

East Lindsay Core Strategy Examination

Stage 1 Core Strategy Hearing Sessions

Matter 6: The approach to housing development, particularly in the Inland areas (Policies SP3 and SP4)

Submission on behalf of Metacre Ltd

21st June 2017

Introduction

1. This submission is made for and on behalf of Metacre Ltd concerning Matter 6 (The approach to housing development).
2. The submission is made with respect to the Examination in Public (EiP) *Inspector's Matters, Issues and Questions* (26th May 2017) and supplements the representations lodged with East Lindsey Council on the *Core Strategy Publication Version* (November 2016). The two should be read together.

Question 3:

Taking account allocations and commitments, what is the planned level of housing growth in each of the inland Towns and Large Villages? Do the larger settlements get more housing growth, as stated in CS para 14, page 23?

3. The Council's Planning Policy Committee Report dated 21st June 2017 includes a table identifying the number of households in each settlement and the proposed growth in terms of existing commitments and proposed allocations. Below is a table summarising this evidence whilst also indicating the scale of growth for each settlement based on its current number of households. The settlements have been ordered in terms of their size (number of households).

| Settlement | Existing Households | Existing Commitments and Proposed Allocations | % increase in households |
|-------------------------|---------------------|---|--------------------------|
| Towns | | | |
| Louth | 7,530 | 1,829 | 24% |
| Horncastle | 3,178 | 697 | 22% |
| Coningsby & Tattershall | 2,553 | 576 | 23% |
| Alford | 1,518 | 309 | 20% |
| Splisby | 1,398 | 687* | 49% |
| Large Villages | | | |
| Woodhall Spa | 1,821 | 404 | 22% |
| Holton le Clay | 1,583 | 333 | 21% |
| Burgh le Marsh | 1,119 | 177 | 16% |
| Sibsey | 880 | 259 | 29% |
| Wainfleet All Saints | 840 | 118 | 14% |
| Wragby | 805 | 153 | 19% |
| Gridmoldby & Manby | 734 | 216 | 30% |
| Tetney | 717 | 155 | 22% |
| North Thoresby | 489 | 177 | 36% |
| Stickney | 445 | 88 | 20% |
| Mareham Le Fen | 439 | 156 | 36% |
| Binbrook | 429 | 8 | 2% |
| Hogsthorpe | 408 | 121 | 30% |
| Marschapel | 317 | 87 | 27% |
| Grainthorpe | 309 | 21 | 7% |
| Legbourne | 282 | 62 | 22% |
| Friskney | 262 | 62 | 24% |
| Huttoft | 246 | 3 | 1% |
| Tetford | 205 | 5 | 2.4% |
| Partney | 109 | 17 | 16% |

*adjusted as the Council's table does not include the addition 350 houses in CS Table A

4. This table demonstrates that the largest towns and villages are not necessarily getting more growth.

- The town of Spilsby (1,398 households) is less than half the size of the town of Horncastle (3,178 households) but has more housing being directed to it. Indeed Spilsby is the smallest of the five towns but is to receive the second highest amount of housing behind Louth. It is also receiving proportionately more housing than Louth. In this respect, Louth is 5.3 times larger than Spilsby in terms of households but is only receiving 2.7 times as much housing. Effectively Spilsby is earmarked to grow by almost 50%, whereas the other Towns would only grow by between 20-24%.
- Growth in the Larger Villages does not reflect size. For example Burgh le Marsh is the third largest Village (1,119 households) yet it has the same amount of housing being directed to it (177 dwellings) as North Thoresby which only has 489 households. This is also despite Burgh le Marsh being given a sustainability score of 164 compared to North Thoresby's 80 (CD11). Indeed three of the four Large Villages receiving the most housing do not have the highest sustainability scores, i.e. Holton Le Clay (333 dwellings), Sibsey (259 dwellings) and Gridmoldby & Manley (216 dwellings) have sustainability scores of 109, 67 and 92 respectively. This is compared to Burgh Le Marsh and Wragby which have sustainability scores of 164 and 134 but are to receive 118 and 153 dwellings.
- Two of the Villages (Woodhall Spa and Holton le Clay) are to have more houses (404 and 333 respectively) than the Town of Alford (309). It is acknowledged that they are slightly larger at 1,821 and 1,583 households compared to 1,518 households, but Alford is categorised as a Town whereas the others are lower down the settlement hierarchy and categorised as Large Villages.
- 11 of the 20 Large Villages will increase in scale at a rate proportionally greater than many of the Towns, even Louth. For example Louth is 17

times the size of North Thoresby but is only getting 10 times the amount of housing.

5. Ultimately the manner in which the growth is to be directed across the towns and large villages does not appear to relate to the sustainability of each settlement or the capacity of the infrastructure to accommodate growth. Instead it appears that the Council had simply sought to try and distribute growth based on the number of households in each settlement, although even that isn't reflected in the actual dwelling distribution.

Question 4:

Taking commitments into account, is the overall extent and distribution of the housing allocations to the Inland Towns justified? How were the minimum allocation figures in Table B on page 26 arrived at? In some cases these figures are less than in some of the larger villages – is this justified? How does this relate to the Settlement Pattern in Policy SP1 (see Policy SP3 4 which refers to housing growth being distributed as set out in the Settlement Pattern).

6. The Sustainable Communities Topic Paper (CD13) states in paragraphs 2.1 and 2.2 that the District's settlements are affected by economies of scale, which means that few can provide all the services that their residents need or want and larger settlements frequently provide for smaller settlements. Moreover, it refers to identifying a settlement pattern to help understand the roles different towns and villages perform and how they relate to each other, stating "*Only then can we confidently direct new growth to those settlements that can provide the greatest benefits to the greatest number of East Lindsey residents.*"
7. CS policy SP1 categorises the settlements into Towns and Larger Villages etc. with Towns defined as providing a range of higher order district-wide services and facilities that because of economies of scale cannot, reasonably be expected in other settlements. Large Villages are defined as providing a range of facilities for their own needs and provide for some of the needs of smaller villages within their immediate sphere of influence.
8. CS policy SP1 then confirms that the Settlement Pattern shall guide the distribution, scale and nature of future development, whilst Policy SP3 states that

Housing growth will be distributed across the inland towns and inland large villages as set out in the Settlement Pattern.

9. Despite this, CS paragraph 14 (page 23) suggests that the extent and distribution of housing allocations has not been based on the settlement pattern and infrastructure capacity issues. Instead it appears to be based simply on the number of households a settlement has. However it is also clearly evident that not all settlements are capable of accommodating proportionately the same amount of growth for a variety of reasons. For example CD13 states in paragraph 4.5 that “*Some of the District’s settlements have issues which will be almost impossible to overcome. A few have extensive flood risk which leaves little or no land available in suitable locations for housing allocations.*” As highlighted in relation to Question 3, this has meant that the amount of growth being directed to settlements is not now necessarily in proportion to the size of the individual settlement as initially intended. Some are receiving proportionately less growth and some more growth.
10. There is no clear justification as to why certain settlements have been chosen to accommodate proportionately more growth than others. As identified in relation to Question 3 above, more housing is being directed to two of the Larger Villages than the one of the Towns, despite them being lower down the settlement hierarchy.
11. Similarly, it is unclear as to why the smallest of the five Towns of Spilsby is earmarked for proportionally more growth than Louth, which is by far the largest and most sustainable of the five Towns. Taking commitments and allocations into account Spilsby is to receive 687 dwellings, which equates to 17% of all the growth directed to the five Towns even though it only accounts for 8.6% of the households in these Towns. This is compared to Louth which contains 47% of the households in the five Towns but is only receiving 45% of the growth. Spilsby will effectively grow by 49% compared to Louth’s 24%.
12. The East Lindsey Retail and Economic Assessment 2012 and subsequent update in 2014 did not consider Spilsby and only focussed on the retail centres of Louth, Horncastle and Alford. The 2012 report identifies that “*Louth operates above the smaller market towns of Horncastle and Alford within the hierarchy, both of which*

are identified as town centres, or small market towns. Horncastle and Alford act as secondary centres intended to serve more local catchment areas, below Louth as a main centre in the District". As part of the Council's evidence base there has been no assessment of the services available in Spilsby to accommodate the proposed residential allocation and no consideration as to whether further retail or service provision may be required. Neither the 2012 nor 2014 update studies considered any potential significant growth in Spilsby and any associated implications. What is known, understood and accepted is the sustainability of Louth and its position within the retail hierarchy and therefore its position to be able to more readily accommodate potential residential growth making sustainable use of existing resources.

13. CS policy SP13 identifies a requirement for an employment allocation of 3ha at Spilsby and 14ha in Louth. The proposed allocation of land for employment purposes at Louth represents 58% of the District's proposed employment allocation compared to only 12% directed to Spilsby. Furthermore, in terms of existing employment land, the East Lindsey Employment Sites Assessment 2016 identifies in table 4 that Louth has existing serviced employment land equating to 110 hectares, or 55% of the District's serviced employment land compared to 7.5ha or 3.7% in Spilsby. There appears to have been no consideration of any potential link between the delivery of employment land and housing allocations.
14. Similarly there is no justification as to why the Town of Spilsby is to receive more growth (708 dwellings) than the Town of Horncastle (697 dwellings) despite it being less than half its size.
15. It is evident therefore that there is no clear justifiable basis for the proposed distribution of housing and it does not appear to be based on the settlement pattern, settlement size, sustainability objectives or infrastructure capacity. The Plan is not therefore sound in its current form.
16. As expanded on in relation to Question 6, Louth should receive a greater share of the housing growth than currently proposed.

Question 5:

Why are no allocations proposed in Horncastle? Is the planned level of housing growth in Horncastle appropriate, having regard to existing housing commitments?.

17. Whilst Horncastle does not have any allocations it does have a high level of existing commitments. However, the Council's approach in deciding how much development to distribute amongst the settlements is still fundamentally flawed.

Question 6:

A significant proportion of the total from Inland allocations is to be provided in Louth (1204 out of 3901). Taking commitments into account, is the scale of increase justified?

18. Louth is by far the largest settlement in the Inland Area and is almost the same size as the other 4 towns combined (7,530 households compared to 8,647). It has the largest level of shops, services, facilities and employment opportunities, whilst also having good infrastructure connections. As previously highlighted the East Lindsey Retail and Economic Assessment 2012 refers to Louth operating above the smaller market towns of Horncastle and Alford, which act as secondary centres intended to serve more local catchment areas, whereas Louth as a main centre in the District. The other two towns of Spilsby and Coningsby & Tattershall are not even included in the assessment. Louth is has over 55% of the District's serviced employment land and is earmarked in the CS to receive 58% of the proposed employment allocations. It is only correct therefore that as the most sustainable and largest settlement by some distance, Louth should accommodate the most housing growth.
19. However, the level of housing growth currently being directed to Louth is not considered reflective of its size and status when compared to other Towns and indeed Larger Villages. For example:
 - Louth contains approximately 47% of the total number of households in all of the Towns and based on commitments and allocations is earmarked to receive 45% of the housing development being directed to the Towns. This is proportionately less than Spilsby, which accounts for only 8.6% of the total households in the Towns but is receiving 17% of the housing development.

- Taking both proposed allocations and commitments into account Louth would grow by approximately 24%, whereas the Town of Spilsby is to grow by 49% and 7 of the 20 Large Villages are to grow between 24% and 36%.
 - Louth is 5.3 times larger than Spilsby in terms of households but is only receiving 2.7 times as much housing.
20. Given its status as the most sustainable and largest Town in the District by some distance, it is considered that Louth can and should accommodate even more of the growth. As previously highlighted in Question 4, it is unclear as to why the far smaller Town of Spilsby is earmarked for proportionally more growth.

Question 7

Taking Commitments into account, is the overall extent, distribution and scale of housing allocations in the Inland Large Villages justified?

21. As highlighted in relation to the above Questions, the proposed distribution of development is not justified.

Question 19

Is ADM5 necessary for soundness? (relating to the approach on allocating growth and large urban extensions)

22. Prior to ADM5 the CS stated that the way of apportioning growth across the towns and large villages means that the Council is not bringing forward any large urban extensions.
23. Metacre's concern was that this is not only factually incorrect, given the allocation at Spilsby, but that it implies that large urban extensions are not appropriate. This is in the context of Metacre seeking planning permission for a 500 dwelling scheme at Louth, as well as the allocation of the site in the Plan
24. NPPF 52 confirms that extensions to existing settlements can best achieve a supply of new homes, stating that local authorities should consider this approach to provide the best way of achieving sustainable development. Larger allocations are often better able to provide community infrastructure due to the economies of scale and can be key in delivering the level and variety of housing required in the District over the plan period. Larger sites can also make a significant contribution

towards affordable housing delivery which is limited on smaller sites in the setting of the 10 unit threshold. For example Metacre currently have a live outline planning application for circa 500 dwellings in Louth, part of which is proposed for allocation and the remainder is subject to a representation seeking its allocation. As part of the proposals the development would be allocating land for a primary school, which the Education Authority has indicated would be beneficial in this part of Louth and is not currently being provided for in the Core Strategy. It would also deliver significant areas of public open space, as well as the provision of highway infrastructure and other infrastructure which is of benefit to the Town. Many of these improvements are not possible on smaller sites. This can be expanded upon at the Hearing if considered helpful.

25. The Council suggest in CS paragraph 15 that there is a link between a predominance of local house builders and smaller sites suggesting that large house builders rarely develop in East Lindsey. There is no published evidence that this is the case. If it is the case that national housebuilders rarely operate in the District there are a variety of reasons as to why this may be the case, one obvious one may be that the Council has not allocated suitable or appropriate sites to appeal to national operators. Equally there is no evidence that national housebuilders would not provide employment for local people and utilise local suppliers. Further to this it is important to recognise that larger allocations are often sold in parcels to more than one developer, which doesn't preclude smaller Lincolnshire based developers, but would provide the scale of development which can also attract national housebuilders. Ultimately there is no robust evidence to justify the Council's suggestion that larger site allocations should not be supported. Indeed to do so may undermine the ability of the Council to deliver its housing requirement by not providing an adequate choice and flexibility of sites to appeal to all sectors of the market.

Question 23

In Policy SP3 3, is the phasing of development in line with infrastructure requirements for developments of over 30 homes justified? Is it clear what will be required to comply with this criterion?

26. Metacre agree with the inclusion of the text 'if required'. However, and for reasons previously stated, it is not evident that the Council's proposed distribution of

housing growth has been based on the capacity of existing infrastructure to accommodate the level of growth proposed for each settlement.

Question 24

The supporting text (para 36, page 29) states that the Council will monitor housing development by the imposition of planning conditions on outline approvals to ensure that reserved matters applications are submitted in a reasonable period of time. Is this justified, reasonable and realistic?

27. Section 92 of the Town and Country Planning Act 1990 states that outline planning permission should be subject to a condition requiring applications to be made for the approval of reserved matters within 3 years. It is acknowledged that local planning authorities are allowed to consider longer or shorter periods of time where appropriate on planning grounds, but there must be clear justification for doing so. In so doing LPAs must also be aware of the 6 tests identified in NPPF paragraph 206, which all conditions must comply with. One of these is that the condition is reasonable in all other respects and the NPPG defines this as not placing unjustified and disproportional burdens on an applicant.
28. Following the grant of outline permission there is often significant additional survey work and assessments necessary before reserved matters applications can be submitted. Indeed conditions are often applied to outline approvals which require additional surveys and assessments to be undertaken, the results of which would have to feed into the reserved matters scheme before the submission of an application.
29. Many outline applications only seek permission for the principle of a development, with all matters relating to layout, access, landscaping, appearance and scale reserved for future approval. The production of the necessary plans and supporting evidence to enable these Reserved Matters applications to be submitted can often be a lengthy process, particularly for larger developments. The fact the Core Strategy is also promoting extensive pre-application discussions with the Council and statutory bodies, together with the production of design briefs and community consultation, will add further delays to the submission of Reserved Matters.

30. Furthermore it is very common for outline applications to be submitted by the landowner or a promotional company, meaning a period of marketing and contract negotiations will be required before the above work can be started and reserved matters submitted.
31. It is therefore unreasonable to suggest that all Reserved Matters applications should be submitted within 12 months. Indeed applying such a condition could place such a burden on applicants that it could undermine otherwise viable and deliverable sites being brought forward. For example if a landowner were to obtain outline permission for a site with such a condition attached, prospective developers might be put off from purchasing the site on the basis that they would be unable to prepare and submit a reserved matters application within such a tight timeframe.
32. There may very well be circumstances where a scheme with outline permission could seek approval for reserved matters within 12 months, and where the requirement for this might be justified in planning terms. However it is highly unlikely that this would be the case for the vast majority of outline applications and the suggestion of applying a blanket condition is therefore entirely unreasonable.
33. The Council are now suggesting in ADM14 that such a condition will only apply to sites with a history of not implementing planning permissions. It is unclear why the Plan needs to make any reference to this as a decision to apply a shorter, or longer, timeframe on an outline application can be considered on a site-by-site basis at the application stage. Indeed, if the Council are suggesting that a large number of their current commitments are sites which are not being brought forward and are subject to repeated resubmissions it raises questions on the actual deliverability of their Committed Supply. This is relevant to note in relation to MIQ Matter 8.