

## **Matter 2 – Housing, Employment and Retail Need**

### **Statement on behalf of Tom Barton Farms & Lockwood Estates**

4<sup>th</sup> November 2022

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1. This statement is made on behalf of Tom Barton Farms and Lockwood Estates, two parties with separate land interests in the West Lindsey area, but both represented by Chave Planning under one umbrella due to their similar concerns with the soundness of the Central Lincolnshire Local Plan.
2. Tom Barton Farms has promoted a site at Lea for the development of c137 dwellings, sheltered housing and a convenience store. This is site reference WL/LEA/002 in the Sustainability Appraisal.
3. Lockwood Estates has promoted a site at Ingham for the development of 10 dwellings and the provision of open space. This is site reference WL/ING/005 in the Sustainability Appraisal.
4. This statement follows on from representations made to the Regulation 19 Publication stage of the Local Plan by both parties. Responses to relevant matters in the Inspector's Matters & Issues Questions will be set out under headings of the questions below.

## **Issue 2 – Housing Requirement – Policy S2**

**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?**

5. The preamble to Policy S2 (paragraph 2.2.5) explains that 1,325 dwellings per year are needed to support the expected growth in jobs in Central Lincolnshire and that an important part of the Local Plan is delivering economic growth within the region to ensure it is competitive and supports the ambitions of the Greater Lincolnshire Local Enterprise Partnership.

6. The National Planning Practice Guidance (Paragraph: 009 Reference ID: 2a-009-20190220) says that the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area and that there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. These include where there are growth strategies for the area that are likely to be deliverable. The Economic Needs Assessment (ENA) (2020) identifies strong growth in recent years, outstripping anticipated growth, and projects forward a growth of approximately 992 jobs per year. In order to provide enough working age population to support the projected level of job growth, 1,325 dwellings per annum would need to be delivered. The Local Plan housing trajectory demonstrates that this figure is achievable, since it has been exceeded over the first three years of the plan period. This is significant evidence to support this housing figure.
7. However, Policy S2 proposes that the Local Plan will use a housing range as its housing requirement, with the national standard method figure (1,060) at the bottom end of the range and the figure needed to match economic growth ambitions (1,325) as the top of the range. The bottom end figure would be the 'housing requirement' and housing would be planned to meet the top end of the range. We disagree with the use of a range, with only the bottom end of the range only being used as the 'official' housing requirement. The figure of 1,325 should be used as the housing requirement as it is the level of planned growth that is required, taking into account the projected level of job growth. If this housing requirement is not achieved then homes will not be provided to match jobs and this would lead to unsustainable outcomes. The National Planning Practice Guidance does not support the approach taken in Policy S2. It does not set out that important economic factors can be taken into account in determining the housing need, for the local authority to then undershoot the established need with a lower housing requirement.
8. We also disagree with the use of a range for the calculation of the 5-year housing land supply. The Local Plan attempts to justify this at paragraph 2.2.6 as in accordance with the Planning Practice Guidance (PPG). However, the PPG says at Paragraph: 001 Reference ID: 68-001-20190722 that *'the 5 year housing land supply is a calculation of whether there is a deliverable supply of homes to meet the planned housing requirement [my emphasis] (or, in some circumstances, local housing need) over the next 5 years'*. It goes on to say that housing requirement figures identified in adopted strategic housing policies should be used for calculating the 5-year housing land supply figure. Only in other circumstances, i.e. when the

planned housing requirement is not up-to-date, will the 5 year housing land supply be measured against the area's local housing need calculated using the standard method. This does not justify the local authority plan-making on the basis of only securing a deliverable supply of housing against the standard method figure. The 5-year housing requirement is there to ensure that Local Plans maintain a deliverable supply of housing land to meet the housing requirement, where this is up-to-date. Furthermore, when the 'top end' figure of 1,325 has been exceeded over the first 3 years of the plan period, it does not make sense to provide circumstances to under-achieve it.

### **Issue 3 – Affordable Housing Need – Policy S22**

**Q3. Based on the expected rate of housing delivery, will the affordable housing needs of the area be met?**

9. In relation to Spatial Issue 1: Housing Need and Ambition for Growth, paragraph 2.4 of the Growth Options Paper STA011.1 recognises that there is an affordable housing need of 592 dwellings per year to 2040. This need equates to nearly 44% of the 1,325 dwellings identified as being needed to support expected job growth, but given that affordable housing policies only require between 10-25% of housing development to be affordable housing, a substantial proportion of these needs will go unmet unless affordable housing is delivered in other ways.

**Q4. Paragraph 7.85 of the HNA states that it is for the Councils to consider whether an increased housing requirement could help to increase the delivery of affordable housing in Central Lincolnshire. Has this been done and what were the reasons for not pursuing higher rates of housing delivery to meet identified needs?**

10. Although Paragraph 7.85 of the HNA provided a clear mandate, the consideration given to this important matter has been very limited. Paragraph 2.4 of STA011.1 says that delivering this level of affordable housing would clearly be challenging under any likely scenarios, but it is not only delivered through planning obligations. Direct development by districts, or housing associations also occurs which help to deliver homes to meet the needs of those whose needs are not met by the market. This is not underpinned or justified by reference to any housing strategies and it does not take into account the extent to which such objectives are reliant on

funding to deliver the homes needed. Therefore, there is a resulting deficit in meeting affordable housing needs which needs to be given further consideration.

11. The effect of not meeting affordable housing need is that the workforce required to work in the area to fill anticipated jobs will not have affordable homes to live in. This could result in increased commuting and/or social disadvantages from people living in unsuitable housing because they can't afford the right home in the right location for their jobs. These potential effects do not appear to have been assessed or taken seriously in the Local Plan evidence. Clearly uplifting the housing requirement and making further housing allocations would directly contribute towards meeting affordable housing needs.

**Q5. Were such options considered as part of the SA process?**

12. The SA Main Report (STA004.1b) considered a higher fixed housing figure sufficient to deliver 592 affordable dwellings per year, to meet the identified affordable housing need, under Policy S2 Part One: Assessing the Amount of Growth, Option 4. It was concluded that Option 4 has potential to deliver substantial benefits but also could have significant impacts on a number of objectives given that this would seek housing development at a level not before seen in Central Lincolnshire.
13. Compared to the chosen growth option there were major positive impacts under the 'Social Equality and Community' due to promoting regeneration and meeting affordable housing needs, but there were negative impacts under other criteria due to the following factors:
  - The level of housing would be well in excess of what has been delivered historically and is likely to encounter deliverability issues and undermine confidence in sites being brought forward.
  - Growth levels substantially above the minimum figure could lead to uncertainty on infrastructure provision. It could also lead to less suitable and/or accessible locations having to be allocated for development, with impacts on accessibility for health services.
  - Greater pollution due to increased levels of traffic and associated increased congestion.
  - Greater, permanent loss of agricultural land and soils, as not all the growth can be accommodated on previously developed land.
  - Greater demand for raw materials.

14. Much of the above impact is uncertain and would depend on the location of development and extent of mitigation available to address impacts. The mere fact that development is above historic levels of delivery, which have been under restraint across a wide rural area, does not seem sufficient to discount the major positive impacts that would result from meeting affordable housing need in full. Given the Government's objective of significantly boosting the supply of homes, it is not good enough to discount this option based on it being above historic levels of delivery. This option has not been tested to determine what the real impacts would be and whether it is possible to mitigate them. It has been dismissed all too readily and therefore the decision is not justified by the SA.



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