SOUTH HOLLAND LOCAL PLAN

Public Local Inquiry

Housing Round Table Session

Combined Position Statement and Responses
of
South Holland District Council

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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 Stansgate Planning on behalf of Michael Parker and Sons (PS/589/H)

The one significant failing of the UCS is a lack of discussion with landowners and agents with a local market knowledge. However whilst the assessment may be a little high, this is unlikely to be so significant to result in the need for additional allocations to meet shortfall.

1.2 Smith Stuart Reynolds on behalf of Allison Homes (PS/638/H)

No, there is insufficient land allocated. There should be a 'non-implementation allowance' and clear indication of what land may have permission granted on it in the event of monitoring predicting a shortfall. There needs to be additional allocation, such as land at Donington. There needs to be a 10 year supply which does not currently exist, and clarity between urban and rural. However, agreed that the UCS is a realistic assessment.

1.3 Paul Walls (PS/654/CS/H/E)

The Plan should be more flexible and not so rigidly bound by strategic requirements. There may be brownfield windfall sites in urban areas with potential for redevelopment for housing. Some more growth may be needed in Group Centres.

1.4 Graham Warren Partnership on behalf of Broadgate Homes (PS/655/H)

There is over reliance on urban capacity and windfall sites, including small sites which may contribute relatively little to community infrastructure. A 'reserve site' should be identified at Holland Park in Spalding.

1.5 Robert Doughty Consultancy on behalf of various clients (PS/662/E/H)

Given that 20% of UCS sites are greenfield, there may be opportunity to relax rural housing restraint by allowing small-scale brownfield site development in the Other Rural Settlements rather than developing greenfield sites on the edge of urban areas.

2.0 Position Statement and Response of the Council

2.1 The Plan allocates sufficient land for housing. This is explained in section 4 of the Housing Topic Paper (CD/SH/32). Furthermore, the Urban Capacity Study provides a robust assessment of the likely delivery of housing in urban areas, which is explained in section 6 of the Topic Paper.

2.2 Allisons in their statement have set out in a table at paragraph 2.5 a calculation of number of years' supply. However, the Council feels that the method of calculation is incorrect and misleading. First, the calculation assesses number of years' supply on the basis of the annual average strategic housing requirement for the whole plan period. In so doing it ignores the fact that a high build rate in the first few years of the plan period has resulted in fewer dwellings per year remaining to be provided for the remaining plan period. Second, it takes into account permissions not started, urban capacity and rural allowances without permission, but does not take into account dwellings under construction and allocated sites without permission.

2.3 We have therefore set out an alternative set of tables below. Table 1 provides figures for 1 April 2004 and, by way of an update, Table 2 provides figures for 1 April 2005. Tables 1a and 2a calculate the Remaining Requirement, taking into account completions to date and to accord with the Strategic Requirement from the Structure Plan. It is the Council's view that this is the appropriate method.

Table 1a: Remaining Requirement (no. of dwellings) as at 1 April 2004			
	Urban	Rural	District
a) Strategic Requirement 2001-21	5700	1900	7600
b) minus Completions 2001-04	-1093	-883	-1976
c) Remaining Requirement	4607	1017	5624
d) which is per annum 2004-21	271	60	331

Table 1b: Number of Years' Supply (land with permission) as at 1 April 2004			
	Urban	Rural	District
e) Permission (under construction or not started)	1879	575	2454
f) divided by Remaining Requirement per annum	271	60	331
g) Number of Years' Supply	6.9	9.6	7.4

Table 2a: Remaining Requirement (no. of dwellings) as at 1 April 2005			
	Urban	Rural	District
a) Strategic Requirement 2001-21	5700	1900	7600
b) minus Completions 2001-05	-1394	-1132	-2526
c) Remaining Requirement	4306	768	5074
d) which is per annum 2005-21	269	48	317

Table 2b: Number of Years' Supply (land with permission) as at 1 April 2005			
	Urban	Rural	District
e) Permission (under construction or not started)	2194	362	2556
f) divided by Remaining Requirement per annum	269	48	317
g) Number of Years' Supply	8.2	7.5	8.1

Tables 1 and 2

a) See Structure Plan.

b) and e) Table 1- see Redeposit Local Plan, Appendix 1, Table 2.
Table 2- see Housing Topic Paper, Table 1 (paragraph 4.5).

NB. Both the Urban and District figures for e) have been reduced by 290 dwellings for the purposes of the above tables (permissions at Sutton Bridge unlikely to be renewed).

2.4 There will come a point, when planning for a rolling supply, when we will be looking beyond 2021 and it will be appropriate to factor in the annual strategic requirement beyond 2021. However, at this early stage there remain 15 years of the plan period which is a more than sufficient time horizon. Whilst the strategic housing requirement is currently under review as part of the review of Regional Spatial Strategy for the East Midlands (CD/EM/04), that will inform our Local Development Framework rather than this Local Plan. Furthermore, the new style Annual Monitoring Reports provide the necessary mechanisms (housing trajectories) to track house building activity and the implications for supply.

2.5 Tables 1b and 2b express the amount of land with planning permission (under construction or not started) as a number of years' supply. In both 2004 and 2005 there was comfortably over 5 years' supply for the urban areas, rural areas and District overall. It is also worth noting that, between 2004 and 2005, the supply has increased in the urban areas, which is important for achievement of the overall strategy to accommodate 75% of all new housing in the urban areas for the period 2001-21. It is in any case not surprising that the urban figure is not significantly higher at this stage, bearing in mind that much of the allocation made by Policy HS3 is new allocation not previously included in a Local Plan, the Plan is not yet adopted and planning applications have therefore yet to come forward.

2.6 Clearly if all the other provisions of the Plan were included in the calculation, namely allocations, urban capacity and allowances for other development under the policies which does not currently benefit from planning permission (set out in Appendix 1 of the Plan), the result, at 1 April 2004, would be 17 years' supply because the Plan provides for meeting the strategic housing requirement figure rather than under or over providing.

2.7 The support of the Urban Capacity Study as being a realistic assessment is welcomed. Monitoring information discussed in the Housing Topic Paper indicates that the housebuilding industry is turning to such sites and bringing them forward. Whilst the Council has not commissioned agents with market expertise to review the assessment, some consultation was undertaken during preparation of the study which did influence the methodology. By way of

clarification, any greenfield element identified in the study is urban capacity and would not therefore represent an urban extension. Regard will be had to the policies of the Plan in determining whether and how such sites should be developed, should planning applications come forward. We will continue to monitor the take up of urban capacity sites.

2.8 The Council is not advocating use of a non-implementation allowance, as explained at paragraph 5.3 of the Housing Topic Paper, but even if the allowance suggested by Allisons were to be applied to the figures, then clearly there would remain over 5 years' supply.

2.9 The Government has just published Draft Planning Policy Statement 3 "Housing" together with its response to Kate Barker's review of housing supply. Draft PPS3 includes policy on the need for an improved land supply for housing development with a 15 year local plan horizon in Local Development Documents that identifies land for the longer term and provides at least a 5 year supply of developable land, which is suitable, viable and available. It is clear from the above figures that the Plan already provides such a supply, having regard to the current strategic requirement and the remaining requirement. Therefore it is not necessary to identify in this Plan any 'reserve sites' as suggested by some objectors. If the need arises to look at this then it can be done as part of the Local Development Framework.

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 Stansgate Planning on behalf of Michael Parker and Sons (PS/589/H and see WR/589/003)

No, there is not an adequate supply and in particular there is insufficient allowance in Long Sutton. There should be a more even distribution between the Area Centres, recognising Long Sutton as the third largest settlement in the District. Suggests reducing provision in Holbeach and increasing it in Long Sutton. The Plan does not provide sufficiently for rural housing for local needs and a new policy is requested. Policy HS6 dealing with housing provision in the Group Centres should be amended to be less restrictive on the replacement of dwellings.

3.2 Smith Stuart Reynolds on behalf of Allison Homes (PS/638/H)

As raised for the Core Strategy Round Table Session, considers that there should be redistribution of housing allocations, reducing those at Spalding and Holbeach and increasing provisions at Crowland, Long Sutton and Sutton Bridge. Also seeks allocation of a site at Donington as a 'reserve site' and inclusion of Donington under Policy HS8 (Affordable Housing) on the same basis as the five towns.

3.3 Paul Walls (PS/654/CS/H/E)

Considers that there is potential to allocate land in the 'gap' between Spalding and Pinchbeck and to achieve significant infrastructure provision, particularly a road link, in association with it.

3.4 Graham Warren Partnership on behalf of Broadgate Homes (PS/655/H)

Yes, there is an adequate supply. The Plan is correct to allocate Holland Park for sustainable development and deals appropriately with rural housing. Objecting

though to the classification of Donington, which should be downgraded in the hierarchy.

3.5 Robert Doughty Consultancy on behalf of various clients (PS/662/E/H)

Concerned for the well-being of small rural communities, given the policy restraint on new housing. Seasonal agricultural employment is important to the District, but the Plan does not do enough to meet their accommodation needs and primarily presents a restrictive framework.

4.0 Position Statement and Response of the Council

4.1 There is an adequate supply of housing sites in terms of distribution, location and size. This is explained at some length in the Housing Topic Paper (CD/SH/32), particularly in sections 4 and 7. Section 6 is also relevant in setting out the yield, both historically and potentially, of urban capacity sites. Additionally the Council's Housing Land Availability information (CD/SH/33) shows that there is a range and spread of sites with planning permission.

4.2 Whilst the Structure Plan provides a breakdown of the strategic housing requirement to 'urban' and 'rural', it is for the District Council in its Local Plan to determine the distribution between the five towns which comprise the 'urban' areas of the Structure Plan. In making allocations we have had regard, amongst other things, to the status of Spalding as a Main Town, to past rates of housebuilding, to outstanding planning permissions and to urban capacity. We have had regard to sustainability principles and to the delivery of the strategy for a more sustainable distribution of housing growth in the District. We have also had regard to the distribution of settlements, for example the fact that the Area Centres of Long Sutton and Sutton Bridge are close together. If the current review of RSS8 results in a higher strategic housing requirement for the District, then the Council will examine again the distribution as part of its Local Development Framework.

4.3 Allisons at paragraph 3.6 of their statement set out some figures to indicate the scope for housing in the rural areas. They say that those figures assume full

implementation of consents. However, it appears to the Council that the figures used by Allisons are derived from their own table set out at paragraph 2.8 of their statement, which does apply their suggested non-implementation allowance.

4.4 The Council's reasoning for the inclusion of Donington in the Area Centres is set out at paragraph 6.4 of the Core Strategy Topic Paper (CD/SH/30) and referred to in paragraph 4.6 of the Council's response to the Core Strategy Round Table submissions. Broadgate's objection to the status accorded to Donington will be addressed in response to that specific objection. Allisons request that Donington be accorded the same status as the five towns for the purposes of Policy HS8 (Affordable Housing). However, in constructing Policy HS8 the Council has had regard to Circular 06/98 "Planning and Affordable Housing" (CD/GO/25) and in particular to which settlements have a population of 3000 or more. As the Council has explained at paragraph 4.2 of its response for the Core Strategy Round Table, whereas Allisons have used ward populations, the Council advocates the use of its own population estimates which relate directly to settlements. The latter show Donington as having a population less than 3000 (population 2108 at 2004).

4.5 As referred to in paragraph 4.8 of our response for the Core Strategy Round Table, the relationship between Pinchbeck and Spalding, and the matter of the future of the 'gap' between the two settlements, will be addressed through the preparation of the Area Action Plan for Spalding as referred to in Pre-Inquiry Change PIC 17 (CD/SH/21). PIC 73 refers to the potential for a new road link through this gap, which will be explored further through the County Council's Local Transport Plan and in association with potential development through the Area Action Plan.

4.6 The Plan deals adequately with the issue of rural housing. The Plan at Appendix 1 illustrates that sufficient provision is being made to reach the strategic housing requirement for the rural areas. Donington, part of the Structure Plan's 'rural areas', is covered by Policy HS5, Policy HS6 relates to the Group Centres, Policy HS7 (as amended by PIC 35) relates to the Other Rural Settlements, Policy HS9 provides for Rural Exceptions for affordable housing and Policy HS12 (as

amended by PIC 40) deals with Agricultural, Forestry and Other Workers' Dwellings in the countryside.

4.7 Regarding the criteria in Policy HS6 relating to the adequacy of supply, the Policy can be operated so as to have regard to whether and how a specific proposal would impact on supply.

4.8 In recent years there have been significant amounts of housing growth in the rural areas. This has built up the stock of rural dwellings which have not been provided specifically as affordable homes. This in turn provides for the needs of those seeking to move home within the rural area, and a specific policy to provide rural exceptions for general market housing is not therefore necessary.

4.9 The Council agrees that seasonal agricultural workers are important to the District. It is worth noting that the crop seasons are now such that many seasonal workers are employed the year round. We consider that Policy HS14 remains appropriate and provides a policy context for the consideration of accommodation proposals. The accommodation needs of workers in the agricultural and food industries can be met in a number of ways and paragraph 5.12 of the Plan, for example, identifies a potential opportunity in association with the employment development planned at Little Sutton/ Long Sutton.

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 Smith Stuart Reynolds on behalf of Allison Homes (PS/638/H)

Request amendment of Policy HS2 to refer to a 5 year supply as a trigger point for action, rather than referring to two phasing periods. Also seeking a commitment that annual housing land availability information be made available by 1 June each year. New sites should be able to be permitted when the trigger point is reached, rather than applications only then being submitted to the Council. SPD could explain how the 5 year supply will be determined.

5.2 Graham Warren Partnership on behalf of Broadgate Homes (PS/655/H)

Planning and Monitoring is reasonably straightforward but Management is not. It takes time to respond to monitoring. There is considerable reliance on small sites contributing. It would not be appropriate to phase large sites. SPD should promote joint working.

5.3 Robert Doughty Consultancy on behalf of various clients (PS/662/E/H)

Phasing of large sites is appropriate, but phasing within large sites would be better addressed by SPD such as a Development Brief.

6.0 Position Statement and Response of the Council

6.1 The Plan provides sufficient guidance to allow the proper monitoring and management of housing provision. This is explained in Section 5 of the Housing Topic Paper. In particular, Policy HS2 (as amended by PIC 30) and Chapter 9 of the Plan (as amended by PICs 76 and 77) are sufficient.

6.2 The phasing of large sites is appropriate and is appropriately dealt with in the Plan. Conditions will be imposed where necessary on planning permissions. This will help, amongst other things, to ensure that infrastructure provision is provided in step with development. Supplementary Planning Documents in the form of development briefs for sites will be appropriate tools to provide for detailed phasing arrangements. The preparation of development briefs is referred to in the Plan and in our Local Development Scheme (CD/SH/01).

6.3 For the purposes of the Plan we believe that it is useful to illustrate the two phasing periods shown in Policy HS2. This shows the 'slowdown' in response to the reduction in the strategic housing requirement introduced by the current RSS8 and emerging Structure Plan.

6.4 The new-style Annual Monitoring Report uses housing trajectories to monitor housing activity and supply in more detail. This will become more sophisticated in due course. In the meantime the Plan is appropriate.

6.5 Regarding the point raised by Allisons about the trigger for release, whilst the Council understands the lead-in times for delivery of housing sites, we would not want to hold as 'live applications' applications submitted in advance of our ability to grant permission, where this could adversely affect our Development Control performance figures. If an application is premature we would refuse permission on that basis, rather than defer the determination of applications. This highlights the need for pre-application discussions.

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 Smith Stuart Reynolds on behalf of Allison Homes (PS/638/H)

Not objecting to the 'one third' requirement but concerned that it will be difficult to deliver much affordable housing outside Spalding and Holbeach due to the allocations strategy. Donington warrants a greater role in provision.

7.2 Graham Warren Partnership on behalf of Broadgate Homes (PS/655/H)

Supportive of the Council's approach, but regard must be had to the economics of provision and the overall planning gain sought.

8.0 Position Statement and Response of the Council

8.1 The Council is justified in requiring one third affordable housing on-site, including small sites. This is explained in the Housing Topic Paper, particularly paragraphs B7.6 and B9.5-B9.9. Sections B2-B5 set the scene regarding need and affordability.

8.2 The Government's recently published Draft PPS3 includes policy on the need for more affordable housing where it is needed, consistent with the delivery of overall housing numbers, in order to help create communities that are sustainable, mixed and inclusive. This lends further weight to the Council's approach which helps us to tackle affordability across the District.

8.3 Paragraph 4.4 of this statement provides the Council's view on how Donington fits into Policy HS8 (Affordable Housing). Other issues, concerning the status of Donington and the amount of housing land required in the rural areas, has already been discussed.

8.4 Regarding the viability of sites, at paragraph B9.6 of the Housing Topic Paper the Council recognises that viability assessments by the developer would need to be carried out to help inform negotiations and take into account the individual circumstances of each proposal. Furthermore, at paragraph 8.4 of the Council's response for the Core Strategy Round Table, we indicate that requests for community infrastructure will need to pass the test of reasonableness.