



Lancaster District Local Plan 2011-2031 Part One: Strategic Policies and Land Allocations DPD

Representations on Inspector's Matters, Issues and Questions: Matter 2, Questions A to I

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/1 Introduction

- 1.1. PWA Planning have been instructed by Oakmere Homes to make formal representations on Lancaster City Council's Local Plan Part One (Strategic Policies and Land Allocations DPD) in relation to the Inspector's Matters, Issues and Questions (MIQ).
- 1.2. Oakmere Homes have previously made formal representations via PWA Planning and Smith Love Planning Consultants on the emerging Local Plan relating to sites known as land west of Watery Lane ('Watery Lane') and land east of Fulwood Drive ('Fulwood Drive').
- 1.3. This statement responds to questions A to I set out within Matter 2 of the Inspector's MIQ. Questions J to M of Matter 2 are answered on behalf of Oakmere Homes within Smith Love Planning Consultants statement. The responses should be read together with the comments previously provided on the submission version of the Local Plan.
- 1.4. This statement is intended to follow the format provided by the inspector in the MIQ document dated 2nd March 2019.

/2 Matter 2: Housing

Main Issue: Whether the Council's strategy for meeting its housing requirement is sound?

Questions:

a) The identified objectively-assessed need (OAN) for housing for the area is 14,000 new dwellings (an average of 700 per year). The Council, as set out in policy SP6, identifies a requirement of 12,000 new dwellings at a rate of 522 per year. Is the Council's housing requirement soundly based and supported by robust and credible evidence? Does it take appropriate account of the 2012-based DCLG Household Projections, the likelihood of past trends in migration and household formation continuing in the future, and 'market signals'? Is the housing requirement appropriately aligned with forecasts for jobs growth? What implications should be drawn from paragraphs 7.9 – 7.13 of the Updated Consultation Statement February 2019, on the OAN figure.

2.1. The Strategic Policies and Land Allocations Development Plan Document (DPD) is one of a suite of documents that will make up the new Local Plan and guide how the future development needs of Lancaster district are met. It sets out a spatial vision for the district and establishes what the strategic development needs of the district are; a spatial strategy then describes how those needs will be distributed. The plan then sets out a series of land allocations to identify where development needs will be met and where areas that are of specific economic, environmental or social importance will be protected.

2.2. To deliver these and the other aspects set by the vision, a series of strategic objectives, and sub-objectives, have been set. Of particular note is Strategic Objective 2 which seeks to provide a sufficient supply, quality and mix of housing to meet the changing needs of the population and support growth and investment.

- 2.3. In this regard, Lancaster City Council undertook a public consultation of 'Part One: Strategic Policies and Land Allocations DPD' in March 2017. The document set out the delivery of 13,500 homes at an annualised delivery rate of 675 dwellings over the plan period. This was phased in accordance with when anticipated infrastructure required to deliver strategic allocations was expected to be completed.
- 2.4. The new Policy SP6 that formed the submission draft of the Local Plan established a lower target of housing for the plan period, set at 522 dwellings per annum delivering just over 12,000 new dwellings. This reduction appeared to be a reflection of local transport infrastructure constraints. The infrastructure needs to be delivered in a timely manner to ensure development comes forward within the plan period. It would seem that the housing requirement has been adjusted to try and avoid this issue.
- 2.5. This figure within the plan means the planning requirement will only deliver 77% of the objectively assessed housing need for Lancaster in the plan period to 2031. This revised figure is the equivalent to 10,440 dwellings in the plan period until 2031, clearly below the requirement of 12,000 set by Policy SP6 of the Local Plan, and the 14,000 identified as the OAN.
- 2.6. In this respect, it is contended that the Council have not rigorously assessed and maximised all possibilities to deliver the OAN in full, despite the evidence presented as part of the examination, and notably Background Paper 1 'Assessing the Reasonable Alternatives – Informing the Spatial Distribution of Development' (Examination Document P_02). Alternative options and opportunities discounted should be revisited, including Oakmere's sites promoted through the Local Plan process known as Watery Lane and Fulwood Drive.
- 2.7. The matter is further pertinent when considering the forecasts associated with jobs growth and the housing requirement. Examination document LCC7.1.4 models the demographic implications of the housing requirement proposed in the submission version of the Local Plan, and the assumptions used in the OAN Verification Study. The modelling indicates that the figure of 522 dpa would fall short in supporting the job

growth that has been concluded as likely in the district (9,551 – 10,348) within the Review of the Employment Land Position (RELP) (Examination Document EM_ELR_02). The proposed scale of housing provision may therefore constrain this job growth or lead to a change in commuting relationships with surrounding authorities which therefore raises important questions over the delivery of sustainable development sought by the plan, and whether it can be found sound and in accordance with the NPPF. Likewise, the implications of Paragraph 7.9 to 7.13 of the Council's Updated Consultation Statement (February 2019) (Examination Document SD_09) states that the figure within the plan does not meet the OAN, and as set out within this statement, it should be increased.

- 2.8. In summary, serious concerns remain over the Council's proposed housing requirement figure, and the adequacy of the planned supply and assumptions made about its delivery. As per previous submissions, the Local Plan is not positively prepared, effective and justified and is therefore considered to be unsound. It is inconsistent with the NPPF and does not seek to significantly boost the housing supply. Further sites should be identified within the Local Plan to ensure the aspiration sought by the vision for the plan and the targets within Policy SP6 can be provided for.

b) Are the constraints identified by the Council sufficient justification for not meeting the full OAN for housing in the District?

- 2.9. No as stated above, it is contended that the Council have not rigorously assessed and maximised all possibilities to deliver the OAN in full, despite the evidence presented as part of the examination, and notably Background Paper 1 'Assessing the Reasonable Alternatives – Informing the Spatial Distribution of Development' (Examination Document P_012). Alternative options and opportunities discounted should be revisited, including Oakmere's sites promoted as Watery Lane and Fulwood Drive. These sites are deliverable now with no infrastructure constraints, helping to boost the supply of housing in the short term, contributing to meeting the Council's OAN and importantly the 5-year housing land supply (5YS), which as discussed below, the Council cannot demonstrate.

2.10. Oakmere remain supportive of the Green Belt review and the removal of the sites known as Watery Lane and Fulwood Drive from the Green Belt.

c) What provision has the Council made for any unmet housing need and does the housing requirement take appropriate account of the need to ensure that the identified requirement for affordable housing is delivered?

2.11. Paragraph 2C.2 of the Council's response to Matter 2 of the MIQs, in relation to question C states that the Council has sought to explore and provide opportunities to reduce the level of unmet need as much as possible whilst taking account of wider environmental constraints both within the district and those of neighbouring authorities. However, as stated throughout this statement, it is not considered this has been effectively undertaken. Two sites promoted by Oakmere are to be removed from the Green Belt, with the capacity to provide for up to 250 homes which are not included within the Council's non-strategic policies and therefore have not been fully considered within the Council's 5YS, nor their contribution to helping meet the Council's OAN.

d) Is the Housing Market Area (HMA) agreed with adjoining authorities in line with the Planning Practice Guidance and does the plan period coincide with housing projections?

2.12. The mismatch between the housing delivery period and the plan period is confusing and misleading, and means the Council is seeking to apply a reduced requirement over a longer period. Based on the plan period and dpa included within the plan, 10,440 dwellings will be provided. The housing delivery period and plan period must be aligned and an additional 3 years' requirement (1,566 dwellings) must therefore be added.

2.13. The matter is made further pertinent through the Council's most recent housing supply calculations included within Paragraph 2F.11 within Examination Document LCC7.2.0. The paragraph implies a reduced figure of 510 dpa, which clearly has further

implications on meeting the OAN, 5YS (both discussed elsewhere within this statement), but importantly the implications of an extended housing delivery period.

e) Are the DPDs clear as to the identified need for additional pitches for gypsies and travellers (policies SP6 and DM9) and is the identified need soundly based and supported by robust and credible evidence?

2.14. We have no further comments.

(f) Is the amount of land allocated for housing sufficient to meet the requirement and how will it ensure delivery of the appropriate type of housing where it is required within the District (with particular reference to Policies SP2, SG1, SG7, SG9, H1, H2, H3, H4, H5, H6, DOS7, DM1, DM2, DM4, DM7, DM8, DM11 and DM12)?

2.15. Key to the examination process of the Local Plan is the Council's ability to demonstrate a 5YS. In the Council's Matter 2 Hearing Statement (LCC7.2.0), it is stated that the Local Plan as submitted will not deliver a 5YS upon adoption. The document states it can only achieve it by lowering the already low housing requirement from 522 dwelling per annum (dpa) to 510 dpa and phasing the requirement so it is 450 dpa for the first five years from adoption, using a 10% instead of 20% buffer and recovering the backlog using the Liverpool method. With respect to the 510 dpa, in either circumstance, using 10% or 20% the Council cannot demonstrate a 5YS (see Paragraph 2G.27 of LCC7.2.0). Furthermore, the suggestion to utilise 450 dpa over the first five years from an adoption (and therefore the Liverpool method despite Government guidance, as recognised by the Council in 2G.9) appears to be a response to the transport infrastructure requirement needed for the strategic sites the Local Plan is dependent on. As highlighted throughout the Local Plan representation period, the need for smaller and medium sized sites to help fill the gap anticipated by the need for housing within the short term has not been addressed.

- 2.16. The lack of 5YS means the plan is unsound and has been submitted too soon, and on the basis of the above the Council is trying to retrospectively modify it. By not seeking to deliver the required number of housing in short term, the Council is failing in its duty to boost the supply of housing, and providing further suppression to the housing market given the history of persistent under delivery of housing within the District in recent years (recognised by the Council within Table 2G.6 and 2G.13 of LCC7.1.2.0).
- 2.17. On this basis, there are serious questions which remain as to whether a sufficient amount of land is allocated to meet the district's requirement. Simply, the Local Plan remains reliant on a number of large, greenfield strategic sites that require significant infrastructure and lead-in time and carry uncertain risk. The requirement for comprehensive master-planning to prevent piecemeal development will also add further delay, such that delivery from this source of supply is not expected until the middle of the plan period. Additional supply is therefore required in the early years of the plan period on sites which can be brought forward quickly without the need for significant infrastructure. This is evidenced with the Council looking to use the Liverpool method to calculate its 5YS, and the continued request to reduce the dpa further over a shorter plan period. In order to respond to this matter, additional supply can be provided by allocating more sites in urban and rural locations via Policies H1 and H2 and ensuring that Neighbourhood Plan Groups also plan positively and proactively in the designated Neighbourhood Areas, and similarly identify urban and rural allocations that maximise the contribution Neighbourhood Plans are able to make to the planned housing supply.
- 2.18. In addition to being quantitatively deficient, we consider that the planned housing supply is also qualitatively deficient in terms of the limited range and geographical distribution of the housing allocations and development opportunities it provides. This is especially noticeable at Morecambe where the Council acknowledges there is limited opportunity for new development, and deliverable opportunities to boost supply in the area should therefore be welcomed. Policy SP2 confirms that Morecambe is one of only two Tier 2 Key Service Centres in the Lancaster settlement hierarchy, yet the Local Plan does not propose any development in and/or around the town.

2.19. In summary, it is considered that further sites should be identified within the Local Plan to ensure the aspirations sought by the vision for the plan and the targets within Policy SP6 can be provided for. It is considered that Policy H1 could be expanded to include other potential emerging sites. This must also not exclude the allocation of suitable sites within the Neighbourhood Plan Areas. In its current context the DPD is considered unsound on the basis that it is not positively prepared in that it is not demonstrated that it is prepared based on a strategy which will meet needs, consistent with achieving sustainable development. This will help to ensure housing does come forward at the right time and in the right place, in a timely manner, ensuring the principles of sustainable development sought by the plan are delivered. Oakmere have previously promoted sites at Watery Lane and Fulwood Drive for this reason. They are available now, and within the control of a single developer who is experienced in delivering housing within the district.

(g) Will the distribution, capacity and speed of deliverability (with regard to viability and infrastructure) of the sites, satisfy the provision of a 5 year housing land supply?

2.20. Oakmere's concerns over this aspect of the plan are well documented within this statement, and other previous submissions. It is clear that the dependency on large greenfield sites that require significant infrastructure both effect the Council's contribution to meeting the district's OAN, but also demonstrating a 5YS, which based on the submitted version of the Local Plan is not achievable. As discussed, alternatives need to be explored and sites of a non-strategic nature need to be considered as part of the sites to be considered as part of the plans housing trajectory, such as those that non-strategic, deliverable now and without infrastructure constraints. Two examples are those promoted by Oakmere as part of the Local Plan, that in combination with deliver approximate 250 homes.

h) Do the DPDs make provision for addressing inclusive design and accessible environments issues in accordance with the NPPF?

2.21. We have no further comments.

i) Is the proposed monitoring likely to be adequate and what steps will be taken if sites do not come forward?

2.23. Additional trigger points should be considered, such as additional household growth information identifying an increased need for housing. However, it remains clear from the information within this statement that there is a need for a greater number of non-strategic housing allocations in the early part of the plan. These allocations would provide greater flexibility with the housing supply, providing more certainty and clarity and reducing the risk of not meeting housing targets.



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