

# **Examination of the Submission Draft Lancaster Strategic Policies & Land Allocations DPD**

## **Hearing Statement on behalf of G and M Parker**

<b>Matter 2</b>	<b>Housing</b>
<b>Question</b>	<b>(m)</b>

April 2019

## **Matter 2      Housing**

**Main issue      Whether the Council's strategy for meeting its housing requirement is sound?**

**Question (m)      Could the Council provide clarification on the amount of housing to be provided within individual neighbourhood plan areas (Policies SC1 and DM54)?**

- 1.1 G and M Parker have expressed its strong and growing concern over the failure of the submitted Strategic Policies & Site Allocations DPD to deliver a sufficient number of new homes to meet the objectively assessed local housing need for Lancaster.
- 1.2 The scale of under-provision is significant and G and M Parker consider that the Council must revisit its evidence base and previously-discounted sites with greater scrutiny to identify additional unconstrained, non-strategic sites for inclusion in the planned housing supply, which can be delivered in the right locations and in the short term when the need is most acute. This is now confirmed by the Council's admission in its Matter 2 Hearing Statement and accompanying 'Approach to Delivering Housing Supply in Lancaster' paper and trajectory, that even if the housing requirement is revised downwards from 522 dpa to 510 dpa, the submitted DPD will, crucially, not achieve a 5 year housing land supply in Years 1 to 5.
- 1.3 G and M Parker consider that Neighbourhood Plan areas must not be excluded or exempted from this exercise as many contain sustainable and highly-suitable locations for growth in accordance with the settlement hierarchy and spatial strategy. In this context, G and M Parker consider that the Council can do more and the submitted DPD can be more ambitious and provide greater certainty, to ensure a greater source of housing land is able, and will be proactively endorsed, to come forward from Neighbourhood Plan areas.
- 1.4 The submitted DPD presently relies solely on the anticipation that Neighbourhood Plan groups will plan proactively and positively for housing growth within their communities, and the Council explains that it has not sought to impose or demand a specific number of houses from a neighbourhood plan and advocates a supply-led approach instead. This approach is highly unlikely to yield the levels of housing growth the neighbourhood plan areas are capable of providing to meet identified needs, and it is noted that the Council is already proposing to revise the anticipated contribution from Neighbourhood Plan areas downwards from 25 dpa in the submitted DPD, to 15-16 dpa in the suggested changes set out in its Matter 2 Hearing Statement and accompanying 'Approach to Delivering Housing Supply in Lancaster' paper and its Appendix 5.

- 1.5 G and M Parker consider that the figure set out in Appendix 5 for the Caton-with-Littledale Neighbourhood Plan area is overly cautious and significantly under-estimates the level of housing supply that the Neighbourhood Plan can deliver. This is not indicative of pro-active and positive planning and a Council seeking to find additional solutions to help boost all sources of housing supply.
- 1.6 The Planning Practice Guidance and Framework are clear that Neighbourhood Plans must not constrain the delivery of important national policy objectives - including the need to help boost housing supply - and they should support strategic development needs set out in Local Plans, plan positively to support local development and should not promote less development than set out in the Local Plan or undermine its strategic policies.
- 1.7 For Neighbourhood Plans which plan for housing growth to benefit from protection from the presumption in favour of sustainable development, they must plan to deliver housing through policies and allocations, and meet identified requirements in full. Allocating sites and producing housing policies provides a planned-for approach to meeting needs, providing greater certainty for developers, infrastructure providers and the community. In turn, this also contributes to councils' housing land supply, ensuring that the right homes are delivered in the right places.
- 1.8 For these reasons, the Framework (paragraph 65) is clear that Council's should set out a housing requirement for each designated Neighbourhood Area through their strategic policies, which reflects the overall strategy for the pattern and scale of development in their areas and any relevant allocations. The reason for this is that once the strategic policies have been adopted, the housing requirement figures should not need to be re-tested at the Neighbourhood Plan independent examination.
- 1.9 Whilst this requirement does not feature in the 2012 Framework, the Council is correct to consider the requirements of up-to-date neighbourhood planning policy set out in the 2018 Framework and the Planning Practice Guidance. G and M Parker have explained in their representations, that they consider the inclusion of minimum housing requirements for Neighbourhood Plan areas would be a positive modification to the submitted DPD and will make the expectation to plan positively and pro-actively clear to Neighbourhood Plan groups. Any decision not to include housing requirement figures as a modification to the submitted DPD must also consider the consequence of having to reconsider the issue when Neighbourhood Plans are submitted for independent examination, and the risk, uncertainty and further delay to housing delivery that is likely to bring about.
- 1.10 G and M Parker agree with the criteria the Council has suggested at paragraph 2M.11 in its Matter 2 Hearing Statement to be used to identify appropriate minimum housing requirement figures for Neighbourhood Plan areas (n.b. not indicative figures). The process must be pre-qualified by ensuring that the SHELAA evidence base is sound and fit for purpose however.

- 1.11 In this respect, G and M Parker have raised concerns over the soundness of the 2019 SHELAA in their representation responding to the Additional Evidence and Information consultation. They consider that the 2019 SHELAA evidence contains a significant flaw and contrasts with the results of the 2015 SHLAA which indicated that both parcels of the land they own at Escowbeck Farm, Quernmore Road, Caton (ref. Parcels 99 and 100 in that evidence) were deliverable beyond 5 years. The single caveat to the 2015 evidence was that further detailed work was required to assess the effects of major development on the landscape and amenity of the Forest of Bowland AONB. The 2015 SHLAA does not contain any indication that either parcel of land was found to be unsuitable for development for any other reason, including its location, sustainability and physical and visual relationship to the settlement form of Caton.
- 1.12 The results of the 2019 SHELAA have also been independently appraised by Tyler Grange landscape consultants on behalf of G and M Parker. Its assessment contained within the Landscape and Visual Appraisal accompanying their representations, confirms;
- 1) The assessment of the site as two separate parcels in the SHELAA is artificial and misleading. There is no 'on the ground' justification to consider them in isolation and to do so, contradicts the recognition that some development is possible in both parcels;
  - 2) The access track which divides the parcels is not a strong, physical feature in the landscape and both parcels share common landscape characteristics, such that in reality there is no difference between them and the site should be read as a whole and assessed as a single entity, and;
  - 3) Landscape character evidence (see Section 3 and Plan 3 of the Tyler Grange Landscape and Visual Appraisal) confirms that any landscape distinction made between the two parcels based on the line of the access driveway is unfounded, as the change in landscape character areas within the site occurs from north to south and not east to west.
- 1.13 Assessment of each SHELAA parcel individually, and on a gross basis rather than considering the net developable area only, will therefore produce skewed results compared to an assessment of the site as a whole, notwithstanding that both parcels were previously scored positively and considered deliverable on their merits in the 2015 SHLAA.
- 1.14 It is also important that the proposed selection criteria set out at paragraph 2M.11 of the Council's Matter 2 Hearing Statement are applied evenly and not skewed solely in favour of a supply-led approach as the Council advocates. Each criteria is an important consideration and a Neighbourhood Plan should be prepared positively, taking the SHELAA evidence provided by the Council into account, but not being unnecessarily restricted and limited to it. The need for housing is clearly a principal consideration given the current scale of planned under-provision across the district, as is the status in the hierarchy of the settlement/s within a Neighbourhood Plan area, together with the level of any growth that has already taken place within the area since the beginning of the plan period.

- 1.15 Taking these considerations together and the relevant information contained in the submitted DPD evidence base, G and M Parker have set out the suggested housing requirement figure they recommend should be included in the DPD for the Caton-with-Littledale Neighbourhood Plan area in their representations.