

South East Lincolnshire Local Plan
Boston Borough Council
Municipal Buildings
West Street
Boston
PE21 8QR

By email only to: programme.officer@southeastlincslocalplan.org

Dear Sir/Madam,

Re: South East Lincolnshire Local Plan – Main Modifications consultation

These representations provide the response of Gladman Developments Ltd (hereafter referred to as "Gladman") to the above consultation. Gladman has been involved throughout the preparation process of the South Lincolnshire Local Plan (SELP), having submitted detailed representations to previous stages of consultation.

Gladman has previously highlighted concerns regarding the housing policies contained in the emerging SELP and consider that further modifications are needed to ensure that the plan provides further flexibility to ensure its ability to respond positively to changes in circumstances which may occur over the plan period. Accordingly, a number of outstanding objections remain and are still considered relevant. These submissions are focused on the need for further modifications to the following:

PMM001

Gladman previously supported the above policies inclusion which ensures the local planning authority will take a positive approach to considering development proposals in accordance with the presumption in favour of sustainable development. However, the reason behind the above modification suggests that national policy and guidance has replaced the need for this policy. This is not the case as paragraph 214 of the revised Framework states that;

"The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24th January 2019. Where such plans are withdrawn or otherwise do not proceed to become part of the development plan, the policies contained in this Framework will apply to any subsequent plan produced for the area concerned."

PPM002

The above modification seeks to provide clarity on where development is to be directed across the settlement hierarchy. It also seeks to insert the wording 'Development will normally be limited to allocated and committed sites and infill.' Gladman do not consider that this element of the policy to be effective as it is an ambiguous statement that is likely to lead to inconsistencies being made through the decision-making process. Indeed, paragraph 154 of the Framework is clear that:

"Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan."

Gladman maintain that a more permissive approach to development adjacent to settlement limits should be included within the policy wording to ensure flexibility so that the Plan can positively respond to development proposals if the Council's proposed allocations do not come forward as anticipated. Gladman believe further flexibility should be built into the Plan and submit the following wording for consideration:

"At any point in the Local Plan period where there is no longer a demonstrable supply of sites to fully meet the five year land requirement, sustainable housing sites that would both make a positive contribution to the five-year supply of housing land and be well related to existing settlements will be supported."

PPM011

The above modification seeks to implement the Liverpool approach for the purposes of calculating housing land supply. Gladman would highlight that this approach does not appear to be consistent with the requirements of national policy. Whilst neither the Liverpool or Sedgefield approach is specifically mentioned, it is clear that the emphasis on meeting the housing need in full on an annual basis as a minimum. The approach proposed through modifications therefore seems as odds with the approach to significantly boost the supply of housing to spread past housing delivery failure over a longer period into the future when it should have already been delivered. It must be borne in mind that any further delay in meeting unmet housing needs is failing to meet those households who need both market and affordable homes since the start of the plan period. This is not simply a theoretical mathematical exercise as there are households who need homes now and it is unreasonable to expect them to wait until later in the plan period when the housing should have already been delivered.

Accordingly, reference to the use of the Liverpool method is not considered to be justified given the previous shortfall in housing delivery already accumulated and suggest that this should be replaced with the Sedgefield methodology to ensure housing shortfall is addressed as soon as possible.

PMM013

In principle, Gladman are supportive of the approach taken by the local planning authorities in selecting housing reserve sites to be released should the need be triggered by the Housing Delivery Test. However, further clarity is needed on how the local planning authorities will bring these sites forward were it demonstrated that the Councils can no longer identify a supply of housing. It is suggested that this clarity is included in the supporting text of the policy or through the action plan as required by the revised Framework if housing delivery falls below 95%.

Notwithstanding this, there may be situations whereby the reserved sites identified may not be available for development at the point in time the Council is unable to demonstrate a five year housing land

supply and could leave the Councils in a precarious situation where they are unable to rectify the housing shortfall in a swift manner. Gladman reiterate the concerns in relation to the need for further flexibility and contingency to be built into the Plan through the suggested wording provided in response to PPM002.

Conclusions

I hope you have found this response to be constructive. Should you require any further information please do not hesitate to contact me.

Yours faithfully,

John Fleming
Gladman Developments Ltd



JOINT COMMITTEE RESPONSE FORM

REP: MM25

PMM REF: PMM001

As is evident from the Document ED052, Question 69, the Inspectors wanted to know if there was any evidence why Policy 1 needed to repeat the NPPF policy. Whilst it is acknowledged that there was support for the Policy the Joint Committee have no evidence regarding the need for repetition in the Local Plan. The essence of this response was provided and published and the Proposed Modification to delete Policy 1 was tabled for the benefit of participants in the final sessions of the EIP.

Clearly the revised NPPF is not required to be encompassed by the South East Lincolnshire Local Plan given its advanced stage. That being said the revised NPPF (in Paragraph 11) covers very similar ground. There would be no obvious deficiency or “loophole” with the deletion of Policy 1.

The deletion of Policy 1 was assessed in the PMM Sustainability Appraisal and was adjudged to have a neutral impact.