector to conclude that a five year housing land supply cannot be demonstrated. This is just 0.4% of the Council's supply.

### 4. Housing requirement

- 4.1 The Five Year Land Supply Report notes in Section 2 that there has been a consistent undersupply in housing land since 2012-2013. In light of this, it is proposed to apply a 20% buffer to the calculation of the five year housing land requirement. We support the approach proposed, as the identified total shortfall of 2,852 (using the estimated total for 2016-2017) for the past five years or 37% compared to a requirement of 7,700 should be regarded as 'persistent'.

## **Addressing the backlog**

- 4.2 We consider that the 'Sedgefield' approach is the appropriate method for Central Lincolnshire and that any residual shortfall should be addressed through boosting the supply on the ground rather than changing the methodology on paper. We therefore endorse the JSPC approach set out in Table 2 of the Five Year Land Supply Report to include the shortfall in the 5 year supply period.

## **Applying the buffer**

- 4.3 In our view, the 20% buffer applies to both the annual requirement and the backlog. Our position is that there are no exceptional circumstances why the position on this issue in Central Lincolnshire should be any different to that set out in the PAS Guidance, the recommendations set out in the Local Plans Expert Group (LPEG) report or recent Local Plan Inspector's reports such as that for the High Peak Local Plan (issued 24 March 2016).

## **5. Housing Supply**

- 5.1 Here we make specific reference to the Central Lincolnshire Five Year Land Supply Report for 1 April 2017 to 31 March 2022. There are a number of weaknesses that we have been able to identify in the supply of sites, as set out in Appendix 1 to the report. We do not make reference to each and every site, but highlight those which provide examples of the shortcomings, which lead to our conclusion that the level of supply stated is vulnerable to change which could easily amount to a reduction of greater than 50 dwellings. This would in turn result in the Joint Strategic Planning Committee being unable to demonstrate a deliverable 5 year supply of housing land.
- 5.2 We also note the Inspector's Questions 8 to 12 and would expect that the evidence used to underpin the assumptions which have been applied to be made available prior to the Examination commencing.

## **Multiple developers**

- 5.3 The Council will need to demonstrate where it considers some of the larger sites will have multiple developers involved from the commencement of construction, implied by the annual delivery rate assumed. Here we highlight site CL818 – North East Quadrant, Lincoln. Larger sites may well be developed by more than one developer over the lifetime of their delivery.

However, the Council will need to provide evidence to demonstrate that multiple housebuilders will simultaneously be on site from the early stages, having regard to the circumstances of each site. Unless this is evidenced, a conservative approach should be taken and the standard build rate of 30 dwellings p.a. should be applied. If an over-optimistic approach is taken, there is a far greater chance of the trajectory failing, especially if there is insufficient flexibility within the supply.

- 5.4 Even if there are multiple developers on a site, then the build rate must take competition into account. For example, if there are two developers, the rate may be 45-50 dwellings per annum rather than a straight multiplier (e.g. 60 dwellings per annum).

### **Lead-in times**

- 5.5 It can take a very long time between obtaining a planning permission and the first dwelling being completed, especially on the larger sites which provide a significant component of the anticipated supply in Central Lincolnshire. This delay can result from a combination of the following:

- approval of reserved matters;
- discharging conditions e.g. concerning ecology, archaeology, contamination, flood risk and drainage etc;
- agreeing S.106s and addressing CIL requirements;
- relocating existing uses often involving clearance of buildings and structures;
- forming new accesses to the highway network ;
- diverting or closing existing highways and footpaths which may involve public inquiries;
- on large sites, negotiating developer agreements to equalise funding arrangements;
- dealing with physical and infrastructure works before the first dwelling can be completed, let alone any compulsory acquisition of land and possible public inquiries.

- 5.6 These issues do not appear to be adequately reflected in the lead-in times, particularly for large sites which currently do not have planning permission. We highlight site CL1101, Land at Mill Lane which is expected to deliver 25 dwellings in year 1, but does not currently have a planning permission in place. Similar doubts exist for sites CL1241, Gainsborough Northern Neighbourhood SUE and for CL819, Western Growth Corridor which are major urban extensions

without planning permission in place and where there will inevitably be many complex issues to be resolved and yet are expected to deliver during 2018/2019.

## Windfalls

- 5.7 A windfall allowance for development on unidentified sites below 25 dwellings capacity is included in the five year supply for the Lincoln Urban Area and for small villages. The windfall allowance is stated to apply from Year 2 of the five year supply period, as the report acknowledges that sites to be delivered in 2016/17 and 2017/18 would already have planning permission. We consider that a more correct interpretation of this approach would be to apply the allowance from year 3 (2019/2020) as it is entirely possible that sites to be delivered in 208/2019 would also already have planning permission and therefore their inclusion could amount to double-counting.
- 5.8 An improved approach would deduct the total number of dwellings with an extant permission on windfall sites from the overall windfall allowance for the five year period. This assumes that the monitoring information is available to identify the relevant windfall sites, which should be the case if the Joint Strategic Planning Committee is able to provide the evidence to support the inclusion of a windfall allowance in the first instance.

## 6. Conclusions

- 6.1 In our view, it is unlikely that the Council can demonstrate a deliverable five year supply of housing land on the basis of the supply set out within the HLS report. Indeed, only 0.4% of the supply would need to be found to be undeliverable for there to be a shortfall. We have identified a range of issues, which could lead to this figure being reduced.
- 6.2 The Joint Strategic Planning Committee should seek to increase the identified supply by allocating sites within appropriate locations on the edge of large villages which might have a capacity of fewer than 25 dwellings, as this would be consistent with the PPG guidance that sites capable of delivering 5 dwellings or more should be assessed. This would avoid uncertainty as to whether any potential site on the edge of a large village will be considered to be 'appropriate' by the Local Planning Authorities and potentially contribute to the assessment of the 5 year HLS.

- 6.3 In our view there are also opportunities to make further allocations in the medium and small villages, in line with the PPG guidance on size thresholds which would be sustainable and commensurate with their function.