
Central Lincolnshire Local Plan Review Examination

Response to Inspectors' Matters, Issues and Questions
submitted on behalf of Cyden Homes
(ID: 1102632)

Matter 2: Housing, Employment and Retail Need

November 2022

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Housing, Employment and Retail Need

**Barton Willmore, now Stantec on behalf of
Cyden Homes (ID: 1102632)**

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Prepared by:	Michael Knott
Checked by:	Michael Knott
Authorised by:	Michael Knott

The Blade
Abbey Square
Reading
Berkshire. RG1 3BE

Tel: 0118 943 0000
Fax: 0118 943 0001
Email: planning@bartonwillmore.co.uk

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INTRODUCTION

- 1.1 Barton Willmore, now Stantec is instructed by Cyden Homes Limited to submit this hearing statement in response to the Inspectors' Matters, Issues and Questions. This statement expands upon the representations submitted on behalf of Cyden Homes at the earlier stages of the Local Plan Review's preparation.
- 1.2 As background, Cyden Homes controls land to the south of Hawthorn Road, Cherry Willingham which is promoted as a site for residential development. The site is not currently proposed for allocation in the Local Plan Review; it is an omission site.
- 1.3 This statement supplements the representation submitted at Regulation 19 consultation stage in May 2022.

RESPONSE TO MATTER 2: HOUSING, EMPLOYMENT AND RETAIL NEED

Issue 1: Local Housing Need

Q1. What is the minimum number of new homes needed over the plan period as calculated using the standard method? Are the calculations accurate and do they reflect the methodology and advice in the national Planning Practice Guidance ('the PPG')?

1.1 We have no further comments.

Q2. Does the PPG list only those circumstances where it would be appropriate to plan for an alternative level of housing provision than the standard method, or, could other locally specific reasons justify a higher figure?

1.2 As acknowledged in question 1, standard method is "a minimum starting point in determining the number of homes needed in an area".

1.3 In this regard, the PPG advises that there will be circumstances where it may be appropriate to plan for a level of housing provision which is higher than the standard method indicates. The PPG is clear that the types of circumstances where it may be appropriate to plan to meet a level of housing need higher than standard method is not a closed list (Paragraph: 010 Reference ID: 2a-010-20201216).

1.4 The Local Plan (see section 2.2) and the Committee's evidence base supports a level of housing need, above that indicated by standard method, of 1,325 dpa. We broadly support this this, albeit we do not consider this figure should be applied as a ceiling to housing need or planned delivery.

1.5 Paragraphs 2.2.4 – 2.2.5 summarises that the Economic Needs Assessment (ECO001) was informed by the Local Industrial Strategy (LIS) for the area and other work produced by the Local Enterprise Partnership (LEP). In our view, consistent with the types of situations given in the PPG, the evidence base including wider strategies for the area supports the Committee's conclusion that actual housing need is higher than standard method.

- 1.6 Furthermore, the Committee's 'top end of the range' figure of 1,325 dpa is lower than the adopted Local Plan annual housing requirement (1,540 dpa) and significantly below the Committee's forecast average annual completions figure for the period 2022-2027 (1,937 dpa) contained in HOU009 (see Table 12). We consider a housing requirement below the planned supply of housing would be inconsistent with the PPG and paragraphs 60 and 81 of the NPPF (2021).

Q3. Is the level of job growth realistic? How has it been calculated and how does it compare to other projections for employment in Central Lincolnshire over the plan period?

- 1.7 We have no further comments.

Q4. How does it compare to past performance?

- 1.8 We have no further comments.

Q5. How has the number of new homes needed to support that level of employment growth been calculated? Are the calculations accurate and robust?

- 1.9 We have no further comments.

Q8. What would be the implications if housebuilding did not match projected increases in job growth?

- 1.10 We have no further comments.

Issue 2: Housing Requirement – Policy S2

Q1. Is the higher figure of 1,325 dwellings per year over the plan period justified and consistent with national planning policy and guidance? If not, what should the housing requirement be for the plan period?

- 2.1 Yes, as explained in our client's response to the Regulation 19 consultation and as summarised above, we consider the higher figure of 1,325 dpa to be justified and

consistent with national planning policy and guidance. The figure of 1,325 dpa should not be treated as a ceiling, as discussed further in response to question 3 below.

Q2. The Committee's response to the Inspectors' Initial Questions includes details of housing completions between 2012 and 2019 (Table 2). Is a housing requirement of 1,325 dwellings per year achievable over the plan period?

- 2.2 Yes. The Committee's latest housing land supply report (HOU009) forecasts 9,684* completions over the next five years (2022-2027). This equates to an annual average of 1,937 dpa, a substantially higher level of housing delivery than is being planned for.
- 2.3 However, it is important that the Local Plan Review allocates sufficient deliverable sites to meet the requirements over the plan period and in accordance with the distribution of development proposed in Policy S2 (please refer to our separate statement for Matter 3).

Q3. If the Local Plan seeks to make provision for 1,325 dwellings per year in response to projected employment forecasts, then what is the justification for setting the housing requirement as a range?

- 2.4 In relation to Policy S2, Appendix 4 of the SA Preferred Plan Policies and Reasonable Alternatives (STA004.1g) compares four options, including Option 1 'Preferred Policy' with Option 3 (Option 3 being a housing requirement of 1,325 dpa).
- 2.5 STA004.1g concludes that Option 3 is predicted to have "major positive effects throughout the plan period and beyond". It supports the Committee's economic ambitions and is justified and consistent with national planning policy and guidance.
- 2.6 For Option 1, STA004.1g states a housing requirement range "would provide greater protection against unplanned, and potentially unsustainable development." This sentiment is reflected in paragraph 2.2.8 of the Local Plan. In our view, this justification is flawed for the following reasons:
- i) It fails the test of soundness that the Local Plan be "positively prepared"
 - ii) It indicates that the Committee's are not satisfied that the sites proposed to be allocated in the Local Plan are deliverable and developable, and therefore the plan is not "justified"
 - iii) By setting the requirement as a range, it could lead Committee's to 'take the foot off the peddle' in supporting the delivery of sites allocated for housing.

- iv) It suggests that, should the 'tilted balance' in paragraph 11d of the NPPF (2021) be engaged in decision making, that "unsustainable development" would be permitted, contrary to national policy.

2.7 Our response to the Regulation 19 consultation also noted that a housing requirement range was not a policy approach supported by the Inspectors appointed to examine the current adopted Local Plan for Central Lincolnshire.

2.8 In conclusion, we maintain that the Local Plan should set a single minimum housing requirement of 1,325 dpa to meet actual housing need established through the Committee's own evidence base, the LIS, and the economic ambitions for the area.

Q4. Is the proposed housing range sufficiently clear to decision-makers, developers and local communities? Is Policy S2 effective in this regard?

2.9 No, for the reasons set out above.

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