

DRAFT STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

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Supporting Economic Growth for the Future

CHAPTER 1 - INTRODUCTION	3
What is the Strategic Housing Land Availability Assessment?	3
The Assessment Area	4
The Broader Context	4
CHAPTER 2 – HOW WE GOT HERE	8
Stage 1 – Planning the Assessment - The Methodology	8
Stage 2 – Sourcing Sites and Information	10
Stage 3 - Desktop and site surveys	11
Stage 4 – Housing site assessment	12
The Present Housing Position	14
CHAPTER 3 – WHAT HAPPENS AFTER THE CONSULTATION?	17
Stage 5 - Review of the Assessment	17

CHAPTER 1 - INTRODUCTION

What is the Strategic Housing Land Availability Assessment?

The Strategic Housing Land Availability Assessment (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. The fifteen years is split into three time periods, 0 – 5 years, 6- 10 years and 11 – 15 years. This will allow the Council to plan for a sufficient supply of land to meet the District's overall housing needs until 2028.

Allocating sites for development is a role for the Local Plan. The SHLAA will provide key evidence to help the Council make decisions about housing allocations in the Plan. It will assess 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 identify any constraints that might have to be overcome. It will also establish whether sites are likely to be made available by their owners and if there are any significant problems and/or constraints 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.

The SHLAA does not allocate sites for housing development nor does it prejudge any planning application that may be submitted in the future.

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 Appendix 1);
- 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

- Once this initial stage of consultation is complete and the Council has chosen an option for the distribution of its housing growth, the SHLAA will look to see if there is any shortfall of sites in the identified settlements and if the Council need to look for additional sites to meet this need.

The Assessment Area

The assessment area is the whole of East Lindsey District Council's administrative area but the named settlements in the assessment are linked to the Settlement Hierarchy in the Draft Core Strategy. 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

National planning policy was set out in Planning Policy Statement 3: Housing (PPS3), required local planning authorities to:

- Identify specific, deliverable sites for the first five years of a plan that are ready for development and to keep this topped up over time in response to market information;
- Identify specific, developable sites for years 6 – 10, and ideally 11 – 15, in plans to enable the five year supply to be topped up;
- Where it is not possible to identify specific sites for years 11 – 15 of the plan, indicate broad locations for future growth; and
- Not include an allowance for windfall in the first 10 years of the plan unless there are justifiable local circumstances that prevent specific sites being identified.

In March 2012 the Government published the National Planning Policy Framework (NPPF) this replaced all the Planning Policy Statements with one, much shorter, document. The NPPF (para 159) still requires local planning authorities to 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.

In order to boost significantly the supply of housing, the NPPF says that 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
- Set out their own approach to housing density to reflect local circumstances; and

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.

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

Regional Policy

Regional Spatial Strategies were established to set broad policy for how the region as a whole, and specific parts of the region, were to develop in the future. Among its key roles was identifying the amount housing land to be built within each District. However, the May 2010 General Election brought about significant change and the Coalition Government intends to rescind the Regional Plans with the enactment of the relevant legislation (Decentralisation and Localism Bill). The level of housing to be built in East Lindsey will now be set by the Council, based on evidence of future need.

The Councils Housing Target

The Council has, because of the issues of flood risk in the coastal flood hazard zone, as identified on the Environment Agencies Coastal Flood Hazard maps determined to divide the housing target in two. There will be an inland target which is a minimum and a coastal target which is a maximum.

Inland

The Council background paper explaining calculation of the District's inland housing target can be found on the Council's website. That target is 5841

The Coast

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 assessment to be carried out covering East Lindsey, Boston Borough and South Holland Councils; called The Coastal Study. Once The Coastal Study had been completed, 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 has not been progressed.

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.

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. Additional work was carried out by Edge Analytics particularly around the coastal target. The Council examined two scenarios; zero population growth and the coastal study target. Accordingly, whilst the Council needs to recognise that the household projections used to inform the zero population growth targets are based on the most recent available data; and that there is a need to respond to the threat of tidal flooding it is considered that:-

- The constraint on development implicit in the targets suggested by the Zero population growth scenario would not meet the needs for the coast and would in effect mean no new permissions would be

granted over and above affordable housing for the rest of the plan period to 2028. This would not assist in creating a balanced community and could affect funding for affordable housing as the Homes and Community Agency do expect to see a mix of housing where grant funding is applicable.

- This scenario would provide no opportunity at all over and above the existing commitments. Even if some of those commitments were not renewed, the gap between the commitments and the target is so great that the chances of any new opportunity for developers coming forward, however small would be next to nothing during the period.

Therefore, it was decided that for the consultation on the Draft Core Strategy the Coastal Study figure of 1605 was to be the target for the coast for the plan period up to 2028.

CHAPTER 2 – HOW WE GOT HERE

Stage 1 – Planning the Assessment - The Methodology

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, and this drew up the stages slightly differently. Although covering the same approach, it has instead 5 main stages, with two additional optional stages, before preparation of, and consultation on, the final report. A copy of this can still be seen on the Council's website www.e-lindsey.gov.uk.

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.

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 but did work with Boston Borough Council, Lincoln City, West Lindsey District Council and North Kesteven District Council to produce a Strategic Housing Market Area Assessment, a copy of which can be found on the Council's website.

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 due to begin, neighbouring Council's were at different stages in preparing their Local Plans and this was not considered viable. In response to comments received, we made some minor amendments to reflect the differing circumstances of the two authorities.

The methodology sets out the full detail of how work on the SHLAA was carried out but below sets out an overview before going on to set out the findings.

As we are seeking only to establish that there is sufficient housing land to meet the broad strategic housing needs of the District until 2028, the search for potential sites has been limited to the 97 settlements emerging from the work on the Local Plan as the settlements where housing allocations are likely to be made. 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 being able to accurately assess deliverability.

Government Guidance states that no allowance should be made for windfall development in the first ten years of the plan. However, an allowance has been made for those sites which have been positively identified through the SHLAA as being deliverable; although these sites have not been identified on the plans appended to this document. Given the relatively small number of these sites and the limited amount of development they will generate, due to their size, this does not create a significant issue for the SHLAA.

Stage 2 – Sourcing Sites and Information

Landowners have been submitting sites to the Council for consideration for a considerable period of time.

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

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).

Stage 3 - Desktop and site surveys

So, how have we gone about identifying sites for consideration in the SHLAA? 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 had attempted to contact landowners or agents for remaining allocated sites to establish when the sites would be developed and any impediments to development. The response to this approach has been mixed and in some cases landowners could not be identified.

For the sites outside the Planning System, the Council used data from the previous Urban Capacity Study, which covered the first six categories of sites identified above. Also included in the search were sites that had been submitted in the consultation exercise on the 2004 Deposit Local Plan, which was subsequently abandoned in 2005, along with other sites suggested by landowners between 2005 and 2011. All sites were mapped and included in the desk top assessment.

The Council also carried out a survey of towns and villages to supplement and up date the Urban Capacity Study sites. In addition, to help us find sites and identify those sites where landowners were willing to see development, we:-

- placed a call for sites on the Council's website
- circulated questionnaires inviting landowners to submit sites that were available for development and which they wished to be considered in the SHLAA
- placed an advert in the local newspaper.

Every site was visited in the field and information collected about its characteristic and constraints.

Stage 4 – Housing site assessment

Appendix 1 contains the details of each site. It is set out in settlement order.

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

Suitability

The 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 narrowed down by existing policies and notations, so that LPAs are in the best position to decide its strategy for housing objectives. 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.

The Council's methodology refined this 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

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. 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 developer/owner;
- existing planning consent (although this cannot, in itself, be a robust indicator of availability);
- any evidence of previous procrastination on development on the site.

Viability/Yield

Finally, to see if these sites are likely to be developed for housing, we must consider the economic viability of new housing development in the locality, taking account of the local housing market and economic factors. We haven't examined this thoroughly yet and will consult directly with local development agents and developers during this consultation exercise to get a more detailed and informed picture.

An assessment needs to be made of how much housing could be expected to be built on each site. This cannot be an exact science; the housing capacity of different sites of the same size will vary according to the sites' shape, orientation, on-site constraints, infrastructure requirements and proximity to buildings nearby 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. Although there has been some adjustment where sites are in sensitive locations or are in areas where the predominant form of the surrounding development is of a different density.

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 will have been 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.

In general across the District we have taken the average density of housing for each tier of the draft Settlement Pattern as described below;

Towns – 26 per hectare

Large villages – 19 per hectare

Medium villages – 14 per hectare

Small villages – 12 per hectare

Deliverability

Only those sites that can satisfy all of the criteria have been taken forward into the assessment because we must be as sure as we can be that, if required, they are able to be developed for housing in the Local Plan period.

Those sites that failed to satisfy some or all of these criteria were discounted from the assessment. They are listed, in Appendix 1 of this document, together with a brief summary of the reason for discounting. Sites identified from other sources, but where there is no indication that landowners have an interest in developing the sites have not been listed.

The fact that a site has been discounted from the SHLAA does not automatically mean that they cannot be considered for in the Local Plan now or 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 they will be definitely be developed in the future, 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 Present Housing Position

Following National Government's decision to rescind all Regional Plans, with the adoption of the Decentralisation and Localism Bill, the responsibility for setting housing figures for future growth has passed to the local Council in each area. The Council has a draft housing target; this will be subject to public consultation in the Councils draft Core Strategy in the late autumn of 2012. The background paper explaining the calculation of this housing figure can be found on the Council's website.

The total draft District wide housing figure is 7446. This is broken down into two targets;

Inland East Lindsey – 5841 (a minimum)

Coastal East Lindsey – 1605 (a maximum)

Both the above include existing commitments as at the 1st April 2012.

At the present time in the named settlements the total land that has been put forward can accommodate approximately 12,321 dwellings across the District.

The Council knows that overall it has enough land for housing for the period till 2028 but that there **may** be a deficit in the following settlements:

Alvingham
Bilsby
Binbrook
Bucknall
Coningsby/Tattershall
Donington on Bain
East Barkwith
East Keal
Fulstow
Grainthorpe
Grimoldby
Hagworthingham
Huttoft
Legbourne
Maltby le Marsh
Mareham le Fen
Marshchapel
South Reston
Spilsby
Stickford
Tetford
Toynton All Saints
Wainfleet All Saints

That deficit cannot be quantified exactly at the present time because the Council has not yet chosen an option for the distribution of its growth across the District. This will be done in the late spring of 2013.

The amount of land put forward for housing and where it will be located will most likely be affected through the SHLAA consultation process. This could change the above picture across the District.

Where We Are Now - Stakeholder consultation

What we would like you to do

Please tell us:-

- if any of the sites identified in the assessment are unsuitable for housing development – and why (i.e. why they do not meet the criteria listed above, use the form below, which will guide you through the criteria);
- if any of the sites are unlikely to come forward for development – and why;
- of any other sites in any of the 97 settlements that we might have missed that satisfy all of the criteria listed above;
- If there is any evidence why any of the discounted sites should be reconsidered, using the criteria above.

Please remember that we are looking for sites that could be developed for housing, ***only if and when the need arises***. This does not mean that they will be allocated, automatically, as housing sites in the Local Plan.

At Appendix 2 of this document are two consultation response forms for your completion and return or you can complete the forms online by going to www.e-lindsey.gov.uk/consultation

PLEASE NOTE – In this instance we will only accept responses that are on the correct forms or electronically submitted. This is to ensure your responses are clearly tailored to the three main criteria; suitability, availability and viability.

CHAPTER 3 – WHAT HAPPENS AFTER THE CONSULTATION?

Stage 5 - Review of the Assessment

The Review of the Assessment is the stage where all the information is brought together to understand the broader picture for future development in East Lindsey, showing:

- 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;
- 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 the Council need to look for additional sites to meet this need.

This will involve drawing up an indicative housing trajectory showing how much land (and how many dwellings) could come forward over each of the time periods, 0 – 5 years, 6- 10 years and 11 – 15 years. This will then allow any shortfalls to be identified and require further assessment of the additional contribution from windfall sites and greenfield sites adjoining or outside the settlements.