

Examination of the Central Lincolnshire Local Plan

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?

1. N/A

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

2. Sufficient housing land supply has been identified in overall terms, assuming all sources are developable. However, the approach taken does not fully exhaust all suitable and available land within the urban area, instead relies heavily on edge-of-urban area locations through Sustainable Urban Extensions (SUEs). This is contrary to the intended spatial strategy of the Local Plan.
3. The Local Plan is intended to be underpinned by a spatial strategy based on concentrating growth within the main urban areas of Lincoln, Gainsborough and Sleaford, with the City of Lincoln accommodating 64% of new homes within the context of this strategy. This reflects an ‘urban first’ approach to delivering the Local Plan’s development needs in the interest of achieving a sustainable co-location of homes and employment and associated services.
4. The housing land supply relied upon to deliver the plan does not reflect such a strategy however in excluding land within the urban area of the City of Lincoln for allocation despite its availability and suitability. This includes Peel’s landholdings to the rear of 295 to 297 Newark Road, Lincoln.
5. This site:
 - Received outline planning permission for its development for 150 apartments in 2017 on the basis of its sustainable location within the defined urban area and comprising brownfield land;
 - Was allocated for residential development in the Central Lincolnshire Local Plan (2017);
 - Was proposed for allocation in the Regulation 18 version of the Local Plan based on its historic planning permission;
 - Is now no longer proposed for allocation solely on the basis of suggested uncertainty in respect of the land-owner’s intentions regarding the site and its development. The Council’s reasoning raises no questions over the suitability or viability of the site¹.
6. The current landowner has remained so since the submission of the aforementioned planning application and there are no legal impediments to its delivery. Peel is now in advanced discussed with a developer partner to deliver the site in accordance with its historic permission. The Committee is

¹ See submission document HOU002a (Site COL/PAR/024)

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aware of this via pre-application discussions held with the City of Lincoln Council by the prospective developer and Peel, most recently in September 2021. There is therefore no ‘uncertainty’ regarding the landowner’s intention with respect to the site.

7. The site is therefore available and, contrary to the Council’s conclusion, there is no uncertainty as to whether the site will come forward for development. Further it should be noted that the site:
- Occupies an accessible location in relation Bracebridge and Central Lincoln close to the A1414 Newark Road
 - Is not within a Conservation Area and not located close to any listed buildings
 - Can be satisfactorily accessed without reliance on third party land
 - Is not affected by any known ground contamination issues
8. In the circumstances, the site has been discounted as an allocation by the Committee in error. As such, the urban land supply identified and relied upon to deliver the Local Plan has been underestimated and should be increased alongside the allocation of Peel’s land to the rear of 295 – 297 for residential development.

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

1. The Local Plan is over-reliant on windfall sites to deliver its housing requirement. The Local Plan’s reliance on this reflects that the Committee has not fully exhausted all opportunities within the urban area to deliver the Plan’s housing requirement. This undermines the plan’s deliverability.
2. Further sites, including Peel’s landholdings at Newark Road, in the urban area should be allocated for development over the plan period to address this point of soundness.

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?

3. N/A

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?

4. N/A

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?

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5. N/A

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

6. The Committee have removed the site to the rear of 295 – 297 Newark Road as residential allocation based on unsound assumptions regarding its deliverability and contrary to the site owner’s stated intentions to develop the site. This site is deliverable in full in the first five years of the plan period. See reasoning in response to Issue 1 Question 2

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?

7. N/A

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?

8. See response to Issue 1 Q3

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

9. N/A

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

10. There is no flexibility within the plan to account for the risk of under delivery of the SUEs over the plan period.
11. The Local Plan places a heavy reliance on the SUEs. Only a handful of small sites are allocated outside of the SUEs, whereby should the SUEs be delayed in their delivery, the overall housing delivery of the Local Plan will fall below the anticipated housing trajectory.
12. Peel has significant concerns regarding the deliverability of the SUEs over the plan period. These are large scale, complex sites in multiple land ownerships and with significant infrastructure requirements. Insufficient evidence has been presented to demonstrate that these can be sustainability and viably delivered over the plan period.
13. In response, greater reliance should be placed on smaller sites within the urban area, that are known to be available and deliverable in the short term. This reduces the inherent risk of under delivery which the Plan’s strategy presents and resulting from its reliant on SUEs. A broader portfolio of sites is needed which will reduce the risk associated with an unbalanced plan in terms of the type of land relied upon.

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14. The site at Newark Road is both available and deliverable (having already been considered suitable) and would be developed within the short-term for up to 150 dwellings. In the context of the above comments, it should be allocated for development during the plan period.

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?

15. N/A

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?

16. N/A