

REPORT TO CABINET

REPORT OF: HEAD OF PLANNING POLICY AND ECONOMIC REGENERATION

REPORT NO. LPA 541

DATE: 5th December 2005

TITLE:	CONCLUSIONS FROM PUBLIC CONSULTATION ABOUT THE URBAN CAPACITY STUDY
FORWARD PLAN ITEM:	BACKGROUND DOCUMENT FOR THE LOCAL DEVELOPMENT FRAMEWORK
DATE WHEN FIRST APPEARED IN FORWARD PLAN:	
KEY DECISION OR POLICY FRAMEWORK PROPOSAL:	Key Decision

COUNCIL AIMS/PORTFOLIO HOLDER NAME AND DESIGNATION:	CLLR SMITH – ECONOMIC PORTFOLIO
CORPORATE PRIORITY:	TOWN CENTRES (A) PLANNING AND CONSERVATION AND AFFORDABLE HOUSING (B)
CRIME AND DISORDER IMPLICATIONS:	MINOR
FREEDOM OF INFORMATION ACT IMPLICATIONS:	REPORT AND UCS AVAILABLE FOR PUBLIC USE ON THE COUNCILS WEBSITE
BACKGROUND PAPERS:	Planning and compulsory Purchase act 2004 PPG3 (Tapping the Potential- good practice guide) South Kesteven Draft UCS March 2005 Responses to consultation received March – April 2005 Employment Land Review – October 2005

1. INTRODUCTION AND SUMMARY

- 1.1 During March and early April this year a period of public consultation was undertaken on the findings of the draft Urban Capacity Study (UCS). The objective of an UCS is to identify potential capacity for housing development on brownfield and other underused land within urban areas, this work forms an important part of the background evidence for the emerging LDF documents. The UCS was undertaken as a joint project between planning officers from the Council and a chartered surveyor from Humberts. The study was undertaken during the summer and autumn of 2004 and the figures included within the study for housing land supply were dated at September 2004.
- 1.2 The consultation period was officially four weeks, although representations submitted before and after the consultation period have been taken on board and are included in the summaries appended to this report. As part of the consultation, efforts were made to identify and consult with landowners or other individuals / organisations with a known interest in land which had been identified in the study. It is acknowledged however that 100% coverage was not achieved. However a notice was put in the local papers and press coverage was received about consultation on the document, which was available on the Council's website and at local district offices and libraries. In addition an agents forum was held to inform those active in the local development industry of both the UCS and the emerging Interim Housing Policy and the period of public consultation on each.
- 1.3 As a result of this consultation some 337 comments have been made by 56 individuals and organisations about the UCS. These comments have been summarised in the schedule appended to this report. Comments made range from objection or support to the inclusion and exclusion of specific sites to comments upon the methodology and general conclusions reached by the study. This report summarises the main issues emerging from the consultation and provides an officer response to each.

2. RECOMMENDATION

- 2.1 Cabinet is asked to note the detailed comments and Officer response made about the UCS and summarised in the attached schedule (Appendix B).
- 2.2 Cabinet is asked to endorse the approach set out in this report to:
- Update Housing Land supply figures used in the UCS to 30th September 2005
 - Amend the methodology set out at the beginning of the study to clarify that sites of 0.4 ha or with an anticipated capacity of 10+ dwellings have been included and that all Greenfield sites including allotments are excluded from the study.

- Update the conclusions for each site included in the UCS which has received planning permission since September 2004 (this should include the deletion of a capacity for Springfield Park and Gonerby House which were included as both commitments and UCS sites in the consultation draft)
- Update all relevant site details where information about the site has been made available through the consultation process, this includes discounting sites where the land owner or occupier has provided information suggesting that the site would not be available for redevelopment for housing;
- Fully assess the additional sites suggested through the consultation process and include these sites if suitable for housing development in the UCS
- Give further detailed consideration to the issue of sites currently in an employment use and consider the conclusions raised in the employment land review (ELR) to the UCS

2.3 These changes should be incorporated into a final UCS which should be published as a background document for the LDF.

3. **DETAILS OF THE REPORT**

3.1 Through public consultation on the UCS a number of individual comments have been made, particularly about specific sites. All comments have been summarised in the schedule appended to this report. In addition to the site specific issues, comments have also been made about the methodology and conclusions set out in the summary at the beginning of the UCS. These more general issues are considered below.

3.2 Site size

3.2.1 The report identifies that only sites of 0.4 ha or larger have been considered in the study. In actual fact the study does include a number of smaller sites, however these are sites where the anticipated capacity is greater than 10 dwellings. This is primarily because of the nature and location of the sites which lend themselves to high density development for flats and apartments. In many cases sites have been identified because of previous or current undetermined planning applications for such development, for example the Impress Metal Packaging site on Springfield Road, Grantham.

3.2.2 The text of the report should therefore be corrected to show that sites of 0.4 ha or larger or 10 + dwellings have been included in the study. This change will also need to apply to the section on Windfall development, which again sets out that the windfall allowance is calculated for small sites of less than 0.4 ha. The windfall allowance made is based on historical rates for small site development. It should be clarified that this includes sites where less than 10 dwellings have been built and generally encompasses site of less than 0.4 ha. This clarification is essential as it demonstrates that sites which are less than 0.4 ha but which yield greater than 10 dwellings have not been double counted.

3.3 Sources of Capacity

- 3.3.1 This section of the study identifies the main sources of capacity as previously developed land (pdl); and sites which may become pdl during the period to 2021. As such one category of land which is included in the UCS and to which objection has been made is car parks.
- 3.3.2 Surface car parks are identified in Tapping the Potential (the ODPM guide to preparing UCS's) as an underused land resource. Redevelopment of car parks can provide a much more efficient use of land combining a number of different uses, including offices, commercial uses, housing and car parking. Redevelopment of car parks in such a way may actually result in an increase in parking provision rather than a loss. Of the car parks identified in the study – most have been discounted, the few which were identified with a potential capacity were considered to lend themselves to redevelopment for flats over car parking, however in response to the consultation it is considered that the following sites be discounted:
- Rainbow stores car park, Market Deeping (De 07, De08 De09) capacity 15 units
 - Watergate car park, Grantham (GR 39) capacity 30 units
- 3.3.3 Sites which have been specifically excluded by the study include greenfield sites, existing areas of housing which may have potential for redevelopment and vacant upper floors or housing which may have potential for conversion to flats.
- 3.3.4 Greenfield sites have been specifically excluded from the study as the objective of an urban capacity study is to identify sites which fall within the first step of the sequential approach to the identification of sites for development (that is previously developed sites within urban areas). It should be noted that allotments are considered to be greenfield and should not therefore be included in the study. It has also become apparent that three sites which have been included in the study are essentially greenfield, and should be discounted. The following sites should therefore be discounted from the study:
- Parts of The Croft, Bourne (Bo17, Bo18 and Bo19) capacity reduced to 51
 - Churchfield, Spalding Road, Market Deeping (De 16) capacity 38
 - Allotments r/o Priory Road, Stamford (ST20b/ST20c) capacity 100
- 3.3.5 There were a number of sites identified in Stamford that are now to be included within the boundary of The New Welland Quarter Opportunity Area as detailed in The Town Center Action Plan consultation draft July 2005. This new site will encompass 8 sites that were originally identified in the draft UCS. It is therefore considered that the following sites should be discounted from the study:
- ST20a – Paddock adjacent to the Priory (capacity 0)
 - ST20b/ST20c – Allotments r/o Priory Road (capacity 100) (this is also a Greenfield site listed in paragraph 3.3.5)
 - ST21 – Works site between Adelaide St and river (capacity 0)
 - ST24 – Harrison Ford, Wharf Road (capacity 0)

- ST24a – Former gas site, Gas Street (capacity 0)
- ST25 – Wharf Road car park (capacity 60)
- ST26 – Depot and works, Wharf Road (capacity 0)

And the following site added:

- - The Welland Opportunity Area (capacity 100)

3.3.6 If final approval is given for this new 12 ha opportunity area, any future development is likely to include a mixture of quality new retail floorspace, leisure facilities, commercial development, enhanced public parking and housing. It may be necessary to relocate some of the existing uses in order to achieve a comprehensive development rather than any piecemeal approach. For the housing element of the mixed-use site, a notional figure of 100 residential units is given with adjustment being made for any loss of capacity for sites that are within the boundary of the new opportunity area.

3.3.7 A number of additional sites have been suggested that have not been previously considered. Some of these sites do not meet the identified methodology (for example they are too small or are Greenfield or lie outside the built up confines of the urban area). It is not considered appropriate to include them in the study at this stage. The following were suggested, but do not meet the specified methodology:

- Land west of the railway line close to Pennine Way, Grantham
- Allotments east of site GR17 between Harlaxton Rd & Springfield Rd, Grantham
- Large area of land to the north-west of Grantham between railway and Great Gonerby
- Area of land to the east of Great Gonerby
- Plot adjacent to site ST02a off Casterton Road, Stamford
- Plot r/o 117 to 129 Kesteven Road, Stamford
- Land to the east of Stamford
- Land to the east of Stamford (adjacent Stamford 250 proposal)
- Land west of Beaufort Drive, Bourne
- Old Texas warehouse, Venture Way, Grantham

3.3.8 5 sites which have been suggested do meet the methodology and should be included with a capacity within the UCS. The capacity or discounting of these additional sites should be subject to the same assessment methods as all sites considered in the draft UCS. The following new sites to be included in the study along with their suggested capacity are:

- Old sewerage works of Uffington Road, Stamford (capacity 33)
- Land south of Uffington Road Stamford (capacity 64)
- Land r/o 60 Ryall Road, Stamford (capacity 10)
- North Street Car park, Stamford (capacity 20)
- Site between 146 to 152 Alexandra Road, Grantham (capacity 10)

3.4 Sites currently in Employment Use

- 3.4.1 A number of sites have been identified in the UCS which are currently in an employment use. This is particularly the case in Grantham. These sites have been identified for a number of reasons. Firstly there is an increasing emphasis in national and regional guidance to re-examine and reconsider the suitability of employment land allocations (see amendments to PPG3 Housing published in January 2005). In addition Tapping the Potential advises that in preparing an UCS consideration should be given to sites which may become “previously developed” during the plan period. In this way sites which would once have been considered large windfall sites can be quantified as part of the housing land supply calculation.
- 3.4.2 To this end the UCS has sought to identify sites which may come forward for redevelopment during the 16 years to 2021. Sites which are currently in employment use have been identified in this UCS where they are considered to be a non-conforming use (that is a use which could be considered a bad neighbour, for example Vacu-lug in Grantham), where sites are known to no longer be appropriate for the use currently operating from them, this may be by virtue of the location in the highway network, or because the building/site is no longer appropriate for their business. Sites have also been included where previous discussions have been held with land owners/occupiers about their future intentions in terms of relocation, downsizing or redevelopment.
- 3.4.3 The general issue of a reduction in the supply of employment land arising from redevelopment for housing is of concern to many respondents. This is a very valid concern, which is shared by the Councils Economic Development Manager, particularly in light of the current situation where very little land is readily available in the district for existing firms to relocate to. Whilst the Council would not wish to see local employers closing down and moving away, it must recognise that if a firm decides that its premises are no longer suitable or appropriate to their operational requirements they will seek to address these shortfalls. This might be through the redevelopment on site, however it may also be through relocation to new premises. The Council must take a pragmatic approach to the future of these sites, a clear strategy will need to be developed to ensure that local employers are not lost and that the local economy remains vibrant. It is acknowledged that there is a current shortage of attractive, readily available employment sites within all four towns, however it must also be recognised that some land which is currently in employment use in the towns is poorly located, unattractive and inappropriately designed for modern businesses.
- 3.4.4 Concern has been raised regarding the amount of employment land which has been identified within the towns as having potential for redevelopment to housing together with the supply of new employment land. These issues have been explored further in a detailed Employment Land Review (ELR) which will not only inform the conclusions of the UCS about certain sites but will also be used to inform the preparation of employment and housing policies in the relevant DPD.

3.4.5 The conclusions given in the ELR (paragraph 5.11) relating to the loss of employment land to non-employment uses are as follows:

Many employment sites identified in the UCS are no longer suitable or in appropriate locations for modern business. The redevelopment of a number of sites, especially those within and close to the town centres, for non-employment use over the Study Period will be significant.

The ELR estimates that up to 2021, the following losses of employment land will occur:

- Grantham – 9.19ha (this excludes the Canal Basin area, due to the size and uncertainty of development)
- Stamford – 2.48ha
- Bourne – 3.21ha
- The Deepings – 2.21ha

3.4.6 This identifies that all of the 4 towns relative to their population are expected to see a loss of employment land. It is therefore key that alternative land is identified in order that relocation of existing uses can be facilitated and employment land is retained rather than lost.

3.4.7 The ELR does however confirm the assumptions made about specific sites within the UCS. There is therefore no need to make changes to the capacity figures within the UCS. What the ELR has done however is flag up the consequences of loss of employment sites in all 4 towns and the importance of ensuring redevelopment is phased into a latter part of the LDF period when replacement employment land should be identified and available.

3.4.8 One particular site in Frognall (Ampy Automation), is currently a large employment site which have some 300 employees. Ampy are actively looking to relocate from their existing site on the eastern edge of Frognall to a more suitable site within the district with land at The Northfield Industrial Estate in Market Deeping providing a possible option.

3.4.9 A concern is that the Ampy site is considered to be in a fairly unsustainable location where most necessary journeys are likely to be made using the motorcar. The Planning Inspectorate held a similar view on sustainability with an appeal site on the corner of Spalding Road and Hall Meadow Road (The Glandell site). This was one of The Planning Inspectorate's main concerns for dismissing the appeal for the Glandell site on 23rd October 2003

3.4.10 At this stage, the Ampy site should be discounted in the UCS, but given the exceptional circumstances surrounding this site (a major employer with a lack of relocation options within the district and activity at the site being a non-conforming use), if reasonable evidence is submitted as part of a planning application proving that all other options have been explored, the site may be considered acceptable for a mixed-use development.

Comments have also been made from other sources that the Vacu-lug site in Grantham (capacity 95) should be discounted as the firm have no intention of moving. However, after discussions with the owners of the site, it is to remain in the UCS with no alterations to its status.

3.4.11 As a result of the consultation on the UCS and the information given in the ELR, it has become apparent that changes should be made to some sites following correspondence from owners or operators or assumptions made about the availability of a site or the timescale for availability are different from those made in the study. Therefore, it is recommended that the following sites be discounted:

- Ampy Automation Frognall, (DE18) capacity 30 units
- Warner's Car Park, Bourne (BO11) capacity 20 units
- Stamford Hospital, Ryhall Road, Stamford (ST18) capacity 30 units

And that the capacity identified on the following sites be moved into a different 5 year time band:

- Land & buildings between Burleigh St, North St and Market Place, Bourne – timeframe adjusted from 5-10yrs to 0-5yrs
- Workshop adjacent to Rainbow Superstore, Market Deeping – timeframe adjusted from 0-5yrs to 5-10yrs
- Land between Springfield Road and Harlaxton Road, Grantham – timeframe adjusted from 5-10yrs to 0-5yrs
- Wordsworth Holdings, Grantham – new timeframe of 10-15yrs
- Site at South Street, Bourne (BO08a) – timeframe adjusted from 5-10 years to 0-5 years

3.5 Contaminated Land

3.5.1 The issue of contamination of sites identified in the UCS was explored as part of the discounting process. The Council's Environmental Health Service is in the early stages of preparing a register of Contaminated land, however at that time this comprised a desktop survey of potential sites. It was therefore concluded that as most of the site identified would be likely to have some degree of contamination that the issue of contamination was not a sound reason for discounting any of the sites. A contamination report would be required prior to the development of any site, this would identify the appropriate mitigating measure which would be required to treat any contamination issues on individual sites. It is considered that reference to this matter should be included within the summary at the beginning of the report.

3.6 Discounted sites and site capacity

3.6.1 A number of comments have been made by landowners about the actual availability and suitability of sites which have been discounted or which indicate that the capacity applied to a site within a certain phase of the plan period is incorrect.

- 3.6.2 These comments and any additional information have been reviewed. In some case it is considered that no change should be made to the discounting or capacity applied. However changes should be made to the following sites:
- Land & buildings between Burleigh St, North St and Market Place, Bourne - capacity changed from 40 to 80
 - Wordsworth Holdings, Grantham – capacity changed from 0 to 50
 - Premises at South Street, Bourne – capacity changed from 60 to 75
- 3.6.3 In particular it should be noted that it is possible that the Wordsworth Holding site in Grantham may come forward for redevelopment before the end of the plan period. Therefore a nominal capacity of 50 dwellings is included in the last phase of the plan period for this site. (It should be recognised that the total capacity figure for this site is much greater and could be as much as 550 dwellings, however it's development is largely dependant upon infrastructure issues in particular the provision of access via an east west by-pass)

3.7 Sites with Planning Permission

- 3.7.1 The UCS was prepared over a six month period. During this period of time a number of sites which were assessed were also being considered through the planning application system. Every effort was made to ensure that sites which gained planning permission were discounted to ensure that there was no double counting included within the housing land supply calculation at the end of the report. Unfortunately two sites failed to be discounted. One of these was the site at Springfield Park, Grantham which was included in the Urban capacity study with a capacity of 300 dwellings but also included in the commitments with a capacity of 370. This approved capacity has now increased to 432. The UCS therefore includes a double count of 300 houses for this site, which should now be discounted. The second site was part of the land at Gonerby House (GR02), which had permission for 10 dwellings (this site was identified in the UCS with a capacity of 12). A further application on the remaining part of this site has since been approved increasing the total site capacity to 21.
- 3.7.2 During the twelve months since September 2004 a number of sites included within the UCS with a capacity have gained planning permission. The capacity of these sites will now be included within the “commitment” figure, therefore the following sites should be discounted from the UCS:
- GR02 Gonerby House, Grantham – capacity 12
 - GR04 Mount Street, Grantham – capacity 25
 - GR10 Calder Close, Grantham – capacity 34
 - GR16 Springfield Park, Grantham – capacity 300
 - GR32 Railway Club, Huntingtower Road, Grantham – capacity 32
 - GR36 Autumn Park & adjacent buildings, Grantham – capacity 100 (part site)
 - GR42 Land r/o Belton Lane & Harrowby Lane, Grantham – capacity 10 (part site)
 - GR53 Former tyre depot and house on Welham Street, Grantham – capacity 40

- GR63 Commercial buildings on Cambridge St. Grantham – capacity 10 (part site)
- ST02a/ST02b/ST02c Redundant Brickworks, Stamford – capacity 200
- ST22 Land between 7-8 St. Leonard Street, Stamford – capacity 14 (part site)
- ST23 Vacant car showroom, Wharf Road, Stamford – capacity 12

3.7.3 A representation has also been made by the developers of Elsea Park, Bourne indicating that they consider that the overall capacity of that site (estimated in the “commitment” figure to be 2000 dwellings) could in fact be higher. However quantifying this is very difficult at this stage. Any additional capacity on this site will be monitored as part of the plan monitor and manage approach and the final capacity of the site will become evident in the latter stages of the plan period.

3.8 Housing Land Supply

3.8.1 The amount of land which has been developed for housing and the amount of land for which planning permission has been granted are monitored on a regular basis. Annual figures for financial years (1st April – 31st March) are provided to Lincolnshire County Council and the East Midlands Regional Assembly for monitoring purposes. These figures will also be included in the 1st Annual Monitoring Report (AMR) which is due to be published in December this year. The figures included in the UCS for overall housing land supply were dated at September 2004. Monitoring for the year 2004-2005 has now been completed. A further review (April 2005-October 2005) on housing completions and commitments has been finalised and the relevant statistics updated.

3.8.2 At 30th September 2005 a total of 4848 dwellings had planning permission (this is an increase of just over 400 on the September 2004 figures). In addition 2730 dwellings have been built in the district since 1st April 2001 (an increase of 605 dwellings since September 2004).

4. **CONCLUSION**

4.1 As a result of the comments made about sites included within the draft UCS it is considered that the following additional sites (or extension to sites) should be considered for potential for residential development during the plan period.

Table 1

Town	Site location	Site size	Suggested capacity if suitable (based on 30 / 40 Ha)
Stamford	Old sewerage works off Uffington Road	0.94 ha	33
Stamford	Land South of Uffington Road (includes ST19)	1.83 ha	64
Stamford	North Street car park and adjacent buildings	0.35 ha	20
Stamford	Land to the r/o 60 Ryhall Road	0.27 ha	10
Stamford	New Welland Quarter Area (mixed use)	12 ha	100
Grantham	Land between 146 to 152 Alexandra Road	0.04 ha	10
Potential new capacity			+ 237

4.2 As a result of the comments received, 14 sites should now be discounted from the UCS reducing the overall capacity by 356 dwellings. Table 2 below indicates which sites are to be discounted.

Table 2

Site Reference	Site Location	Capacity	Reason for discounting
ST20b/ST20c	Allotments r/o Priory Road Stamford	100	Site to become part of Welland Opportunity Area
ST25	Wharf Road car park	60	Site to become part of Welland Opportunity Area
BO17-BO19	*The croft (capacity 84-51)	33	Reduced capacity to 51
DE07-DE09	Service areas & car park to Rainbow Superstore	15	Agreed to discount
DE16	Churchfield, Spalding Road & Broadgate Lane	38	Greenfield site
DE18	Ampy Automation, Frognall	30	Agreed to discount
ST 18	Stamford Hospital, Ryhall Road	30	Agreed to discount
BO 11	Warner's car park, Bourne	20	Recently extended with Greenfield element
GR 39	Watergate Car Park, Grantham	30	Agreed to discount
Total Capacity to be discounted		356	

4.3 As a result of the consultation the overall capacity of the sites included in table 3 below should be changed. This results in an overall increase in capacity of 105 dwellings

Table 3

Site Reference	Site Location	Change in capacity	Reason for change
BO12-BO15	Land & buildings between Burleigh St, North St & Mkt Place	+40	Information leads to increase from 40 to 80 units
GR22	Wordsworth Holdings	+50	Notional figure of 50
BO08a	South Street, Bourne	+15	Revised boundary
Total change in capacity		+105	

4.4 As a result of planning permissions granted during the period September 2004 – 30th September 2005, 14 sites, with a total capacity of 789 should be discounted from the UCS and an increased capacity of 653 (including a reduction of 300 for Springfield Park) added into the “commitment” figure in the final supply table.

Table 4

Site Reference	Site location	Approved capacity by Planning permission	UCS capacity	Overall change+/-
GR02	Gonerby House, Gonerby Road	21	12	9
GR04	Mount Street	20	25	-5
GR10	Calder Close	34	34	0
GR16	Springfield Park	432 (370 included in commitments)	300	-238
GR32	Railway Club Huntingtower Road	32	32	0
GR36	Autumn Park & adjacent commercial buildings (part)	140	100	40
GR42	Land to r/o Belton Lane & Harrowby Lane (part)	7	10	-3
GR53	Former tyre depot and house on Welham Street	48	40	8
GR63	Commercial buildings on Cambridge Street (part)	4	10	-6

ST02a/ST02b /ST02c	Redundant W.C. Brickworks	273	200	73
ST22	Land between 7-8 St. Leonard's Street (part)	2	14	-12
ST23	Vacant car showroom Wharf Road	10	12	-2
Total Change in Capacity		653	789	-136

4.5 Table 5 below indicates the changes arising to the Housing land supply calculation as a result of the changes suggested in response to the consultation on the UCS. The figures of urban capacity for each town are based upon the conclusion of this report.

Table 5

	Complete 2001-05*	Planning approvals @30/9/05	Revised UCS capacity	Small site windfall	Total Supply	Structure Plan	+/-
Grantham	752	1352	1081	340	3525	3800	-275
Stamford	327	519	392	255	}	}	
Bourne	398	2148	276	119	}4723	}3500	+1223
Deepings	122	57	25	85	}	}	
Rural	1131	772	N/a	0	1903	1900	+3
Total	2730	4848	1774	799	10151	9200	+951

* Completion figures for 1/4/2001 – 30/9/2005

5. CONTACT OFFICER

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Appendix A

Summary of UCS sites for Grantham, Stamford, Bourne and The Deepings

Appendix B

Schedule of Comments made about the Draft Urban Capacity Study (March 2005)