

Spatial Planning Team
Economy and Growth
Business Development
North Lincolnshire Council
Civic Centre
Ashby Road
Scunthorpe
Lincolnshire
DN16 1AB

By email only

26 November 2021

Dear Sir/Madam

ABL003/GP

RE: NORTH LINCOLNSHIRE LOCAL PLAN – PUBLICATION PLAN OCTOBER 2021 (REGULATION 19) – Representations of behalf of ABLE Limited.

We write on behalf of our clients, ABLE Limited, Elba Securities Limited, Able Humber Ports Limited and RH Nelson Limited, to submit representations on the *Publication Plan (Regulation 19)* version and stage of the North Lincolnshire Local Plan 2017-2038. ABLE Limited is the UK Asset Manager of Elba Securities Limited. Able Humber Ports Limited and RH Nelson Limited are subsidiaries of Elba Securities. For simplicity our clients are collectively referred to as 'ABLE' for the purposes of these representations.

Completed on-line questionnaires have been submitted via North Lincolnshire Council's (NLC) website but it is considered useful to also include a comprehensive version in this letter setting out our case, particularly given the stage of the Local Plan process to which the representations relate.

It should be noted representations were submitted on behalf of ABLE to the *Initial Consultation (Regulation 18)* of the North Lincolnshire Local Plan in April 2017 and again in March 2018 in relation to the *Issues and Options Consultation (Regulation 18)*. Further representations were submitted in March 2020 in relation to the *Preferred Options Consultation (Regulation 18)*.

This set of representations seek to question the *soundness* of the *Publication Plan* across a number of issues. These relate specifically to:

- (i.) the housing requirement and housing supply for North Lincolnshire;
- (ii.) presenting an alternative site for consideration given the housing issues identified;
- (iii.) specific comments on some of the draft policies; and
- (iv.) seeking clarification on the status of a site promoted twice through the Call for Sites process, yet continues to be omitted from the most recent Strategic Housing and Employment Land Availability Assessment (SHELAA) September 2021.

The representations also repeat the economic and sustainable opportunities for seeking to co-locate housing in close proximity to the key employment designations within the South Humber Gateway.

For completeness, our main objections relate to:

- Policy SS6 and SS7 – specifically that there is an overreliance on the Lincolnshire Lakes scheme meeting the housing supply across the Plan period. It is apparent that this historic overreliance has stifled residential development in more appropriate locations;
- Policy H1 – specifically that there is uncertainty about the deliverability of some of the committed and allocated sites in the Plan;
- Policy EC4 – specifically to remove land immediately adjacent to the east of East Halton from the South Humber Bank Landscape Initiative to allow for the potential for development which incorporates appropriate landscape buffering and screening.

Our clients

ABLE is one of the most prominent businesses within North Lincolnshire and will have a significant impact on ensuring that a prosperous economy can be achieved in the district. ABLE has secured planning permission and a Development Consent Order through the Nationally Significant Infrastructure Project (NSIP) process for their ABLE Logistics Park (ALP) and ABLE Marine Energy Park (AMEP) respectively. These will provide a mix of uses for port-related storage and associated service facilities for ALP and for AMEP, the provision of onshore facilities for the manufacture, assembly, storage and installation of wind turbines and related items.

Background and progress for the ABLE projects

The ABLE projects will generate a substantial amount of employment and investment through construction and direct and indirect employment of a mix of types of jobs once the developments are fully operational. Both the ALP and AMEP schemes are within the identified South Humber Banks Strategic Site Allocation (Policy SS10) which demonstrates a commitment from both ABLE and NLC to ensure the schemes are delivered to maximise their potential to deliver employment and attract investment to the region. Since the last representations were submitted in March 2020 extensive progress has been made by our clients at both facilities to secure their delivery.

The Chase Hill and Eastfield Road roundabout has been completed and will allow, as a minimum, for the commencement of the first 100+ acres of the ALP development to come forward. We also understand that NLC is well aware of the significant levels of commercial interest that the site is now attracting and that enquires are largely characterised as being large scale footloose inward investment projects.

Following the detailed design process for the AMEP scheme, it was announced that the scheme will receive around £75million in government funding to support its construction. It demonstrates a commitment from the government to support the offshore wind sector which in turn will allow the aims of the AMEP scheme to be realised and support economic growth in North Lincolnshire and the wider Humber Gateway. This is coupled with the designation of the Humberside Freeport in March 2021 which will encourage further trade and investment to the area. The Freeport designation will provide customs zones, tax sites offering tax relief to businesses and new investment. The AMEP site falls into both of these areas.

The first phase of AMEP works will see the development of up to 217ha (536 acres) of land and the construction of 1,349m of heavy-duty, deep-water quays, to develop a bespoke facility to serve the needs of the offshore wind sector.

AMEP's primary activities will cover the manufacture, storage and installation of offshore wind components within an anticipated new 'world-scale' industrial cluster. The quays will provide four adjacent installation bases with a likely annual capacity to install c. 4GW of offshore wind power.

ABLE commenced the AMEP land assembly process in 1999 and obtained the planning permission – through a Development Consent Order – in October 2014. To date, including land development and acquisition the Group has invested £282m at AMEP.

In terms of job creation, it is anticipated that by 2030, 1,500 direct on-site jobs will be created, along with 1,500 in the immediate supply chain.

In the Chancellor's Budget Speech (March 2021) it was confirmed that AMEP would receive a £75m grant award as the successful bidder for the Offshore Wind Manufacturing Investment

Scheme (OWMIS) and, that as part of the Humber Freeport bid, would host a Freeport Tax site. At the end of October, the statutory instrument to provide the AMEP Freeport Tax Site was laid before Parliament.

Three manufacturing projects – each with a memorandum of understanding in place - are at varying stages of progressing towards planning application submissions and the issue of design and build tenders for their factories.

In the meantime, AHPL has responded to a wide range of installation enquiries from each of the likely Contracts for Difference (CfD) Allocation Round 4 participants. Those enquires are from OEMs, developers and installation contractors and feature a mix of both foundation and turbine packages. Furthermore, AHPL is now engaged in discussions to enable the enquirers to secure/reserve their required occupation(s).

In terms of specific numbers of jobs created, it is anticipated that the AMEP scheme will generate c. 2,000 direct manufacturing jobs and, combined with direct and indirect jobs from ALP, will generate c. 9,000 jobs.

Representations

In our previous representations it was argued that new residential development should be located close to where the jobs will be created. The representations identified that the existing strategy for residential development is not working and a new strategy should be considered. The Able sites previously put forward are considered available, deliverable and suitable, in terms of close proximity to existing settlements, good access to the major road network and public transport, and limited on-site physical constraints. Co-locating residential development with employment centres reduces the time and distance for commuting and can maintain and improve the vitality of the existing settlements to where the sites will be located. Overall the site options can achieve sustainable development.

It is noted however that the *Preferred Options Consultation (Regulation 18)* and the *Publication Plan (Regulation 19)* have not identified any of the ABLE sites for residential development. Due to the current failings of the planning strategy associated with the North Lincolnshire Core Strategy, i.e., advocating the majority of growth to the west of Scunthorpe through the Lincolnshire Lakes scheme, residential development has been stifled in the most appropriate locations and speculative development in unsustainable locations to be brought forward.

This, in combination with the reduction in housing requirement through the standardised methodology, has led NLC to claim to demonstrate a 5-year housing land supply as well as a sufficient supply of housing across the Plan period. However we want to take this opportunity to demonstrate that the Lincolnshire Lakes scheme will not deliver the number of homes specified across the Plan period, and there is uncertainty about the deliverability of some of the allocated sites in the *Publication Plan*.

Should further sites be needed to make the Plan sound then ABLE has sites which are deliverable and/or developable in accordance with the National Planning Policy Framework (NPPF) definitions (in NPPF Glossary) and have a very reasonable prospect that they will be available and viably delivered.

Housing Distribution and Supply

ABLE object to *Policy SS6 spatial Distribution of Housing Supply*, *Policy SS7 Strategic Allocation at Lincolnshire Lakes* and *Policy H1: Site Allocations* because they are not effective as set out in paragraph 35(c) of the NPPF.

Housing Requirement

By way of context, the standard methodology has significantly reduced the annual requirement for North Lincolnshire. It now aligns much closer to the average rates of housing delivery in recent years across the district. For example, in the *Preferred Options Local Plan* (February 2020) the annual requirement was 419, and the *Core Strategy* requirement (the adopted plan at present) requires 754 homes per annum.

The reduction in the number of homes required means fewer dwellings need to be identified to meet the lower requirement, though this reduction has not been generated through recent

years of successful housing delivery. This is clearly demonstrated through Figure 1 below (which has been extracted from the NLC Housing Delivery Test of August 2020).

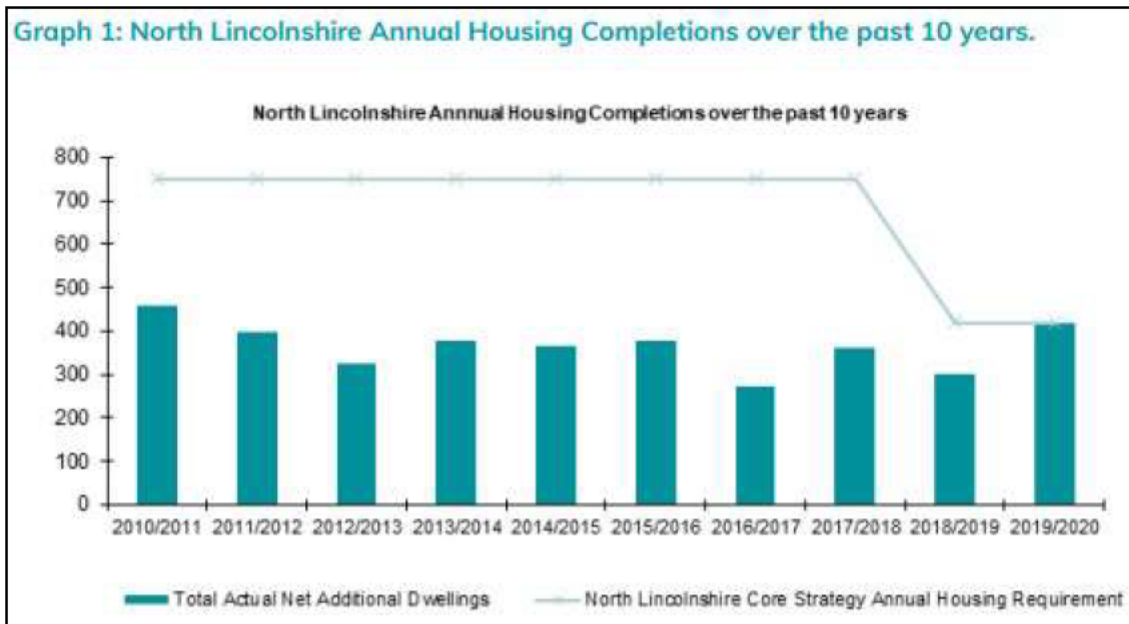


Figure 1: NLC Annual Completions over the past 10 years (NLC Housing Deliver Test, August 2020)

The historic delivery rates demonstrate that the previous planning strategy of relying on the Lincolnshire Lakes scheme to meet the housing need did not work and no meaningful or effective measures were put in place to try and meet the housing requirement. This approach is clearly contrary to paragraph 60 of the NPPF which identifies the Government’s objective of significantly boosting the supply of homes.

Furthermore, the housing delivery test scores demonstrates that despite the reduction in the housing requirement NLC is still underachieving in the delivery of housing. The table below sets out the scores NLC were awarded since the first test was introduced in 2018.

Year	Score
2018	73% (20% buffer required)
2019	75% (20% buffer required)
2020	94% (Action Plan and 5% buffer required)

Figure 2: Housing Delivery Test scores for North Lincolnshire Council, extracted from gov.net.

Housing delivery has improved but NLC has still failed to deliver its annual housing target in any one year since 2007/08. The housing supply is therefore critical in ensuring that the housing requirement for NLC is met. The amount of supply available should take into account the consistent failings to meet the requirement in previous years and ultimately reduce the risk of continued failings to deliver the annual housing requirement. The most effective way to reduce this risk is to allocate and make available more sites for delivery.

Housing Supply

An over-reliance on delivery at Lincolnshire Lakes means there is a high risk of North Lincolnshire being unable to meet its housing need of 7,126 dwellings. A separate note is attached in Appendix 1 which contains a review of the likely housing delivery at Lincolnshire Lakes and this shows the scheme could deliver between 990 dwellings and 1,650 dwellings up to 2038 leading to a substantial shortfall in the housing supply. The note challenges the assumptions of on-site delivery through two measures; firstly the significant lead in times associated with a site as complex as Lincolnshire Lakes, and secondly challenging the annual delivery rate by applying conservative and optimistic delivery scenarios for Lincolnshire Lakes. In both instances the scheme falls short of the 2,150 dwellings suggested in the Local Plan – the conservative scenario produced 990 dwellings and the optimistic scenario produces 1,650 dwellings. **Consequently, the overall housing supply in the Plan would be reduced to**

6,826 at best or 6,166 at worst through the overreliance of the Lincolnshire Lakes scheme alone.

In addition, other sites and permissions have been analysed and this shows that it is reasonable to also exclude these from the supply.

Site H1P-13 (Land off Barrow Road, Barton-upon-Humber) is allocated for 225 homes. However paragraph 5.64 of the *Publication Plan* states “the first phase of the link road will need to be constructed as part of this allocation to provide the first link the first phase of the link road between A1077 and Caistor Road.” The link road for the site represents a significant piece of infrastructure required to bring site forward. Land to the south of the allocation was put forward in the most recent SHELAA but was not allocated in the *Publication Plan*, which brings into question the feasibility of delivering a link road when only 225 homes are allocated. There is no apparent evidence of funding being considered or available to deliver the link road, therefore there are doubts as to whether a 225 homes scheme can absorb the costs associated with this infrastructure. On that basis it is considered that 225 homes are undeliverable if the full link road connection is required and 225 should be removed from Local Plan.

Site H1C-20 (Glandford Park Stadium) is currently listed as a committed development for 160, however it can only be brought forward as part of stadium redevelopment plans for Scunthorpe United. However stadium redevelopment plans have been put on hold due to Covid-19 and there is currently no evidence to suggest the works will commence. The stadium redevelopment planning permission (PA/2018/1388) is set to expire on 2nd July 2022, and there is no evidence of any of pre-commencement conditions being discharged. On this basis this site cannot be relied upon as a committed development for the purposes of the Local Plan.

Therefore on the basis of the above, the total number of sites across the plan should be reduced by a further 385 dwellings. **This indicates an overall shortfall of 6,441 at best or 5,781** against the housing need of 7,126 dwellings.

In terms of the 5-year housing land supply position, the *Five Year Housing Land Supply Statement (August 2021)* confirms the following number of homes will be available for each year of the 5 year housing land supply.

Year	Number of Homes
2021/2022	362
2022/2023	425
2023/2024	455
2024/2025	493
2025/2026	523

Figure 3: Annual Housing Supply, calculated from *Five Year Housing Land Supply Statement (August 2021)*

As has been demonstrated previously the number of homes in the supply are higher than the delivery rates achieved across NLC historically and brings into question whether the future delivery will match the perceived supply of housing.

The Housing Land Supply Statement also indicates that NLC can demonstrate a supply of housing equivalent to 5.64 years with a surplus of 207 homes. However we seek to challenge whether certain allocated sites will contribute to the 5-year housing land supply that is suggested. Sites H1P-14, H1P-15, H1P-16, H1P-17 and H1P-18 (various allocations to the north and east of Brigg) comprise 840 homes collectively. However there are causes for concern with including the sites within the 5-year housing land supply. As with Site H1P-13, this is due to the requirement for the delivery of a link road through each of the allocations. We would also question why the sites were not allocated as one in the *Publication Plan* – if the site is in multiple ownerships we have found, in our experience of delivering large scale sites, that this has the potential to delay securing planning permissions due to lengthy and complicated S.106 agreements needing to be prepared. On this basis the 180 homes identified in the *Five-Year Housing Land Supply Statement* for these sites should be removed from the supply.

Further concerns about the 5-year housing land supply are raised as a result of recent appeal decisions as set out in the table below. Each appeal confirms that NLC cannot demonstrate a 5-year housing land supply (albeit no exact figure is provided in the listed appeal decisions):

Appeal Reference	Appeal decision date	5YHLS discussion
APP/Y2003/W/21/3268814	14/09/2021	Unable to demonstrate a five-year supply of deliverable housing sites
APP/Y2003/W/21/3272134	13/09/2021	Both parties agree no 5YHLS can be demonstrated.
APP/Y2003/W/21/3274828	09/09/2021	Both parties agree no 5YHLS can be demonstrated.
APP/Y2003/W/21/3268393	09/09/2021	The Council cannot demonstrate a five-year supply of deliverable housing sites. There is no description of the actual shortfall however, the Council indicates in the committee report that the proposal would address the current under-supply of housing land therefore I consider the shortfall to be significant.
APP/Y2003/W/21/3267607	05/05/2021	There is no dispute between the parties that the local planning authority cannot demonstrate a deliverable five-year supply of housing sites and therefore the development of the appeal site would make a positive, albeit small, contribution towards boosting housing land supply in the local area

Figure 4: List of appeal decisions confirming NLC cannot demonstrate a 5-year housing land supply, extracted from PINS

This raises further doubt over the reliability of the housing supply position put forward by NLC. The most efficient and effective remedy to this situation would be to allocate further sites through the Local Plan.

Alternative Site

On the basis that there is ambiguity over the deliverability of the sites set out in the *Publication Draft*, plus the lack of evidence to suggest the supply of homes available for the next 5 years can be delivered, we are taking this opportunity to repeat to NLC that a suitable and alternative site can be delivered to meet their housing need.

Land east of East Halton

The site known as land east of East Halton is 63.78ha and extends along the full extent of the eastern settlement boundary of East Halton. A full site appraisal, which was submitted through the previous Call for Sites process in April 2017, is included in Appendix 2.

The site has been promoted through the Call for Sites process and the most recent SHELAA determined that it should be discounted from the assessment. The table below shows the extract

RNLR3	Land east of East Halton	East Butterwick (note this should be listed as East Halton in the SHLAA)	<ul style="list-style-type: none"> The site is within 250m of several scheduled monuments and 70m of a listed building. The site needs a Heritage assessment. Existing infrastructure is unable to support such a large area of development.
-------	--------------------------	--	--

Figure 5: East Halton extract from the SHELAA (September 2021)

We acknowledge that the site is within 250m of a number of scheduled ancient monuments located within or around East Halton. However, with careful master planning and layout design an appropriate buffer can be provided to limit development around it. As part of any planning application a suitably qualified Heritage / Archaeological consultant will be appointed to advise on the required mitigation for these heritage assets.

The scale of potential development would be proportionate in relation to the neighbouring ALP and AMEP schemes, delivering a mix of much needed housing and the appropriate screening

from the key employment areas along the South Humber Bank. The scheme would be supported by highway improvements, open space provision, education provision, and local retail provision (most likely to be convenience retail which would support residents and employees at ALP and AMEP). These requirements would be secured through conditions and S.106 obligations for any planning permission granted. This provision of infrastructure would be carefully master planned and designed to ensure that benefits would be felt for not just new residents but for those living in East Halton and surrounding villages already. Furthermore, there have been substantial improvements to the highway network to the south of the site which will improve accessibility to East Halton. A sensitive master plan approach would also ensure the identity and character of the existing East Halton village is protected.

The site is in close proximity to the Able Logistics Park and Able Marine Energy Park, which have proposed infrastructure improvements as part of their respective schemes. There may well be opportunities to take advantage of the offshore wind energy produced to be shared with any new homes constructed to create an energy synergy between the AMEP and the development site. Offering renewable energy solutions to these homes will reduce demand on existing utilities and infrastructure providers, and, combined with the fact the site would be co-located with employment opportunities which would reduce commuting distances and time, would assist towards delivering a suitable and sustainable development for North Lincolnshire.

Given the issues identified in relation to housing supply, NLC should revisit their assessment of available, suitable and deliverable sites and Land East of Halton should be allocated for housing and related facilities.

Policy SS10: Strategic Site Allocation - South Humber Bank

We are supportive of the draft policy specific to the South Humber Bank and consider it is sound, legally compliant and complies with the duty to cooperate requirement. The South Humber Bank, as identified in the Housing and Employment Land Allocations DPD (2016), is by far the largest allocated employment site in North Lincolnshire and can facilitate employment use classes B1, now use class E(g), B2 and B8, as well as estuary related employment uses. These representations have explained the long-term and ongoing commitment from ABLE at their two sites within the South Humber Bank. Once completed there will be a substantial employment offering (circa. 9,000 jobs) and has the growing potential to support significant residential development in close proximity to these employment areas.

Policy EC4: South Humber Bank – Landscape Initiative

ABLE object to emerging *Policy EC4: South Humber Bank – Landscape Initiative* on the basis that it is not justified as set out in paragraph 35(b) of the NPPF.

Whilst it is considered the industrial buffer areas are important to maintain the separation between industrial and residential areas on amenity grounds, the areas defined in the policy map should be revised so not to prejudice much needed residential development from coming forward adjacent to industrial areas to support new jobs being created, especially in the South Humber Bank. Development itself can act as a buffer to exiting settlements and various measures can be carefully designed to reduce visual impact, noise impact, and light impact from industrial areas. There are several measures (repeated in past representations) that can be delivered as part of careful masterplanning and secured through conditions and / or S.106 obligations to ensure these works are undertaken properly and in accordance with planning policy and approved details.

Call for Sites

On behalf of our clients, we have submitted a number of sites via NLC’s “Call for Sites” process. A number of sites were first submitted in April 2017 and an additional site was included in 2018 at Staniwells Farm.

The schedule below in Figure 7 confirms the sites submitted via the Call for Sites process in terms of their assessment in the most recent SHELAA:

Site Reference	Address	Settlement	Reason
----------------	---------	------------	--------

RNLR3	Land east of East Halton	East Butterwick <i>(note this should be listed as East Halton in the SHLAA)</i>	<ul style="list-style-type: none"> The site is within 250m of several scheduled monuments and 70m of a listed building. The site needs a Heritage assessment. Existing infrastructure is unable to support such a large area of development.
ZXAVI	South Marsh Farm site	Barton upon Humber	<ul style="list-style-type: none"> Junction improvements will be needed at Barrow Road/Falkland Way. The site is adjacent to and may form part of former landfill potential geotechnical and contamination constraints. The site falls in an area which is safeguarded for Clay Reserves.
F8Y5H	North Killingholme East	North Killingholme	<ul style="list-style-type: none"> Whilst the site could be accessed from Church Lane Highways have concerns about the ability of the surrounding infrastructure to accommodate a development of this size. North Killingholme is not a sustainable location for a development this size. Any development would impact on LC20 South Humber Bank Landscape Initiative and Landscape enhancement LC15-20. The site is too large for this size settlement.
XX4K4	North Killingholme West	North Killingholme	<ul style="list-style-type: none"> Any development would impact on LC20 South Humber Bank Landscape Initiative The site is too large for this size settlement.
-	Staniwells Farm, land adjacent to the A15 to the east and the B1398 to the west	Hibaldstow	N/A

Figure 7: Extract of ABL sites assessed in SHLAA September 2021

The Staniwells Farm site, however, was not included in the *Strategic Housing and Economic Land Availability Assessment (SHLAA)* of September 2019. For the avoidance of doubt the site was resubmitted in March 2020 to make sure the site was assessed as part of any further update to the SHLAA.

The most recent SHLAA of September 2021 has again failed to include the site in the assessments. This is despite the site being identified on NLC's webpage on a further "Call for Sites" showing that the site has been subject to a previous "Call for Sites" submission (see image below which was included in the representations submitted in March 2020). We also have email confirmation from NLC dated 13th March 2018 confirming receipt of comments relating to the *Issues and Options Consultation (Regulation 18)* and the additional Call for Sites submission.

Submit a site

SITE BOUNDARY

If the site you would like to submit for consideration is highlighted on the map as submitted in a previous stage or the current stage of consultation you do not need to re-submit. **Please note: sites previously submitted have not necessarily been allocated in the preferred options. Please see the [policy map](#) for site allocations.**

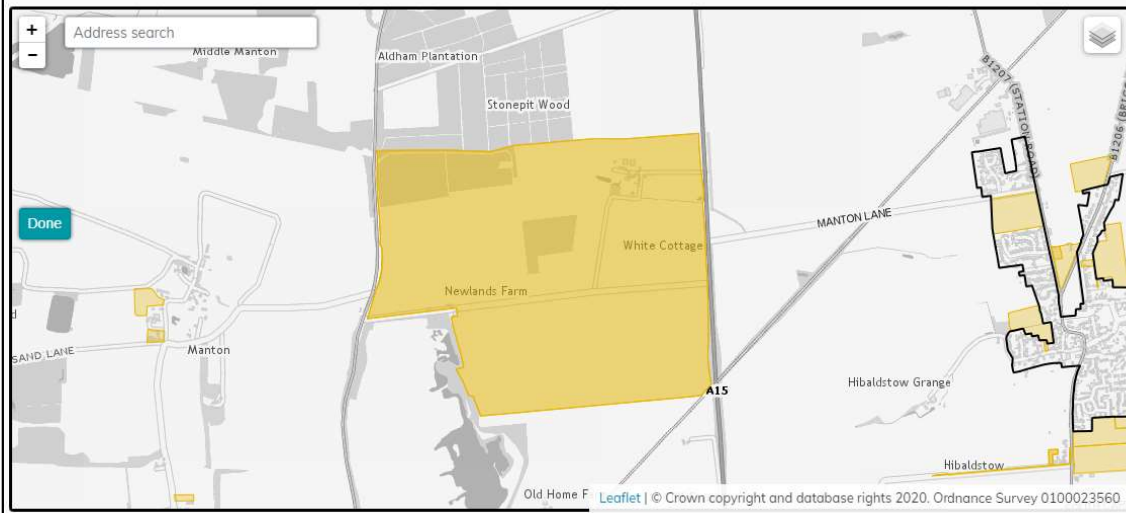


Figure 7: Extract from Call for Sites map on NLC website identifying Staniwells Farm, March 2020 (also included in previous representations)

We formally request a written explanation for the omission of this site. There have been two opportunities to include the site in the SHELAA reports and on both occasions this has not happened. It brings into question whether other sites have been omitted from the assessment in the SHELAA reports and ultimately whether the *Publication Plan* has been prepared on a sound basis.

Conclusion

These representations outline a number of concerns about the soundness of the Plan, particularly in relation to housing delivery and the spatial strategy, which should be addressed to ensure that the correct growth strategy is adopted and the appropriate level of housing growth is delivered so as to ensure a “sound” Local Plan.

We have long argued for a reconsideration of the spatial distribution of housing growth areas given the historic failings to deliver much needed housing to NLC through the Lincolnshire Lakes scheme. Whilst the reduced housing requirement for NLC has meant there is less pressure to find more sites to meet the requirement, it is considered that there should be greater consideration towards locating housing growth in close proximity to the key employment sectors. This redistribution should take into account of the over-reliance of the Lincolnshire Lakes scheme and, as these representations have demonstrated, the likely shortfall that will be generated as a result. It should also factor in the tenuous 5-year housing land supply position, which has been exposed through these representations.

We have set out in these representations that significant progress has been made along the South Humber Bank through the Freeport designation and the Government funding for the AMEP scheme to facilitate mass job creation to support economic growth to North Lincolnshire and the wider region. Economic growth is also supported through the availability of housing and associated facilities in close proximity, which can be brought forward through the site we are promoting at East Halton.

Should it be confirmed at any Examination in Public that the *Publication Plan* needs to identify more or alternative sites to ensure the Local Plan can be found ‘sound’ it is considered that the land east of East Halton is available, suitable and deliverable. It would constitute sustainable, development, being close to an existing settlement, having good access to the major road

network and public transport, and limited on-site physical constraints. It is deliverable now as defined in the Glossary to the Government's National Planning Policy Framework (NPPF), as it is 'available now, offers a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years.'

We would ask that these representations be taken into account in formulating the Local Plan and we look forward to being involved in the next stage of the plan-making process. If you have any queries or require further clarification or details, please do not hesitate to contact me.

Yours faithfully,



GREG PEARCE



Appendix 1 - Potential Housing Delivery at Lincolnshire Lakes

**North Lincolnshire Local Plan - Publication Plan (October 2021)
Supporting Note : Potential Housing Delivery at Lincolnshire Lakes**

25th November 2021

Introduction

1. This note has been prepared by David Lock Associates (DLA) on behalf of Able UK in support of representations submitted to the North Lincolnshire Local Plan Publication Plan (October 2021). The note should be read alongside the submitted representations. DLA were asked to review the likely housing delivery that might result from the proposed extension to Scunthorpe at Lincolnshire Lakes (referred to in Policy SS7-1 and Policy SS7-2 of the Plan) over the plan period to 2038. In this context, both the lead-in times and potential build-out rates have been examined. DLA has extensive experience of planning for, and helping deliver, some of the largest strategic-scale developments in the country, for example, Cranbrook in East Devon, Houlton in Warwickshire, Alconbury Weald in Cambridgeshire and East Kettering in Northamptonshire. Moreover, DLA has provided evidence to many Local Plan Examinations on housing delivery and proposed strategic housing sites.

Background

2. Lincolnshire Lakes is a long-standing strategic project to the west of Scunthorpe, east of M181 and north of M180, intended to deliver 6,000 new homes and substantial new employment floorspace. It is established in existing development plan, including an Area Action Plan (2016). Outline planning permissions were granted for 2,550 dwellings and 450 dwellings in 2013 (PA/2013 1000 and 1001 respectively). More recently, an outline planning permission was granted for 2,500 dwellings on 21st August 2021 (PA/2015/0396) along with a permission for junction works and a hybrid permission for infrastructure works and supporting uses. For the purpose of this review, it is assumed these recent permissions are the ones to deliver the numbers in the Local Plan allocations
3. The submission version of the Local Plan, now out for consultation, assumes 2,150 dwellings will be delivered up to 2038 although some references in the Plan are 2,000 dwellings (for example paragraph 4.48 and page 352). North Lincolnshire's Housing target is 7,326 against a need based on the standard methodology of 7,128. This means delivery of housing at Lincolnshire Lakes is fundamental to the Local Plan strategy representing 29% of the total target and 36% of the new site allocations. If there is not a realistic prospect of the 2,150 dwellings being delivered then further sites are likely to be needed in the plan period.

Lead-in times

4. North Lincolnshire's Strategic Housing Land Availability Assessment (SHLAA) September 2021 Table 1 suggests a 30-month lead-in for large developments with outline planning permission to the first completed dwelling. In this context, before Reserved Matters for new residential development can be secured, a number of critical site wide documents need to be submitted and approved, including a site wide phasing programme, site wide master plan and strategic design code and site wide ecological strategy and mitigation plan. Agreeing the Reserved matters for the first development parcels will also take time and, while there may be some overlap in preparation, it is reasonable to assume no delivery of dwellings in the first five year of the plan up to 2025/26. It is noted that the latest five-year land supply statement of the Council (August 2021) does not include Lincolnshire Lakes scheme and DLA concur with this position. First completions of dwellings are therefore assumed to occur in 2026/27.



Build-out rates

5. Build-out rates is largely a function of how many different residential outlets are available, the demand for dwellings in each outlet (strength of the market) and the ability of the wider market to absorb the overall number of dwellings without a significant drop in price. Housebuilders will not build if there is not sufficient demand to retain a price with a suitable margin. Specialist and affordable housing can be added to the market number although at Lincolnshire Lakes affordable housing is subject to a post phase one review. It is notable that the Lincolnshire Lakes AAP set out a housing trajectory up to 2028 with an average build-out of 523 dwellings per annum (dpa) over 12 years. This would have made the scheme one of the fastest build-out rates in the country over recent decades. This Publication Plan is intended to replace the AAP but, nonetheless, the previous trajectory and the evidence it was based upon can be considered as unrealistic.
6. There is no recent history of strategic scale development in North Lincolnshire or adjoining authority areas upon which to base the build-out assumptions. At this stage, it is also unknown how many residential outlets there will be. At Lincolnshire Lakes, it is reasonable to assume that there will be three residential outlets for the 2,150 dwellings envisaged in the Plan Period, based on the “three sustainable villages” referred to in the Local Plan. It is accepted more outlets may be possible at future phases of development once a market has been established.
7. As a reasonable benchmark, between 30 to 50 dwellings can typically be sold on each outlet meaning a build out rate of 90-150 dpa. The North Lincolnshire SHLAA also assumes 90 dpa for large schemes over 400 dwellings with 3 developers or more. It also prudent that numbers ramp up from years 1 to 3 to allow for the market to be established. On other schemes, there are circumstances that indicate higher numbers of dwellings can be achieved, especially where there is very strong market demand, multiple outlets and diversity of housing offer. In this case, no market evidence has been provided to show there is a demand that could deliver higher numbers per outlet in North Lincolnshire and there are no large-scale sites to reference form the current five-year supply.

Examples of build-out rates

8. This should be viewed in the context of overall North Lincolnshire average completions across all sites over the last five year of 452 dwellings per annum. It can also be viewed in the light of studies of build-out rates across the country. The Letwin Review assessed 15 sites and showed a range of build out rate of between 86-572 dwellings, but most of these were London or South east based schemes where demand is far stronger.¹ Only once scheme was identified in northern England, Ledsham Garden Village in Cheshire (2,000 dwellings) with an average build out of 114 dwellings per annum. Work undertaken by Lichfields, ‘Start to Finish’ includes data on large and strategic scale sites over the last two decades.² It shows an average build out of 160-181 dwellings per annum for schemes over 2,000 dwellings but, again, the vast majority were in the South East of England. Only two outside the south of England and midlands with over 2,000 dwellings were included: Chapleford Urban Village, Warrington (2,144 dwellings) with an average of 165 dwellings per annum and Ledsham Urban Village, Cheshire (see above). It should be noted that most of the Chapleford build-out occurred pre-recession, up to 2009.

Potential for infrastructure delays

¹ Independent Review of Build Out Rates (The Letwin Review) October 2018.

² Lichfields ‘Start to Finish’ (2nd Edition) Feb 2020.

9. Whilst it is positive that some essential infrastructure has been delivered (such as the flood mitigation works) and permitted in the August 2021 decisions, the extent of the infrastructure works required to ensure continued residential delivery continues remains challenging. For example, this includes, the construction of lakes, upgrade of B1450, M181 southern junction works, new East-West Link Road and off-site highway improvements. All of this increases the likelihood of delay to build-out and indicates it is appropriate to consider cautious build-out assumptions.

Suggested Build-out rates for Lincolnshire

10. Taking the various factors into account, two build-out scenarios have been set out below for Lincolnshire lakes in the plan period to 2038: a conservative scenario of 90 dpa and optimistic scenario of 150 dpa. With both achieving first completions in one outlet in 2026/27, this shows a total of between 990 dwellings and 1,650 dwellings achievable over the plan period.

Table 1: Build-out scenarios for Lincolnshire Lakes

		Lincolnshire Lakes Residential Completions (Optimistic Scenario)												
Years		26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	TOTAL
Scenario 1	Residential (C3) Annual completions (dwellings)	50	100	150	150	150	150	150	150	150	150	150	150	1650
	Cumulative completions (C3)	50	150	300	450	600	750	900	1050	1200	1350	1500	1650	
Notes														
Build-out for scenario assumes three residential outlets maximum at 50 dpa each.														
Years are based on 1st April to 31st March to match planning monitoring periods.														
		Lincolnshire Lakes Residential Completions (Conservative Scenario)												
Years		26/27	27/28	28/29	29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38	TOTAL
Scenario 1	Residential (C3) Annual completions (dwellings)	30	60	90	90	90	90	90	90	90	90	90	90	990
	Cumulative completions (C3)	30	90	180	270	360	450	540	630	720	810	900	990	
Notes														
Build-out for scenario assumes three residential outlets maximum at 30 dpa each (based on SHLAA assumption paragraph 3.7)														
Years are based on 1st April to 31st March to match planning monitoring periods.														

Conclusion

This note has been prepared on behalf of Able UK to inform representations being made on the north Lincolnshire Local Plan submission version, in particular to examine potential housing delivery at the Lincolnshire Lakes strategic allocation. The Publication Plan assumes 2,150 dwellings can be completed by 2038 but this is considered to be over-optimistic with housing delivery of 990 dwellings to 1,650 dwellings a reasonable range to consider. Consequently, the overall housing supply in the Plan would be reduced to 6,826 at best or 6,166 at worst. This suggest further housing sites are required to ensure the housing need of 7,128 and an appropriate buffer can be met.

Appendix 2 – Land east of East Halton Site Appraisal

BRIEFING NOTE

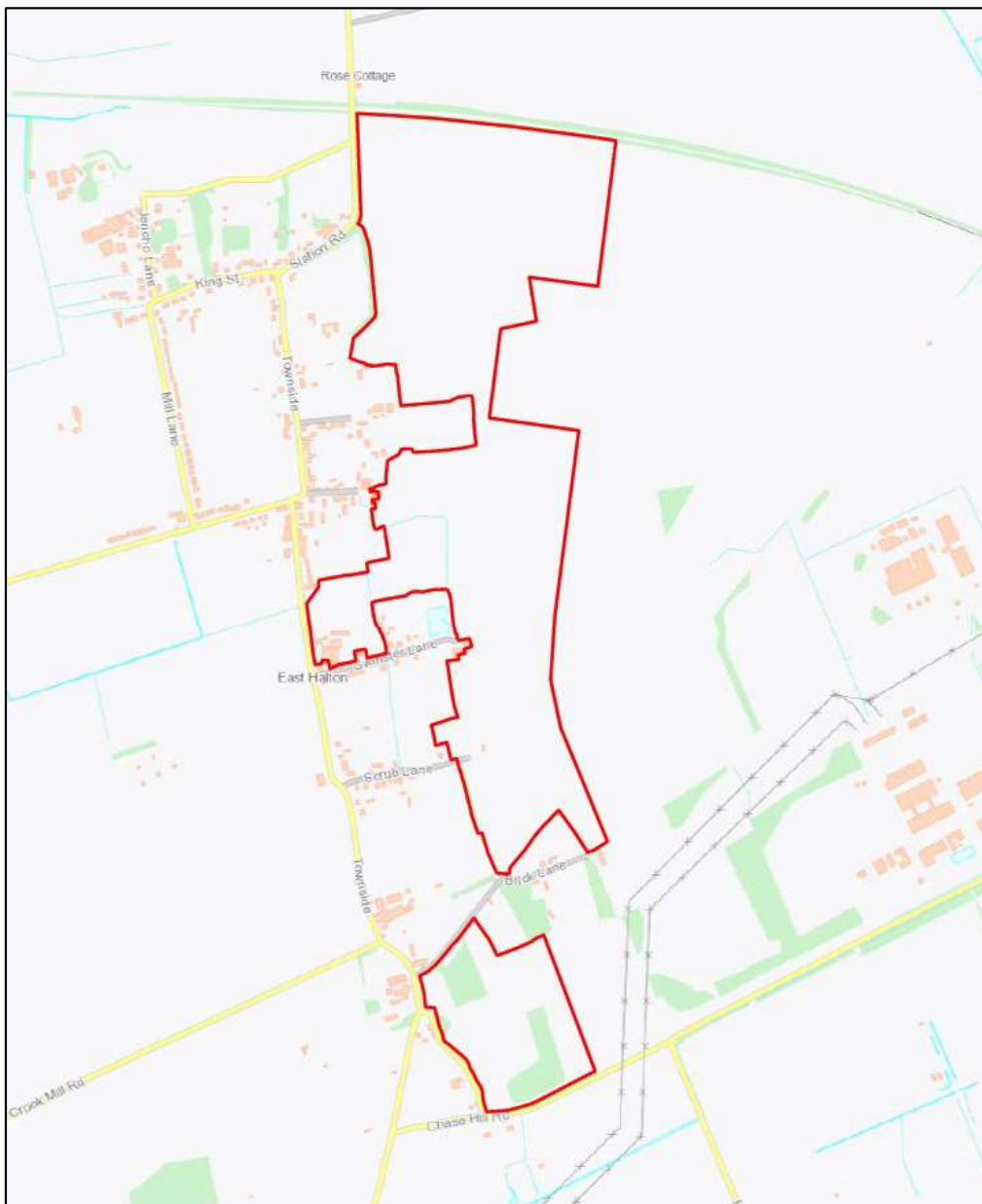
Land east of East Halton, North Lincolnshire
Site Appraisal

Updated November 2021
First Issued April 2017

ABL003

Introduction

- 1) This site appraisal relates to the land east of East Halton, North Lincolnshire. For the purposes of this appraisal all the sites will be known as East Halton. It sets out details of the site context, constraints and justifies the potential for residential development in this location.



Site Location / Context

- 2) The main site at East Halton is 63.78ha and extends along the full extent of the eastern settlement boundary of East Halton and is made up of farmland and hedgerow and a cricket ground. The majority of the site is bound by further hedgerow and farmland however the northern boundary is bound by the same former railway line at Gloxhill 2. To the east of the site is the site of ABLE Logistics Park which was granted planning permission in July 2013 (PA/2009/0600) and a new permission was granted via a S.73 in November 2015 (PA/2015/1264). The smaller site is 10.80ha and located just south of the main one. It is a green field site bound by Brick Lane and Chase Hill Road.
- 3) Both sites are located in close proximity to East Halton which is the nearest settlement and within 2km of major roads. The sites are within the South Humber Gateway which is subject to various transport improvement projects. The sites are adjacent to ABLE Logistics Park which was granted planning permission in July 2013 (PA/2009/0600) and a new permission was granted via a S.73 in November 2015 (PA/2015/1264), and the Able Marine Energy Park which was granted a Development Consent Order (DCO) through the Nationally Significant Infrastructure Projects (NSIP) in December 2013 which came into force on 29th October 2014.
- 4) East Halton is a relatively linear village and the majority of properties are built along the main roads with very few tertiary streets connecting to them. That said the village follows a circular route from Townside along to King Street, Mill Lane and College Road. There are a range of facilities in East Halton including a village shop / post office, a pub, a primary school, and village hall.



Site History

- 5) The sites do not have any significant planning history. There is a vast range of planning history in relation to householder applications for properties in East Halton. As mentioned above to the

east of the site is the site of ABLE Logistics Park. The only application on the main East Halton site relates to a gas pipeline and associated offtake facility (PA/2001/0377) where part of the pipeline crosses the site as it moves east-west.

Constraints/Other matters

Flooding

- 6) Both parts of the East Halton Sites are outside of any flood risk zone.

Access

- 7) The smaller East Halton site can potentially be served by Townside or Chase Hill Road, whereas the main site has no direct access unless one is created at Townside or further north into the village off Station Road.
- 8) The East Halton sites are close to major roads such as the A160 and A180 which connect to Immingham, Brigg, Grimsby and Scunthorpe. There have been upgrades to the A160 junction where it meets Humber Road, Harborough Road and East Halton Road and there is now an improved route to the A180.
- 9) Furthermore, the South Humber Gateway Transport Contributions states that infrastructure improvements including the A160 Improvements Scheme, A18 – A180 link road scheme, and the South Humber Bank Link Road are proposed which will be of benefit to the employment allocations in the Humber South Gateway and any proposed scheme in East Halton. The South Humber Bank Link Road has since been delivered in May 2020, with finalisation to occur over the coming months following construction delays associated with the COVID-19 pandemic.

Scheduled Ancient Monuments

- 10) There is one Scheduled Ancient Monument (SAM) that slightly encroaches into the main East Halton site, however the majority of this SAM is outside of the site. There are three other SAMs within close proximity of the sites which are moated areas associated with farm land.

Listed Buildings

- 11) There are three listed buildings in close proximity to the East Halton sites, including a Grade II* Manor Farmhouse and a Grade II White Cottage. The Grade I listed Church of St Peter is the closest listed building to the site but there are no listed buildings on any part of the sites in East Halton.

Other constraints

- 12) There are electricity pylons in close proximity but these do not cross the sites. The gas pipeline, mentioned in the planning history above, crosses through the centre of the main East Halton site and therefore any proposed development would need to retain an easement if diverting the pipeline would be too costly.
- 13) We note that there is a North Lincolnshire Local Plan (2003) Policy which washes over the site. Policy IN6 relates to areas defined as industrial buffer areas and the policy states that "development will not be permitted within the defined amenity buffer areas associated with the South Humber Bank, North Killingholme Airfield and the former British Sugar Site, Brigg industrial areas. Within these areas, schemes for indigenous tree and shrub planting and habitat creation will be required". Any scheme proposed at East Halton would therefore need to provide suitable mitigation, i.e. a buffer, between the site and the development at the ABLE Logistics Park.
- 14) In regard to the emerging North Lincolnshire Local Plan, the site is identified as 'Green Space'. In addition, within close proximity of the East Halton site there are three areas identified as 'Important Open Space' and three additional locations identified as a 'Local Wildlife Site'.

- 15) The site falls within the South Humber Gateway and any developments that would result in an increase in 10 peak time trips are required to contribute towards transport improvements in the area. It is expected that development at this site will create more than 10 trips and therefore will be required to contribute. The contributions are calculated per trip and the total cost of the Transport Improvements and Strategy is £8.235million which is based on accommodating 3,680 new vehicular trips on the North Lincolnshire Council network. This equates to £2,238 per trip.

Summary/Next Steps

- 16) Although the sites have not had any extensive planning history and therefore the principle of development has not been tested yet, it is located in close proximity to East Halton, albeit this is a smaller village settlement as per the settlement hierarchy in the Core Strategy.
- 17) There have been substantial improvements to the highway network to the south of the site which will improve accessibility to East Halton. The site is in close proximity to the Able Logistics Park and Able Marine Energy Park, which have proposed infrastructure improvements as part of their respective schemes.
- 18) In light of the foregoing appraisal, we recommend that this site is considered for residential development through the new Local Plan and Call for Sites procedures. There will be a substantial amount of new jobs created as a result of the Able Logistics Park and Able Marine Park developments and to support these jobs new quality housing will be needed in close proximity to encourage sustainable travel to work whilst being located adjacent to a settlement with services/facilities.

GP/EBS/ABL003