



Gladman Developments Ltd

Central Lincolnshire Local Plan EiP

Matter 12 – Health, Well-being and Accommodation Needs (LP9, LP10)

Issue 12b – Meeting Accommodation Needs – Policy LP10

Q6. Paragraph 4.4.6 states that developments should have regard to evidence of need contained within the latest SHMA. Central Lincolnshire Housing Growth Plan or other appropriate evidence such as the Joint Strategic Needs Assessment and the Lincolnshire Extra Care Strategy. However, Policy LP10 only requires regard to be had of the latest SHMA. Is the policy effective? If other evidence comes forward ahead of the latest SHMA does the policy have the requisite flexibility to respond to changing housing needs and market signals?

1. Whilst Gladman are generally supportive of the general thrust of this policy which seeks to ensure the delivery of housing that will contribute to meeting the housing needs of the housing market area as identified in the latest Strategic Housing Market Assessment (SHMA). The 2015 SHMA does not recommend a proportion of M4(2) dwellings and it is therefore difficult to see how this need will be delivered when it is not supported by any robust evidence in accordance with the housing and economic development needs assessment chapter of the PPG.
2. Further, no figure for older **person's** accommodation or what level the Council are going to provide has been included within the Plan. This should be clearly set out. Gladman do not believe that Policy LP10 addresses this element of housing need in sufficient detail. The proposed policy fails to address in sufficient detail the need for specialist housing with care for older people. The Local Plan does not take a positive policy approach in relation to the housing needs of older people.
3. Only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the Local Plan. To progress with this policy as currently proposed will likely lead to inconsistencies being made through the development management process as it does not provide a clear indication of what developers are required to provide.
4. Accordingly, it is necessary that this policy allows for a degree of flexibility. Requiring 30% of all dwellings to meet M4(2) of the Building Regulations is considered to be overly prescriptive particularly where this could affect the viability of a development proposal being delivered. As highlighted in our previous responses to the Local Plan careful consideration to paragraph 173 of

the Framework needs to be considered so that this policy does not place undue policy burdens on developers that prevent or stall sustainable growth opportunities.