

SOUTH HOLLAND LOCAL PLAN

Public Local Inquiry

Housing Round Table Session

Combined Responses Supplement
of
South Holland District Council



HOUSING

Topic 1. Does the Plan allocate sufficient land for housing? Does the Urban Capacity Study provide a robust assessment of the likely delivery of housing in urban areas?

1.0 Summary of Other Participants' Position Statements

1.1 Geoffrey Collings & Co on behalf of various clients (PS/590/CS/E/H)

In the case of Long Sutton, no. The Urban Capacity Study is inaccurate for Long Sutton, could be misleading in general terms and cannot be relied upon to deliver housing.

1.2 Calthrops on behalf of Executors of R Mason Deceased (PS/504/CS/E/H)

No, there is insufficient housing land. The Urban Capacity Study methodology is questionable. It may fail to deliver sufficient housing to meet all identified needs, let alone needs resulting from employment activity outside the District.

1.3 Barker Storey Matthews on behalf of Mr P Ruysen (PS/665/CS/H)

The Plan appears to allocate sufficient land, but there are sites excluded which would provide for logical development, supporting services and relieving some pressure for greenfield urban extensions.

1.4 Development Land & Planning Consultancy Ltd on behalf of Larkfleet Homes Ltd (PS/587/E/H)

Regard should be had now to Government's recently published Draft PPS3. The Plan relies significantly on unallocated urban capacity sites and this is of concern in the light of Draft PPS3, particularly given the challenge of affordable housing provision.

1.5 Environment Agency (PS/588/H)

Largely supportive of the discounting for flood risk in the Urban Capacity Study. However, no distinction is made between the Strategic Flood Risk Assessment's Zone 2 areas (white areas and purple hatched areas). Sequentially, the land outside the breach envelope should be developed first, that is to say the white land should be developed before the purple hatched land.

2.0 Response of the Council

2.1 The Council refers to its Combined Position Statement and Responses LPA/RTS/H paragraphs 2.1 to 2.9. The following additional points are made.

2.2 The Council regards its Urban Capacity Study as robust and will monitor progress with urban capacity sites in order that the Study's assessment can be reviewed if necessary. If delivery from urban capacity sites falls short then the Plan's provisions will be reviewed (through the preparation of the Local Development Documents) if necessary.

2.3 The suggestion made on behalf of Larkfleet Homes that the Plan should be amended to comply with the draft consultation version of PPS3, and in particular the passage at para. 14 which states that an allowance for brownfield windfalls should only be made where it is not otherwise possible to allocate sufficient land, is not accepted. That document was only issued for consultation on 4 December 2005 and the consultation period does not expire until 27 February 2006. The passage in question is likely to be the subject of significant representations, not least from those authorities which have traditionally seen a significant portion of their housing completions from windfall sites and where there is no reason to suppose that that trend will not continue. Significant reliance on urban capacity sites is important in seeking to achieve the reuse of previously developed land and the more efficient use of land in sustainable locations, in accordance with Government policy.

- 2.4 Geoffrey Collings & Co. has indicated (in evidence for hearings and alluded to in the round table submission) that the Study includes greenfield sites in the urban areas (including Long Sutton) whereas Policy HS5 restricts housing development in the Area Centres to brownfield sites. However, the Council has proposed a Pre-Inquiry Change (PIC 33) to Policy HS5 to include undeveloped land as a second preference to brownfield sites. Hence the housing provision figures do reflect this policy as proposed for change.
- 2.5 In response to the points raised by Calthrops, as they have suggested in their own statement for Housing Topic 2 (and Core Strategy Topic 2 and acknowledged by the Council in paragraph 4.3 of our response to that) the cross-border issues will be appropriately addressed through the review of RSS8 and other regional and sub-regional work and can then be addressed in our Local Development Documents. The matter of cross-border commuting needs to be carefully understood and considered in the context of seeking more sustainable patterns of development overall.
- 2.6 As explained at paragraph 4.4 of the Council's Combined Responses Supplement for the Core Strategy Round Table, some of the sites recently removed from defined settlement limits may have potential for reallocation in the longer term, particularly in the Area Centres and to a lesser extent the Group Centres. This will be dependent upon future decisions on the strategic housing requirement, its distribution and the suitability of sites. In the meantime the Plan provides for the strategic housing requirement to be met, including the Structure Plan's urban-rural split.
- 2.7 On the matter of flood risk, the Council refers to paragraph 4.4 of its Combined Position Statement and Response for the Core Strategy Round Table (LPA/RTS/CS). Further to that, as explained in paragraph 4.5 of the Council's Combined Responses Supplement for the Core Strategy Round Table it is important to note that physical and environmental constraints, including flood risk (and other factors such as contamination) constitute just one of the criteria identified at paragraph 31 of PPG3 against which the potential and suitability of housing allocations should be assessed. That factor was taken into account, in addition to others, in determining the allocations in the Plan. The Council's more

detailed responses to the Environment Agency's site specific objections will be given in our proofs of evidence for those hearings.

Topic 2. Is there an adequate supply of housing sites in terms of distribution, location and size? Does the Plan deal adequately with the issue of rural housing?

3.0 Summary of Other Participants' Position Statements

3.1 Geoffrey Collings & Co on behalf of various clients (PS/590/CS/E/H)

In terms of Long Sutton there is no supply of housing sites.

3.2 Calthrops on behalf of Executors of R Mason Deceased (PS/504/CS/E/H)

The Plan will not provide sufficient housing in the south of the District, in Crowland. It fails to deal with demand generated by employment outside the District and may also need reconsidering in the light of forthcoming regional work on housing needs. These wider issues may be for the Local Development Framework rather than this Plan. Rural housing is dealt with appropriately.

3.3 Barker Storey Matthews on behalf of Mr P Ruysen (PS/665/CS/H)

Severe restrictions on Group Centre villages and a moratorium on development in Other Rural Settlements may have an adverse effect on the rural community.

3.4 Development Land & Planning Consultancy Ltd on behalf of Larkfleet Homes Ltd (PS/587/E/H)

Support the enhanced proportion of new housing now directed to Spalding but believe that there needs to be greater certainty, especially in achieving affordable housing provision, through the identification of a wider range of deliverable and sustainably located housing sites (as opposed to reliance on windfalls).

4.0 Response of the Council

4.1 The Council refers to its Combined Position Statement and Responses LPA/RTS/H paragraphs 4.1 to 4.9. The following additional points are made.

- 4.2 By way of clarification in response to Geoffrey Collings & Co, although there are no sites in Long Sutton allocated under Policy HS3, the Plan does provide for appropriate urban capacity sites to come forward for housing in Long Sutton in addition to existing permissions.
- 4.3 With regard to the points raised by Calthrops the Council refers to what it has said at paragraph 2.5 of this Response under Topic 1.
- 4.4 The Plan provides for the strategic housing requirement to be met, including the Structure Plan's urban-rural split. Development fulfilling genuine local needs in the Group Centres and Other Rural Settlements is not ruled out by the Plan.
- 4.5 The Urban Capacity Study identifies a wide range of sites within the 'urban' areas, being sites which do not already have permission for housing development. Whilst the sites assessed are not shown on the Proposals Map of the Plan they are indicated in the Study which is available as a Background Paper (CD/SH/13). Turning then to allocated sites, these are urban extensions which reflects the fact that urban capacity is not sufficient to meet the housing needs of the District alone and urban capacity sites are generally smaller. In the Housing Topic Paper (CD/SH/32) at paragraph 7.7 the Council explains that the approach to allocate large sites is appropriate and more beneficial than allowing a number of smaller sites where potentially less community infrastructure could be achieved. This is consistent with the criteria set out in PPG3, paragraph 31, concerning the ability to build communities. The Council also refers to what it has said at paragraphs 2.2 and 2.3 of this Response under Topic 1.

Topic 3. Does the Plan provide sufficient guidance to allow the proper monitoring and management of housing provision? Is the phasing of large sites appropriate and is this matter appropriately dealt with in the Plan? How far should this be dealt with in the Plan itself, rather than in Supplementary Planning Document and/or the Annual Monitoring Report?

5.0 Summary of Other Participants' Position Statements

5.1 Geoffrey Collings & Co on behalf of various clients (PS/590/CS/E/H)

Feel that most, if not all, of the brownfield sites in Long Sutton will be built out by the end of 2007/08 and that the Plan will leave Long Sutton to stagnate until 2021.

5.2 Calthrops on behalf of Executors of R Mason Deceased (PS/504/CS/E/H)

Yes, but the Plan should be supplemented by an Annual Monitoring Report. The Local Development Framework will provide opportunity to consider a more sophisticated monitoring process.

5.3 Environment Agency (PS/588/H)

The phasing of the housing allocation at Holland Park in Spalding is not in line with the sequential approach advocated in PPG25. The area indicated for development post 2021 which is SFRA 'white land' and therefore outside the breach envelope should be developed before the part currently allocated for development before 2021 which is SFRA 'purple hatched land' and therefore inside the breach envelope.

6.0 Response of the Council

6.1 The Council refers to its Combined Position Statement and Responses LPA/RTS/H paragraphs 6.1 to 6.5. The following additional points are made.

- 6.2 The Council has already referred to the fact that it will monitor progress on the delivery of housing. We have a housing land availability monitoring system which is updated monthly and which is progressively providing greater integration with and monitoring of the Urban Capacity Study sites. The Council has already produced its first new-style Annual Monitoring Report (CD/SH/36).
- 6.3 In respect of the points made by Geoffrey Collings & Co. the Council refers to what it has said at paragraph 2.6 of this Response under Topic 1.
- 6.4 The Council does not agree with the Environment Agency's suggested amendment to phasing of the housing development at Holland Park, Spalding. As explained at paragraph 2.7 of this Response under Topic 1, there are other criteria which must also be taken into account. The Council's more detailed response to the Environment Agency's site specific objection will be given in our proof of evidence for that hearing.

Topic 4. Is the Council justified in requiring one third affordable housing on-site, including on small sites?

7.0 Summary of Other Participants' Position Statements

7.1 Geoffrey Collings & Co on behalf of various clients (PS/590/CS/E/H)

The implications of the affordable housing policy need to be monitored by looking at progress of and results on sites permitted which meet the requirements of the policy and also whether the policy is leading to non-implementation of housing sites.

7.2 Calthrops on behalf of Executors of R Mason Deceased (PS/504/CS/E/H)

Yes, this is accepted.

7.3 Barker Storey Matthews on behalf of Mr P Ruysen (PS/665/CS/H)

No, the affordable housing requirement may prejudice the viability of development, lead to non-implementation and could encourage less efficient use of land. The requirement should be relaxed.

7.4 Development Land & Planning Consultancy Ltd on behalf of Larkfleet Homes Ltd (PS/587/E/H)

The Plan needs to have regard to site viability. It should also make specific allocation of land for affordable housing.

8.0 Response of the Council

8.1 The Council refers to its Combined Position Statement and Responses LPA/RTS/H paragraphs 8.1 to 8.4. The following additional points are made.

8.2 The affordable housing requirement should not be relaxed. However, we agree that the effectiveness of the policy and any impact on delivery and

implementation should be monitored through the Annual Monitoring Report and remedial action taken if necessary.

- 8.3 With regard to the suggested approach of allocating sites specifically for affordable housing, this could be a useful tool to help address affordable housing needs in the District. However, the Council feels that we should await completion of the review of RSS8, which may increase our strategic housing requirement, and other regional and sub-regional work before considering this approach in our Local Development Documents. It is important to note that the sites allocated for housing under Policy HS3 of the Plan are expected to contribute a number of benefits of which affordable housing is only one, as explained in paragraph 7.8 of the Housing Topic Paper (CD/SH/32).
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