

EAST LINDSEY STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

NOVEMBER 2016

Supporting Economic Growth for the Future



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CHAPTER 1 - INTRODUCTION

What is the Strategic Housing Land Availability Study?

1.1 The Strategic Housing Land Availability Study (SHLAA) is part of the evidence to support the preparation of the Council's Local Plan. It identifies the potential supply of land that could be made available for housing development in East Lindsey over the next fifteen years. This will allow the Council to plan for a sufficient supply of land to meet the District's overall housing needs until 2031 at least.

1.2 Allocating sites for development is a role for the Local Plan. The SHLAA provides key evidence to help the Council make decisions about housing allocations in the Plan. It assesses whether sites are **broadly** suitable for housing development, for example, that the land is not required for other purposes, that it is not at serious risk of flooding or that reasonable means of access can be provided; and identifies any constraints that might have to be overcome. It also looks at whether sites are likely to be made available by their owners and if there are any significant problems that could mean that they are not viable. It does **not** undertake a rigorous examination of each site, as would be necessary if the land were to be subject of a planning application, nor does it set any sequential preference for sites, unless it is clear that a site lies outside a settlement and does not and could not during the plan period be developed to either join up or relate to that settlement.

1.3 ***The SHLAA does not allocate sites for housing development nor does it indicate that a site should be allocated. Similarly, it does not prejudge any planning application that may be submitted in the future or indicate that a suitable site will be granted permission.***

1.4 The SHLAA will consider:

- which sites are likely to come forward for housing development within the identified settlements in East Lindsey (identified settlements will be set out in the Council's Draft Core Strategy and are listed in Table 1 of this document);
- how much housing these sites are likely to provide;
- how this compares to the total amount of housing the Council needs to provide over the lifetime of the Local Plan;
- which greenfield sites adjoining or outside the settlements are likely to come forward for housing, should they be included in the Local Plan Settlement Proposals;
- how much housing these sites could contribute to the Council's housing need; and

- if there is any shortfall of sites in the identified settlements, if the Council need to look for additional sites to meet this need.

The Study Area

1.5 The study area is the whole of East Lindsey District Council's administrative area. The Council considered working jointly with other neighbouring authorities but the timetables for the preparation of respective Local Plans did not make this feasible.

The Broader Context

National Policy

1.6 In March 2012 the Government published the National Planning Policy Framework (NPPF) this replaced all previous Planning Policy Statements with one document. The NPPF (para 159) still requires that local planning authorities prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.

1.7 The NPPF says that, in order to boost significantly the supply of housing, local planning authorities should:-

- Use their evidence-base to ensure that their Local Plan meets the full objectively assessed requirements for market and affordable housing in the housing market area, as far as consistent with the policies set out in the Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;
- Identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there is a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% to provide a realistic prospect of achieving the planning supply and to ensure choice and competition in the market for land;
- Identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;
- For market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and, set out a housing implementation strategy describing how

they will maintain delivery of a five-year supply of housing land to meet their housing target; and

- Set out their own approach to housing density to reflect local circumstances.

1.9 Local authorities may make an allowance for windfall sites in the five year supply if they compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens.

1.10 The SHLAA is aimed at providing the background information to demonstrate these requirements.

The Councils Housing Target

1.11 The Council's housing target has been set, in the Core Strategy, as 7215 or 481 houses per year. Calculations show that the District had a 3.85 year supply of housing meaning that there is an undersupply 1.15, as the Council should have a 5 year housing supply. This equals 553 additional homes which will need to be allocated in the Local Plan and added onto the housing target. Therefore the housing target for the whole District is $7215 + 553 \text{ homes} = 7768$ or approximately 517 homes per year. However, the housing target is affected by the presence of flood risk along its coastline; as identified on the Environment Agencies Coastal Flood Hazard maps. As a result, the Council has determined to divide the housing target. There will be an inland target which is a minimum and a coastal target which is a maximum.

Inland

1.12 The background paper explaining calculation of the District's inland housing target can be found on the Council's website. The target for this part of the District is 6460 houses.

The Coast

1.13 When the 2009 Regional Plan was being prepared, there was a lot of discussion about the potential impact flooding, especially along the Lincolnshire Coast, would have on future housing development. The Government Inspectors carrying out the examination into the Regional Plan felt unable to make a decision on this issue without further investigation and asked for a study to be carried out covering East Lindsey, Boston Borough and South Holland Councils; called The Coastal Study. Once The Coastal Study was completed and its findings were used to draw up policy options for a new Regional Plan. However, this

coincided with the Regional Plans being rescinded and this work was not progressed.

1.14 The Coastal Study concluded that there should be limited future housing development on the Lincolnshire Coast, sufficient only to meet natural growth in each Council's administrative area.

1.15 Since that time, the Council jointly commissioned (with a number of other Lincolnshire District Councils) the preparation of a Strategic Housing Market Assessment (SHMA) to help inform the development of its housing figures and its overall approach to housing, including the delivery of affordable housing to its communities. Work has also been carried out Edge Analytics on developing the housing target for the Coast. More information on this can be found on the Council's website in the Housing Topic Paper and the paper "Updating the Demographic Evidence 2015".

1.16 A figure of 1308 has been set as the target for the coast for the plan period up to 2031; this is made up of existing commitments.

CHAPTER 2 – HOW WE GOT HERE

Stage 1 – Planning the Assessment - The Methodology

2.1 Guidance published by the Department of Communities and Local Government (DCLG) sets out the process that should be followed when preparing a SHLAA. This guidance remains extant, despite the publication of the NPPF. It sets out eight main stages and two additional optional stages to be carried out. Boston Borough and East Lindsey District Council's agreed to work together on a joint methodology, which has been subject to consultation. Although covering the same approach, it drew up the stages slightly differently, having 5 main stages with two additional optional stages, before preparation of, and consultation on, the final report. A copy of this can be seen on the Council's website www.e-lindsey.gov.uk .

2.2 For ease of reference, this report has been laid out in line with the different stages of the process as included in the methodology jointly agreed with Boston Borough Council.

2.3 As required by the guidance, the Council considered partnership working to carry out its SHLAA. The Council does not have a formal housing market partnership. The most suitable partners are other local authorities, where economies of scale can be gained from producing a joint SHLAA. However, at the time work on the SHLAA was began, neighbouring Council's were at different stages in preparing their Local Plans and this was not considered viable.

2.4 The SHLAA seeks to establish that there is sufficient housing land to meet the broad strategic housing needs of the District until 2031, therefore, the search for potential sites has been limited to the inland towns and large villages, as these are the locations where the housing allocations are to be made in the Core Strategy. Only sites over 0.1 hectare have been included in the survey, as sites below this size are less predictable, both in terms of identification and in being able to accurately assess deliverability. The consideration of windfall sites is included below in stage 6 of the methodology.

Stage 2 – Sourcing Sites and Information

2.5 In line with the DCLG Guidance, the following categories of site have been considered as part of the study:-

Sites in the Planning System

- Sites allocated for housing (but not developed, or part developed) in the existing 1995 East Lindsey Local Plan;
- Sites allocated (or with permission) for employment uses;

- Sites for which the allocated use is no longer required;
- Sites having (part) unimplemented planning permissions for housing.

Sites Outside the Planning System

- Vacant and derelict land;
- Surplus public sector land;
- Sites in non-residential use with redevelopment potential (including car parks, commercial premises and over the shop premises);
- Empty homes;
- Residential areas with space for intensification or redesign;
- Previously undeveloped (greenfield) sites within settlements;
- Locations where regeneration strategies are actively being pursued;
- Broad areas of greenfield sites alongside settlements (only if a shortfall of available sites is identified to warrant consideration of urban extensions).

2.6 Available data on the above sites within the Planning System are already collated by the Planning Department as part of the Council's ongoing monitoring of housing supply. The Council attempted to contact landowners or agents for undeveloped allocated sites from the previous plan, to establish when the sites would be developed and if there were any impediments to development. The response to this approach has been mixed and in some cases landowners could no longer be identified. A similar exercise is also regularly carried out for sites with planning permission to determine a likely timescale for development of these sites.

2.7 In establishing the sites outside the Planning System, the first six categories of sites identified above have been addressed through: data from the previous Urban Capacity Study (which included a survey of towns and villages); sites that were submitted in the consultation exercise on the 2004 Deposit Local Plan, which was subsequently abandoned in 2005; and other sites put forward by landowners between 2005 and 2016. Sites held in the system from the consultation exercises on the 2004 Plan have only been considered available where the interest in the site could be demonstrated to be ongoing.

2.8 The Council has held formal calls for land and has also continued to accept submissions at any time, up to the preparation of the plan for consultation, and as a result of each consultation stage. All sites were mapped and included in the desk top study.

Stage 3 - Desktop and site surveys

2.9 The Council holds an extensive range of digital mapping overlays that contain spatial information on a number of factors relevant to site

selection; such as areas protected for biodiversity, flood risk etc. This data was reviewed to make sure that it was up to date.

2.10 In addition, every site was visited in the field and information collected about its characteristic and constraints, which helps to supplement the available desktop survey. Data about each site is recorded in a comprehensive database which is attached to a digital mapping overlay; so all information is recorded in one place and can be viewed alongside the other overlays relevant to site assessment, which is the next stage in the methodology.

Stage 4 – Housing site assessment

2.11 The Council assessed each site against 3 main criteria, Suitability; Availability and Viability.

Suitability

2.14 Desk top data, such as flood risk areas, archaeology, contaminated land etc, was combined with information from the site surveys and each site was assessed against common criteria to determine its suitability. Government guidance suggests that Local Planning Authorities (LPAs) should not be limited by existing policies and notations. By not constraining too tightly its potential sources of housing, it enables the Council to take a broad view of all its policy objectives at the time the Settlement Proposals are drawn up. Government guidance says that the Council should consider if sites are subject to the following:

- **policy restrictions** – such as designated or protected areas, existing planning, corporate or community strategy policies;
- **physical problems or limitations** – such as access, infrastructure, flood risk, contamination or other risks;
- **potential impacts** – including effects on landscape or conservation; and
- **environmental conditions** – which would be experienced by prospective residents.

2.12 The Council's methodology refined this, and considered the following:-

- Does it contribute to, or detract from, the creation of sustainable communities?
- Previously allocated or permitted, but undeveloped, sites will generally be suitable but have circumstances changed sufficiently to reduce their suitability?
- Are there overriding planning policy objections or constraints?
- Are there overriding physical problems or constraints?
- Are there any overriding infrastructure constraints?

- Would development of the site cause unacceptably harmful impacts to people or the environment, either on or off the site?

Availability

2.13 It is important that sites included in the SHLAA are known to be available; otherwise this does not represent a true picture of the amount of housing sites that will be delivered. Therefore, only sites nominated by the landowner and with a continuing interest in development have been considered to be available. To determine the availability of a site for development, a judgement was made on the basis of the best information available at the time, including:-

- freedom from ownership problems, including ransom strips, multiple ownership, tenancy conditions;
- written commitment to development, or to sell the land for development, presented by a developer/owner;
- existing planning consent (although this is not, in itself, be a robust indicator of availability and this is followed up where possible to establish if applicants are still willing to develop); and
- any evidence of previous procrastination on development on the site.

Viability/Yield

2.14 Finally, to see if these sites are likely to be developed for housing, the likely economic viability of new housing development in the locality needs to be considered, taking account of the local housing market and economic factors. This can only be a broad overview as there are many factors that influence the viability of a site which are confidential or commercially sensitive; such as availability of finance, the amount paid for a site, along with the wider market conditions.

2.15 As a starting point, the SHLAA identifies how much housing could be expected to be built on each site, taking into account the factors in the site assessment, to consider if this might have implications for the site coming forward. The capacity of sites of the same size will vary according to the site's shape, orientation, on-site constraints, infrastructure requirements and context, as well as being influenced by the local character and the type and size of houses to be built. Larger sites will generally be capable of absorbing the varying influences of such constraints.

2.16 The capacity of sites has been adjusted where sites are in sensitive locations or are in areas where the predominant form of the surrounding development is of a different density.

2.17 The capacity of the site may also be affected by overriding constraints. For example, if half of a site is in a flood risk area, the capacity is calculated on the developable part only. It may be that more of the site can be developed once a flood risk assessment has been carried out, but it is not possible to assess this in such a strategic document.

2.18 The prevailing average density of the different types of settlement has been assessed and used as a starting point in calculating possible capacity. Average densities were calculated for all sites put forward, regardless of the type of settlements; however, the SHLAA only identifies sites in the inland towns and large villages. The average densities are:

Towns – 26 per hectare
Large villages – 19 per hectare
Medium villages – 14 per hectare
Small villages – 12 per hectare

Deliverability

2.19 Only those sites that can satisfy all of the criteria have been identified as deliverable. Appendix 1 of this document provides a summary for each of the inland towns and large villages where housing sites are to be allocated. Appendix 2 provides information on the sites promoted in the medium and small villages, where there are to be no allocations.

2.20 The fact that a site has been discounted from the SHLAA does not automatically mean that they cannot be considered in the future. It is possible that the constraints identified now could be overcome in the future. Similarly, because a site is included in the SHLAA does not mean that it will definitely come forward, as there may be insurmountable constraints that are identified once the opportunity for more detailed site appraisal has occurred through the Settlement Proposals or when a planning application is submitted. The availability of a site may also change.

Stakeholder Consultation

2.21 The initial tranche of sites were subject to consultation in October 2012. 170 responses were received on that document, from a cross section of respondents; including residents, land owners and town and parish council's. Comments varied with responses both supporting and objecting to sites. Where comments provided new and additional information, this was taken into account in revising the document and the responses helped inform the production of this document. The October 2012 consultation contained sites in the medium villages. These settlements are not receiving allocations in the new Core Strategy;

however, the comments were still registered on the Council's database for future reference.

2.22 Additional sites have been promoted by landowners, across a number of settlements. These have emerged through the consultation and subsequently. The new sites have been considered using the same methodology, as outlined in this document and the separately published methodology.

Stage 5 - Review of the Assessment

2.23 The Review of the Assessment brings all the information outlined above together to set out the broad picture for future development in East Lindsey. It shows:

- which sites are likely to come forward for housing development within the identified settlements in East Lindsey;
- how much housing these sites are likely to provide;
- how this compares to the amount of housing the Council needs to provide over the lifetime of the Local Plan;
- the source of sites making up the delivery of housing;
- which greenfield sites adjoining or outside the settlements are likely to come forward for housing;
- how much housing these sites could contribute to the Council's housing need; and
- if the Council need to look for additional sites to meet this need.

2.24 The Plan is proposing a housing trajectory for the delivery of the 7768 housing target over the Plan period. The trajectory will be as follows;

- 2016 – 2021 – average of 591 homes per annum;
- 2021 – 2025 – average of 481 homes per annum;
- 2025 – 2031 – average of 481 homes per annum.

2.25 The amount of land put forward for housing and where it will be located may be affected through the SHLAA and Local Plan consultation process. The responses residents, town and parish councils, developers and agents give, may mean some sites presently discounted are reconsidered or sites which have been included have to be removed from the Plan. This could change the picture across the District.

2.26 Table 1 below shows the housing distribution. This is based on the overall inland target, less planning permissions that have already been granted outside the towns and large villages; giving a revised target of 6174. Column two shows how this is divided between the settlements in

which the Plan is proposing growth. Column three shows that target figure minus existing commitments through the planning permissions already granted in each settlement. The final column shows the subsequent amount of housing that is to be allocated through the plan.

Table 1

SETTLEMENT	TARGET 7768 less 1308 on coast 308 homes granted outside towns and large villages	COMMITMENTS	BALANCE	ALLOCATION
ALFORD	326	148	178	161
BINBRROK	92	8	84	0
BURGH LE MARSH	241	82	159	95
CONINGSBY/ TATTERSHALL	549	159	390	417
FRISKNEY	56	3	53	59
GRAINTHORPE	66	3	63	18
HOGSTHORPE	88	21	67	100
HOLTON LE CLAY	340	7	333	326
HORNCastle	683	697	-14	0
HUTTOFT	53	3	50	0
LEGBOURNE	61	39	22	23
LOUTH	1619	625	994	1204
MANBY/ GRIMOLDBY	158	139	19	77
MAREHAM LE FEN	94	43	51	113
MARSHCHAPEL	68	3	65	84
NORTH THORESBY	105	17	88	160
PARTNEY	23	17	6	0
SIBSEY	189	20	169	239
SPILSBY	301	73	228	264
STICKNEY	96	64	32	24
TETFORD	44	5	39	0
TETNEY	154	98	56	57
WAINFLEET	181	22	159	96
WOODHALL SPA	391	52	339	352
WRAGBY	173	121	52	32
TOTAL	6152	2469	3683	3901

2.27 Table 2 below expresses the housing land outlined above in terms of each of the categories identified in the SHLAA (see paragraph 2.7 above). It only looks at the source of sites that are within the inland towns and large villages; the areas that the Plan is seeking its strategic growth. Development coming from other sources is not included. For example, planning permissions granted in smaller settlements or that on the coast (where existing commitments already meet the target). The 161 assigned to Alford in Table 1 is not included in Table 2, as Alford is preparing a Neighbourhood Development Plan, which will allocate housing sites in the town, so the decisions about the types of land allocated will be considered in that document.

Table 2

Category	Total
<i>Sites in the Planning System</i>	
Sites allocated for housing (but not developed, or part developed) in the existing 1995 East Lindsey Local Plan	112
Sites allocated (or with permission) for employment uses	0
Sites for which the allocated use is no longer required	0
Sites having (part) unimplemented planning permissions for housing	2357
<i>Sites Outside the Planning System</i>	
Vacant and derelict land	152
Surplus public sector land	0
Sites in non-residential use with redevelopment potential (including car parks, commercial premises and over the shop premises)	0
Empty homes	0
Residential areas with space for intensification or redesign	0
Previously undeveloped (greenfield) sites within settlements	0
Locations where regeneration strategies are actively being pursued	0
Broad areas of greenfield sites alongside settlements (only if a shortfall of available sites is identified to warrant consideration of urban extensions).	3588
Total	6209

N.B. Alford NDP will allocate land for an additional 161 dwellings taking the total to 6307

2.28 At the time of publication, 837 sites had been put forward in the SHLAA across the District; these can accommodate approximately 40,369 dwellings. Some of these sites are located in settlements that the Council is not intending to grow, settlements within the coastal policy area subject to high flood risk or in the open countryside. Within, or adjacent, to the named settlements 556 sites have been submitted accommodating approximately 37,834 dwellings; which is significantly in excess of that required over the plan period. Not all of these sites are suitable for

development and accordingly such sites have been discounted through the SHLAA process.

2.29 There remain 191 sites identified through the SHLAA which already have the benefit of planning permission or have been deemed potentially suitable and these can provide approximately 9,152 dwellings.

2.30 The Council has selected sites within the majority of the named settlements to provide for the level of need identified through the Plan. There is a small deficit in some settlements which is not significant enough to require addressing strategically and is likely to be met by windfall plots within the settlement. However, there is a more significant deficit in seven of the settlements which has had to be addressed by releasing additional land elsewhere in the District. The decision not to allocate land at Binbrook and Tetford, as a result of landscape sensitivity due to the village's location in the AONB, means that there is a shortfall of 123 across these two settlements. Grainthorpe also has a shortfall of 45 due to flood risk constraints; similarly Wainfleet All Saints shortfall of 63 is due to flood risk. There is also a deficit at Woodhall Spa, but there are sufficient pipeline sites waiting the signing of section 106 agreements to meet this shortfall. There is a shortfall at Burgh le Marsh of 64 due to the lack of suitable sites. There is also a shortfall of 50 at Huttoft again due to the lack of suitable sites, although recent permissions will meet a small amount of this.

Stage 6 Assessing Housing Windfall Sites

2.31 The NPPF states that Local Authorities may make an allowance for windfall sites in their five year housing land supply, if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Historically, windfall sites have contributed up to 50% of the District's total housing supply. Many of these are very small-scale, infill sites, developed by the local building companies in the District. These small companies have provided housing 'to order' for customers, thus making them less susceptible to the wider economic fluctuations experienced by volume house builders and helping ensure a continuous level of delivery. They also contribute to the Government's desire to accommodate the self-build market within the current planning system.

2.32 Because of the long historical trend of this type of delivery, the type of sites that are delivered in this way and the local nature of the delivery, the Council believe it has sufficient evidence to make an allowance for windfall sites in its housing supply. It is believed that this allowance should be 15%. This still allows for the 5% buffer as prescribed by the NPPF, but reflects the need to ensure that up to 20% additional supply to assist housing delivery. Having an up to date Local Plan should see the number of windfall developments reduce. However, given that the SHLAA

does not identify sites below 0.1ha, it is envisaged that this will still form a recognised part of housing delivery across the District.

Stage 7 (if required) Assessing Broad Locations for Housing

2.33 Where the SHLAA has identified a potential housing shortfall over the plan period, methodology requires investigation of potential brownfield or greenfield sites and broad locations (ie not site specific) within, adjacent to, or outside existing settlements. The figures above in table 2 demonstrate that there is sufficient land already put forward through the SHLAA to provide for housing need over the plan period. Many of these sites will be greenfield, due to the low level of brownfield land in the District, and many will be outside the (adjacent to) existing settlements, as developable sites within settlements are limited.

2.34 Given that the housing target can be met through current sites, there is no need to investigate additional broad locations

Stage 8 The Final Assessment Report

2.35 Table 1 of this report sets out the overall housing position through the Local Plan in terms of commitments and allocations in respect of the individual settlements. The inland target for the plan (less existing commitments through planning permissions outside the towns and large villages) is 6152. Once existing commitments in those towns and large villages are deducted, sites for 3683 dwellings need to be found, and sites have been allocated to accommodate a further 3901; meaning that the target has been met.

2.36 On a settlement by settlement basis, there are some settlements where the number of dwellings allocated does not match the amount needed, when commitments have been deducted from the target, and this is set out in more detail in paragraph 2.30 above. However, Table 1 shows that, through allocations in other settlements, the Council can provide sufficient land, through existing commitments and allocations to meet the strategic need over the plan period.

2.37 Appendix 1 of this document shows the sites which are to be delivered to meet the Plan's housing target. This includes the sites with existing planning permission, along with the sites that are proposed for allocation through the Settlement Proposals document.