

EiP Statement

Fylde Council Local Plan

Our ref 41917/02/MW/PN
Date 12 June 2017
To Programme Officer
From Lichfields

Subject **Hearing Statement: Matter 5 – Housing – Site Allocations and Delivery**

1.0 Introduction

- 1.1 Lichfields is instructed by Taylor Wimpey UK Limited [Taylor Wimpey] to make representations on its behalf to the Fylde Council Local Plan [FCLP].
- 1.2 This statement has been prepared in response to the Matters, Issues and Questions raised by the Inspector for the Matter 5 Examination in Public [EiP] Stage 2 hearing sessions.
- 1.3 Separate representations have been submitted in respect of Matter 6 – General Development.
- 1.4 The representations should be read in conjunction with previous submissions on the FCLP [Representor ID: 60] as well as those made on Matter 6.
- 1.5 Taylor Wimpey is seeking to bring forward a high quality residential extension on land at Weeton Road, Wesham. This would assist in the delivery of sustainable development within the Borough by making a significant contribution towards meeting the need for market and affordable housing.
- 1.6 This statement expands upon Taylor Wimpey’s previous representations in light of the Inspector’s issues and questions.

2.0 Planning Issues

Issue 9 – Does the Plan set out a positively prepared strategy for the supply and delivery of housing that is justified, effective and consistent with national policy?

Q1 - In relation to the 5 year supply does the Plan clearly set out annual targets, completions to date, the approach to catching up the shortfall and the buffer to be applied?

Q2 - Appendix 2 of the Plan includes a housing trajectory for the Plan period. In light of the Council’s recent evidence this is proposed to be updated. However is it necessary to include site specific details given it may quickly become out of date? Should a housing trajectory graph be included in the Plan?

- 2.1 Taylor Wimpey welcomes the statement in the submitted version of the Local Plan [§10.15] which recognises that Councils are required to have a 5-year supply of housing land available.

- 2.2 However, in our appended Technical Note we set out how the Council's latest evidence produced by Turleys and Amion suggests that the OAHN should be 430dpa rather than the 415dpa pursued by the Council. We go on to demonstrate that FBC does not have a 5 year supply of housing land, and that they must therefore allocate additional sustainable and deliverable sites such as land at Weeton Road, Wesham in the Local Plan.
- 2.3 Whilst the Local Plan [§§10.16-10.19] sets out annual targets, completions to date and the approach to catching up shortfall, these must be updated to reflect the latest evidence (e.g. an OAHN of 430 dpa and 2016/17 completions) summarised in a concise table presenting the information.
- 2.4 It is evident that FBC has experienced a persistent period of undersupply and as set out in the appended Technical Note, there has been persistent under-delivery over the past 14 years and therefore a 20% buffer is required.
- 2.5 FBC's 2015-2016 Authority Monitoring Report [AMR]¹ identifies that a 20% buffer is required. The AMR also seeks to deal with the accrued under-delivery since the start of the plan period over the first five years and apply the 20% buffer to both the under-delivery and housing requirement (Sedgefield Method). FBC maintained this approach in the Interim Five Year Housing Supply Statement, base-dated 28th February 2017². Taylor Wimpey agrees with this approach and agrees that the application of a 20% buffer in line with the requirements of the Framework [§47] applied using the Sedgefield Method is appropriate.
- 2.6 In the IHSS, FBC re-iterates its intention to change its approach from using the Sedgefield to the Liverpool Method upon adoption of the Local Plan. Taking the 'residual approach' advocated by the LPA, would only postpone dealing fully with the backlog now and would only delay meeting the identified needs of the community for new homes and give rise to social problems such as overcrowding and low productivity. Furthermore, such an approach conflicts with the objective of the Framework³ to 'boost significantly' the supply of housing. In these circumstances, as a minimum, the under-provision since the start of the Plan Period (2011) should be addressed within the 5-year period using the Sedgefield Method.
- 2.7 A housing trajectory is important to help identify which sites contribute to the Council's claimed supply and assess whether the lead-in times and delivery rates for each site are correct. Taylor Wimpey considers that it is important for the Plan to include a housing trajectory as an appendix as it helps demonstrate amongst other things a deliverable 5 year supply of housing.
- 2.8 Taylor Wimpey acknowledges that the housing trajectory is based on a constantly evolving situation and as such welcomes the requirements in Policy H1(b) and H1(c) for '*keeping under review housing delivery performance*' and '*ensuring there is enough deliverable land suitable for house building capable of providing a continuous 5 year supply from the start of each annual monitoring period*'. A housing trajectory graph could also be included to provide further clarity within the Local Plan itself.

¹ Ref: ED008, page 40

² Ref: EL1.008

³ Framework - §47

Site Allocations - Policies SL1-SL5

Q3 - In light of further planning permissions that have been brought to my attention, do these policies need updating with new sites?

Q5 - The policies refer to masterplans and design codes for each site without planning permission in the case of Policies SL1 and SL2 and specific strategic sites without planning permission for Policies SL3 and SL4. Are these justified and consistent with Policy M1?

Q6 - Is the methodology for site assessment and selection robust and justified?

Q7 - Are the proposed housing site allocations in Policies SL1-SL5 justified and deliverable? Are the delivery rates for the sites reasonable and achievable?

- 2.9 Whilst Policies SL1-SL5 should be updated to include appropriate sites, the approach taken to date by FBC towards this issue has been re-active rather than pro-active and this should be corrected. Whilst the Council should update the policies and housing trajectory to reflect any new planning permissions, the process of identifying housing sites in the Local Plan should be driven to a large extent by the Spatial Strategy and 'locations for development' set out in Policy DLF1, §6.21. Table 2 of the Local Plan identifies the proportion of the housing requirement that will be provided in each of the Strategic Locations for Development. Simply reacting to new permissions and adding them to the trajectory and policies risks distorting the identified spatial distribution of development in a sustainable way. Instead, the Council should allocate additional sustainable sites in the Strategic Locations (e.g. Kirkham and Wesham).
- 2.10 Policies SL1-SL5 do need to be updated to include sites which are now included in the Council's trajectory as a result of now being the subject of planning permission. However, sites should only be included in Policies SL1-SL5 if they can and will deliver the anticipated level of housing set out in the policies and housing trajectory.
- 2.11 Taylor Wimpey has concerns that at least some of the proposed allocated sites will not deliver the anticipated level of housing and therefore does not consider that the methodology for site assessment and selection is robust and justified. As we have set out in previous representations (Matter 3 – Housing and employment requirements 13th March 2017 and appended Technical Note), the Council has included at least some sites within its trajectory that will not deliver the number of units anticipated by the Council and/or for which the Council's lead-in times and delivery rates have been over-estimated. Consequently the level of supply from some sites is optimistic and does not accord with the comments in the recent Housing White Paper⁴ on the need to secure delivery (e.g. the proposed housing delivery test).
- 2.12 As we set out in the appended Technical Note, the issue is addressed to some extent in the IHSS through the inclusion of a 10% reduction for sites not coming forward, applied to all sites in the trajectory. However, based on the analysis of past completion rates set out in the appended Technical Note, we have concerns that the Council's approach under-estimates the likely under-delivery on medium and small sites. Based on past completions, a reduction of 20% should be applied to small (1-9 dwelling) and medium (10-49 dwelling) sites. Furthermore it should be noted that even with a 20% reduction, the Council's anticipated completions from small and medium sized sites are still far in excess of the average completions since the start of the plan period.

⁴ Fixing our broken housing market – DCLG (2017)

- 2.13 As set out in Taylor Wimpey’s Matter 6 Statement, Lichfields considers that Policy M1 should be removed from the Plan as it is not justified or consistent with national policy to require each allocated site within the Strategic Locations for Development to prepare masterplans and design codes that meet the 24 criteria set out in Policy GD7. This is unduly onerous and inflexible, and does not represent positive planning. The level of information required by criteria (a.) to (x.) of Policy GD7 is adequately covered by other development plan policies and should therefore be addressed in any planning application submitted for the allocated sites. It is also noted that §7.4 sets out further detailed requirements for the masterplans which are not listed in Policy M1 e.g. a viability assessment and a delivery strategy. Taylor Wimpey therefore considers that Policy M1 should be deleted.
- 2.14 Taylor Wimpey is concerned that Policy M1 effectively devolves responsibility for setting out the details for the delivery of the allocated sites to a SPD. In this regard, we wish to highlight that it is not the purpose of a SPD to create new policies or impose additional infrastructure requirements which are outside the scope of the adopted development plan policy.
- 2.15 Taylor Wimpey is concerned that the requirement to prepare masterplans and design codes for each allocated site would impact on housing delivery in the short term as the preparation of such information and its adoption as a SPD is likely to take in excess of 12 months.
- 2.16 It is also unclear who should bear responsibility for the preparation of the masterplan for each strategic development location, which §7.4 states should set the vision for the strategic development location, together with the strategy for implementing that vision and how the individual sites collectively will meet that vision. The Local Plan allocates 57 strategic and non-strategic sites. Whilst it is accepted that development has already commenced on a number of these, the preparation of masterplans for each of these sites by the Council is unrealistic. In context, it is important that the Council does not burden developers with unnecessary requirements that could impact on the delivery of housing in the short term. This is particularly important given that the Council cannot currently demonstrate a 5 year supply of housing land.
- 2.17 In any case, Taylor Wimpey considers that there are inconsistencies between Policy M1 and Policies SL1-SL4 that need to be clarified. For example, Policy M1 states that masterplans and design codes will be prepared for each allocation site within the Strategic Locations for Development named in Policy DLF1, whereas Policies SL1-SL4 implies that this requirement will not apply to sites where planning permission has been approved.
- 2.18 Taylor Wimpey is concerned that the requirement to prepare masterplans and design codes for each allocated site would impact on housing delivery in the short term as the preparation of such information and its adoption as a SPD is likely to take in excess of 12 months. If such a requirement is included in any version of the Local Plan that is adopted, it will only further increase the need for additional allocated sites to provide greater certainty and flexibility in terms of 5YHLS.
- 1.1 In summary, even using the Council’s ‘best case’ scenario (an OAHN of 415 dpa and 10% reduction to all sites for non-delivery), FBC cannot currently demonstrate a 5 year supply of housing land (4.8 years at best). This is set out in Table 1 below. Set against an OAHN of 430dpa and using the ‘Sedgefield’ method, the deliverable 5-year supply position is **4.6 years** based on FBC’s claimed supply and methodology but just **4.4 years** based on Lichfields methodology (applying a 20% reduction to small and medium sites to reflect past delivery). This is set out in Table 2 below.
- 1.2 Therefore in its current form, due to the lack of a 5 year supply of housing land, the Local Plan fails to meet the requirements of the Framework and is unsound. The Council must allocate

additional sustainable and deliverable sites such as land at Weeton Road, Wesham to make the Local Plan sound.

Table 1: 5-Year Housing Land Supply Position based on OAN of 415dpa

Housing Requirement (2017/18-2022/23)	FBC Approach		Lichfields Approach	
5-year Requirement	(5x415)	2,075	(5x415)	2,075
Backlog (2011-2016)		952		952
Requirement + Backlog		3,027		3,027
Framework 20% Buffer		605		605
Outstanding 5 Year Requirement Requirement + Backlog + Buffer		3,632		3,632
Residual Annual 5-Year Requirement		726		726
Large Sites (50+ dwellings)				
Allocations		135		135
Minded to Approve		352		352
Planning Application Commitments		2,091		2,091
Total from Large Sites		2,578		2,578
Medium Sites (1-49 dwellings)				
Allocations		150		150
Minded to Approve		326		326
Planning Application Commitments		435		435
Total from Medium Sites		911		911
Sub Total		3,489		3,489
Small Sites (1-9 dwellings)				
Small site commitment and Minded to Approve (unallocated sites)		335		335
Small sites and Windfall Allowance (unallocated sites)		0		0
Long Term Empty Homes re-entering market		50		50
Sub Total	385	385	385	385
Total 5 Year Supply (Sites and Allowances)		3,874		3,874
10% Allowance for supply not coming forward (All sites)		-387		n/a
10% Reduction from Large Sites		n/a		-258
20% Reduction from Medium Sites		n/a		-182
20% Reduction from Small Sites		n/a		-67
Total Supply		3,487		3,367
Over/Under Supply 5 year period (Under Supply Expressed as a Minus)		-145		-463
5-year Housing Supply (Expressed as Years of Residual Requirement)		4.8		4.6

Source: FBC and Lichfields

Table 2: 5-Year Housing Land Supply Position based on OAN of 430dpa

Housing Requirement (2017/18-2022/23)	FBC Approach		Lichfields Approach	
5-year Requirement	(5x430)	2,150	(5x430)	2,150
Backlog (2011-2016)		1,042		1,042
Requirement + Backlog		3,192		3,192
Framework 20% Buffer		638		638
Outstanding 5 Year Requirement Requirement + Backlog + Buffer		3,830		3,830
Residual Annual 5-Year Requirement		766		766
Large Sites (50+ dwellings)				
Allocations		135		135
Minded to Approve		352		352
Planning Application Commitments		2,091		2,091
Total from Large Sites		2,578		2,578
Medium Sites (1-49 dwellings)				
Allocations		150		150
Minded to Approve		326		326
Planning Application Commitments		435		435
Total from Medium Sites		911		911
Sub Total		3,489		3,489
Small Sites (1-9 dwellings)				
Small site commitment and Minded to Approve (unallocated sites)		335		335
Small sites and Windfall Allowance (unallocated sites)		0		0
Long Term Empty Homes re-entering market		50		50
Sub Total	385	385	385	385
Total 5 Year Supply (Sites and Allowances)		3,874		3,874
10% Allowance for supply not coming forward (All sites)		-387		n/a
10% Reduction from Large Sites		n/a		-258
20% Reduction from Medium Sites		n/a		-182
20% Reduction from Small Sites		n/a		-67
Total Supply		3,487		3,367
Over/Under Supply 5 year period (Under Supply Expressed as a Minus)		-343		-463
5-year Housing Supply (Expressed as Years of Residual Requirement)		4.6		4.4

Source: FBC and Lichfields

Q4 - Policy SL5 relates to sites that are not within Strategic Locations for Development (SLD). Is its inclusion within the chapter on SLD appropriate and effective?

- 2.19 The inclusion of Policy SL5 in the chapter on Strategic Locations for Development may lead to confusion and the Council should consider re-arranging the relevant sections of the Local Plan to provide greater transparency, consistency and clarity.

Q8 - In Policy SL5 no sites are listed for Elswick as these will be determined as part of the Neighbourhood Plan (NP). What is the timescale for the NP and is this approach justified?

- 2.20 The emerging Local Plan Publication document states that:

“Elswick Parish Council has agreed to prepare a NDP, following the decision of the Development Management Committee on 9 March 2016 to reduce the number of homes from 140 to 50 and to change its status to a Tier 2 Smaller Rural Settlement. It is the Parish Council’s intention to allocate suitable sites in and around Elswick to provide 50 homes over the plan period, in addition to the existing commitments.” [§1.9]

- 2.21 In both the IHSS and in the most recently updated Housing Land Supply Trajectory base dated 31 March 2017 (EL5.003g) FBC has included 15 dwellings from the Elswick Neighbourhood Plan within the 5YHLS and 50 within the overall trajectory.

- 2.22 The Elswick Neighbourhood Area was approved by Fylde Borough Council on 3rd August 2016. Since that time no Neighbourhood Plan has been published or consulted on and only limited progress has been made. Indeed, in a recent consultation response to a planning application (16/0180) for 50 dwellings in Elswick, which was refused on 8th February 2017, the Parish Council commented as follows:

“Elswick Parish Council has been formulating a Neighbourhood Plan and recognises that this is a lengthy process; however, in a short period, has made considerable progress. There has been a tremendous response to the Neighbourhood Plan questionnaire with over 30% of households submitting responses. The overwhelming message from the questionnaire is that villagers wish to see the housing allocation in the emerging Local Plan distributed uniformly throughout around the village with several small developments rather than one or more large housing estates, enabling the village to grow whilst retaining its character. The whole purpose of the plan is to give a voice to the community to help them manage their neighbourhood, if this planning application is granted it goes totally against the purpose of the Neighbourhood plan and the Localism Act.” [§1.9]

- 2.23 The first reason for refusal given by FBC in refusing planning permission was:

“The development of the site for up to 50 dwellings will, in combination with recent planning approvals, result in a level of development in Elswick that will exceed that assumed in the emerging Fylde Local Plan, which is at an advanced stage of preparation, and identified Elswick as a tier 2 settlement expected to support only limited expansion. In the absence of any significant community facilities within the village and a limited public transport service in the village, the proposal would result in increased journeys by private motor vehicle and so would be economically, socially and environmentally unsustainable and contrary to the provisions of Policy S1 of the emerging Fylde Local Plan to 2032.”

- 2.24 FBC has acknowledged through the reason for refusal that 50 dwellings in Elswick would be unsustainable and would exceed the levels assumed in the emerging Local Plan. Any neighbourhood plan allocation could therefore not amount to 50 dwellings. In any case there is no reasonable prospect of the Elswick Neighbourhood Plan being advanced through to adoption in the foreseeable future and as such there are no sites identified that would meet the tests of the Framework Footnote 11 and the entire Neighbourhood Plan allocation should be removed from the 5YHLS and the trajectory overall. Therefore the site in the Elswick Neighbourhood Plan should also be removed from the Fylde Local Plan as an allocation and additional sustainable and deliverable sites should be identified and allocated in the Local Plan to ensure a 5YHLS can be demonstrated.

Policy H1

Q9 - H1b refers to performance monitoring in relation to housing delivery. Can the Council clarify the purpose of the rolling 3 year review period and how 'the delivery of uncommitted sites will be adjusted' if completions targets are missed by 20%? Is this justified and effective?

- 2.25 Taylor Wimpey requests that the Council provides further clarification on how the delivery of uncommitted sites will be adjusted if completions targets are missed by 20%. This is considered highly likely given the Council's expected average completions (775 dpa) over the next 5 years compared to the long term average of 230dpa. The Council will also need to consider the implications of the delivery test in the Government's Housing White Paper which will require action to be taken if delivery falls below 95% of the Council's annual housing requirement.

Policy H2 - Density and mix of new residential development

Q10 - A minimum density of 30 dph is proposed under Policy H2. Is this justified across all development sites, whether small or large?

- 2.26 Local authorities can set out their own approach to housing density but the Framework [§47] indicates that this should be based upon local circumstances and not harm the objective of significantly boosting the supply of housing. A blanket minimum density of 30 dph across all sites is not justified or backed up by the evidence.
- 2.27 Furthermore, a minimum density of 30 dph would be contrary to other policies in the plan and evidence such as the latest Housing Land Availability Schedule (EBO18, page 3) which demonstrates that over half of the new build completions in the 2015/16 monitoring year (57%) were on sites with densities less than 30 dpa. Policy GD7 (a) requires the density of new residential development to reflect and wherever possible enhance the local character of the surrounding area.

Q13 - The policy requires the delivery of at least 20% of homes on sites of 20 or more dwellings to be designed to accommodate the elderly. Is this justified and based on robust evidence?

Q14 - Is the requirement for specialist accommodation to include compliance with the optional technical standard for wheelchair adaptable dwellings justified and based on robust evidence of identified need? Has the impact of applying these standards on viability of schemes been considered? (Also see Policy GD7)

Q15 - Evidence set out in supporting text to Policy H2 states that rural areas have significantly fewer 1 and 2 bedroom homes than other parts of the Borough. Therefore whilst H2 states that 50% of developments of 10 or more dwellings should be 1-3 bed, 33% of home in rural settlements should be 1-2 bed. What is the source of this?

Q16 - Does the policy provide sufficient flexibility to react to market forces?

- 2.28 Taylor Wimpey acknowledges that Fylde, like many authorities in England, has an ageing population that must be accommodated in terms of its housing need. The Plan does not contain any evidence, however, of where the 20% requirement or the requirement to comply with the optional technical standard for wheelchair adaptable dwellings M4(3A) has been derived from. There does not appear to be any evidence regarding appropriate locations for such dwellings or any consideration of issues such as the number of older residents who may wish to stay in their existing home and make adaptations if and when required.
- 2.29 Whilst the policy does include the wording to the effect that the 20% requirement and the requirement to meet the optional technical standard will be relaxed if “*it is demonstrated that this would render the development unviable*”, Taylor Wimpey considers that this is the incorrect approach. Similar to our comments on density at §§2.26 and 2.27 above, the Council appears to be seeking to apply the requirements on a blanket basis across all sites with no forethought or adequate consideration of viability and affordability issues.
- 2.30 Given the likely impact of the requirements of policy H2 on both viability and affordability a more robust assessment should be undertaken and robustly evidenced.

Policy H4 - Affordable housing

Q17 - It has been suggested that Policy H4 should be amended so that residential developments at the Fylde-Blackpool periphery should provide financial contributions for affordable housing to be spent in Blackpool. Has this approach been considered by the Council and is it reasonable?

- 2.31 Taylor Wimpey encourages the Council to give due consideration to these issues and would potentially welcome measures to provide greater flexibility to the provision of affordable housing. However, any mechanisms proposed should be fully viability tested and backed up by robust evidence if included in the Plan. For example, any contribution would likely be instead of on-site provision rather than in addition to.

Q18 - Under tenure the policy refers to the provision of starter homes. Is this appropriate in light of the Housing White Paper?

- 2.32 The White Paper should be given full consideration and due weight, with the policy reviewed in light of this. As well as including Starter Homes within the proposed definition of affordable housing [Box 4], the Annex to the White Paper states at **§A.124** that:

“the Government will not introduce a statutory requirement for Starter Homes at the present time”;

and also that Local Authorities should:

“deliver starter homes as part of a mixed package of affordable housing of all tenures.”

- 2.33 Policy H4 will need to be updated to reflect this and any changes proposed will need to be fully viability tested and backed up by robust evidence.

3.0 Conclusions

- 3.1 In order to address the issues detailed above and ensure that its approach to identifying its housing requirement and forward land supply meets the tests of soundness, it is essential that the Council:
- 1 Updates its housing policies to reflect the full objectively assessed need for housing;
 - 2 Allocates sufficient additional sites for new homes across the entire plan period to meet the full objectively assessed need for housing and make the Local Plan sound.
- 3.2 Taylor Wimpey reserves the right to submit further evidence at the EiP hearing sessions to justify its position on the housing requirement and housing land supply.



Appendix 1

5 Year Housing Land Supply Assessment for Fylde - Technical Note 2

5 Year Housing Land Supply Assessment for Fylde Technical Note 2

Taylor Wimpey UK Limited

June 2017

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1.0 Introduction

Purpose

- 1.1 Lichfields has been commissioned by Taylor Wimpey UK limited to prepare this report to assess Fylde Borough Council's latest 5-year housing land supply position [5YHLS]. This Technical Note informs Lichfields' Matter 5 Hearing Statement for the Fylde Local Plan EiP (Stage 2).
- 1.2 On 10th May 2017, Fylde Borough Council [FBC] wrote to the EiP Inspector¹ and provided an updated Housing Land Supply Trajectory base-dated 31st March 2017² and a document entitled '*The Objectively Assessed Housing and Economic Development Needs and the Fylde Local Plan to 2032*' [OAHEN Document]³.
- 1.3 This Report assesses the impact of the updated Housing Land Supply Trajectory and the OAHEN Document on the Council's latest published position on 5YHLS.

Background to the Council's 5YHLS Position

Published HSS (March 2016)

- 1.4 FBC's most recently published full 5YHLS position is set out in its latest Housing Supply Statement [HSS] (base-dated 31st March 2016).
- 1.5 The housing need figure used by FBC in calculating its 5YHLS in the 2016 HSS was **636dpa**. The figure is based upon what the Council considered to be its identified Objectively Assessed Housing Need [OAHN], at **370dpa**, plus an allowance for past under-delivery.
- 1.6 FBC concluded that it had a housing supply figure of **3,052 dwellings** which suggested that the Borough had a **4.8-year** supply of housing land.
- 1.7 The lack of a sufficient 5YHLS was considered in a number of recent appeals, which demonstrated that FBC was unable to demonstrate a 5YHLS, with the level ranging from a low of **3.5-years** to a high of **4.8-years**.

Fylde Local Plan Submission Version (August 2016)

- 1.8 The Submission version of the Fylde Local Plan [Submission Local Plan] [§10.16] set out an annual housing requirement of 370dpa, totalling 7,770 over 21 years, and made provision for a forward supply of 7,891 dwellings over the plan period (2011-2032). The Submission Local Plan also included a housing trajectory as an appendix.

Inspector's Questions (January 2017)

- 1.9 Subsequent to the submission of the Local Plan, the Inspector wrote to FBC on 12th January 2017 to seek clarification on a number of matters. As part of its Local Plan EiP preparations, on 27th January 2017 the Council issued a formal response⁴ to the Inspector's initial questions on the status of its 5YHLS.

¹ Ref: EL5.003e

² Ref: EL5.003g

³ Ref: EL5.003f

⁴ Ref: E1.001b

- 1.10 FBC provided the Inspector with a revised 5-year trajectory for the period 2016/17-2021/22 (base-dated 31st March 2017). This was essentially an updated version of the trajectory that was attached to the March 2016 HSS and included in the Submission Plan.
- 1.11 The updated evidence set out a supply of **3,471 dwellings** against a base housing requirement of 420 dpa and suggested that FBC considered that it would have a 5-year supply upon the (eventual) adoption of the Local Plan (951 dwelling over-supply), equating to **6.9-years** supply.

EiP Stage 1 Hearing Sessions (March 2017)

- 1.12 On 13th March 2017, as part of Taylor Wimpey's response to the Matters, Issues and Questions raised by the Inspector for the Stage 1 EiP hearing sessions, Lichfields made representations on behalf of Taylor Wimpey in respect of *Matter 3 – Housing and Employment Requirements*. The Lichfields Matter 3 Paper included Technical Note 1 which addressed the OAHN and 5YHLS issues in detail.
- 1.13 The Technical Note raised concerns over a number of elements of the Council's calculation, not least the FBC OAHN of 370dpa and the application of the 'Liverpool' rather than the 'Sedgefield' approach. Lichfields also disagreed with the Council's approach to lead-in times and rates of delivery and the level of supply from some of the sites was optimistic and did not accord with the comments in the Housing White Paper⁵ on the need to secure delivery (e.g. the proposed housing delivery test).
- 1.14 It is not necessary to repeat the contents of that report but in summary Lichfields conclusions were:
- 1 Due to persistent under-delivery over the past 13 years (to 2015/16 monitoring year), a 20% buffer is required and that this should be applied to both the requirement and backlog using the Sedgefield approach. On this basis the Council had:
 - a A 5-year requirement of **3,182 (636dpa)** using an OAHN of **370dpa**; and,
 - b A 5-year requirement of at least **4,142 dwellings (828dpa)** using an OAHN of at least **450dpa**, which Lichfields considered should be used.
 - 2 Following Lichfields' detailed review of all sites included within FBC's latest 5YHLS trajectory⁶, a number of sites which were included within the Council's 5-year supply were considered not to meet the definition of 'deliverable' as set out within the Framework [Footnote 11] and should be discounted completely.
 - 3 Lichfields demonstrated that some sites will not deliver the number of units anticipated by the Council, as correspondence with developers and agents revealed that the Council had over-estimated lead-in times and delivery rates.
 - 4 On this basis Lichfields considered that:
 - a The Council's realistic position in terms of a 5YHLS was **2,903** dwellings, a reduction of **568 dwellings** from FBC's claimed supply; and,
 - b The Council's realistic 5YHLS position was **3.6-years**.
- 1.15 On 22nd March 2017, prior to the Stage 1 hearings, the Programme Officer sent an email to all Representors to inform them that the Council had provided an Interim Five Year Housing Supply Statement [IHSS] base-dated 28th February 2017 which included an updated Housing Trajectory.⁷

⁵ Fixing our broken housing market – DCLG (2017)

⁶ Base dated 31 March 2017.

⁷ Ref: EL1.008

- 1.16 In the IHSS, the Council claimed a **5.58 year** supply of housing land as shown in Table 1.1. This was based on a supply of 3,479 dwellings against an annualised requirement of 624dpa. The annualised requirement came from an OAHN of 370 with a 20% buffer applied to both the requirement and the backlog and the application of the Sedgfield method.

Table 1.1 - FBC's Interim 5 Year Supply Position - base dated 28th February 2017

OAHN Plan Period Housing Requirement at 28th February 2017		No. of Homes
OAHN plan period housing requirement 2011-2032 (21 years) (370dpa x 21)		7,770
OAHN housing requirement between 1 st April 2011 and 31 st March 2017 (6 x 370dpa)		2,220
Completions between 1 st April 2011 and 31 st March 2017 (6 years)		1,472
Under delivery (shortfall) between 1 st April 2011 and 31 st March 2017 (2,220 – 1,472)		748
Five Year Housing Requirement at 28th February 2017		No. of Homes
Annual Housing Requirement		370
5 year housing requirement and shortfall ((370 x 5) + 748)		2,598
Adjusted 5 year housing requirement, including shortfall and 20% buffer (2,598 + 520)		3,118
Adjusted annual housing requirement for 0-5 year period (3,118 / 5)		624
Five Year Housing Supply at 28th February 2017		No. of Homes
Requirement		
Adjusted 5 year housing requirement, including shortfall and buffer		3,118
Supply		
Existing Supply		3,816
Potential Supply		50
10% allowance for supply not coming forward		387
Total Supply ((3,118 + 50) -387)		3,479
Over/Under Supply 5 year period (Total Supply – Requirement, 3,479-3,118)		362
Equivalent Years Supply 5.58 (3,479 / 624)		

Source: Fylde Council Interim Five Year Supply Statement (March 2017)

- 1.17 FBC also re-iterated, through the IHSS, that the Council intends to use the Liverpool Method rather than the Sedgfield Method of dealing with any backlog upon the adoption of the Local Plan. As previously set out in Taylor Wimpey's representations relating to Matter 3 at the Stage 1 hearings, it is considered that such an approach is fundamentally wrong. Further comments are made at Section 3 in relation to this point.
- 1.18 It is noted that FBC applies a 10% allowance (reduction) for sites not coming forward in the IHSS. Whilst Lichfields agrees in principle with this approach, we note that FBC apply a 10% allowance to all sites, including small sites. Lichfields consider that a 10% reduction on small sites, such as those below 10 dwellings, is not sufficient to reflect the uncertainties with this type of development coming forward and therefore a 10% reduction should be considered a minimum. Further comments are also made in relation to this point at Section 3.

EiP Stage 2 Hearing Sessions

- 1.19 On 10th May 2017, FBC wrote to the EiP Inspector⁸ and provided an updated Housing Land Supply Trajectory base-dated 31st March 2017⁹ and a document entitled '*The Objectively Assessed Housing and Economic Development Needs and the Fylde Local Plan to 2032*' [OAHEN Document]¹⁰.

⁸ Ref: EL5.003e

⁹ Ref: EL5.003g

¹⁰ Ref: EL5.003f

- 1.20 The updated Housing Land Supply Trajectory effectively updates the previous trajectory included in the IHSS, including updating the completions figures for the 2016/17 monitoring year. It should be stressed that FBC's latest paper does not provide an updated calculation of the 5-year supply, in the form set out in Table 1.1; indeed if such a table were included it would show a shortfall in the 5YHLS contrary to the requirements of the Framework [§47 & §49].
- 1.21 The OAHEN Document summarises the latest evidence produced by the Council's independent economic development and planning advisors (Turley and Amion Consulting) to support an OAHN range of between 410dpa and 430dpa. The report concludes that the OAHN should be at the upper end of this range (i.e. **430dpa**).
- 1.22 The OAHEN Document also sets out how the Planning Committee resolved on 8th May 2017 that the Housing Requirement for Fylde Borough to 2032 is 415dpa and that the Local Plan be amended accordingly.
- 1.23 No justification is made for the 415 dpa figure other than that it sits somewhere within the 410dpa – 430dpa range. Lichfields disagrees with the housing requirement of 415dpa and considers the housing requirement should be **at least 430dpa** as the Council's own consultants suggest. Further comments on this point are provided in Section 3.

Impact of latest evidence on FBC's 5YHLS Position

- 1.24 The remainder of this report assesses the impact of the updated Housing Land Supply Trajectory and the housing requirement figures in the OAHEN Document, using the Council's latest published position on 5YHLS in the IHSS.

2.0 **Housing Requirement**

Objectively Assessed Housing Need [OAHN]

2.1 It is noted that FBC's OAHEN document states that:

"The evidence indicates an OAHN of between 410 and 430 dwellings per annum..." [§5.5.1]; and that,

"The full need for housing will be more closely aligned with the upper end of the identified OAHN range." [§5.5.3]

2.2 Despite the OAHEN Document clearly identifying that the housing requirement should be at the upper end of the 410-430dpa range, the Council has resolved to pursue a housing requirement of 415dpa; the midpoint of the range. Lichfields disagrees with this position and considers that a housing requirement of 430dpa should be set in the Local Plan in accordance with the Council's own evidence produced by Turley and Amion.

2.3 Nevertheless, Lichfields has assessed the impact of using both figures (415dpa and 430dpa) on FBC's housing requirement and resultant 5YHLS position.

Backlog and Buffer

Scale of the Backlog

2.4 The Practice Guidance¹¹ states that the relevant test for considering backlog within a 5YHLS assessment is whether the rate of development shows that actual supply fell below planned supply. Planned supply, in this context, will have been the relevant adopted housing requirement for the period against which past supply is being assessed.

2.5 The Practice Guidance also states that:

"...the assessment of a local delivery record is likely to be more robust if a longer term view is taken, since this is likely to take account of the peaks and troughs of the housing market cycle".¹²

2.6 The historic housing requirement contained within the Regional Strategy was for 306dpa for the period of 2003-2021. Table 2.1 sets out the housing completions since 2003 provided within FBC's 2012 SHLAA and updated by the Updated Housing Supply Trajectory.¹³ The figures vary year on year with an annual average of 210 completions to 2015/16. A significant peak was experienced during 2007/08 and 2008/09, which until 2016/17 were the only years over the 14-year assessment period where the relevant target was attained.

¹¹ Practice Guidance - ID: 3-035-20140306

¹² ibid

¹³ Ref: EL5.003g

Table 2.1 - Housing Completions 2003/04 – 2016/17 against a requirement of 415 dpa

Year	No of Completions	Planned Requirement	Shortfall	Accumulated Shortfall
2003/04	142	306	n/a	n/a
2004/05	285	306		
2005/06	130	306		
2006/07	168	306		
2007/08	394	306		
2008/09	305	306		
2009/10	145	306		
2010/11	115	306		
2011/12	140	415	-275	-275
2012/13	162	415	-253	-528
2013/14	234	415	-181	-709
2014/15	230	415	-185	-894
2015/16	317	415	-98	-992
2016/17 ¹⁴	455	415	40	-952
Total	3,222	4,938	-952	-952

Source: Fylde Borough Council Strategic Housing Land Availability Assessment 2012, Five Year Housing Supply Statement base date 31st March 2016 (May 2016) and Updated housing Land Supply Trajectory base dated 31st March 2017

Table 2.2 - Housing Completions 2003/04 – 2016/17 against a requirement of 430 dpa

Year	No of Completions	Planned Requirement	Shortfall	Accumulated Shortfall
2003/04	142	306	n/a	n/a
2004/05	285	306		
2005/06	130	306		
2006/07	168	306		
2007/08	394	306		
2008/09	305	306		
2009/10	145	306		
2010/11	115	306		
2011/12	140	430	-290	-290
2012/13	162	430	-268	-558
2013/14	234	430	-196	-754
2014/15	230	430	-200	-954
2015/16	317	430	-113	-1,067
2016/17 ¹⁵	455	430	25	-1,042
Total	3,222	5,028	-1,042	-1,042

Source: Fylde Borough Council Strategic Housing Land Availability Assessment 2012, Five Year Housing Supply Statement base date 31st March 2016 (May 2016) and Updated housing Land Supply Trajectory base dated 31st March 2017

2.7

The Council has identified an OAHN that relates specifically to the period 2011-2032. In this instance therefore, it is considered that the backlog against the OAHN for 2011/12-2016/17 should be taken into account in the 5YHLS calculation. This is because the housing need has a start point of 2011 which ignores the previous undersupply as there is a re-basing of the housing need in the OAHN. Since 2011/12 the Council has singularly failed to secure the necessary housing supply to meet the needs of its community and this must be addressed, in the 5YHLS, if the overall housing needs are to be addressed by the Local Plan in a robust and urgent manner.

¹⁴ From Updated housing Land Supply Trajectory base dated 31 March 2017

¹⁵ ibid

- 2.8 Lichfields has calculated the backlog/shortfall from the 2011/12 – 2016/17 monitoring years against two OAHN figures (415dpa and 430dpa). A total of 1,538 dwellings were delivered over the past 5 years, against targets of 2,490 and 2,580 respectively, the backlog for this period therefore ranges from **952** to **1,042** dwellings.

Persistent Under Delivery

- 2.9 It is evident from Tables 2.1 & 2.2 that FBC has experienced a persistent period of under-supply and therefore Lichfields considers that FBC's approach of applying a **20% buffer** in line with the requirements of the Framework [§47] is appropriate. This is accepted by the Council.
- 2.10 It should be noted that in the IHSS, the Council applies the 20% buffer to both the OAHN and backlog combined. Lichfields supports this approach as the 20% addition is required as a reflection on the track record of under delivery and this should reflect the totality of the undersupply because it relates to the extent of development required. This approach was supported by the Council in the agreed Statement of Common Ground at the Church Road Inquiry¹⁶ and agreed at the subsequent Dowbridge appeal¹⁷ in 2016.

Treatment of the Backlog

- 2.11 It is a well-established principle, and one with clear precedent, that under delivery against requirements should be addressed within the 5-year period (the 'Sedgefield approach'), rather than being recovered over the lifetime of the plan period. The Practice Guidance states:

“Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the duty to cooperate.”¹⁸

- 2.12 The shortfall accrued represents a backlog of households whose needs have not been met. These needs have not gone away or been met elsewhere. As such, there is a need to address this shortfall as a matter of urgency. To postpone dealing fully with the backlog now, and by taking the 'residual approach' advocated by the Council, would only delay meeting the identified needs of the community for new homes and give rise to social problems. Furthermore, such an approach conflicts with the objective of the Framework¹⁹ to 'boost significantly' the supply of housing. In these circumstances, as a minimum the under-provision since 2011 (952 dwellings or 1,042 dwellings depending on the OAHN applied) should be addressed within the 5-year period.

- 2.13 Further support for this approach comes from the Examination of the Cheshire East Local Plan Strategy and both:
- 1 The Inspector's Interim Views on the Legal Compliance and Soundness of the Cheshire East Local Plan Strategy (6th November 2014); and,
 - 2 The Inspector's 'Further Interim Views On The Additional Evidence Produced By The Council During The Suspension Of The Examination And Its Implications For The Submitted Local Plan Strategy' (14th December 2015).

¹⁶ Land at Blackfield End Farm, Church Road, Warton, PINS Ref: APP/M2325/A/14/2217060 (Report to SoS 30 April 2015)

¹⁷ Land off Dowbridge, Kirkham, PINS Ref: APP/M2325/W/16/3144925, 23 January 2016

¹⁸ Practice Guidance - ID: 3-035-20140306

¹⁹ Framework - §47

- 2.14 Lichfields therefore considers that the backlog should be addressed within the 5-year period and not spread over the plan period. In addition, the 20% buffer figure should be applied to both the requirement and the backlog.
- 2.15 Depending upon whether the Council's housing requirement figure of 415dpa is used, or whether the higher figure of 430dpa is applied, the adjusted 5-year housing requirement would be between **726dpa** and **766dpa** (see Table 2.3 & 2.4).

Table 2.3 - 5-Year Requirement - FBC Approach

	Calculation	Totals
OAHN	415 dpa x 5	2,075
Under Provision (2011-2016)		952
Sub Total	2,075 + 952	3,027
Buffer at 20%	3,027 x 20%	605
Total Requirement	3,027 + 605	3,632
Annual Requirement	3,632 / 5	726

Table 2.4 - 5-Year Requirement – Lichfields Approach

	Calculation	Totals
OAHN	430 dpa x 5	2,150
Under Provision (2011-2016)		1,042
Sub Total	2,150 + 952	3,192
Buffer at 20%	3,192 x 20%	638
Total Requirement	2,192 + 638	3,830
Annual Requirement	3,830 / 5	766

Conclusion

- 2.16 The appropriate plan period for this assessment is 2011-2032. Lichfields has set out the Council's past completion data and consider that a 20% buffer is required due to the presence of persistent under-delivery over the past 14 years.
- 2.17 Using the Council's annual requirement figure and incorporating past under delivery and an appropriate buffer, we conclude that the Council has a 5-year requirement of **3,632 (726dpa annually)**. However, using the higher OAHN figure of 430dpa would lead to a 5 year housing requirement of at least **3,830 dwellings (766dpa annually)**.

3.0 Housing Land Supply

Components of the 5YHLS

3.1 FBC's 5YHLS is made up three main components across several sites:

- 1 Allocations (in the emerging FLP);
- 2 Planning Applications which the Council is minded to approve subject to a S106 agreement; and,
- 3 Planning Application Commitments.

3.2 Several sites within FBC's 5YHLS make a contribution to more than one component as a result of multiple planning permissions, applications or allocations on the same site. To make up the total **3,874 dwellings**, the Council includes:

- 1 **3,489** dwellings from sites of 10 dwellings or more (comprising medium sites of 10-49 dwellings and large sites of 50+ dwellings). This is made up of:
 - a **285** dwellings will be delivered on sites (or parts of larger sites) which are allocated but do not currently have planning permission;
 - b **678** dwellings will be delivered on sites for which the Council is minded to approve permission subject to the signing of a s106 Agreement;
 - c **2,526** dwellings will be delivered on sites with planning permission; and,
- 2 **335** dwellings from small sites (less than 10 dwellings) commitments and minded to approve planning applications²⁰; and,
- 3 An allowance of **50** dwellings from Long Term Empty Homes re-entering the market.

3.3 We note that 911 of the 3,489 dwellings in the Council's 5YHLS trajectory are on sites which the Council consider will make a contribution of 10-49 dwellings.

Allowance for Non-Delivery

Approach

3.4 The Framework²¹ stresses the intention of the Government to significantly boost the supply of housing and advises that only deliverable sites should be included within the 5YHLS. The Practice Guidance²² provides further advice and indicates that deliverable sites for housing could include those that are allocated for housing in the development plan and sites with planning permission (outline or full that have not been implemented) unless there is clear evidence that schemes will not be implemented within 5-years.

3.5 The Lichfields Technical Note 1, submitted with the Matter 3 Statement, raised concerns over the Council's approach to lead-in times and rates of delivery and demonstrated that the level of supply from some of the sites was optimistic and did not accord with the comments in the Housing White Paper on the need to secure delivery (e.g. the proposed housing delivery test).

²⁰ In its response to the Inspector's Initial Questions (Ref: E1.001b) the Council acknowledged that whilst this is listed as an allowance, it is in fact a commitment.

²¹ Framework - §47 - §49 and Footnotes 11 & 12

²² Practice Guidance - ID: 3-031-20140306

- 3.6 The Council's updated Housing Land Supply Trajectory deals with many of the issues raised in this paper. It is not therefore considered appropriate to reiterate these points or urge the EiP Inspector to amend the trajectory to discount specific sites. The Council's approach, in the IHSS, of applying a discount to reflect the uncertainties in the delivery of housing land is considered to be an appropriate approach to adopt, as the known constraints have been largely addressed.

Appropriate Non-Delivery Allowance

- 3.7 Whilst Lichfields agrees in principle with the approach of applying an allowance for non-delivery, there are concerns with FBC application of a 10% allowance to all sites regardless of size.
- 3.8 In Lichfields broad experience of this type of work, smaller sites often experience non-delivery at a proportionately higher rate than larger sites for a multitude of reasons (e.g. individual landowners with no immediate desire or need to see a site delivered, unlike a commercial housebuilder). Therefore, whilst a 10% reduction in relation to large sites over 50 dwellings would seem reasonable, Lichfields consider that a 10% reduction on medium sites (10-49 dwellings) and small sites (1-9 dwellings) is likely to under-estimate the scale of under-delivery.
- 3.9 Table 3.1 & 3.2 show the completions from small and medium sites for each monitoring year since the start of the plan period and the Council's anticipated delivery for such sites within the 5YHLS.

Table 3.1 Completions from Medium Sites (10-49 dwellings) Since Start of Plan Period

Monitoring Year	No of Completions from sites 10-49 dwellings
2011/12	53
2012/13	54
2013/14	41
2014/15	19
2015/16	52
2016/17	107
Annual Average 2011-2017	54
2017/18	284
2018/19	183
2019/20	212
2020/21	117
2021/22	115
Annual Average 2017-2022	182

Source: FBC Updated Housing Land Supply Trajectory (base dated 31 March 2017)

Table 3.2 Completions from Small Sites (1-9 dwellings) Since Start of Plan Period

Monitoring Year	No of Completions from sites 1-9 dwellings
2011/12	9
2012/13	57
2013/14	25
2014/15	35
2015/16	34
2016/17	47
Annual Average 2011-2017	35
2017/18	67
2018/19	67
2019/20	67
2020/21	67
2021/22	67
Annual Average 2017-2022	67

Source: FBC Updated Housing Land Supply Trajectory (base dated 31 March 2017)

- 3.10 With 911 of the 3,489 dwellings in the Council's 5YHLS trajectory on sites of 10-49 dwellings, the annual average delivery expected from medium sites in the 5YHLS by the Council is 182. This is nearly three and a half times the total average annual completions from such sites (54) since the start of the plan period. Likewise, the annual average delivery expected from small sites in the 5YHLS by the Council is 67. This is nearly double the total average annual completions from such sites (35) since the start of the plan period.
- 3.11 Lichfields therefore considers that a discount of, at least, 20% is justified from medium and small sites rather than the Council's 10% discount. This reduction of 182 dwellings from medium sites and 67 from small sites is included in the 5YHLS within our calculations.
- 3.12 It should be noted that even with a 20% reduction, the Council's anticipated trajectory would still see 729 dwellings provided on medium sites and 268 dwellings from small sites within the 5YHLS at an average rate of 146 and 54 completions per year respectively (substantially higher than past rates of development).
- 3.13 It should be noted that whilst a 10% reduction is considered reasonable for larger sites, where a larger site has clear constraints to deliverability, the Council should not simply include the site and make a reduction but should remove or push the site back to later in the 5YHLS trajectory.

4.0 **Balance of Requirement and Supply**

- 4.1 The balance of the housing requirement and supply in Fylde, based on the 5 year requirement set out at Section 2.0 above and the housing supply at Section 3.0, is summarised in Table 4.1.
- 4.2 Set against an OAHN of 415dpa and using the 'Sedgefield' method, the deliverable 5-year supply position is **4.8 years** based on FBC's claimed supply and methodology but just **4.6 years** based on Lichfields methodology.
- 4.3 Set against an OAHN of 430dpa and using the 'Sedgefield' method, the deliverable 5-year supply position is **4.4 years** based on Lichfields methodology.

Table 4.1 – Balance of Housing Requirement & Supply

Housing Requirement 2017-2022		FBC Approach		Lichfields Approach		Lichfields Approach	
Requirement pa			415		415		430
5-year Requirement (2017-2022)		2,075		2,075		2,150	
Backlog (2011-2016)		952		952		1,042	
	Sub Total	3,027	3,027	3,027	3,027	3,192	3,192
Framework Buffer (20%)			605		605		638
Outstanding 5-year Requirement			3,632		3,632		3,830
Residual Annual Requirement	3,632 / 5		726		726		766
Housing Supply 2017-2022							
Large Sites (>50 dwellings)	Allocations	135		135		135	
	Minded to Approve	352		352		352	
	Planning Permission	2,091		2,091		2,091	
		Sub Total	2,578	2,578	2,578	2,578	2,578
	Less Discount (10%)		258		258		258
	Total		2,320		2,320		2,320
Medium Sites (10-49 dwellings)	Allocations	150		150		150	
	Minded to Approve	326		326		326	
	Planning Permission	435		435		435	
		Sub Total	911	911	911	911	911
	Less Discount (10% or 20%)		91		182		182
	Total		820		728		728
Small Sites (<10 dwellings)	Planning Permission	335		335		335	
	Windfall Allowance	0		0		0	
	Empty Homes Allowance	50		50		50	
		Sub Total	385	385	385	385	385
	Less Discount (10% or 20%)		38		77		77
	Total		347		308		308
Total 5-year Supply			3,487		3,356		3,356
Difference (Undersupply expressed as a minus)			-145		-276		-474
5-year Housing Supply (Expressed as Years of Residual Requirement)			4.80		4.62		4.38

5.0 Conclusion

- 5.1 Lichfields has assessed the housing requirement in Section 3.0 of this report and has found that, due to the persistent under-delivery over the past 14 years, a 20% buffer is required. This should be applied to both the requirement and backlog using the Sedgefield approach.
- 5.2 On this basis we have concluded that the Council has a 5-year requirement of 3,632 (726 dpa) using an OAHN of 415 dpa. However Lichfields considers that an OAHN of at least 430 dpa should be used, which gives a 5 year housing requirement of at least **3,830 dwellings (766 dpa)**.
- 5.3 We also have concerns over the Council's approach to accounting for under-delivery. FBC's approach is to apply a 10% reduction to all sites in the 5YHLS trajectory. Whilst Lichfields agrees in principle with the approach of applying a reduction for non-delivery, based on past completions, a reduction of 20% should be applied to small (1-9 dwelling) sites and medium (10-49 dwelling) sites. Even with a 20% reduction, the Council's anticipated completions from small and medium sized sites are still far in excess of the average completions since the start of the plan period.
- 5.4 It is therefore considered that the realistic 5YHLS position based on the 'Sedgefield' approach to applying the 20% Framework buffer and an appropriate OAHN of 430 dpa is **4.4 years**.
- 5.5 Even using the Council's 'best case' scenario (an OAHN of 415 dpa), FBC cannot currently demonstrate a 5 year supply of housing land (4.8 years at best).
- 5.6 In its current form, due to the lack of a 5 year supply of housing land, the Local Plan fails to meet the requirements of the Framework and is unsound. Therefore, the Council must allocate additional sustainable and deliverable sites such as land at Weeton Road, Wesham in the Local Plan.

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