**Examination of the East Lindsey Core Strategy and the East Lindsey Settlement Proposals Development Plan Document**

**Inspector’s Matters, Issues and Questions (MIQs)**

**Stage 2 – Settlement Proposals DPD**

**Matter 3a – Housing Land Supply**

**Issue: Will the Core Strategy and Settlement Proposals DPD deliver the housing requirement for 2017 to 2031 (including for affordable housing) for the period 2017 to 2031? Do the plans meet the requirements of paragraph 47 of the NPPF in respect of housing delivery?~~; and paragraph 10 of the Planning Policy for Traveller Sites (PPTS) in respect of delivering the relevant development?~~**

In responding to the questions below, please have regard to the questions and answers for the Stage 1 Core Strategy, Matter 8. These concern what the five-year supply requirement should be. Please also have regard to the Council’s revised evidence on housing supply available as documents ED016 to ED033.**CHECK DOC NOS**).

*Total Housing Supply for the plan period*

1. Will the policies in both plans ensure that the overall housing requirement for 2017 to 2031 can be met, taking into account under-delivery since 2011? What is the supply from coastal commitments, inland commitments and allocations as of 2017? Is there likely to be any supply from ‘windfall’ development, including for example through policies SP3 5 and SP4?

*The Council believes that the policies in both plan ensure that the overall housing requirement for 2017 to 2031 can be met. The 1085 under delivery of housing has been incorporated into the overall housing requirement. This shortfall is calculated below;*

*The Council would agree that the start date of the Local Plan is 2011. The plan would therefore run from 2011 – 2031. This would make a total housing need at 481 homes per year over the 20 year period = 9620.*

*Up to the 1st March 2017 the District should have delivered 2886 homes for the period 2011 – 2017, this is 6 x 481, but as set out below the District delivered 1081 homes;*

*2011 246*

*2012 240*

*2013 276*

*2014 278*

*2015 405*

*2016/17 356*

***Total 1081***

*2886 – 1081 = 1805*

***This leaves a shortfall of homes of 1805.***

*Rebasing the housing target to run from March 2017 to 2031. This would mean 14 years remaining in the life of the plan or 481 x 14 = 6743. Add onto that the shortfall of homes from the years 2011 – end of February 2017.*

***6743 + 1805 = 7819****.*

*The supply from Inland commitments, Coastal Commitments and Inland allocations is set out below;*

|  |  |
| --- | --- |
| *Commitments inland* | *3118* |
| *Commitments coastal* | *1262* |
| *Inland allocations as set out in Table B* | *4170* |
|  |  |
| ***Total – This includes a 9.0% buffer against the housing requirement;*** | ***8550*** |

*Given the range of policies in the Plan which allows windfall, there is a very high probability that more supply will come forward during the plan period from windfall developments, though it is difficult to quantify. At the present time the Council has 253 homes on windfall applications moving toward permission with another 94 waiting for sign off for S106. The following policies support windfall development;*

*SP3 in inland towns and large villages*

*SP4 in medium and small villages both as infill and on brownfield land*

*SP5 housing for older persons*

*SP8 Rural affordable housing*

*SP9 Single plot exceptions*

*SP18 housing on the coast on brownfield sites*

1. Is the supply of housing sufficient in both the inland and coastal areas to meet relevant plan targets?

*The plan target is 7819, the supply as set out in answer to question one is 8550. This leaves a buffer of 9% or 731. Add to that the 347 homes in major applications in windfall in the pipeline either moving toward an approval or waiting for S106 sign off and that figure rises to 1078. It is very unlikely that the Council is not going to approve another windfall development over the plan period. Overall, the Council believes that this is sufficient housing to meet the requirement as set out in the Plan.*

1. Should the shortfall in housing delivery between 2011 and 2017 be recovered over the next 5 years (‘Sedgefield’) or over the remaining plan lifetime (‘Liverpool’)?

*With regard to the housing trajectory setting out how the Council believes the housing is going to come forward over the period there are two options to consider or a combination of the two.*

1. *Liverpool method - spreading the undersupply over the whole plan period, this would equate to 558 homes per year.*
2. *Sedgefield method – recovering the undersupply within the first five years. This would equate to a trajectory as set out below;*

*2017 – 2022 = 698 homes per annum*

*2023 – 2027 = 481 homes per annum*

*2028 – 2031 = 481 homes per annum*

*Given the current situation with completions, the Council believes that the amount of housing set out in the Sedgefield trajectory is unlikely to be completed in the District in exactly the same way it is set out above. The Housing Trajectory setting out all the commitments and the inland housing allocations shows that there will be a predicted rise in completions in the first five years if development comes forward at the rate that those developing have informed the Council.*

*However, looking at the present year 2017/2018 it is believed that there will be the delivery of approximately 490 homes. The evidence presented in the trajectory ED32 shows that there will be a substantial increase in dwellings coming forward in the next 5 years, therefore the Council proposes to recover the undersupply in the first five years. The trajectory is set out below;*

*It is proposed for a main modification to paragraph 19 of Policy SP3 so that the paragraph reads as follows;*

*The Council will allocate sites in the Settlement Proposals Document along with existing commitments for the phased delivery of the ~~7768~~ 7819 housing target including the undersupply of housing over the following trajectory;*

|  |  |  |  |
| --- | --- | --- | --- |
| *2017/18* | *490* | *2022/23* | *485* |
| *2018/19* | *749* | *2023/24* | *481* |
| *2019/20* | *749* | *2024/25* | *481* |
| *2020/21* | *749* | *2025/26* | *481* |
| *2021/22* | *749* | *2026/27* | *481* |
| *Total for the period 2017 – 2022* | *3486* | *2027/28* | *481* |
|  |  | *2028/29* | *481* |
|  |  | *2029/30* | *481* |
|  |  | *2030/31* | *481* |

**Five year supply of housing sites**

1. What should the five year requirement be, including a 5% or 20% buffer as appropriate?

*During the Examination Hearing on the 13th July it was requested that a table be supplied setting out past delivery targets against completions going back to 2001.*

*Please see the table and graph below;*

|  |  |  |  |
| --- | --- | --- | --- |
| *Year of Target and Plan* | *Target* | *Completions* | *+ or -* |
| *2001 – Adopted Lincolnshire Structure Plan ran from 2001 - 2021* | *520* | *663* | *+143* |
| *2002* | *520* | *624* | *+104* |
| *2003* | *520* | *487* | *-33* |
| *2004* | *520* | *568* | *+48* |
| *2005* | *520* | *497* | *-23* |
| *2006 – Adopted regional plan* | *600* | *619* | *+19* |
| *2007* | *600* | *732* | *+132* |
| *2008* | *600* | *578* | *+58* |
| *2009* | *600* | *681* | *-22* |
| *2010* | *600* | *573* | *-27* |
| *2011 – Start period for the Local Plan* | *481* | *246* | *-235* |
| *2012* | *481* | *240* | *-241* |
| *2013* | *481* | *276* | *-205* |
| *2014* | *481* | *278* | *-203* |
| *2015* | *481* | *405* | *-76* |
| *2016* | *481* | *356* | *-125* |
| ***Total*** | ***8486*** | ***7823*** | ***-663*** |

The Council would advocate that the above table and graph shows that over a 16 year period there has not been a persistent under-delivery of housing. The table shows that under-delivery only really started to occur after the recession hit the District when the whole housing market nationally was effected by outside economic factors. The Council would also advocate that affordability has not been an issue with the supply situation as median house prices are only just coming back to 2007 prices with terrace housing not reaching it yet.

Over the whole 16 year period the under delivery is relatively low at 663 homes and the Council would advocate that the buffer should be 5%.

1. Will both plans help to ensure that there will be a five year supply of deliverable sites for housing upon its adoption; and a rolling five year supply thereafter (assuming both a 5% and 20% additional buffer to ensure choice and competition in the market for land)? Which sources of supply will ensure sufficient delivery, including allocated sites? Are the sources of supply for each five year period set out in a supporting document? Are proposed modifications ADM43, ADM44 and ADM7 (the latter amending the Core Strategy) necessary to make the plan sound? Is ADM45 an additional/minor modification or is it necessary to make the plan sound?

*The Council believes that there will be a five year supply of deliverable sites for housing upon the Local Plan`s adoption. Set out at ED31 and ED32 is a paper setting out the five year supply position and a housing trajectory of the allocated sites, inland and coastal commitments. The trajectory shows that the Council is seeking to deliver 3486 homes during the first five years of the plan and that if everything were to come forward as set out there would be 4577 homes completed. Given the slowly rising number of completions, this is perhaps an over-estimate but it demonstrates that there is the ability to deliver in the first five years. Setting out the housing supply it shows that with a 5% buffer the 5 year supply is 6.35 years and with a 20% buffer it is 5.55 years.*

*Overall the trajectory at ED32 shows that over the plan period there is sufficient housing to satisfy the identified need of 7819. The plan target is 7819, the supply as set out in answer to question one is 8550. This leaves a buffer of 9% or 731. Add to that the 347 homes in major applications in windfall in the pipeline either moving toward an approval or waiting for S106 sign off and that figure rises to 1078. This is without the Council granting another permission over the plan period.*

*ADM43 – This refers to paragraph 21 of policy SP3 and it is proposed to modify this paragraph so it reads as follows;*

*Table B below shows the ~~minimum~~ allocation of housing across the inland towns and large villages as set out in the Settlement Proposals Document. These figures are not targets and should not be read as such.*

*ADM44 is a minor modification as is a typo.*

*The modification adds clarity for those reading the plan that the housing requirment is not a target as such with a ceiling.*

*ADM45 is a transcription error*

*ADM7 – this is not relevant now and has been removed*

1. The analysis tables indicate that the majority of sites are expected to be developed within the first five years of the plan period. Is this realistic? Would there be any impediment to development coming forward in this way in respect of infrastructure provision etc?

*The majority of owners/developers of sites have told the Council that they are going to bring their sites forward within the first five years, it is very unlikely that this will happen on the ground. The Council has prepared a plan period trajectory setting out what we believe could come forward over the period. This is shown as ED32. The Council has tried to build into the plan period trajectory any known impediments to sites coming forward where it may take longer. The statutory providers were consulted on the growth targets for all the settlements and made no major objections to the amount of growth proposed overall.*

1. How will the supply of sites be monitored and managed to ensure a rolling five year supply of specific deliverable sites throughout the plan period? Should the plan include a trajectory for the expected rate of delivery of market and affordable housing for the plan period?

*The Council has a very robust system in place for monitoring and managing housing supply, there is 2 and half days a week in officer time set aside for this with additional resource at the yearly monitoring time (January/February). Every month all approvals are logged onto the Council`s Housing Position statement, the history of each site being checked to make sure there is no double counting. All building control starts and completions are also logged every month. Expiries are monitored every six months. The Council also contacts all owners/developers of sites to ask when sites are going to be delivered, makes site visits periodically and feeds onto the position statement information from the planning officers about sites. The Position Statement is also published on the Council`s website. Rebasing housing through the local plan examination process has allowed the Council to “housekeep” its position statement and start again at 2017. This will assist with monitoring by making the position statement easier to manage.*

*With regard to a trajectory, please see the answer to question 3 above, which sets out the proposed housing trajectory as a main modification.*

1. No housing allocations are proposed to be made in Horncastle, Huttoft and Partney due to the number of existing commitments being adequate to meet the requirement. Should the maps for these settlements show the commitments to be relied upon (as appears to have been done in the coastal settlements)? Are these commitments listed somewhere? Would there be any benefit in allocating some or all of these sites in the plan?

*Many of the commitments, especially in Horncastle are for single plots and would not show clearly on a map. The Council did debate whether to place the commitments on a map but it just was not clear because of site size and it was felt that publication on the website was a more effective mechanism for telling residents and other interested parties where they were.*

*Also planning permissions granted as commitments change and therefore placing them on a map would only be a snapshot of the situation as at the time of the publication of the plan.*

*All the commitments across the whole District are shown on the Council`s position statement which is published on the Council`s website so everyone can see it.*

*Supply of affordable housing*

1. The Core Strategy sets a requirement for 2825 affordable dwellings to be delivered in the period 2016-2031. How many affordable dwellings will the plan deliver in this period against this requirement and from what sources?

*Set out below is a table showing the potential supply of affordable housing over the plan period*.

|  |  |
| --- | --- |
| *Identified need including backlog 2016 – 2031* | *2825 or 188 a year for 14 years and 193 for 1 year* |
| *Completions 2016* | *158* |
| *Remaining need from 2017 – 2031* | *2667* |
|  |  |
| *Supply* |  |
| *Inland housing allocations* | *1233* |
| *Inland commitments* | *598* |
| *Coastal commitments* | *281* |
| *Housing Capital Programme to be developed* | *107* |
| *Community Led Housing project (funding from the Government £2m – received)* | *50 to 70* |
| *Total* | *2269 to 2289* |

It is proposed that the table above is a main modification to replace the table on page 36 of the Core Strategy.

*There are also another 90 affordable houses waiting in major applications windfall in the pipeline moving toward an approval in applications and 106 have been given permission since March 2017; this equals 2485 if the Community Led Housing project provides its top level figure.*

*For just this year alone the delivery will be 106 plus the 90 moving toward an approval, this is 196 x 13 (years left, excluding 2017/2018) = 2548 and that is excluding the above dwellings set out in the table above*

*The Council believes that it will achieve its requirement of 2825.*

1. Is it necessary to consider an increase in the total housing requirement in order to deliver the necessary amount of affordable housing?

*The Council does not believe it is necessary to increase the total housing requirement in order to deliver the necessary amount of affordable housing. Given the Council`s delivery in 2016/2017, and its continued delivery in 2017, it demonstrates a robust approach to delivery of affordable housing and demonstrates that the amount of housing can be delivered over the plan period. For just this year alone the delivery will be 106 plus the 90 moving toward an approval, this is 196 x 13 (years left, excluding 2017/2018) = 2548*

**Matter 3b – Supply of Gypsy and Traveller Accommodation**

**Issue: Will the Settlement Proposals DPD meet the requirements of paragraph 10 of the Planning Policy for Traveller Sites (PPTS) in respect of delivering the relevant development?**

1. Is the plan consistent with paragraph 10 part a) of the PPTS? Will the sites identified in the plan be delivered within the first five years of the plan period? How will this be monitored and managed? Are any contingency plans necessary/in place?

*The Council is looking to deliver the two sites in the Local Plan within the first five years, much sooner if possible.*

*With regards to the Louth site, work has commenced to either buy it and if meaningful negotiations on its purchase cannot be reached then the Council is going to move to compulsorily purchase the site.*

*With regard to the transit site in Mablethorpe, this is Council owned land and the Council is waiting for the outcome of the Examination, when that is over then works will be put in place to bring the site forward. The site is being used informally already and the Council is tolerating this but wishes to place the site on a more formal footing as soon as possible. It is hoped this can be achieved over the winter period of 2017/2018 when the transit population drops to almost nil.*

*The other transit site on the Burgh Bypass is privately owned and was being used as a transit site up until very recently, the owner wished to continue that use but is also waiting for the outcome of the Local Plan examination and a planning appeal. Whilst waiting they have stopped the use of the site.*

*The contingency that the Council has is that it could make the Mablethorpe transit site larger. This is not the best solution and the Council would only do this if the site at Burgh was deemed unsuitable, as it would mean accommodating all transit provision on one site and this comes with associated social problems during the summer usage. It would be preferable to have the transit provision broken down onto the two sites.*

*The contingency for the permanent site provision is that the Council would have to look to buy land somewhere in one of the other larger settlements outside the area of flood risk. This would also mean that the Council would have to apply for planning permission as well which would make the process longer, as the site in Louth already has a live consent on it.*

*The matter is being monitored within the Planning Policy Team who is liaising with the Council`s Property Services Team. Both teams will be involved in bringing the sites forward.*