

TABLE OF CONTENTS

1. Introduction.....	1
1.1. Background	1
2. Issue One: Land Constraints.....	1
3. Issue Two: Industry Constraints	1
4. Issue Three: Policy Environment	1
5. Issue Four: Social Housing and the rental sector	2

1. Introduction

1.1. Background

- 1.1.1. The Robert Doughty Consultancy has been appointed by Allison Homes Eastern Ltd to submit a representation to the Barker Review of Housing Supply.
- 1.1.2. Allison Homes Eastern Ltd is a residential developer based in Spalding, primarily concentrating development within the county of Lincolnshire. The Robert Doughty Consultancy is a medium sized Planning and Landscape Architecture practice acting as the firm's agent for approximately 10 years. The majority of the Consultancy's work is concentrated within the County.
- 1.1.3. The Consultancy's experience thus enables the practice to respond primarily to issues 3 and 4 identified in the review.

2. Issue One: Land Constraints

- 2.1.1. In Lincolnshire there has been a general over allocation of dwellings within the adopted period of Local Plans. In response to this a number of authorities are de-allocating land that does not have a current planning permission in their revised Local Plans.
- 2.1.2. There are local variances in demand between districts, this is primarily market led. This has encouraged developers to target operations in specific areas at the expense of others.
- 2.1.3. The revised housing figures and increased emphasis on sustainability has forced the Local Authorities to revise allocations.

3. Issue Two: Industry Constraints

- 3.1.1. Brownfield sites do offer potential constraints to developers. The expense of contaminated land risk-assessments can be a major factor in decisions. Following the completion of an investigation, it is possible to identify that development might not be possible or that removing pollutants will come at considerable cost. Contrary to popular belief, these costs are not passed onto the house buyers but are deducted from the land purchase that can influence whether land is made available; it might have a better value as an asset on the books.

4. Issue Three: Policy Environment

- 4.1.1. There is no doubt that the policy and interpretation has a large affect on housing supply, although the guidance can be interpreted in a number of ways. It

cannot be too specific as it has to be responsive to both rural and urban areas. Local Authorities are thus able to interpret the guidance to their own circumstance. Fundamental issues do, however, come to the fore e.g. an emphasis on Brownfield above Greenfield development and increased housing densities, but there is a large degree of scope within the guidance.

- 4.1.2. The planning system provides limited incentive to develop Brownfield land, particularly in rural areas. Hidden costs of potential contamination act as a deterrent and Greenfield sites typically border open countryside, which is attractive to potential purchasers.
- 4.1.3. Reform of the planning system needs to ensure that it becomes more responsive to change. The increased pressure for affordable housing units is a good example; the sudden rise in house prices has led to an increased demand for controlled tenure housing, but the lack of flexibility within the system has meant that local authorities have not been able to secure them.
- 4.1.4. Section 106 Legal Agreements are an affective tool in ensuring that suitable housing developments are constructed and the only way to secure contributions that would not be possible via condition. They do, however, create delay in planning decisions through long drawn-out negotiations to ensure that all contributions relate 'fairly and reasonably' to the proposed application.
- 4.1.5. The use classes order and 'change of use' applications can place undue restrictions on housing supply. This is particularly pertinent in rural areas where barn conversions have to demonstrate that an industrial usage has been explored. Local Authorities that have a recognized lack of housing should encourage applications utilising a change of use to Class C3.

5. Issue Four: Social Housing and the rental sector

- 5.1.1. The affordable housing issue has brought with it a number of constraints to developers. The level of affordable housing required on an application area should be clearly stated in a Local Plan, negotiations over the level of affordable units can be time consuming and affect the site's likelihood of being developed.
- 5.1.2. Protracted negotiations between developers and housing associations can also lead to delays in development. This places greater pressure on developers to maximise profits on the remaining units.
- 5.1.3. Affordable units can also detract from the desirability of open market housing through a social perception that housing in a controlled tenure detracts from the desirability of owner occupied dwellings. This is reinforced by the growing

awareness of the general public of the terms 'social housing' and 'housing association': it is often a question asked by prospective purchasers 'where is the social housing going'.