

Response to Issues and Options Consultation Housing and Economic Land Availability Assessment Call for Sites Part 3 Annex 7

Self-Build and Custom Housebuilding Evidence of Andrew Moger BA (Hons) MA MRTPI

1. Following my evidence including cross examination on the matter of Self-Build and Custom Housebuilding the Council has drawn attention to the Central Lancashire Local Plan Strategic Housing and Economic Land Availability Assessment (SHELAA) Methodology Statement Iteration 1 – April 2019 Annex 7 (**ID 9.12**) and in particular, paragraphs 2.21 and 2.22. I therefore welcome the opportunity to comment upon this within this response note.
2. The consultation pages of the Central Lancashire emerging Plan Call for Sites 3 explain that there were two previous call for sites undertaken as follows:
 - Part 1 which ran for 12 weeks from Friday 17 August 2018 until Friday 9 November 2018; and
 - Part 2 which ran for 10 weeks from Monday 28 January 2019 to Monday 8 April 2019.
3. The Part 3 Call for Sites ran alongside the Issues and Options Consultation and ran for 12 weeks from Monday 18 November 2019 to Friday 14 February 2020.
4. The Central Lancashire webpage¹ explains that the third round of Call for Sites is to *“give residents and stakeholders the opportunity to submit more smaller housing sites of up to five dwellings as well as employment sites, both of which were few in number during the first two rounds of Call for Sites consultation and both of which are integral to ensuring a robust and future proof Local Plan for Central Lancashire, one that provides sufficient places for residents to work and live”* (emphasis added).
5. For clarity, paragraph 2.21 should be read in the context of its preceding paragraph at 2.20 which states:

¹ <https://centrallocalplan.citizenspace.com/central-team/call-for-sites-part-3/>

“NPPG requires the size of sites to be considered in the SHELAA to be specified. It also suggests that the SHELAA should consider all sites and broad locations capable of delivering:

- *Residential uses: five or more dwellings, or*
- *Economic development: sites of 0.25ha (or 500 sqm of floorspace) and above.”*

6. Paragraph 2.21 states:

“NPPG also advises that where appropriate, alternative site thresholds may be considered. The Central Lancashire Authorities have decided that the threshold to be applied for residential development (in the first iteration of the SHELAA), will be:

Residential use threshold for SHELAA Iteration 1:
No threshold applied. <i>(All sites regardless of size, will be included in Iteration 1 of the SHELAA)”</i>

7. Paragraph 2.22 then states:

“The reasons for this departure from the suggested NPPG threshold for residential use in Iteration 1 of the SHELAA are as follows:

- *To help ensure there are enough housing sites to meet the likely requirement;*
- *To facilitate a minimum allocation of 10% of small and medium sized housing sites (i.e. no larger than 1 hectare) as required by the NPPF; and*
- *To have enough small sites to encourage self-build housing and additions to the brownfield register, etc.”*

8. The first two call for sites apparently failed to yield sufficient smaller sites and the third call for sites according to the wording of the Consultation page on the website is to seek submission of smaller sites (and employment sites).

9. Paragraph 1.6 of Annex 7 states that *“the SHELAA is an important evidence source to inform plan-making, but will not in itself determine whether a site should be allocated for housing or economic development.”*

10. Whilst I acknowledge the reference to self-build in the third paragraph of paragraph 2.22, it is important to consider that in supply terms this relates to a call for sites and as such does not relate to sites that are subject to planning applications nor, at present, allocations.
11. In addition to which, as to my knowledge there is no published documentation setting out the Council's assessment of the sites submitted to Call for Sites 3 and their potential suitability for development.
12. In light of which we do not know how many small sites were received through the Call for Sites 3, and secondly we do not know how many of these face constraints to delivery such as being located within the Green Belt or within Flood Zone 2 or 3. Thirdly we do not know how many of the sites submitted the Council consider may be suitable for development.
13. In respect of future supply of Self-Build and Custom Housebuilding within Chorley Borough, one can draw no robust conclusions on future supply based upon a single bullet point reference at paragraph 2.2 of Annex 7 indicating that the Council are seeking smaller sites to, amongst other things, 'encourage' self-build.
14. As my Proof of Evidence explains at paragraph 2.4, the Housing Strategy for England (2011) identified the lack of land suitable for self and custom build as one of the main challenges holding back the growth of the sector.
15. At paragraph 2.52 of my Proof of Evidence, which discusses the March 2017 House of Commons Briefing Paper on Self-Build and Custom Build Housing, draws reference to the AMA Self-Build Housing Market Report – UK 2016-2020 which sets out that "*self-build completions are still below Government targets and a number of challenges still constrain growth in the sector*" including "*ongoing difficulties surrounding the availability of land for self-build projects*".
16. One can draw no reasonable conclusions from the third bullet point of paragraph 2.22 that the matter of problems with supply of land for serviced plots identified in my evidence has been addressed, nor that the policy vacuum has been addressed, for the reasons I set out at paragraph 12 above, and for the reason that based upon the Council's own timetable for the emerging Plan, there will be no adopted Plan in place with a policy to deal with self-build and custom housebuilding for at least another three and a half years.

17. Conversely, through the appeal proposals we have a willing landowner offering 10% (totalling 18 plots) of the site for Self-Build and Custom Housebuilding (secured by legal agreement that has been agreed with the Council) now, in order to address a level of demand identified by the Council's own evidence base within the Housing Study (**CD7.05**) as far exceeding the demand on the Council's Self-Build Register.

18. Despite the introduction of Annex 7 of Call for Sites 3 as **ID9.12** my position remains that nothing less than **substantial weight** should be attributed to the provision of 18 self-build and custom housebuilding plots secured by legal agreement through the appeal proposals for the reasons detailed in this response note as well as those within my Proof of Evidence and Supplemental Evidence and outlined during my evidence of 24 June 2020.