

## ***Housing Growth and the Location of Inland Growth***

1. The Government has introduced the National Planning Policy Framework (NPPF) replacing previous planning policy and related guidance, some of the key messages for the District contained in the document are:

- The Councils policies must be in conformity with the NPPF.
- The Council must be pro-active in its approach to the provision of new housing. This means being less reliant on “windfall sites”. These are sites which have not previously been identified/allocated for housing by the Council.
- The Council must set its own housing target based on a robust evidence base.
- The Council should use the evidence base to try to ensure it meets the requirements for market and affordable housing.
- The Council should set out an approach to housing density.
- In terms of the location of housing, the preference is to build in locations that offer a range of community facilities and have good access to jobs, key services and infrastructure, away from areas of all types of flood risk.

2. The District faces a significant issue with regard to housing. 38% of East Lindsey, including the important towns of Mablethorpe and Skegness which are in an area of high coastal flood risk. ~~Strategic housing development here would be out of conformity with national planning policy, because housing is classed as vulnerable development, and should be avoided by directing it away from the areas of highest risk.~~ 38% of East Lindsey is in an area of high coastal flood risk. This area is covered by the Environment Agency`s Coastal Flood Hazard Map and is called the Coastal Zone. The map is shown on page 80 of the plan and the zone covers the red (danger for all), orange (danger for most), yellow (danger for some) and green (low hazard – caution). Therefore it is not realistic to promote an option of large-scale housing growth in this area. However, to meet our objectives of having a network of thriving, safer and healthy communities, and to try and address the causes and effects of climate change, we believe that we must deal with this issue head on.

3. In the inland part of the District the towns and large villages provide the key facilities for many of the medium and small villages in the District. Some of these smaller villages have their own flood risk issues and a number have reached a point when further growth would detrimentally alter their character. At the same time, evidence shows

that there is little correlation between growth and the protection of services and those smaller rural villages would have to grow substantially in order to keep or attract new services such as shops into their settlements.

4. Future housing growth in the District needs to be a response to population growth and social trends. It is the social trend element that affects East Lindsey's population growth more so than natural growth. Even though the number of deaths exceeds the number of births the population of the District continues to grow. This growth is caused by in migration of mainly older persons. The District's young people and those over 75 leave; in migration is outweighing out migration. In turn this older structure to the population has implications for the number and type of houses and the housing market.

5. The recent economic recession affected the District, with house building numbers falling and in migration slowing. This follows a national pattern. The plan must however be able to respond and react to a potential return to previous levels of migration and growth.

5(i) East Lindsey is a relatively self-contained housing market area with 77% of those working in the District living in the District. There are some wider linkages to Boston in the South and North East Lincolnshire in the north but migration to surrounding authority areas has only a relatively small net impact upon population change.

6. Therefore the aim of the Plan is to achieve a balance that supports the more urban parts of the District, helps the retention of existing rural services through a sustainable settlement pattern and strong policies which protect local services and facilities, and takes into account the issue of flood risk. To that end, it is essential that realistic targets for growth be established, that the Plan is flexible and able to react to change and the Council deals with housing growth in areas of flood risk in a different way to those outside of it.

7. As a starting point, using evidence from the Council's Strategic Housing Market Area Assessment Update October 2016 and the household and population projections produced by Edge Analytics in 2016, the Council has set an overall District wide housing target for its objectively assessed housing need for the Plan period of ~~7215~~ 9620 homes or 481 homes a year. The starting point of the Local Plan for the purposes of calculating housing growth is 2011 with the Plan running to 2031.

8. In addition to the housing ~~target~~ requirement, the Council has to set out how it is going to deal with any past undersupply of housing. As at

the 1<sup>st</sup> ~~February 2016~~ March 2017, the District from the period 2011 to 1<sup>st</sup> March 2017 should have delivered 2886 homes against the housing requirement of 481 homes a year, as set out below;

Year	Annual Requirement of Housing	Completions of Housing
2011	481	246
2012	481	240
2013	481	276
2014	481	278
2015	481	405
2016/17	481	356
TOTAL	2886	1801
<b>Total Shortfall</b>	<b>2886 -1801 = 1085</b>	

The District had only delivered 1801 homes leaving a past undersupply which amounts to ~~553~~ 1085 homes, ~~which included a 5% buffer. The Council will look to deliver this undersupply within the first five years of the plan period.~~ Therefore the housing requirement from 2017 – 2031 = 6734 (i.e. 481 x 14 years); plus the shortfall from above of 1085 which equates to a total housing requirement of **7819** for the period 2017 to 2031. ~~This brings the overall District wide housing target requirement for the Plan period to **7768** 7819 homes.~~

9. Historically, (completions 1981 – 2010) an average of approximately 33% of all housing growth in the District has occurred on the coast. This would correspond to approximately 2578 of the ~~7768~~ 7819 housing target. Previously this approximate amount of housing would have been allocated in the coastal zone. The Council has chosen a zero population growth scenario for the coast; this will provide a dwelling growth of 49 homes per year or 735 dwellings across the plan period. This in effect means no significant growth in the coastal population but makes provision for the formation of new households which are calculated to increase by approximately 4.9%. Inevitably, there will be some non-preventable in migration as homes become empty and are sold on to incomers from outside the coastal zone. As at the ~~28<sup>th</sup> February 2016~~ 1<sup>st</sup> March 2017 the coastal zone had ~~1308~~ 1262 extant planning permissions for housing, as this is over the 735 homes set out in the chosen scenario, the Coastal Zone will be restricted to existing commitments only for the Plan period with some exceptions as set out in Strategic Policy 18 (SP18) Coastal East Lindsey.

10. This is the first time housing growth on the coast has been constrained to existing commitments. Whilst the Council has been

monitoring this for the past three years, there is not enough data yet to evidence that the housing need in the coastal zone will still arise or that it will transfer inland if housing is constrained on the coast. Likewise there is no evidence to support that it will not.

11. Demand for housing has been reduced across the District since the recession. The Council is uncertain about whether it will return to pre-recession levels. New build completions and sales of housing are rising again albeit slowly but there appears, on the surface, to be a downwards trend. Given the fact that the Council has an undersupply of housing and national policy is clear that plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historic under performance, viability, infrastructure or environmental constraints, the Council has no evidenced reason for constraining its overall objectively assessed housing need.

12. The remaining amount of objectively assessed need will therefore be allocated inland and be located within the towns and large villages, as set out in the Settlement Proposals Development Plan Document, on a range of suitable sites for a range of different types of housing development.

The target is broken down into two.

- On the coast there are approximately ~~1308~~ 1262 homes which covers the area of the Coastal Flood Hazard maps these are existing commitments.
- Inland a **minimum** of ~~6460~~ 6557

13. The coast is of such strategic importance to the District, future development in this area will be guided by discrete policy in the Core Strategy. This policy, is set out in Chapter 10 and aims to provide strong and flexible support to economic, business, cultural and tourism growth in the areas covered by the coastal flood hazard zones. This policy is also designed to give positive indications of what will and what will not be supported by the Council in this important area. The Coastal Housing target will be confined to existing commitments and details of this are also set out in Chapter 10.

14. Because housing demand in the District and population growth is predicated on the in migration of mainly older persons it is impossible to predict where new residents are going to want to live. The starting point requirement for the inland towns and villages is calculated on the number of households in the Parish taken from the 2011 Census divided by the total number of households across the towns and large villages; this is

shown as a percentage. This percentage is then multiplied by the District target total. This in effect means that the larger settlements will get more growth. It assumes that the need for housing will be proportional to the number of houses. As demand arises mainly from migration it makes no distinction between demand in the towns and villages.

15. This way of apportioning growth ~~across the towns and large villages~~ means that the Council is not allocating its growth into a few settlements ~~bringing forward any large urban extensions. Whilst this means of delivering growth may be appropriate in more urban places, East Lindsey does not have a history of delivery of large sites over 300 units.~~ but spreading it across the inland towns and large villages, as set out above this reflects the way the population grows through the in migration of mainly older persons. The predominance of house builders who operate in the District tend to be smaller, with the national companies only rarely developing in the District. The Council strongly supports these smaller more Lincolnshire based developers and builders because they form a key employment sector and use the services and supply chain in the District. Large urban extensions could in effect penalise the smaller developers who rely on the District for employment.

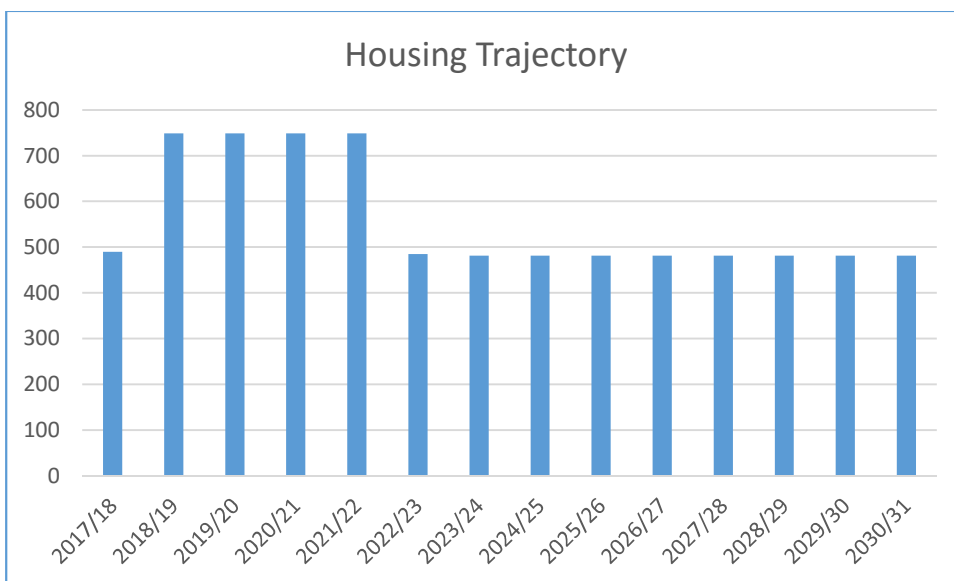
16. The other factor of concern around allocating large urban extensions in the towns of the District would be their ability to come forward and be delivered. Given that the in migrants could choose to live anywhere and there is no evidence to show they all go to one or a few settlements in the District. East Lindsey could end up with many windfall developments outside of an allocated urban extension and only slow growth or no growth on the allocated sites.

17. Work has started on analysing long term housing market trends around the District, particularly focusing on movement between Coastal and inland East Lindsey, the social dynamics of the District's housing market and the level of demand.

18. This work needs to be undertaken over at least a 5 year period, during a period of normality with regard to the economy and whilst policies are in place in order to see any long term trends. At the moment this work is not considered robust enough to reliably inform new policy.

19. The Council will allocate sites in the Settlement Proposals Document ~~along with existing commitments~~ for the phased delivery of the ~~7768~~ 7819 housing ~~requirement~~ including the undersupply ~~of housing for the period 2011 - 2016~~ over the following trajectory, ~~this will recover the undersupply within five years;~~

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



~~2016 – 2021 – an average of 591 homes per annum~~  
~~2021 – 2025 – an average of 481 homes per annum~~  
~~2025 – 2031 – an average of 482 homes per annum~~

20. As at 1<sup>st</sup> February 2016<sup>7</sup> table A below shows the position with regard to the delivery of the District's housing growth in the Plan period 2016<sup>7</sup> 2017 - 2031.

<b>HOUSING TARGET REQUIREMENT 2016 - 2031</b>	<del>7768</del> 7819
Commitments inland	<del>2777</del> 3118
Commitments coastal	<del>1308</del> 1262
<del>Spilsby site SPY310 which will be started during the plan period and the remaining part of it could start coming forward toward the end of the plan period</del>	350
Inland allocations as set out in Table B	<del>3901</del> 4170
<b>Total – This includes a <del>7.3</del> 9.0% buffer against the housing target requirement;</b>	<del>8336</del> 8550
<b>Other sources of housing that could come forward during the plan period – these have not been included in the housing target requirement above only the 15% windfall allowance will be part of the 5-year supply calculations</b>	
Possible homes from brownfield sites in the coastal zone	<del>218</del> 448
Possible homes from brownfield sites in the medium and small inland villages	<del>202</del> 245
<del>Windfall allowance 15% of target</del>	<del>1165</del>
<b>Total</b>	<del>1935</del> 693

**TABLE A**

21. 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.**

<b>SETTLEMENT</b>	<b>ALLOCATION</b>
ALFORD - This housing will be allocated in the Alford Neighbourhood Plan	161
BURGH LE MARSH	<del>95</del> -200
CONINGSBY/TATTERSHALL	417
FRISKNEY	59
GRAINTHORPE	18
HOGSTHORPE	<del>100</del> -98
HOLTON LE CLAY	326
HORNCastle	0
HUTTOFT	0
LEGBOURNE	23
LOUTH	1204
MANBY/GRIMOLDBY	77
MAREHAM LE FEN	113
MARSHCHAPEL	84
NORTH THORESBy	<del>160</del> -165
PARTNEY	0
SIBSEY	239
SPILSBY	<del>264</del> -425
STICKNEY	24
TETNEY	57
WAINFLEET	96
WOODHALL SPA	352



WRAGBY	32
TOTAL	<del>3901</del> 4170

**TABLE B**

~~22. It is important that housing growth occurs in line with infrastructure, the Council therefore wishes to see sites over 30 demonstrate how they are going to phase development if required in order for necessary infrastructure improvements to occur and for early engagement with infrastructure providers to take place on sites over 10, this is particularly focused on water infrastructure as recommended in the East Lindsey Stage 2 Water Cycle Study 2016.~~

23. The Council will ensure that there is an appropriate variety of house types and sizes on developments. Given the older demographic of the District and that young people move out, this will include **strongly** support for the provision of smaller houses, including 1 bedroom units, and housing for older people, including extra care and single storey accommodation outside areas of high flood risk. This will provide choice and help meet local needs.

24. Growth is not just about housing. Depending on the level and nature of population growth then the demand for employment, health, leisure, recreation and retail services will expand commensurately and inevitably, settlements will expand and change in character.

25. The District does not have a history of past industrial development so it is inevitable that growth will have to occur on green field sites. The Council will produce a brownfield land register, encouraging land owners of brownfield land in sustainable locations to put their sites forward for the register and will try, where it is applicable, to ensure that brownfield land is developed first. This can be found in Strategic Policy 10 (SP10) Design.

26. Empty houses can blight a community and are an additional source of housing. The Council is committed to bringing empty houses back into use and has a target in its Housing Strategy of 15 such properties a year. The Council will if necessary support this commitment through the planning process.

27. Overall the housing target for the inland area, adjusted to reflect current commitments, will influence the scale and location of sites required in individual settlements. The Strategic Housing Land Availability Assessment will contribute to the identification of appropriate sites. This

will aim to ensure that the release of sites can be managed over the plan period to maintain a 5-year supply of deliverable houses plus a 5% buffer.

28. The protection and enhancement of the natural, historic and built environment is considered a key factor in ensuring that housing growth contributes to and sustains the District's communities. All housing developments should be in accordance with all other relevant policies in this plan.

29. 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.

30. 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 will monitor future delivery and consider whether it should have a windfall allowance in the 5 year supply during the review of the plan. the Council believe it has sufficient evidence to make an allowance for windfall sites in its housing supply. This allowance it is believed should be 15%. Having an up to date Local Plan with site allocations, phasing sites, monitoring delivery and having a clear delivery pathway for housing should see the number of windfall developments reduce.~~

31. The usual approach with regard to housing allocations is to provide a buffer or fall back in the allocations to ensure that if sites do not come forward then others can take up the housing need easily. Given that the Local Plan is going to be reviewed in 5 years, and at that time additional sites can be allocated if the need and evidence arises. Policy SP3 therefore sets out a minimum inland housing target of ~~6460~~ 6557 but the Settlement Proposals Document has an additional allocated buffer provision for housing which is approximately ~~7.3%~~ 9.0% or ~~568~~ 731 homes. The buffer is the difference between the ~~housing requirement target~~ and the ~~amount of~~ supply of housing actually allocated in the Settlement Proposals Document.

32. ~~It is important that windfall sites coming forward during the plan period are sited in sustainable locations that are within or adjoining the inland towns and large villages. They should not leave development out of character or isolated from the main body of the settlement. These sites should therefore only be located wholly within or adjoining the main~~

~~body of the settlement. A windfall site is any site that comes forward that is not allocated in the Settlement Proposals Document.~~ Windfall sites are those that come forward for consideration during the life of the Local Plan but are not allocated in the Plan. It is important that windfall sites coming forward are sited in sustainable and appropriate locations and that they do not harm the character of settlements or their rural setting. There are specific policies in the Plan which support windfall housing development (SP4, SP5, SP8, SP9, SP12, SP18) outside of these the towns are settlements with a high level of services and facilities and therefore additional growth can be supported providing sites can conform to the policies in the Plan and national policy. The large villages are smaller with a lesser level of services and facilities, it is important that windfall sites are managed so that whilst some additional growth is supported over and above the site allocations it does not harm the character and amenity of these settlements.

32(i) In the AONB windfall development must have regard to the policies within this Plan but also the NPPF, particularly paragraphs 115 and 116 which affords great weight on conserving landscape and the scenic beauty of Areas of Outstanding Natural Beauty.

33. The Council considers that the housing allocations in the Settlement Proposals Document and existing commitments will deliver the housing target and that there is enough flexibility in the provision of housing to significantly boost supply and provide choice in the market. Given this the Council believes that the Plan gives it a 5 year supply of housing plus a 5% buffer.

34. The Council will keep the buffer on the 5 year supply under yearly review and will increase it to 20% if evidence shows that the demand across the District is improving yet housing is still not being brought forward

35. It is considered important that the Council keeps its housing trajectory under review. Given the number of unknowns the Council is facing as a consequence of apparent lowering of demand and constraining housing growth on the Coast, the Council will continuously monitor housing development by:

- Monitoring monthly the start on sites and completions of all housing developments in the District.
- Corresponding on a half yearly basis with all the owners of sites in each relevant phase of the plan to ascertain surety on the deliverability of those sites.
- Working with developers as planning permissions are processed to establish at approval stage a timetable for the delivery of sites.
- ~~The imposition of planning conditions on outline approvals to ensure that reserved matter applications are submitted in a reasonable period of time if it appears that sites are not coming forward and through repeated resubmissions (12 to 18 months)~~

- Publishing on the Council's website, at a minimum of half yearly, the 5 year land supply.
- Monitoring the supply of affordable housing being brought forward.
- Carrying out evidence based work to try to gather a wider understanding of the demographic dynamics of the population of the District.

36. ~~The Council will carry out a full review of its housing policy within 5 years. This work has already begun. This review will examine the impact of the policy, along with a review of the Coastal policy (as set out in that policy) on the population change of the District.~~ There are a number of factors in the Local Plan which mean there is uncertainty around delivery and impact of the policies, especially as this is the first time the Council has constrained housing growth on the coast. The Council will carry out a full review of its housing policy with a review being submitted for examination by December 2021. This review will examine the impact of the policy alongside the Coastal Policies SP17 to SP21 and re-assess the objectively assessed need for housing and the housing market area.

37. The Council has also put in place an East Lindsey Economic Action Plan. This Action Plan sets out all the projects the Council and its partners will undertake to try and drive positive results into the economy of the District. It is also the vehicle which the Council will use to monitor, investigate and evidence the impact of its policy on the economy, demographics and society of the District.

38. The Council has set out a trajectory of its housing supply over the plan period 2017 – 2031, accompanying this is a position statement setting out the allocated housing sites and inland and coastal commitments and the position with regard to the 5 year supply of housing. This information is updated yearly and can be viewed via the Council's website at [www.e-lindsey.gov.uk](http://www.e-lindsey.gov.uk) or if you require a hard copy of these documents contact the Planning Policy Team at Tedder Hall, Manby Park, Manby, Louth LN11 8UP

### **Strategic Policy 3 (SP3) – Housing Growth and the Location of Inland Growth**

**1. The overall District wide housing ~~target~~ requirement is ~~7768~~ 7819 homes for the ~~plan~~ period 2017 - 2031.**

**The ~~target~~ requirement will be:**

- ~~On the coast~~ In the Coastal Zone the area which is covered by the Environment Agency's Coastal Flood Hazard Map. The map is shown on page 80 of the plan, the zone covers

the red (danger for all), orange (danger for most), yellow (danger for some) and green (low hazard – caution), approximately ~~1308~~ 1262 homes ~~which covers the area of the Coastal Flood Hazard maps these are existing commitments.~~ Housing on the coast will be constrained to these existing commitments with the exceptions set out in Strategic Policy SP18 (SP18) Coastal East Lindsey.

The following settlements are in the Coastal Zone; Addlethorpe, Anderby, Chapel St. Leonards, Croft, Ingoldmells, Mablethorpe, New Leake, North Cotes, North Somercotes, Saltfleetby All Saints, Saltfleetby St. Clements, Saltfleetby St. Peter, Skegness, Skidbrooke + Saltfleet Haven, South Somercotes, Sutton On Sea, Theddlethorpe All Saints, Theddlethorpe St. Helen, Trusthorpe;

- Inland a minimum of ~~6460~~ 6557 homes

2. The Council will ~~allocate sites for~~ ensure the phased delivery of the ~~7768~~ 7819 homes as follows;

2017/18	490	2026/27	481
2018/19	749	2027/28	481
2019/20	749	2028/29	481
2020/21	749	2029/30	481
2021/22	749	2030/31	481
2022/23	485		
2023/24	481		
2024/25	481		
2025/26	481		

~~2016 – 2021 – an average of 591 homes per annum~~

~~2021 – 2025 – an average of 481 homes per annum~~

~~2025 – 2031 – an average of 482 homes per annum~~

~~3. Development sites over 30 should demonstrate phasing of development in line with infrastructure requirements.~~

4. **Housing growth will be allocated in the Settlement Proposals Document and will be distributed across the inland towns and large villages distributed across the inland towns and inland large villages as set out in the Settlement Pattern. These are;**

**Towns – Louth, Alford, Coningsby/Tattershall, Horncastle and Spilsby.**

**Large Villages - Binbrook, Burgh le Marsh, Grainthorpe, Grimoldby/Manby, Friskney, Hogsthorpe, Holton le Clay, Huttoft, Legbourne, Mareham le Fen, Marshchapel, North Thoresby, Partney, Sibsey, Stickney, Tetford, Tetney, Wainfleet (All Saints), Woodhall Spa and Wragby.**

5. ~~**Windfall sites within the inland towns and large villages will be supported providing they are spatially appropriate, in that they would not leave development out of character or isolated from the main body of the settlement. These sites should only be located wholly within or adjoining the main body of the settlement.**~~ **Towns - Housing growth on windfall sites in appropriate locations\*\* within the settlement and outside of, but immediately adjacent to the developed footprint\*\*\* will be supported.**

**Large Villages – Windfall development will be supported in appropriate locations\*\* within the settlement and outside of, but immediately adjacent to, the developed footprint\*\*\***

**\*\* 'appropriate locations' means a location which does not conflict, when taken as a whole, with national policy or policies in this Local Plan. In addition, to qualify as an 'appropriate location', the site, if developed, would:**

- retain the core shape and form of the settlement;**
- not significantly harm the settlement's character and appearance;**  
**and**
- not significantly harm the character and appearance of the surrounding countryside or the rural setting of the settlement.**
- Be connected to the settlement by way of a footpath.**

**\*\*\* 'developed footprint' of a settlement is defined as the continuous built form of the settlement and excludes:**

- individual buildings or groups of dispersed buildings which are clearly detached from the continuous built up area of the settlement;**
- gardens, paddocks and other undeveloped land within the curtilage of buildings on the edge of the settlement where land**

*relates more to the surrounding countryside than to the built up area of the settlement;*

- *outdoor sports and recreation facilities and other formal open spaces on the edge of the settlement.*

**6. *The Council will commit to review Policy SP3 with a review being submitted for examination by December 2021, including an assessment of the objectively assessed housing need, housing market area and the operation of the Coastal Policies.***