

# East Lindsey Core Strategy 2016 – 2031 Examination

## Lincolnshire County Council Hearing Statement

8 August 2017

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

**Main issue: Is the overall approach to housing development in the inland areas justified?**

#### Questions

- 1. Is there a policy which specifically allocates the housing sites set out in the Settlement Proposals DPD?**

There is no policy which specifically allocates housing sites in the Core Strategy. However, there are references in Chapter 2 (paras 12 and 19) to that effect.

#### Questions - inland Towns and Large Villages

- 2. The plan states (para 14, para 23) that the starting point requirement for the settlement is calculated on the number of households as a percentage. Is this starting point figure for each of the inland Towns and Large Villages set out anywhere?**

Para 14 is based on para 9.1 of the Housing Topic Paper (CD 15) but neither sets out a specific percentage figure. It would be helpful if the calculation was set out more formally in order to clarify the assumptions made. Para 23 refers to meeting the housing needs of smaller households.

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

The planned level of housing growth for each inland Town and Large Village can only be assessed by referring to Table 1 of the SHLAA (CD 17) which includes allocations and commitments. These combined figures are not included in the Core Strategy. The larger settlements (Towns and Large Villages) receive more

housing growth compared to the medium and small villages. However, it is difficult to know whether each larger settlement is allocated an appropriate amount of housing based on the demographic proportionality approach taken by the Council because of the lack of baseline information.

- 4. Taking commitments into account, is the overall extent and distribution of the housing allocations to the inland Towns justified (ie - Louth 1204, Alford 161, Coningsby/Tattershall 417, Horncastle 0, Spilsby 264)? How were the minimum allocation figures in Table B on page 26 arrived at? In some cases these figures are less than in some of the Large Villages (eg Holton le Clay 326, Sibsey 239 and Woodhall Spa 352) – is this justified? How does this relate to the Settlement Pattern in Policy SP1 (see Policy SP3 4 which refers to housing growth being distributed as set out in the Settlement Pattern).**

Using available 2011 Census information, <http://www.ukcensusdata.com/east-lindsey-e07000137#sthash.irYYmEnP.dpbs> , the Towns and Large Villages (referred to in the question) have populations and households numbering:

| Settlement     | Pop       | h/h   | Allocation | Housing Target (Tab 1 SHLAA) | Target as % of pop and h/h |
|----------------|-----------|-------|------------|------------------------------|----------------------------|
| Louth          | c. 16,000 | N/A   | 1204       | 1619                         | 10%                        |
| Horncastle     | c. 7,000  | 3,300 | 0          | 683                          | 10% & 20%                  |
| C&T            | c. 7,000  | 2,600 | 417        | 549                          | 8% & 21%                   |
| Alford         | c. 4,500  | 2,000 | 161        | 326                          | 7% & 16%                   |
| Spilsby        | c. 3,000  | 1,400 | 264        | 301                          | 10% & 21%                  |
| Woodhall Spa   | c. 4,300  | 1,940 | 352        | 391                          | 9% & 20%                   |
| Holton Le Clay | c. 3,700  | 1,600 | 326        | 340                          | 9% & 21%                   |
| Sibsey         | c. 2,000  | 880   | 239        | 189                          | 9% & 21%                   |

The approach of apportioning housing growth to the Towns based on a pro rata assessment has the merit of simplicity but does not reflect the growth potential and sustainability credentials of individual settlements. A uniform approach therefore lacks sophistication. LCC would prefer a more targeted approach to distribution which acknowledges the superior sustainability of the Towns compared to the Large Villages, based on existing facilities and the potential for new infrastructure. Unlike the villages, there is no quantitative assessment of the Towns provided in the Sustainable Communities Topic Paper (CD 13), other than an acknowledgement that the Towns "provide a range of higher order district-wide services and facilities that because of economies of scale cannot reasonably be expected in other settlements." (para. 2.5)

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

Horncastle has the potential for more growth if highways issues can be resolved. Whilst ELDC is allocating all but 70 dwellings on suitable sites in Louth, the capacity of such sites in Horncastle is 1248, based on the SHLAA. Horncastle would benefit from a higher housing and employment land allocation to enable provision of needed education (see para. 9.3 in the East Lindsey Infrastructure Delivery Plan: CD 92) and road infrastructure. The growth potential of Horncastle should form part of the work programme for the early review of the Local Plan.

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

Louth is the largest town in the inland area of the district and benefits from a relatively wide range of facilities compared to most other settlements in the district. The table included in the response to Q. 4 above suggests a proportionate amount of housing (using the method adopted by East Lindsey) at least in relation to the existing population of the town.

- 7. *Taking commitments into account, is the overall extent, distribution and scale of the housing allocations in the inland Large Villages justified (these vary from 0 in some settlements to 352 in Woodhall Spa)? How were the minimum allocation figures in Table B on page 26 arrived at? How does this distribution relate to the Settlement Pattern in Policy SP1 and does it take adequate account of the availability of services and facilities in the Large Villages? (see Policy SP3 4 which refers to housing growth being distributed as set out in the Settlement Pattern).***

As stated in the response to Q. 4 above, LCC would prefer a more targeted approach which allocated more housing in some of the Towns with less housing in some of the Large Villages.

- 8. *What is the justification for there being no allocations in the large villages of Huttoft and Partney?***

No comment.

- 9. *Is the approach to windfall sites in the inland Towns and Large Villages justified? Does Policy SP3 5 provide a clear indication of how a decision maker should react to a development proposal, given there are no settlement boundaries? Will it be clear when a particular site within or adjoining the main body of the settlement would be spatially appropriate and would not leave the development out of character or isolated from the main body of the settlement? Is there any definition or explanation***

***of these terms? Is there intended to be any limit on the extent of housing growth allowed in these settlements under this policy or to the size of individual sites/developments? Is there any intended priority to sites within the main body of the settlement or to previously developed land? The supporting text (para 29) states that historically many windfall sites have been very small scale infill sites – is the continuation of this past position the policy intention here?***

The policy should be modified so that it defines what is meant by *spatially appropriate*. This can be done by explaining that it involves locations where development would not conflict with other plan policies, and where development would retain the core shape and form of the settlement, and would not significantly harm the settlement's character and appearance or its rural setting. This would inevitably rely on some planning judgement. It also needs to be made clear that this applies to windfall sites falling within the *developed footprint*, a term which then needs to be defined by reference to the built form of the settlement. Development proposals could be allowed on sites of up to 9 dwellings or 0.25 hectares for employment uses. However, in exceptional circumstances proposals may come forward at a larger scale on sites of up to 25 dwellings or 0.5 hectares per site for employment uses where proposals can be justified by local circumstances

- 10. *Is Policy SP3 5 on windfall development in the inland Towns and Large Villages consistent with national policy in the NPPF (paras 115 and 116) regarding Areas of Outstanding Natural Beauty (given there are Large Villages within the AONB – Binbrook, Tetford and Partney)?***

NPPF seeks to conserve the landscape and scenic beauty in AONBs. "Major developments" should be resisted in such environmentally sensitive areas but may be allowed in exceptional circumstances. None of the mentioned villages has allocated housing sites and modest amounts of carefully designed housing would be appropriate where a need can be demonstrated.

- 11. *Is it intended that windfall development in the inland Towns and Large Villages will make any contribution to the anticipated housing supply in Table A of the CS (eg to the windfall allowance 15% of target of 1165)?***

It is not clear from SP3 or supporting text if these windfalls are included in Table A.

### **Questions – inland medium and small villages**

- 12. *Does the restrictive approach to housing development in the inland Medium and Small Villages in Policy SP4 comply with the Framework and the PPG (see 'context' above) and the approach set out on page 17 (para 2) of the plan which refers to the inter-relationships between smaller and***

***larger settlements? Is the restrictive approach justified having regard to the services and facilities available in these settlements (eg as set out on pages 17 and 18 of the CS)?***

Policy SP4 is broadly in compliance with the PPG on Rural Housing in that it does not propose a blanket restriction on housing development, albeit with a list of restrictive criteria. The Sustainable Communities Topic Paper (CD 13) has identified the development constraints affecting a number of medium villages (para. 4.6).

***13. Is it justified that there are no housing allocations in the Medium or Small Villages***

Yes. These are the least sustainable settlements in the district and offer a different quality of life to the Towns and Large Villages. East Lindsey is noted for its tranquillity, a key component of which is remote living in a sparsely populated area, quite often in villages possessing only rudimentary facilities.

***14. Is it justified to limit housing development in the inland Medium and Small Villages in Policy SP4 to sites that are brownfield and have buildings on them that have become disused? Is it justified to require that these sites have been actively marketed for a community, economic or leisure use for 12 months? And that first consideration should be given to the conversion of buildings?***

The approach to managing housing development in SP4 seems to be predicated on preserving the character of East Lindsey's smaller and least sustainable villages. Promoting conversion and re-use of buildings is consistent with this approach.

***15. Should the plan allow for appropriate infilling within these villages?***

No comment.

***16. What evidence is there that there is little correlation between growth and the protection of services? (para 3 page 21 of the CS)***

Evidence is provided in the Sustainable Communities Topic Paper (paras 3.1 – 3.4: CD 13) which includes survey results. More broadly, a change in the way people shop and spend their leisure time is resulting in less demand for a physical presence close to home.

