



for William Foster  
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**OBJECTION IN RELATION TO THE EXCLUSION  
OF LAND ON BURRINGHAM ROAD SCUNTHORPE  
FROM THE LAND ALLOCATIONS DOCUMENT OF  
NORTH LINCOLNSHIRE COUNCIL.**

**DECEMBER 2014.**

1. **INTRODUCTION.**

- 1.1 Throughout this submission, reference should be made to the more detailed argument put forward as the original objection to the site edged in red attached being excluded for residential development in the Council's Allocation document. There is, in this objection, an updated reference to Land Supply.

2. **THE SITE**

The land in question is located immediately adjoining and set between existing residential development close to the existing urban area.

- 2.2 Proposed immediately next to the site is the Lincolnshire Lakes project which is intended to provide the Scunthorpe Urban Area with 6,000 dwellings by 2028. By definition therefore, if the Lakes project is a sustainable urban extension (para. 1.4 Core Strategy and para. 2.57 Area Action Plan for Lincolnshire Lakes), then the objection site must fall into the same category.

- 2.3 It is available, suitable, achievable and deliverable. (para. 47 of NPPF), and should therefore be allocated and included within the Council's 5 year land supply figures.

3. **LAND SUPPLY**

- 3.1 The Council's 5 year Land Supply document has been extremely difficult to obtain and only became available in October 2014 despite requests over the last 12 months for it.

- 3.2 On the basis of that document the Council conclude that they have a sufficient 5 year land supply and that there is no need to allocate additional sites.
- 3.3 The 2011 Core Strategy Inquiry concluded that for the life of that plan the Scunthorpe Urban Area needed to provide 9,892 dwellings. (i.e. 82% of District Wide total). Between April 2011 and April 2014 there have been 679 completions in Scunthorpe, giving a yearly average of 226.
- 3.4 There is therefore a requirement to deliver 9,213 dwellings in the Urban Area by 2026. That gives an annual average completion rate of 768 dwellings. Added to that, under paragraph 47 of NPPF is the need for a buffer of either 5% or 20%, dependant on past delivery of housing. That means a 12 year requirement of either 9,674 or 11,055, dependant on which buffer is used.
- 3.5 The Councils document for Land supply figures (other than in table 3) does not recognise the number of dwellings required in the Scunthorpe Urban Area, even when it is defined in the Core Strategy, merely a District Wide figure. Equally, the Council have applied a 5% buffer. Is this the correct one to use? We list below the completions both District Wide and in the Scunthorpe Urban Area, to demonstrate why 20% should be used.

	<u>District Wide Completions</u>	<u>Scunthorpe Completion</u>
0/4 05	551	156
05/06	1,160	319
06/07	688	355
07/08	480	151
08/09	337	192
09/10	302	133
10/11	457	315
11/12	399	324
12/13	326	224
13/14	379	131
<b>Total</b>	<b>5,079</b>	<b>2,220</b>

3.6 This gives a district wide yearly average of **508**, and a Scunthorpe average of **222** compared to 806-921 now required in the Urban Area, depending which buffer is applied.

3.7 We submit that because these figures, particularly in the Scunthorpe context, demonstrate substantial under performance, compared to what the Core Strategy now requires, that a 20% buffer should be applied, which will assist bringing forward the number of dwellings required.

3.8 We say this in the Scunthorpe context, which now must produce 768 dwellings/year, plus a figure for the buffer. The last ten years have produced 222/year, which equates to 29% of the yearly total now proposed. Even in its best year in 2006/2007 at the

height of the housing boom, Scunthorpe only produced 46% of the requirement now proposed. In the last 5 years it has only produced 225/year, equating to 29% of the new requirement.

3.9 The Land Allocations document therefore does need to be pro-active to increase numbers of delivery in Scunthorpe by almost 400%. That is no easy task. We examine here what we consider to be a reasonable assessment for delivery rates over the next 5 years

3.10 In making housing provision within a new plan, PAS advises that evidence needs to be shown about deliverability, viability and constraints, including;

- What sites are deliverable, suitable, available now, achievable and viable.
- What level of development has previously been achieved and what is the market capacity within the area.
- What market signals, such as land prices, house prices, rents, affordability, rate of development and overcrowding are demonstrating.
- What are the views of developers, i.e. rates per site (or sales per outlet where the site is large and contains different areas to be built out)
- What infra-structure is required and how will this be funded.
- What viability constraints exist.
- What environmental designations exist.

3.11 These indicators are particularly important in this submission as they have been used to try and illustrate time periods for delivery of the Lakes project and other allocated sites, particularly in the Scunthorpe context.

3.12 The very ambitious housing figures set for North Lincolnshire (bearing in mind past completion rates) and more particularly Scunthorpe, are as a consequence of the 15,000 jobs to be created as part of the Humber Bank development referred to by the

Council. An under supply of housing, particularly in the first 5 years, can have considerable negative implications. These include, amongst others, house price rises due to lack of supply, and an increase in unaffordability. This impacts on the local economy, constraining the ability of employers to attract the employees they need.

3.13 The PAS conclude that a recent appeal in Dawlish demonstrates that the identification of a site is not an automatic assumption that it is deliverable. It follows that all sites should be critically addressed. This document seeks to do this to show that Scunthorpe will be short in the first 5 years of housing supply.

3.14 It is important that in addition to simply allocating sites, Councils understand such crucial elements such as likely build rates. Attached to this objection are 2 letters of explanation from national builders. Their explanation about site completion rates leads to severe doubts about the forecasts put forward by North Lincolnshire Council about build rates, particularly in respect of the Lakes project, when the past delivery trends are examined in paragraph 3.5.

3.15 Paragraph 49 of the National Planning Policy Framework (NPPF) is clear that relevant policies for supply of housing should not be considered up to date if a Council cannot demonstrate a 5 year supply of deliverable sites. This approach has been upheld at numerous appeals including Taporley Cheshire, the Dawlish appeal, and at Popley, where an appeal for 450 homes was allowed in a land supply argument.

3.16 In the light of these appeal decisions, it is obvious that Councils need to rigorously assess deliverability of sites in accordance with footnote 11 of para 47 of the NPPF.

3.17 We would acknowledge that assessing deliverability is not an exact science. However, experience and input from house builders is a very good starting point, and as the PAS advice states....'assumptions relating to development rates,( i.e. numbers built per site/sales outlet per annum) are in line with current REALISTIC completion rates, and that the development industry agrees with them'.

3.18 The 5 year Land Supply figures show 1,800 houses out of a Scunthorpe total of 3,661 will be built at the Lakes. The Lakes Area Action Plan reduces the 1,800 to 1,240, giving an Urban Area total of 3,101, if all of these dwellings were provided. The requirement until 1<sup>st</sup> April 2019 excluding any buffer is 3,840.

3.19 We therefore argue that there is a shortfall in the 5 year supply of about 20% excluding a buffer. That assumes all the sites (excluding the Lakes)shown in table 3 of the Land Supply comes forward in the numbers stated.

3.20 We would submit that this will not happen and would refer to our original submission paragraphs 5.3 – 5.29 updated in this evidence.

3.21 Taking the Scunthorpe sites in the same order in which they are listed in the 5 year Land Supply document, we offer the following comments:

3.22 Phoenix Parkway

No planning permission. Likely yield to 1/4/19 with a June 2016 start.100 units

3.23 Land at the Glebe.

A large complicated site with adverse ground conditions, no planning permission, and likely yield to 1/4/19 with a March 2017 start. 100 units.

3.24 Land off Burringham Road

Site has benefit of outline permission, Council owned. This site invited tenders in summer 2014 with no takers. Likely earliest start 1<sup>st</sup> July 2016 with 70 units produced.

3.25 Crosby Scheme Phase 2.

Under construction 25 units.

3.26 Land north of Doncaster Road

See paragraphs 5.9 – 5.14 of original submission. Likely yield now only 50 units.

3.27 Council Depot

Application under preparation with issues on demolition and contamination. Likely start date January 2017 with yield of 50 units.

3.28 Cliff Gardens

Simple site with 28 unit yield.

3.29 Offices and factory Sunningdale Road

Recently granted permission with developers to start work summer 2015. Likely yield 66 units.



3.30 Westcliff Precinct

Delivery unknown.

3.31 Somervell Road

This Council owned land has planning permission and would provide 66 units.

3.32 Hilton Avenue

This is a site forming part of an estate built in the mid 70's. It has not come forward in the last 35 years and is unlikely to produce any units.

3.33 Lakeside

Average completions here have been 76/year and all 233 homes should be completed.

3.34 Normanby Road West

4 dwellings to complete.

3.35 Crosby Road

This is a 2007 permission and may not yield any dwellings in the next 5 years.

3.36 Sheffield Street

This could provide 10 dwellings.

3.37 Crowberry Drive

This could provide 28 dwellings.

3.38 Hebdon Road

This 5 year old permission may provide 14 dwellings.

3.39 Collum Avenue

This may provide 14 dwellings.

3.40 Parkinson Avenue

This may provide 24 dwellings.

3.41 Morecambe Avenue

This may provide 20 dwellings.

3.42 Crosby Phase 1

This may provide 29 dwellings.

3.43 Old Crosby

Likely to produce 16 units.

3.44 West of Scunthorpe

Updated in Area Action Plan to 1,240 dwellings in 5 years. There is no detailed application submitted and lead in time is similar to 3.26 above. Earliest possible occupation is January 2017 (equates to about a Spring 2016 start on site) Likely yield circa 300 dwellings.

3.45 East Common Lane

Possible yield of 40.

3.46 Enderby Road

Possible January 2017 start with yield of 60.

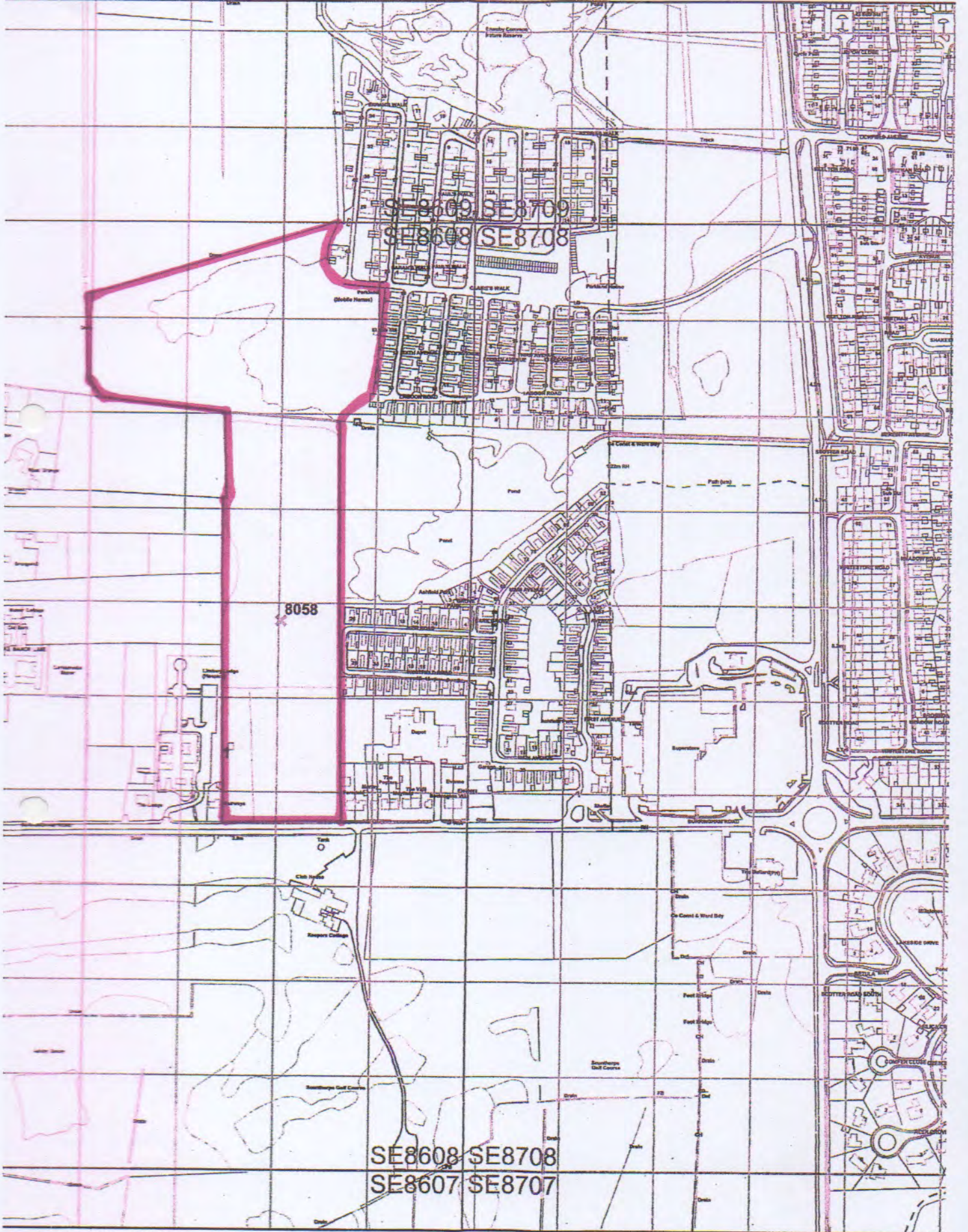
3.47 Dartmouth Road

No planning permission, no application, with possible yield of 50.

4. **CONCLUSION**

- 4.1 We calculate with a reasonable degree of accuracy, using experience, local knowledge and advice from house builders, that the Urban Area can provide somewhere in the region of 1,400 units over the next 5 years.
- 4.2 Even applying a 5% buffer, the Urban Area requires 3,802 dwellings 1,400 completions as we predict will only give 38% of the housing needed.
- 4.3 Our figure of 250/year is also very close to the performance over the urban area in the period 2004/2014 (see our para.3.5) In simple terms, we think there is only a 19/23 month land supply.
- 4.4 If the appointed Inspector were to agree that because of high targets and an extremely poor historical completion rate that a 20% buffer is required, then the Council only have a 32% supply or 19/20 months.

- 4.5 Even if you allow our figures of 300-325 dwellings from contingency sites in our original submission (paras. 6.20-6.28), then the supply is still well below that required.
- 4.6 The objection site's allocation will have a number of benefits both long and short term.
- 4.7 It is available, suitable, achievable, and can be delivered quickly. It can be planned such as to compliment and assist the delivery of the Lincolnshire Lakes scheme. It will also provide a desperately needed site to extend the existing Hospice and help with traffic problems along this stretch of Burringham Road.
- 4.8 Its allocation will enable new housing to be provided close to the existing Urban Area, and is worthy of a residential allocation.



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