



Gladman Developments Ltd

Central Lincolnshire Local Plan EiP

Matter 4 – Sustainable Urban Extensions (LP28, LP30, LP39, LP44, LP48)

General Questions – Policy LP28

Q2. What was the rationale behind the reliance upon SUEs rather than smaller site allocations in order to meet the OAN?

1. See responses to Matter 1 and Matter 3.

Q3. Were alternative locations for growth and SUEs considered and tested as part of the Local Plan preparation? Where is this set out?

2. Gladman believe that insufficient housing growth is directed by the Local Plan towards the rural areas of the Housing Market Area (see response to matter 3), **Gladman draw the Inspector's attention to** paragraph 4.16 of the Sustainability Appraisal (SA) which states that:

'In terms of housing allocations, sites that were subject to significant constraints, or in a location that would be unsuitable in line with the overall approach to the Local Plan, were rejected and were not subject to IIA as they were not considered to be a 'reasonable alternative'. Sites outside the top 4 categories of the settlement hierarchy in LP2 were also not considered to be reasonable alternatives, as allocation would be contrary to the settlement hierarchy. These sites were not subject to IIA.'

3. It is clear from the above that the Council has not considered and tested the sustainability of housing sites in lower order settlements. Gladman have been unable to locate an appropriate evidence base for the chosen locations for growth. **This issue goes to the fundamental core of Gladmans'** submissions in response to matter 3, the methodology applied by the Councils in determining the settlement hierarchy has not been consistently applied and as such has discounted the ability of sustainable growth being delivered in sustainable settlements across the Housing Market Area such as Bassingham.

Q4. How was the mix of uses and number of dwellings/amount of employment land decided? What is the reason for requiring employment land within each of the SUEs (42ha in total) given the overall employment

land need is only 23ha and Policy LP5 seeks to allocate 111ha of strategic employment sites? Should the SUE policies include a greater degree of flexibility regarding employment uses?

4. Whilst Gladman does not wish to comment on the specific mix of uses and amount of employment land decided in relation to the question above, it is our view that the Councils need to ensure that its evidence on employment land is sufficiently aligned with its housing need evidence. Failure to demonstrate a reasonable alignment between the economic policies and the housing strategy goes to the soundness of the Plan. Indeed, the Councils position is clear that it intends to allocate significant level of employment land that may not be fulfilled by the resident workforce if the housing **strategy is not aligned with the Plan's economic aspirations.**

Q.8 Taking into account physical and planning constraints, infrastructure and land ownership, are all of the SUE's capable of being delivered in a manner envisaged by the Plan? Are they all viable?

5. The emerging Local Plan is heavily reliant on large Sustainable Urban Extensions (SUEs) to deliver the housing needs of the Housing Market Area. In total, the emerging Local Plan expects 14,700 dwellings to be delivered through SUEs, approximately 44% of the total growth expected to be delivered over the plan period. Whilst recognising the general principle and sustainability benefits that can be achieved through these proposals, their development will be associated with overcoming a number of significant delivery and infrastructure constraints. Gladman therefore question their ability to come forward in the timescales envisaged by the Council.
6. **The Hourigan Connolly Report (Appendix 3 of Gladmans' representations to the submission version of the Local Plan)** outlines that urban extensions can often take much longer than envisaged to come forward for **development. The report's conclusions are arrived at by** analysing the delivery of a robust sample of urban extensions taken at a national scale. It identifies how long each site took to deliver housing from original conception through to the delivery of the first phases of development. In short the study emphasises that the delivery of urban extensions can be problematic and the timescales associated with the delivery of houses on such sites is often significant. Using 80 schemes as case studies, the Hourigan Connolly report finds that an eight year period should be allowed from the preparation of an outline/in principle planning application to the delivery of homes on site.
7. Complications in delivering SUEs may arise due to a range of factors, these include; landownership issues, prolonged S106 negotiations, land remediation, provision of key infrastructure, community benefits, market competition and adherence to policy requirements.
8. Gladman believe that assumptions made in respect of the delivery of the identified housing through **SUEs in the Council's housing trajectory (August 2016) risks the plans** ability to meet the tests of soundness contained in paragraph 182 of the Framework.
9. Indeed, Gladman doubt how realistic the start dates as outlined in the housing trajectory are for the proposed SUEs as a substantial number of SUEs have yet to have applications for reserved matters submitted for determination by the relevant local planning authorities. The application of unrealistic

start dates in the housing trajectory could result in a significant shortfall in housing land supply which will **in turn impact on the Councils'** ability to demonstrate a five year housing land supply across the plan period.

10. Gladman also consider that the annual rates of delivery applied to several SUEs are unrealistic and unachievable. As identified in the Hourigan Connolly Report, it is considered that an average annual delivery rate of 30 dwellings per annum is realistically achievable, with delivery increasing depending on the number of outlets acting on site. Whilst it is accepted that delivery could increase over 30 dwellings per annum this is dependent on the number of additional outlets acting on site and no robust evidence has been provided by the Councils to justify the delivery rates anticipated. It is unlikely that there will be more than three developers acting on site at any one time due to increased competition, this would result in the maximum delivery rate of 90 dwellings per annum being realistically achievable.
11. Further, the fact that several of the proposed SUEs (Gainsborough; Northern Neighbourhood, Southern Neighbourhood, South East Quadrant, Western Growth Corridor and South West Quadrant) continue towards the end of the plan period allows no room for slippage and should this happen provides no manoeuvrability to allow the Council to react to changing market conditions i.e. where there is an undersupply of housing. Should any slippage occur in the early years of the plan period this will result in a concentrated affect and unrealistic delivery rates required in the later years of the plan period.
12. GDL consider that this is not clearly set out, there is a lack of justification for the lead in times and delivery rates, particularly on the large SUEs. The delivery rates appear incredibly generic and are not based on up to date evidence. GDL have prepared below what is considered to be a more realistic assessment of the length of time between application submission and completions for large applications (development sites that are smaller than SUEs):
 - Preparation of an outline application - 3-6 months
 - Resolution to grant planning permission - 6-9 months
 - S.106 process - 6-9 months
 - Site sale, equalisation agreements etc. - 3-6 months (where required)
 - Preparation of reserved matters and consultation - 3-6 months
 - Discharge of pre pre-commencement (design brief, masterplan etc.) - 3-9 month
 - Determination of reserved matters - 3-6 months
 - Discharge of pre-commencement conditions - 3-6 months
 - Site set up and initial infrastructure - 3-9 month
 - Lead in first house completion - 3 months
 - Total = 3-6 years
13. Delivery timescales envisaged for large SUEs are likely to be longer than large applications as demonstrated in the Hourigan Connolly Report. As such, it is considered that many of the larger sites would appear to have unrealistic delivery rates. It appears that some of the sites identified in Appendix 1 to the updated Five Year Housing Land Supply Report are listed as not currently having planning permission but have units been delivered in Years 2016/17 and 2017/18, this is unrealistic

and cannot be relied upon. The Council have no robust evidence for the claims made in the trajectory and therefore these claimed delivery rates cannot be relied upon for sites without planning permission, particularly those large sites where no planning application has been submitted.

14. In the likely event that the proposed SUEs do not come forward as envisaged, a significant shortfall will soon arise and will further exacerbate housing shortfall across the HMA.

Q9. What contingency arrangements are in place should one or more of the SUEs fail to come forward in the manner envisaged? Should the plan include a policy to ensure that sufficient housing land is delivered if monitoring identifies that any of the SUEs may not be deliverable/developable or would be significantly delayed? If so, what action would be appropriate and how and when would it be triggered?

15. The Plan provides for no flexibility in the likely event that the proposed SUEs fail to come forward as envisaged. Whilst broad locations for growth are identified under Policy LP54 the policy wording is **clear that development proposals 'could' be considered not 'will' be considered**. Further, the broad locations for growth merely seek to allocate further SUEs which will not resolve the chronic housing needs of settlements across the rural area and will not address any identified deficit in a timely manner.
16. The lack of flexibility contained in the Plan (as further discussed in response to Matter 3) means that should the expected rates of delivery not be realised, the plan will under deliver as there is no appropriate contingency measures included in the Plan. Central Lincolnshire's **housing shortfall** is already significant, due to the significant reliance on SUEs to deliver the annual requirement, should any one of these slip below that projected, this will only add to the substantial shortfall in housing land supply and will further exacerbate housing shortfall across the HMA. As a consequence, the implications for the Councils would be a failure to demonstrate not only a five year housing land supply but failure to deliver **the HMA's overall housing requirement** across the plan period. Gladman recommend that in order to address this issue and ensure that the plan is delivered in full, additional housing sites across a range of sustainable locations need to be identified as submitted in response to Matter 3, and realistic adjustments made to the housing trajectory need to be applied.
17. Accordingly, Gladman recommend that a 20% buffer of reserve sites should be included within the Plan to allow for additional contingency. This approach has been followed by a number of Inspectors at Local Plan Examinations. Further, it is considered necessary to refine the OAN supporting the Plan rather than seeking to meet the lower OAN. Consequently there will be a need to allocate additional housing land to provide flexibility should the SUEs fail to come forward as expected. The Examination of the East Cambridgeshire¹, Amber Valley² and East Devon³ Local Plans all provide examples of where Examination procedures have been suspended pending the identification of further sites by the **Council's involved**. There is a critical need therefore for the Councils to identify further sites to ensure

¹ See Interim Conclusions to the East Cambridgeshire Local Plan Examination

² See letter dated 12/05/2014 to the Amber Valley Local Plan Examination

³ See Inspector's letter dated 31/03/2014 to the East Devon Local Plan Examination

that the Plan is able to meet its housing needs and demonstrate a robust five year housing land supply to ensure the Local Plans deliverability.

18. In addition, given the significant reliance of strategic sites to meet the **Plan's** housing needs in the event that these sites should not come forward it is necessary that the Plan also contains a trigger event which will require the Councils to take action. Gladman note Main Modification 25A to the North Northamptonshire Joint Core Strategy⁴ which states that *'In order to provide an early-warning if supply of housing land is running short relative to NPPF requirements, monitoring will be undertaken against the Policy 28 requirement plus an additional 25% buffer. If not available, this would trigger corrective action by the local planning authority in order to boost supply.'* It is therefore critical to the soundness of the Plan that a modification such as this is included to ensure that the Plan contains sufficient flexibility and contingency to react to changing market conditions.
19. Gladman consider that it would be prudent that given the growth is already focused towards the urban areas, that further growth should be directed to lower order settlements. Gladman believe that this strategy of development dispersal will allow sufficient flexibility to allow sites of a smaller scale to come forward more readily until the proposed SUEs commence delivery and would make best use of existing infrastructure and facilities whilst providing adequate market choice to meet the housing demand.

Q10. Why does Policy LP28a require proposals to demonstrate availability and deliverability – is that not a prerequisite for allocation?

20. A site should not be allocated if it is not available or deliverable and this question and observation goes to the heart of the concern Gladman have over the reliance on the SUEs over the plan period. The policy requirement referenced above is neither effective nor justified. To require developers to demonstrate that a SUE is available and deliverable gives no certainty whether the sites identified in the Local Plan will come forward as envisaged and is contrary to the explicit requirements of paragraph 47 of the Framework. This is a clear flaw that should have been dealt with by the local planning authorities through the plan preparation process. Should any SUEs be found unable to come forward due to issues relating to availability, deliverability or physical and environmental constraints then it will result in a substantial shortfall in housing delivery and mean that the Local Plan cannot be found sound.

⁴ <http://www.nnjpu.org.uk/docs/JCS%20App%201%20Main%20Mods%20Final%202022-06-16.pdf>