
FREETHS

CENTRAL LINCOLNSHIRE LOCAL PLAN

MATTER 2 HEARING STATEMENT: OBJECTIVELY ASSESSED NEED, THE HOUSING REQUIREMENT AND AFFORDABLE HOUSING (LP3, LP11)

PREPARED ON BEHALF OF
TAYLOR LINDSEY LTD

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1. INTRODUCTION

- 1.1. This Statement is prepared by Freeths LLP on behalf of our client Taylor Lindsey Ltd and is submitted as evidence as part of the Central Lincolnshire Local Plan Strategy examination. Taylor Lindsey Ltd is promoting a number of sites for development within the administrative area of Central Lincolnshire.
- 1.2. The issues covered by this Statement relate to Matter 2: Objectively Assessed Need, the Housing Requirement and Affordable Housing of the 'Schedule of Matters, Issues & Question for Examination' dated 16/09/16 (updated 26/09/16) prepared by the Inspector and forming the basis of the Examination Hearings. This Statement responds specifically to questions 13, 17, 18, 21 and 33 identified by the Inspector.

2. COMMENTS

Q13. What if employment land development and job creation is higher than the baseline forecast, and subsequently there is insufficient housing to support the development of allocated employment sites? Will there be a need to find more housing sites?

- 2.1. The Plan sets a target of 36960 new homes between 2012 and 2036 (1540 dwellings (net) pa), a figure derived from the Strategic Housing Market Assessment (SHMA) (2015) which identifies an Objectively Assessed Need (OAN) for dwellings in the range of 1432-1780 dpa, accounting for both housing need and economic growth (the latter is set out in the Economic Needs Assessment (ENA) (2015)). We consider that the target should be based on 1780 dpa.
- 2.2. Although deliverability is questioned, primarily due to the reliance on the larger sites, such an increased requirement (1780 dpa) would support SHMA comments echoing the ENA which highlights local analysis identifying potential for stronger levels of job growth to exist beyond the recommended baseline forecast in Central Lincolnshire. The ENA identifies the potential to realise between approximately 820 and 940 jobs per annum to 2036 (such levels of job growth are closely aligned to that seen in the ten years preceding the recession in 2008), generating a justified need for up to 1,780 dpa.

- 2.3. The Council acknowledges the potential for an increased housing requirement due to job growth given past trends such that coupled with the Plan's reliance on a number of SUEs where delivery cannot be assured within the plan period, it is considered that additional provision and sites will be required, planning positively and flexibly to allow choice, competition and contingency.

Q17. Will the housing requirement in the Local Plan significantly boost the supply of housing as sought by paragraph 47 of the Framework? Does it reflect the Vision of the Local Plan which states that Central Lincolnshire will be a location of 'positive growth'?

- 2.4. No. As stated above, the plan relies heavily on a number of large scale major strategic sites / Sustainable Urban Extensions which will be particularly challenging such that deliverability is a major concern. Such large scale sites will require major infrastructure works to be undertaken and have a number of constraints such as flooding, transport and contaminated land that will need to be addressed. Such constraints will subsequently impact on delivery and could exacerbate issues relating to viability. In the context of deliverability there is, as a result, concern that a 5 year supply of housing (as required by paragraph 47 of the NPPF) cannot be demonstrated and that it is unlikely these sites will be delivered within the plan period as anticipated. Greater choice and flexibility is therefore required in terms of size and location to deliver the OAN.

Q18. Should the housing requirement at paragraph 2.4.1 and Policy LP3 be expressed as a minimum figure given the range of OAN identified by the SHMA? Is it adequately clear that this figure is the housing requirement?

- 2.5. Yes, but with an increased requirement.

Q21. Has the affordable housing need (17,400 dwellings) been correctly established?

- 2.6. This is questioned. The affordable housing requirement is extremely high and as a proportion of overall housing need is not considered to be deliverable against the backdrop of infrastructure requirements, other site constraints and local market conditions.

Q33. Overall, is the housing requirement in the plan justified? If not, what should it be?

- 2.7. No. The upper figure of 1780 dpa identified in the SHMA should be utilised in policy LP3, requiring an overall, minimum housing target of 42720 over the plan period. A range of additional sites of varying size/scale should also be identified to provide choice, competition, flexibility and contingency to meet the Council's full OAN requirement and as such, reduce reliance on the SUEs.