

## Home Builders Federation

### Matter 9

## CENTRAL LINCOLNSHIRE LOCAL PLAN EXAMINATION

### Matter 9 – Housing Land Supply

#### Issue 1 – Total Housing Land Supply

Q1. What is the most up-to-date position regarding the projected supply of housing over the plan period?

This is for the Council to answer. However, our statements are based on the supply estimates set out in the submitted local plan and we will make any comments on updated evidence at the hearings if necessary.

Q2. Is the projected supply of housing justified and has sufficient land been identified to ensure that housing needs will be met?

Using the housing trajectory from the submitted local plan there is a headroom of 3,622 dwellings (12%) between the overall HLS of 32,672 dwellings and Central Lincolnshire's upper end of the housing requirement range of 29,150 dwellings. The HBF always advocates as large a contingency as possible to facilitate optimum flexibility. There is no precise formula to determine an appropriate amount of headroom but where a plan is highly dependent upon one or few large strategic sites and/or localities to meet its need greater flexibility is necessary as the risk of the plan not meeting needs increases should any site or are not deliver as expected. As we note in our statements this local plan allocates 20,450 dwellings on SUEs of which 13,900 dwellings are expected to be delivered by 2040. This represents 42.5% of the homes expected to be delivered over the plan period. In addition, the HBF are also concerned as to the ability of brownfield sites in all Value Zones and non-strategic greenfield sites and SUEs in mid lower and lower Value Areas to deliver homes as expected by the Council. These may take longer to come forward due to the need for site-by-site negotiations and under these circumstances, a headroom of only 3,522 dwellings may provide insufficient flexibility.

Q3. Does the total housing land supply include an allowance for windfall sites? If so, what is this based on and is it justified?



The Council state that the windfall allowance of 75 dwelling per annum. The Council will need to outline whether they have considered the impact of the policies on the windfall allowance. As we note elsewhere in these statements the viability evidence suggests that brownfield development will be challenging in across the borough and as such polices such as S7 and S22 for example could reduce the amount of windfall coming forward across central Lincolnshire. Whilst we recognise that there is some flexibility in these policies, we are concerned that many such sites will just not come forward.

Q4. Paragraph 69 of the Framework states that in order to promote the development of a good mix of sites, local planning authorities should (amongst other things) identify land to accommodate at least 10% of their housing requirement on sites no larger than 1 hectare, unless there are strong reasons why this cannot be achieved. What proportion of the housing requirement will be met from sites no larger than 1 hectare?

This is for the Councils to answer. However, in providing this answer the Councils must refer to sites either allocated in the local plan or identified in brownfield register. The Council should not include any provision from small windfall sites as these do not benefit from formal identification and the intended benefits of this policy with regard to small and medium sized developers.

## **Issue 2 – Five-Year Housing Land Supply**

Q1. Taking into account completions since the based date of the Plan, what will be the anticipated five-year housing land requirement upon adoption of the Plan?

Assuming the plan is adopted in 2023/24 our assessment is that they will have 6.64-year housing land supply on adoption.

Q2. Based on the housing trajectory, how many dwellings are expected to be delivered in the first five years following adoption of the Plan? Where is this set out?

The housing trajectory in on page 170 of the submitted plan indicates that 9,145 will be delivered in the first five years following adoption.

Q3. What evidence has the Committee used to determine which sites will come forward for development and when? Is it robust?

The HBF does not wish to comment upon the acceptability or otherwise of individual sites. However, the HBF considers it is important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The HBF would expect the Council to have the evidence to support the proposed delivery of these sites.

Q4. Where sites have been identified in the Plan, but do not yet have planning permission, is there clear evidence that housing completions will begin within five years?

The HBF does not wish to comment upon the acceptability or otherwise of individual sites. However, the HBF considers it is important that all the sites contained within the plan are deliverable over the plan period and planned to an appropriate strategy. The HBF would expect the Council to have the evidence to support the proposed delivery of these sites.

Q5. What allowance has been made for windfall sites as part of the anticipated five-year housing land supply? Is there compelling evidence to suggest that windfall sites will come forward over the plan period, as required by paragraph 70 of the Framework?

The trajectory does not include any windfall allowance between 2022/23 and 2025/26 to ensure there is not double counting between windfall and extant permissions. The HBF would agree that this approach is sound.

Q6. Having regard to the questions above, will there be a five-year supply of deliverable housing sites on adoption of the Plan?

On the basis of the housing trajectory on page 170 of the local plan there will be a five-year housing land supply on adoption. However, the HBF has not undertaken an assessment as to the deliverability of the sites in the five-year land supply and careful consideration will need to be given to the delivery rates from allocated sites and whether these have been adequately justified and have taken account of the policies in this plan which may delay their delivery.

Q7. What flexibility does the plan provide if the SUEs in particular do not come forward in the timescales envisaged?

See response to question 1.

Q8. Is it necessary to have a review mechanism in the Plan to consider progress against these, and other sites, and to identify any appropriate steps to increase supply if required?

Yes.

Q9. In the current Central Lincolnshire Local Plan, Policy LP54 identified broad locations for future growth which could come forward where certain criteria were met. Is a similar policy required for soundness in the Local Plan Review?

Yes.

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