



Fylde Local Plan

SUMMARY OF RESPONSES TO THE EVIDENCE CONSULTATION

3rd August 2017 – 14th September 2017

October 2017

Summary Of Responses To The Evidence Consultation 3rd August 2017 – 14th September 2017

This document has been prepared following the consultation carried out between 3rd August 2017 and 14th September 2017 into evidence that had been brought forward by the Council since the Submission of the Fylde Council Local Plan to 2032 to the Secretary of State, and therefore was not considered in the consultation on the Publication Version Local Plan.

The evidence consisted of:

- The Objectively Assessed Housing and Economic Development Needs and the Fylde Local Plan to 2032 (May 2017) incorporating
 - Fylde Addendum 3: Analysis of the OAN in light of the 2014-based SNPP and SNHP (Turley, May 2017)
 - Independent Assessment of the Economic Prospects of Fylde (Amion Consulting, May 2017)
- Fylde Council Five-Year Housing Land Supply Statement, Base Dated 31st March 2017, Examination in Public Edit July 2017
- Settlement Hierarchy Note, July 2017
- Gypsy and Traveller Accommodation Assessment Update

The responses in unedited form have been published on the Council's website, Examination webpage, as documents EL7.003a-g. They have also been provided to the Inspector of the Local Plan Examination.

This report provides a summary of the points made in the responses and gives a brief response from the Council. The document will be published on the Council's webpage and provided for the Inspector as an Examination document.

The Council has produced an updated calculation to its 5-year housing land supply position which is attached as Appendix 1. Statements to appeals incorporating this calculation are attached as Appendices 2 and 3.

Consultees' names are abbreviated for sake of space; full details of representors are found in the Contents of document EL7.003a.

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Summary of responses and Council response

Consultee	Point raised	Council response
Section 2 and Annex 1: Economic Forecasts, Objectively Assessed Needs and the Housing Requirement Figure		
Selection of the housing requirement figure		
TW Kens Rigby	Using planning judgement to justify housing requirement lower than top end of OAN range is not consistent with Framework requirement to significantly boost housing delivery.	<p>Noted that Taylor Wimpey acknowledge that in certain cases there will be a requirement to make a planning judgement in relation to balancing housing needs and employment growth. The OAN is 410 to 430.</p> <p>The Government's current consultation relating to the standard methodology for the assessment of housing needs provides a "sense-check" of the Council's position and an indicator of the Government's preferred approach: it therefore can be considered Government guidance. The data tables accompanying the consultation provide an indicative assessment of housing need based on the proposed formula, assessed for each local planning authority. For Fylde, this provides a requirement of 296 dwellings per annum. The Council's housing requirement figure of 415dpa therefore comfortably exceeds the requirement of the consultation standard methodology,</p>
Tony Guest	In each of the last 20 years and more there have been vastly more permissions signed off for houses to be built than the builders have actually built	Comment noted
Tony Guest	Builders have also consistently delivered at slower rates than were quoted when they applied for planning permission	Comment noted
HBF SLG Story Gladman HLM Prospect Wainhomes	<p>415dpa is still too low. By the Council's own evidence a figure at the top end of the range should be pursued. This would require an OAHN of 430dpa</p> <p>Amion concludes that it is "expected...that the likely level of employment growth will be at the upper end of this range"; Turley note that the significant need for affordable housing identified in the SHMA "provides further support for placing greater emphasis on the upper end of the OAN range"</p>	Paragraphs 2.1 to 2.22 of the consultation document and sections 4 to 7 of Annex 1 (pages 34-38 of the consultation document) provide the justification for the housing requirement figure of 415
TW Metacre	As above, concludes the OAN should be 432 dpa	See above
Oyston	Despite 415 being within range 410-430, do not consider robustly justified; the OAHN is insufficient (no figure specified) (justification that follows relates to EZs and affordable housing)	See above

Consultee	Point raised	Council response
Persimmon	Supports the positive uplift in the housing requirement of 51%, to provide a figure of 415 dpa, would also encourage the Council to adopt the higher figure of 430 dpa as identified by the OAN range	Support welcomed. Paragraphs 2.1 to 2.22 of the consultation document and sections 5 to 7 of Annex 1 (pages 35-38 of the consultation document) provide the justification for the housing requirement figure of 415.
HBF Gladman Prospect	Economic and housing strategies should be aligned; economic strategy of the Council includes growth at the two Enterprise Zones; housing requirement should take account of this; based on previous evidence this would require 450dpa.	Section 2.4 of the Amion report (pages 144-145 of the consultation document) provides commentary on the current position in the Blackpool Airport EZ, and section 3.5 (pages 156-157) draws conclusions. It is not considered there is yet sufficient evidence to make a specific adjustment to the baseline employment forecasts. The Council will monitor this position as new evidence emerges.
CPRE	Table 4.3 of Addendum 3 reported that applying alternative labour force assumptions based on OBR evidence relating to the changing economic participation rates of the population shows a much lower level of population growth and therefore lower housing need. 325 dpa could support the upper end of the AMION job growth forecast, in contrast to the recommended OAN range of 410 to 430 dpa.	Addendum 3 recommends an OAN range of 410-430 dpa; however, the assessment of a "robust" position provides a sense check which provides support for the Council's housing requirement of 415 within the given range.
Co Op Greenhurst	Welcomes the increase to 415 dpa but does not endorse figure or methodology	Support welcomed
McT	415 is towards lower end of range, would have been reasonable to select the midpoint 420, this being justified, effective and consistent with national policy	Simply adopting the midpoint is not justified on the basis that it is the midpoint.
SLG Gladman Metacre	Difference between 415 and top of range is minor, only 315 dwellings over the plan period, so why not plan for the top of the range as supported by evidence base and more in line with objective to significantly boost housing supply?	The figure of 415 is considered deliverable, aligns with the Council's objectives and takes a pragmatic approach bearing in mind the volatility and unreliability of employment data on which the OAN range is based
SLG	Significant uplift from the demographic starting point is entirely irrelevant; demographic starting point is exactly that; uplifts and adjustments should be applied to reflect a variety of factors; should be properly applied regardless of the degree of uplift	The uplifts have been properly applied, but the degree of uplift and the reasons they have been applied should be recognised
TW, SLG, HLM Metacre	Borough has consistently under-delivered housing in the past; failed to acknowledge this is result of lack of supply rather than delivery: lack of any housing allocations: 1996-2006 Local Plan (adopted 2003) had no housing allocations; 2004-16 Local Plans Alterations Review adopted 2005) made no allocations, introduced moratorium; Joint Lancashire Structure Plan (in force up to 2008) requirement was 155 dpa, Council actively suppressed supply: housing on sustainable sites refused to avoid exceeding target; RSS requirement of 308 (2008-2011) never had sites allocated to deliver it; 7-year moratorium; reliance on windfall development Tilted balance and emerging Local Plan has led to increase in delivery: previous under-delivery does not justify selection of an OAHN at the lower end of the range	National Policy until 2011 was to plan, monitor and manage, involving housing maxima for districts such as Fylde in order to drive growth towards the largest conurbations in the region. Nevertheless, the figure of 415, with the shortfall from the start of the plan period and buffer, leads to a five-year housing supply requirement of 735 dwellings per annum. Further increases in the requirement could risk leading to an undeliverable plan.

Consultee	Point raised	Council response
Metacre	Many sites in plan granted permission only at appeal: sites HS21, HS29, HSS1, HSS2, HS57, HSS8, HSS9, HSS11, HSS13, HS45, HS40: total 2,685	This can have no bearing on the derivation of the OAN or the housing requirement
Metacre	The provision of sufficient land and sites over time would have resulted in a higher average annual completion and delivery rate than that achieved.	No evidence is provided to support this; it would be impossible to demonstrate that higher delivery would have been achieved
CPRE	<p>Recommended OAN Range of 410 to 430 dpa represents very significant uplift of +58% to 66% from the 2014-based Household Projection.</p> <p>OAN Range is excessive when compared with previous housing requirements:</p> <p>Joint Lancashire Structure Plan 2001-2016 Housing Requirement: 155 dpa</p> <p>North West of England Plan – RSS to 2021 Housing Requirement: 306 dpa</p> <p>Average homes completed in Fylde, 2003 to 2017: 227 dpa (See 5)</p> <p>Average homes completed from start of Plan Period (6 years): 250 dpa</p>	Comment noted. The Council regards the figure of 415 as deliverable.
Tony Guest	Every time the Council overestimates how many houses are needed in its Local Plan, the excess is hung around the neck of the next Local Plan as a shortfall. Not recognized as a mistake made by planners with a long history of serially overestimating the requirement, but a shortfall. The effect is to grossly distort the planning process.	Housing requirements are derived from local evidence, within the wider context of national (and previously regional) policy. The lead times in plan production inevitably result in delayed response when targets are amended by changes in national policy.
CPRE	Latest assessment of housing need recommends an unrealistically high OAN range; accepting an excessive OAN runs the risk of adopting a Local Plan with housing provision and a 5-Year Housing Land Supply which could quickly become out-of-date leaving the Council vulnerable to further costly planning appeals.	The Council considers the housing requirement figure a deliverable target
CPRE	Underlying the projections is uncertainty and complexity: housing need after the chosen demographic projections falls below the range of need to support forecast job growth; wide range of employment forecasts; evidence of worsening market signals; historic volatility in BRES employment data; uncertainty in timing and scale of employment growth at EZs; use of alternative labour force assumptions produces need of only 325 dpa.	Each of these issues is addressed within Addendum 3 and the Amion report. A reasoned judgement for adopting the position taken is included in each case.
CPRE	Recommend that the following decisions are made by the Inspector before the Housing Requirement is finally confirmed: Decision on the Housing OAN; Decision on the Housing Shortfall (undersupply) that needs to be recovered; Decision on the 5-Year Housing Land Supply methodology to be used	Comment noted
CPRE	Requirement of 415 dpa does not account adequately for constraints identified in the report (lack of identified sites of 10-15 dwellings that could deliver in 5 years, environmental and highways constraints) on the site allocation and delivery and, most importantly, maintenance of a robust 5-Year Housing Land Supply.	The Council disagrees with this opinion. The Council has been able to plan for the figure of 415 within these constraints

Consultee	Point raised	Council response
CPRE	Short term constraint on the housing requirement is the numbers required to be delivered to achieve a five-year housing land supply; huge uplift in completions peaking at 914 dpa in 2019/20 (each year's numbers are tabulated: totals are 679, 719, 914, 690 and 708); idea that 914 dwellings could be built is fanciful	The five year supply calculation includes a 20% buffer (i.e. six years supply) to provide for five years delivery. The requirement for delivery is the housing requirement itself, plus a share of the backlog.
HLM	Completions projected to reach 679, 719, 914, 690 and 708 over next 5 years, surely 430 or indeed 440-450 is achievable in this context	The Council has planned to have a five-year housing land supply including a 20% buffer, which is reflected in these figures. To then re-plan for a higher requirement would have implications on the five year requirement in turn, requiring the Council to plan for a still higher level of supply. The representor is advocating a means of assessment that results in an upward spiral.
HLM	Seems that 415 has been worked backwards from available land supply, based on report to 8 th May 2017 Planning Committee. If so, suggests that the plan has not been positively prepared	The Council refutes this comment. The requirement has been selected from within the identified range, based on the Council's judgement of the appropriate level. It was essential to include within the Committee Report information for members concerning the implications for delivery.
Wainhomes	Should the Council consider that supply is constrained such that it is not possible to identify a housing supply which will address the full OAN, they should be seeking to address the shortfall by other means rather than suppressing the full OAN.	The Plan does address the full OAN. The full OAN is 410-430.
Tony Guest	Looking at the Addendum as a whole, it does not use the available evidence in an objective and balanced way. Instead, each area of study is scoured for extreme data points. Maxima and minima are carried forward as averages. Benign or moderating factors are ignored. A long history of over-estimated housing need has not caused anyone to stop and think about previous failures in methodology.	The Council disagrees. The Addendum and its contents has been professionally produced. Contrary to the assertion about extreme data points, the use of moving averages by the Amion report has the effect of smoothing trends and lessening the impact of outliers to produce more reliable projections.

Consultee	Point raised	Council response
Starting points and uplifts		
CPRE	The Starting Point for the OAN is the average 2014-based Household Projection for Fylde (2014-based SNHP) over the Plan Period = 259 households per annum; actual SNHP figures are not reproduced in Addendum 3.	An explanation of how households are converted to dwellings is contained within section 2 of Addendum 3 (page 54 of the consultation document)
Metacre	It is noted that the Addendum 3 report identifies an adjusted headship rate calculation applied to the 2014-based SNHP (similar to that applied to the previous SHMA and two addenda reports). Table 3.2 indicates that using an adjusted headship rate return (effectively an adjustment to ensure younger household formation rates return to the levels evidenced in 2001) results in a base demographic 'starting point' of 283 dpa rather than 274 dpa.	This adjustment has been applied (paragraph 4.46 of Addendum 3) resulting in the 408-432 figure.
Tony Guest	Re market signals: no sign of material market pressure and, in some areas, signs of market slackening. The idea that a random 10% should be added to the OAN on the basis of these data is troubling	The adjustment of 10% is recommended in Addendum 3 based on detailed analysis of all of the criteria required by the PPG. The Council considers it robust.
CAPOW RWPC	A considerable number of future residents are those re-locating for retirement to the Fylde Coast from Scotland, Manchester and East Lancs. Whether it is incumbent on FBC to make housing allocations merely on the basis of desired re-location is questionable.	If the Council failed to plan for sufficient housing to take account of projected migration levels, it does not follow that migration would not happen. Instead, it would create greater scarcity of housing that would affect Fylde residents in need of housing.
CAPOW RWPC	The raising of the retirement age, now accelerated, is likely to reduce the numbers of retirees seeking to move to the Fylde	The Edge modelling assumptions on migration (page 115) explains how age-specific migration rate schedules are applied to a reference population (those areas from where people are likely to move to Fylde) to project internal migration.
HBF	Identifies a minimum demographic need of 351dpa; based upon the use of the 2014 based SNPP and SNHP with adjustments for longer-term migration patterns and improved household formation rates for younger households. This is supported	Support noted
Tony Guest	In considering population growth Addendum 3 starts from the position that ONS/DCLG serve to underestimate the projected housing need for Fylde. This position is undermined by the fact that the ONS declared a UPC (unattributable population change) to correct its previous estimate of Fylde population with a material reduction (890). Addendum 3 assigned this UPC to migration (without any evidence) although the ONS had themselves declared it unattributable.	Paragraphs 3.10 to 3.17 set out how the UPC has been considered within the study. This was considered previously at Stage 1 hearings in relation to The SHMA and Addenda 1 and 2.
Tony Guest	The paper uses a 12 year base to establish population trend growth rather than the recommended 10 year base to include an additional year with high population growth ('for the sake of prudence') Figure 3.1 Addendum 3.	The 12 year base is used for consistency with the earlier iterations of the SHMA, so that the original years' data included remain.

Consultee	Point raised	Council response
Tony Guest	Headship rates for young adults have been assumed to recover to previous levels, despite a long term trend reduction and recent changes to the benefit system that will tend to drive them further down. The effect of this assumption is to increase estimated household formation rates	A positive response has been applied to address evidence of the potential suppression of younger household formation rates consistently represented in recent official projections. This provides a positive response to the assumed reduction in younger household formation within the 2014-based SNHP, which is considered at least partially associated with the worsening affordability and historic undersupply of housing in the borough. This adjustment is methodologically consistent to that used in Addendum 2
Tony Guest	The Addendum assumes a level of inward migration set at the historic maximum rather than the historic average level.	The components of the migration projections are set out in the Edge assumptions (pages 115-116 of the consultation document). The methodology is considered robust.
Tony Guest	The Addendum uses the lowest recorded value of unemployment in the Fylde (3.3%) as its predicted average rather than the actual average or trend figure	The steady-state 2015 unemployment rate provides a robust assumption and is supported.
Tony Guest	By virtue of the above assumptions (and others like market signals), none of which appears well evidenced, the Addendum raises the 'objectively assessed annual housing requirement number' from 274 to in excess of 400. The overriding impression is that every opportunity is taken to raise the housing requirement rather than establish a well evidenced figure	The objectively assessed need is 410-430. The components of the calculation set out in Addendum 3 are all essential elements that need to be included if the housing needs of the population are to be addressed, in line with the Framework.

Consultee	Point raised	Council response
Employment Growth and Impact of Enterprise Zones		
CAPOW RWPC	The OAN is based on jobs growth, which is not supported by evidence (see para 2.9) and there is likely to be job contraction at BAe, the Land Registry and at Axa/Aegon/ReAssure (Axa/Aegon/ReAssure recently indicated moving MORE jobs away from Lytham). We believe it is more appropriate to evaluate future needs based on evidential data and for the plan to be adjusted accordingly	The Council supports the Amion report, which is based on data relating to all jobs within the borough. Consideration of specific employers in isolation does not reflect employment trends across all sectors within the borough.
Metacre	Although uncertainty recognised, assessment of the effects of EZs is critical; failing to do assessment undermines identification of realistic OAN, without assessment, OAN is not justified or effective	The Amion report states that the evidence does not support an allowance for the effect of the EZs. To make a projection notwithstanding this would not be justified
Tony Guest	The purpose of the Enterprise Zones is to create jobs to mitigate job losses; not to contribute to employment growth but to reduce employment loss; failure of the EZs (in particular the Warton EZ) to generate target job growth represents a failure to mitigate job losses. The failure of the Warton EZ alone (a matter of record) has a negative impact of the same order over the plan period as the Amion Report's (unsupported predictions) of job growth.	No allowance is made in the Amion report for the impact of the Warton EZ as it is not considered justified. The job growth predictions are therefore unaffected
Tony Guest	As well as Lancashire EZ target for long-term to create 4-6000 jobs, also had short/medium term goal to create 1200 jobs (split equally across the Samlesbury and Warton); seems dishonest to ignore the failure to achieve short/medium term job goals	The Lancashire EZ is a single entity. Initial infrastructure spending has concentrated activity at Samlesbury.
Tony Guest	2.10 The statement in this paragraph (suggesting that the Enterprise Zones will drive employment growth to the upper end of the imagined employment growth range) is inconsistent with the statement in 2.11. which says their effect should be ignored.	The conclusions are consistent. It would not be justified to incorporate the EZs into the baseline scenario by way of an adjustment. Addition of an adjustment notwithstanding this would be a "Policy-On" intervention and therefore outside the OAN.
Tony Guest	No current plans at the LEP or BAeS to progress the Warton Enterprise Zone	Comment noted.
SLG	Amion notes that no allowance for EZs in OAN as insufficient evidence; but as EZs are "Policy-On", adjustment should be made to OAN when determining housing requirement.	The evidence from Amion states that an allowance would not be justified; therefore the assessment has been made. To make an additional adjustment would be an "act of faith" which the Council considers unwarranted

Consultee	Point raised	Council response
SLG	Although Council states that new activity at Warton could come forward within the next 3 years, Council employ "planning judgement" to decide that the Warton EZ will deliver no new jobs at all in the period to 2032 (a total of 15 years). This is patently absurd. The EZ was designated to stimulate jobs growth, and there are potential plans for activity to come forward in as little as three years. To plan for no jobs growth whatsoever from the EZ is simply not justified and the antithesis of positive planning advocated by national policy.	The timing, scale and additionality of the employment that will be created at Warton is still uncertain with BAE Systems not currently able to provide any specific quantified outputs or a programme of anticipated delivery. The Council therefore considers it a reasonable approach to take account of the previous lack of delivery at Warton and the anticipated off-setting role of any future job creation. Nevertheless, the Council will monitor the situation and in any case will review as part of the 5-yearly review process.
Prospect HBF	Positively prepared plan which seeks to effectively align housing and economic growth should take the full development potential of EZs into account. At the very least the plan should include a trigger mechanism for a plan review once the delivery on these sites is known, as identified by the Council's own evidence.	The Council will monitor the situation as part of the Council's Monitoring Framework. Review will take place in any case through the 5-year review process.
SLG Oyston	Council concludes Blackpool Airport EZ subject to uncertainty, no additional job growth factored in; this is unjustified: Blackpool Council recently purchased the airport, previously purchased 27 acres, both in order to stimulate the EZ; producing masterplan to deliver	The Amion report states that the evidence does not support an allowance for the effect of the EZs. To make a projection notwithstanding this would not be justified
SLG	Council have two alternatives. The housing target can be increased to reflect economic activity from the EZs; or, the Council can commit to an early review of the plan once more details about the EZs are known; clear preference for the former approach, as that is the best way of providing certainty for both residents and developers – one of the key objectives of the plan-led system.	The Council will monitor the situation as part of the Council's Monitoring Framework. Review will take place in any case through the 5-year review process.
SLG	Council recognise that considerable weight should be afforded to employment growth at EZs over plan period, but no account whatsoever is made of the EZs in the housing target because of uncertainty of the precise timing and quantum of job creation. This approach is not consistent with national policy, is not justified by the evidence and will not be effective	The Amion report states that the evidence does not support an allowance for the effect of the EZs. To make a projection notwithstanding this would not be justified
Kens	Monitoring as a means of accounting for employment growth at EZs will mean Council is always playing catch-up with actual need.	The Council disagrees with this opinion. Monitoring, and indeed the 5-yearly review, will allow projections to be made when there is a basis to do so, and provide the Council with evidence to respond accordingly. Making a projection before evidence is available would be incorporating notional employment growth into a current housing requirement for implementation and could not be justified.
Fred Moor	"purpose of these uplifts clearly being to support a positive level of employment growth in Fylde" reveals this to be a desire, not evidence, this is driven by Vision which is desire, not evidence	Purpose of planning is to support positive outcomes

Consultee	Point raised	Council response
Liz Oades	Evidence shows that BAe and other large employers are contracting and job creation in Fylde is modest. I therefore contend that as housing growth is predicated on job growth then the number of houses is far too high	Addendum 3 produces an OAN range based on all components of the need for housing, of which employment change across all sectors is one component. The recent news regarding BAE lends support for the Council's selection of 415 as the housing requirement within the range.
HLM, TW	Disagree that EZs represent a “policy-on” position; not a policy imposed through the Local Plan, it is national policy formally in place, should be part of baseline assessment	The previous AECOM report treated the EZs as a “Policy-On” position. The Amion report states in Section 3.5 that ‘There remains though a high degree of uncertainty in terms of the timing, scale and additionality of new employment at the Enterprise Zones, including the extent to which it will be offsetting potential job losses... on balance, given the uncertainties, it is not considered there is yet sufficient evidence to make a specific adjustment to the baseline employment forecasts presented ... This position should be monitored and updated as new evidence emerges’. Making an adjustment would therefore be applying a “Policy-On” position.
HLM	In planning for a lower housing requirement, the Council are actually applying a ‘policy on’ position by seeking to increase the proportion of inward commuting	The Council is not planning for a lower housing requirement. The Council is planning for the delivery housing to meet its OAN.
Wainhomes	Risk of not making provision for EZ growth would be increase in commuting; pressure on available housing supply will exacerbate the issue of affordability of housing, which is acknowledged to “remain and indeed continues to worsen”. Risk at upper end of OAN, will be insufficient housing delivered to support the labour force growth needed for economic development.	The Amion report states that the evidence does not support an allowance for the effect of the EZs. To make a projection notwithstanding this would not be justified
TW	Amion report says there is not sufficient evidence to include allowance for additional employment growth from the EZs, therefore it is not necessary for Council to make a “planning judgement” regarding EZs as they are not factored into the model	A planning judgement is required as to the quantum of future jobs growth within the forecast ranges. Regard should be had to the effect of applying alternative labour force assumptions, which would reduce housing need to 325 dpa.
TW	The upper and lower figures of employment change presented at Table 5.1 of the Amion report are simply different ways of projecting forward the average of the three forecasts i.e. they have nothing to do with policy choices	The upper and lower figures (55-91) have been used to model housing growth needed to support this level of job growth (para 4.46 onwards of Addendum 3).
TW	The higher figure in Table 5.1 of the Amion report (based on the yearly average of the three forecast data sets) is still below the growth in employment seen over some years within Fylde	This is acknowledged (in fact this is a quote from the report itself). Employment data is by its very nature volatile. The Amion report reaches its conclusions notwithstanding this fact.
TW	The level of growth suggested by the yearly average of the three forecast datasets is more reflective of recent historic trends and therefore allows for flexibility	In this context recent means very recent.

Consultee	Point raised	Council response
Metacre	OAN range 408-432 fails to take account of published and committed investment plans of LEP in EZs, operational, Blackpool EZ created 450 new jobs in first year of operation with 28 new companies (in total 200 businesses occupied space employing 1,500 people).	The Amion Report considers the effect of the EZs insofar as they will affect overall employment growth in Fylde. The Blackpool Airport EZ is an existing business park, of which a substantial part is located within Blackpool and all of which adjoins the main urban area of Blackpool. The Blackpool Airport EZ is intended to contribute principally to the reduction of unemployment in Blackpool
Metacre	Chilmark study calculates range of +41 to +79 jobs per annum in 2 EZs, above the base 91 jpa set out in the Independent Economic Assessment	See above
HBF	AECOM analysis in employment Land Review 140 jobs per annum still valid; whilst acknowledged "policy-on", would accord with alignment of housing and employment strategies.	The Council considers such a Policy-On position highly aspirational and this is not a sufficient basis for incorporating it into the housing requirement.
CPRE	Agree with Council's identification of uncertainty, notes disparity in projections between forecasting houses	Noted
Metacre	Amion says average of 3 forecasting houses, therefore 91 jobs per annum (1,548 total 2015-32) in a "policy-off" context: reasonable approach	The Amion report suggests a range of 55-91
Metacre	Concerned about use of moving averages as an approach: suggests spurious levels of accuracy – averages of averages	Moving averages are intrinsically likely to be more accurate in producing a forecast trend
Tony Guest	Amion report cannot reasonably be called an independent piece of technical evidence	The Council disagrees with this opinion.
Tony Guest	Very clear from the data presented in this report and from previous studies that employment is difficult to predict. The natural inclination seems to be to predict increases in employment. SHMA tells us that between 2001 to 2012 there was a 1.2% fall in employment	Figure 2.1 of the Amion report shows that there has been jobs growth in Fylde since 2012
Tony Guest	Historic record of employment levels in the Borough is not represented in a consistent way; Cambridge, Oxford and BRES broadly agree on historic shape of employment trends but differ significantly on values; Experian records different trends, fails to record significant falls in employment; Experian shows +3000 whilst others show almost no net growth; as Experian fails to accord with BRES trend and fails to reflect historic record, its use leads to flaws in estimation process: should be rejected	The methodologies employed by the Forecasting Houses are explained in Section 3.2 of the Amion report. Section 3.5 of the Amion report concludes "The forecasts from the three forecasting houses are all produced using reputable models, considered to be broadly reasonable and up-to-date and there is no reason to consider that either one is likely to be the most accurate. On this basis, and given that the main focus of this report is on total employment change, it is recommended that an average of the forecasts is used rather than selecting one forecast as the preferred baseline scenario". The Council therefore considers the approach fully justified.

Consultee	Point raised	Council response
Tony Guest	Sectoral analysis: manufacturing has high location quotient, but this is based on existence of airfield at Warton; but BAE moving activity away from Warton to other sites, F35 final assembly and flight testing will be in Italy, so that activity will cease; therefore no basis for applying UK-wide sectoral trends	Table 3.2 of the Amion report shows the forecast change by sector in Fylde for each of the forecast houses: this confirms anticipated job losses from the manufacturing sector.

Consultee	Point raised	Council response
Market signals		
Tony Guest	The market signals show no pressure on housing at either end of the housing market. Summary presentation of the market signals in table 5.8 of Addendum 3 is highly misleading. In summary the market signals are relatively benign both in absolute terms and in comparison to national and regional trends. The decision to use these signals to justify a 10% uplift in the OAN defies all logic. One of the most powerful indicators of housing availability is expressed in rental prices, which are flat/falling; this, along with other benign indicators seems not to have been properly weighted	The adjustment of 10% is recommended in Addendum 3 based on detailed analysis of all of the criteria required by the PPG. The Council considers it robust.
Tony Guest	Local Plan cannot 'significantly boost the delivery of housing' or contribute to 'a significant uplift on the long term historic rate of delivery'. These results are driven solely by the housing market, over which the Council has no influence.	By providing sites, the Local Plan can allow for higher rates of delivery, to the extent that the housing market will fulfil it. Restricting housing land supply would in turn restrict potential delivery
CAPOW RWPC	Evident from new house prices, particularly in some areas, that new development is ADDING to worsening affordability and doing little to ease it. This links back into the needs of the community and not the need for excessive profit.	New development adds to the housing stock, fulfilling demand, lessening price pressure on the existing stock
CAPOW RWPC	Para 5.10 Refers to mean house prices, but this has to be taken with the type and quality of housing in mind. Many properties in Lytham are large and expensive, therefore raising the mean house price considerably. Residents with the finance to move are doing just that as too much development is beginning to affect the desirability of the Fylde. I personally know of two millionaires who have relocated because of both this and health-affecting fracking.	Whilst the Council is keen to encourage millionaires to remain in Fylde, and indeed to relocate to the borough, suppression of development of housing for the wider population of the borough in order to achieve this would not be justified.
HBF TW	Agrees that the market signals indicate a need for an uplift to the demographically based figure. In particular affordability, concealed families and overcrowding all warrant an uplift; agrees that these signals are not as severe as in other authorities and below national averages; 10% uplift is considered appropriate	Support noted
Metacre	Adjustment of 10% supported but should be higher: LPEG guidance suggests that where the affordability ratio is above 5.3 but below 7.0 then a 10% uplift is appropriate, with a 20% uplift where affordability is worse than 7.0; currently 6.5 and has typically been over 7.0; reasonable to deal with this persistent and acute concern by way of a larger upward adjustment of 20%	The adjustment of 10% is recommended in Addendum 3 based on detailed analysis of all of the criteria required by the PPG. The Council considers it robust.
Tony Guest	The figures for house price changes show that price levels in Fylde are relatively high on a regional basis but have followed trends that are similar to its neighbouring boroughs, i.e. reflecting a reduction since 2008 (Fig 5.1 Addendum 3) although, apparently rising in the last couple of years.	Noted

Consultee	Point raised	Council response
Tony Guest	Rents have been flat or fallen slightly, suggesting that accommodation pressures are very low.	Noted
Tony Guest	Table 5.8 presents Fylde as number 3 (out of 6) for lower quartile rent changes (on a scale where 1 is highest market pressure and 6 is lowest). This amounts to misrepresentation since all the regions are recorded in Fig 5.3 as having the same value of 0% increase apart from Preston (4%) and England (5%). So Fylde should be shown as 6 along with the other 0% regions	Noted
Tony Guest	Fylde is shown to have the highest reduction in affordability in Table 5.8 but data (Fig 5.4) shows that it is very random and very sensitive to the trend period selected: 2000 to 2015 the affordability change would be 55% rather than the 82% shown for the period from 2001 to 2016. This would put Fylde at 5 in Table 5.8 rather than 1	Noted
Tony Guest	Within data on overcrowding, homelessness and concealed families, compared to the wider region and nationally Fylde has substantially lower housing pressure markers	Noted

Consultee	Point raised	Council response
Affordable Housing		
Tony Guest	Council has regularly reduced the target proportion of affordable housing to a fraction of the figure required by the Council's then relevant planning policy.	The Framework requires that regard is had to the viability of development, in order that it does not stall. The Council will only allow a smaller proportion than required in the policy where justification is provided in accordance with Policy GD8.
Tony Guest	Need for affordable housing is addressed significantly in Fylde by the private sector; affordable housing backlog (as set out in the SHMA) is very low (4 affordable d.p.a. over 5 years); Government's approved calculation of affordable housing requirement excludes private sector contribution and therefore does not reflect the position in Fylde	The Council agrees that the role of the private sector is important, however need for new affordable housing units remains significant: the position adopted is a pragmatic one which will maximise the delivery of new affordable housing units as far as is achievable
SLG Wainhomes	Housing requirement does not take proper account of the need for affordable housing in the borough; need of 249 dpa derived from addendum 1; Council assume 30% of requirement would be delivered as affordable housing, equating to 124.5 dpa – exactly half affordable housing need: discrepancy is one of the reasons why Turley advocate “placing greater emphasis on the upper end of the OAN range”	The OAN range provided by Addendum 3 is 410-430. This has been produced having regard to the requirement for the consideration of further adjustment relating to affordable housing.
SLG	Correct process for incorporating affordable housing need in the requirement is set out in <i>Satnam Millenium v Warrington BC</i> High Court case: requirement is to meet full OAN for market <u>and</u> affordable; “This exercise is (a) having identified the OAN for affordable housing, that should then be considered in the context of its likely delivery as a proportion of mixed market/affordable housing development; an increase in the total housing figure included in the local plan should be considered where it could help deliver the required number of affordable homes; (b) the Local Plan should then meet the OAN for affordable housing, subject only to the constraints referred to in NPPF, paragraphs 14 and 47.” Second limb of (a) not carried out; no assessment of how an increase in market housing beyond the OAN for market housing could enable the OAN for affordable homes to be met; therefore unsound, need to increase requirement or to demonstrate why to do so would be contrary to Framework	Addendum 3 paragraphs 6.39 to 6.47 (pages 97-98 of the consultation document) provides justification for the approach taken. The evidence states that a further upward adjustment is not justified, as it would be doubling of the historic rate of development, but also crucially the OAN range already represents a marked uplift to the concluded demographic projection of need (following adjustments).
Fred Moor	Latest evidence STILL does not provide the number of 'affordable' houses that the evidence demands. The annual 120 to 130 dwelling 'affordable housing' figure being settled on after considering the new evidence has been derived not from the evidence of 'affordable' housing need, but from calculating the number of dwellings Fylde wants to see built to support the illusory level of employment growth it has set out in its vision	The evidence of Addendum 3 states that a further upward adjustment is not justified

Consultee	Point raised	Council response
Fred Moor	The 2013 SHMA said Fylde needed 207 (or 220 based on the 'Fylde system' of calculation) 'affordable' dwellings a year. The 2014 updated modelling increased the overall net annual affordable housing need from 207 a year, to 249 a year which - when reverse engineered - gives a need for a total of what the report describes at Para 6.43 as being "in excess of 800 homes per annum" It is, in fact, 830 dwellings a year (or 1079 a year using the Fylde system of calculation) that need to be built in order to meet Fylde's 'affordable' housing need.	The number of affordable dwellings needed would not increase just because they were delivered by off-site provision. Neither would it result in a requirement for more market houses in order to deliver them. The numbers and proportions remain the same.
Fred Moor	The latest proposal meets neither the 830 (nor the 1079) dwellings a year that are said to be necessary to meet the affordable housing needed in Fylde. Instead - and in an admission of how preposterous these numbers STILL are - a number that is thought to be an acceptable number of overall dwellings has been set, and the proposal suggests that an affordable housing number which is 30% of this, and in the region of 120 to 130 dwellings a year, should be accepted. This number has NOTHING to do with the 'supposed' EVIDENCE of the affordable housing need. It is a number plucked from thin air.	It is not clear whether the respondent supports the delivery of the affordable housing that the Council seeks to deliver, or not
Fred Moor	If 249 is really the affordable housing need, plan must be unsound if it only proposes 130 affordable dpa.	Addendum 3 paragraphs 6.39 to 6.47 (pages 97-98 of the consultation document) provides justification for the approach taken. The evidence states that a further upward adjustment is not justified, as it would be doubling of the historic rate of development, but also crucially the OAN range already represents a marked uplift to the concluded demographic projection of need (following adjustments).
Liz Oades	Disagree with the number of affordable houses shown as being needed; evidence used is, in my opinion, flawed and intentionally used to provide a justification	The Council disagrees with this opinion; the representor has not provided evidence in support of this response.
TW Metacre Oyston	The proposed OAN range of 408 – 432 dpa as set out in Addendum 3 will not meet even half of the annual level of affordable housing needs (the Addendum estimates some 120 – 130 affordable dwellings per annum set against the target need of at least 247 dpa). Rather than simply accepting that the affordable housing need is so acute that it cannot be met in full, the Council should adopt a more positive and proactive approach and allocate additional sites in sustainable locations that can come forward in the short term and provide for a mix of market and affordable housing.	Addendum 3 paragraphs 6.39 to 6.47 (pages 97-98 of the consultation document) provides justification for the approach taken. The evidence states that a further upward adjustment is not justified, as it would be doubling of the historic rate of development, but also crucially the OAN range already represents a marked uplift to the concluded demographic projection of need (following adjustments).

Consultee	Point raised	Council response
Tony Guest	SHMA shows that a greater proportion of the Borough's affordable housing need is met by the private rented sector (renting to tenants in receipt of housing benefit) than is met by social housing providers. The SHMA provides sufficient detail to allow one to amend the affordable housing calculation by including private rented provision. If one assumes the same level of churn in the affordable private rented stock as in the social housing (not an unreasonable assumption) to generate dwellings availability, then the amended calculation shows that rather than there being a shortfall of over 200 affordable homes per year, there is an excess of over 100. There needs to be an explanation of why the Council is putting forward numbers that ignore the private sector contribution.	Privately rented housing does not fall within the definition of affordable housing used in the Framework. The Council has recognised the role of the private sector in reducing pressure on affordable housing need. However, to accord with the Framework, the plan must seek to meet needs for market and affordable housing (as the Framework defines).
Tony Guest	Affordable housing comes at a cost: raises the price of all other open market dwellings through its subsidy mechanism driving more people into the affordable housing sector; failure of the Council to secure from developers the levels of affordable housing contribution set out in planning policies also suggests that the quoted affordable housing need is not viable. This is unsound planning.	The Viability Assessment submitted with the Plan demonstrates that the levels of affordable housing required are viable.
CAPOW RWPC	Affordable housing requirement of 249 could be exaggerated by those who may not be entitled to such housing, being a "want" not a "need" and through multiple applications in Fylde, Blackpool and Wyre; there is little or no homelessness; OAN for market housing should be reduced from 415 accordingly	The affordable housing need was assessed in the 2013 Fylde Coast SHMA, and in Addendum 1. The conclusions are considered robust.

Consultee	Point raised	Council response
Section 3 and Annex 2		
The Council's revisions to methodology and adjustments to delivery rates: general comments		
Story CoOp HBF	Broad agreement to new approach to build-out rates with emphasis on obtaining feedback from site owners/developers; when information not available, assumptions are appropriate in those circumstances	Support noted
Story CoOp	Broad agreement to new approach to lead-in times, reflecting information provided by site/owners/developers where available; where lead-in time is not available from developers, assumed times largely provide a realistic assumption of delivery	Support noted
Story	Lead-in times should consider whether the site has a promoter on board, on a site-by-site basis, as may result in delay	The assumptions used reflect the typical position at each stage of the process of bringing a site forward. Therefore, a site where outline planning permission is granted moves forward; it moves forward again when reserved matters are granted. This issue is therefore already reflected in the assumptions
Story Hollins	For allocated sites to be regarded as commencing in the fifth year as assumed, Council must provide robust evidence that there is a realistic prospect of sites coming forward within this time scale in line with Footnote 11 of the NPPF and PPG	Supporting evidence was previously provided within the Council's Matter 5 MIQ statement, and considered at the Stage 2 hearing sessions.
CoOp	Assumptions used should be reviewed in future years as developments are completed to ensure they remain robust	The Council will review the delivery rates of sites through the Monitoring Framework
Gladman HBF Prospect	Assumption of 2 developers on sites over 300 should be reconsidered	The Council retains this assumption in the methodology for when required; however it has sought to establish the intentions of developers/ site owners on large sites in order to gain a more accurate picture of delivery
HLM	No accounting for any slippage in delivery from sites due to unforeseen circumstances, suggest a blanket 10% reduction as endorsed by S78 appeals	The Council does not support the imposition of a blanket 10% reduction in addition to scrutiny of site delivery.

Consultee	Point raised	Council response
The housing trajectory and allocations for the whole plan period		
Persimmon	Agrees that the specific allocation of sites does provide greater certainty over the deliverability; flexibility regarding additional, as yet unidentified sites should be encouraged and supported too; have reservations regarding the Council's apparent inflexible approach regarding sites which are not currently identified within the 5 year housing land supply; Flexibility needs to be supported, to supplement the identified list of sites, to ensure the Council more than meets the required level of housing development over the plan period	The Council accepts, in a modification proposed to Policy DLF1, that larger windfall sites can and will come forward on appropriate sites.
Metacre Wainhomes	Not sufficient sites to provide the whole plan period requirement	The Council disagrees with this opinion.
SLG Prospect Wainhomes HBF	Disagrees that allocations for plan period gives greater certainty of delivery; plan needs additional housing land to provide contingency/flexibility for slippage/non delivery; LPEG proposed 20% reserve sites; notes other plans have taken this approach e.g Stratford Upon Avon (20%), Cheshire East (7%), St Helens (draft) (mechanism for release of additional sites), Warrington (draft) (5%), Rugby (20%) (additional 1,200 homes); should recognise need to plan for 15-20% of supply not coming forward within the plan period.	The Council disagrees that reserve sites are necessary or practical.
HLM	Last 5 years of the plan period to have only around 50% of requirement according to trajectory, decision to allocate sites for the whole plan period means that there will be insufficient sites to provide for 5-year supply towards the end of the plan period; if Council to retain the approach, should allocate further sites to deliver at the latter part of the plan period	Actual delivery of sites during the course of the plan period will be monitored, and 5-yearly review will ensure that the Council continues to plan for delivery of the requirement
HLM	Propose application of a 5% buffer throughout the plan period	This proposes a circular process: to take the buffer, add it to the requirement, and then recalculate a 5 year requirement. The buffer itself becomes larger, and so on. The Council disagrees with this approach: a buffer means bringing delivery forward from later on. The five-yearly review will deal with the issue of supply further into the future.
HLM	Propose additional allocations as reserve sites, including expansion of existing allocated sites	The Council would consider expansion of existing allocated sites when the plan is next reviewed.
HLM	Alternative is to amend strategic policies to allow flexibility, to allow additional sites to come forward, through a strategic windfall allowance	The plan has sufficient flexibility, without any windfall allowance, which would allow a contest for applicants to submit the quickest.

Consultee	Point raised	Council response
Metacre	If Queensway were only to deliver 60 dpa rather than 100dpa (as was previously the Council's position) and sites with deliverability questions are excluded from the overall plan supply together with the windfall and empty homes allowance, the overall supply for the remaining Plan period drops to 6,250 dwellings. This is substantially below both the residual requirement based on a 432dpa requirement (7,534) and based on the Council's suggested 415dpa requirement (7,177 residual requirement)	The Council does not accept that the significant number of sites referred to, nor a substantial element of the delivery of HSS1 according to the developer's own projections, should be struck out of the plan.
SLG	<p>Concern is the suggestion that land at Queensway, St Annes Kensington Developments is expected to deliver 100 units per annum from 2019/2020 and achieve full delivery (1,150 dwellings) within the plan period; reliant upon evidence presented by Kensington Developments and the expectation that they will deliver units from two outlets running concurrently throughout the plan period; unrealistic and not founded on any evidence which has been tested; the council's own supply methodology states up to 60 dpa forecast from large sites with two separate house-builders; both with separate financial resources, supply chains and labour force to draw upon and accelerate completions. This is not the case here.</p> <p>Kensington Developments are a locally based privately owned developer with resources likely to be commensurate to their scale; turnover of just under £9m; no evidence to suggest that Kensington Developments have delivered a site of this scale and at the rate they are asserting that can be achieved; would assert that an output of 60 dwellings per annum (from 2019/20) would be far more appropriate and realistic. This would result in the St Annes, Queensway delivering 675 dwellings across the plan period (a reduction of 475 dwellings). Owing to the minimal flexibility currently envisaged within the FLP, this reduction alone precipitates the need to identify additional housing allocations to meet the borough's housing requirement.</p>	The Council recognises that the total number of dwellings at the Queensway site is now reduced to 999 in line with the reserved matters applications. However, the delivery rates have been provided in evidence supplied by the developer. The Council does not agree that this evidence should be disregarded in favour of that of a third party.

Consultee	Point raised	Council response
Additional sites: general comments		
HBF SLG Story McT TW Oyston Persimmon Prospect	Whilst sites of less than 15 units could add to the five year supply, so could larger sites. The fact that larger sites would not fully deliver in the five years is largely irrelevant. They would simply assist in providing a greater delivery buffer.	If the Council requires sites that will contribute to its 5 year supply, rather than over the plan period, it needs to ensure that such sites will primarily fulfil that objective.
SLG Kens TW Oyston Hollins Persimmon	Larger sites could deliver more than 15 dwellings within the 5 years	Comment noted
SLG McT TW Oyston Persimmon Hollins	No evidence provided by Council to support statement that further larger sites would threaten the delivery of those allocated, also against national policy objective to boost housing and increase choice	Strategic sites allocated in the plan that have significant infrastructure requirements at the outset are less likely to be brought forward if the market is saturated.
Hollins	The Council did not object to the scheme allowed via appeal 3166394 on the basis that it would destabilise the delivery of the development strategy, despite it being for major development in Newton with Scales. Nor did it object to application 16/1029 for development off Sanderling Way on these grounds	To base refusals specifically on the plan strategy at the stage of Examination that the plan had reached, given the challenges to the strategic policies that remained, could not have been supported
McT	To be concerned with an excess of development demonstrates that the Council is still exceptionally reluctant to provide a generous housing land supply of deliverable sites in their Local Plan	The Council disagrees with this opinion. The Council has allocated housing sites to deliver 15 years' worth of housing, which represents a positively-prepared plan.
Story McT TW Hollins	Additional sites could come forward before year 5: Council should engage with landowners/developers	The Council welcomes engagement with developers
Story	Site information to demonstrate "hurdles" can be overcome was not requested as part of call for sites	The extent of certain issues was not as clear at the time of the call-for-sites in 2015. The acceptability in principle of some sites, or otherwise, has sometimes only become apparent through the application process or plan-level assessment, involving statutory consultees. The Council acknowledges the potential difficulty this poses for developers/landowners but is a reflection of known issues in the borough.
Liz Oades	Developers are land banking; developers are not producing sufficient houses to substantiate arguments for additional sites	Comment noted

Consultee	Point raised	Council response
TW	Delivery later in the plan period from additional sites would not destabilize the development strategy but in fact help to stabilise it; very little headroom in the overall supply of sites for the plan period and therefore additional sites should be identified to provide necessary flexibility	If the Council were to require additional sites that would deliver later in the plan period, it would consider allocations to meet this requirement specifically.
TW Metacre Oyston Hollins	Council's contention that no sites have been put forward with information demonstrating they are deliverable is wrong (refer to own sites)	This is not what the Council has stated. It has stated that no omission sites submitted within Local Plan representations were deliverable sites in accordance with the development strategy and for between 10 and 15 dwellings
Hollins	To demonstrate that no additional deliverable sites are available, the Council should carry out a call for sites	If there had been a need for additional sites at any stage, the Council would decide how to approach the identification of suitable sites
Hollins	Council has not adopted a forensic approach to site delivery of those between 10-100, therefore it is not known whether any of those could be brought forward	Where early delivery is known, the trajectory is amended. The Council encourages applicants to deliver early, and the existing delivery rates reflect those efforts. Further advancement of sites beyond that already known cannot be relied upon without further information.
Hollins	Council refers to brownfield register, but if sites are to go on the register, they should have been allocated	The representor acknowledges that the Council does not place significant weight on this factor
Hollins	Constraint of the requirement to assess and demonstrate no LSE from effect on pink-footed geese does not apply to all potential sites	Although this is the case, identifying that a site is not affected is not straightforward and is often only achievable through the planning application process, or a plan-level screening
Hollins	Constraint of Preston Western Distributor Road delivery is known to be a constraint in Warton and not in Kirkham, on the basis of applications and appeals. The Council must produce evidence if it is to be considered a constraint in all parts of the borough to justify use of Liverpool approach	Not all of the constraints listed apply to all sites
Hollins	Constraint of M55 Junction 4 capacity on sites not yet allocated must be demonstrated by the Council if it is to use it to justify Liverpool approach	Lancashire County Council have consistently stated that there are limits to the amount of development that can be accommodated at Junction 4 of the M55 and the Highways Officer from LCC attended the examination hearings to provide evidence on this and other issues.
Hollins	Constraint of M55 Junction 3 capacity on sites not yet allocated must be demonstrated by the Council if it is to use it to justify Liverpool approach; not used as a refusal reason for the Sanderling Way Wesham site, which demonstrates there is further capacity	Highways England's response to the Local Plan is found in pages 465-469 of SD013b. It is clear that additional works will be required in order to deliver even the committed levels of development, and there is no certainty that further works could be funded; added to that, there were limits to development that could be accommodated in Wyre, which is served by the junction.

Consultee	Point raised	Council response
Tony Guest	Council's statement that previously developed sites are not widespread is not true; total amount of employment land in use in the Borough is progressively reducing. New employment sites are opened each year but a larger amount of land is released from such employment use. This is classic previously developed (or brownfield) land.	Treatment of the Council's supply of employment land as previously-developed land suitable for housing would be poor planning, potentially constricting jobs growth and economic activity in the borough as a whole.
Persimmon	The Council's identification of the vagaries of the housing market and a slowdown in demand, which as it currently stands with a fixed list of sites, could easily result in the Council missing its delivery target of 415 dpa. On this basis, if the Council supported a more flexible approach to additional sites coming forward, which would deliver any number of units, this would help demonstrate the Council is trying all options to meet the 415 dpa, and 5 year housing land supply targets required	The Council will monitor the delivery of sites, through the Monitoring Framework. In the event that housing delivery falters due to an issue with the market generally or specific sites, the Monitoring Framework will set out the action required by the Council to redress the supply issue.

Consultee	Point raised	Council response
Additional sites: specific sites put forward		
Mr Chabba	Land adj Madhuban Cropper Road North would be deliverable for 10 or more dwellings	
SLG	Land at Peel Farm Whitehills	
MWEst	Merlewood Country Park, Little Eccleston, for 20-27 park homes	
Story	Land off Mill Lane Elswick for 50 dwellings	
Co Op	Land off Chain Lane, Staining for 30 dwellings	
HLM	Land between Blackfield End Farm and Clifton House Farm Warton	
Metacre	Land off Sanderling Way Wesham for 68 dwellings	
Oyston	Land off North Houses Lane, St Annes for 500 dwellings	
Hollins	Land off Fleetwood Road, north of Wesham	
Greenhurst	Reallocation of employment site ES1 Queensway St Annes	
Mrs Metcalfe	Kimbark Peel Hill Whitehills	
Prospect	Beech Road Elswick	
Kens	Whitehills Rd Whitehills	
TW	Land North of Weeton Road Wesham	

In the event that the Council required additional sites for inclusion in the plan, these sites would be considered along with others. No detailed assessment or appraisal has been undertaken in response to the representations, but the Council notes the specific cases made for each site within the representations.

Consultee	Point raised	Council response
Five Year Supply Methodology		
CAPOW RWPC	Liverpool method more appropriate as two major sites at Queensway and Whyndyke; using Sedgefield could lead to oversupply and negative equity, effects seen in Ireland, Spain and Madeira.	Comment noted
HBF SLG Story Rigby McT HLM Metacre Prospect Greenhurst	Supports Sedgefield, consistent with PPG, robust evidence required to justify deviation from this method	Comment noted
TW Gladman	The shortfall accrued represents a backlog of households whose needs have not been met. These needs have not gone away or been met elsewhere and as such, there is a need to address this shortfall as a matter of urgency. Council's use of the Liverpool method would therefore seem at odds with that approach, if the intention is to spread past housing delivery failure over a longer period into the future, which offers no guarantee that it will be delivered.	The effect of the backlog is recognised. However, the Liverpool method is a widely recognised and accepted method for assessing the 5-year supply, locally written into recently adopted plans for Blackpool (2015) and Preston (2015). Therefore it is clearly considered a way of dealing with a backlog that is sensible, pragmatic, effective and fully accords with the Framework and PPG.
HBF SLG Story HLM Prospect	Council proposes use of Liverpool approach due to identified slippages on known sites and the precarious five year supply identified in table 1, Annex 2. This appears a somewhat negative approach. A more positive approach would be to identify additional sources of supply which could bolster delivery in the five year period.	The implication within this suggestion is that the Sedgefield method should be adopted to accompany such additional sources of supply. The Council considers that the use of Liverpool is preferred, in order to produce a more effective plan.
Co Op Gladman McT	Liverpool is not commensurate with the objective of boosting the supply of housing, meeting housing needs in full; only serves to artificially inflate the Council's actual housing land supply position.	The Council disagrees with this opinion. The supply of housing is and will be significantly boosted by the plan. The Liverpool method will ensure delivery of the backlog, whilst ensuring that the plan is effective.
Story Hollins	The Council expects to deliver only 78 dwellings more than the total requirement over the plan period. Although the majority of sites may benefit from planning permission, the market can change, permissions can lapse and delivery rates can slow. With less than 1% flexibility in the supply, there is no certainty that the backlog would be met over the plan period. A more positive approach would be to identify additional sources of supply which could bolster delivery in the five year period to ensure the housing shortfall is met.	The Council has allocated sites for the whole plan period; this gives more certainty in delivery of the backlog over that time than the permitted alternative of planning for broad locations for growth, whilst avoiding the imposition of unrealistic delivery targets in order to deliver the backlog within 5 years

Consultee	Point raised	Council response
Co Op	Under the Sedgefield approach, the Council's ability to demonstrate a Five Year Supply is marginal at best (5.1 Years). Therefore, over the course of a monitoring year, it is conceivable that the supply could dip below five years. This is a binary matter; the Council either can or cannot demonstrate a five year supply. However, ongoing reference to the Liverpool method will only serve to distract all stakeholders involved in the Development Management process and should be deleted from the Plan (and its associated evidence base) in its entirety.	The Council disagrees that the Liverpool method should not be referred to.
Co Op	On this basis, it is not agreed that the Plan will be effective at adoption as it may seek to rely on the Liverpool method if supply dips below five years in future years using the Sedgefield method. This only serves to defer the debate as to which methodology is suitable and the matter should be resolved definitively (using Sedgefield) as part of the Local Plan.	The issue should be resolved definitively in favour of the use of Liverpool, as proposed by the Council
McT	Additional sites are required that are deliverable	The Council disagrees. The Council will have a five-year supply at adoption under the Liverpool method, with a supply approximating to five years under Sedgefield.
TW	At the Stage 2 Hearing Sessions the Inspector acknowledged that the Council had failed to justify the use of the Liverpool method and invited the Council to do so. However, the Council has failed to provide any robust evidence as part of the Additional Evidence Document to justify the use of the Liverpool method.	The Council disagrees. The case made by the Council is set out in paragraphs 3.19 to 3.27 of the consultation document. The earlier paragraphs 3.5 – 3.18, in response to the Inspector's questions, further support the case.
TW	Legal advice sought, states: "...the Council cannot use the alleged inability of early delivery as a reason for adopting the Liverpool approach it seeks to advocate contrary to the inspector's clear indication in favour of the orthodox Sedgefield approach."	Paragraphs 3.5 to 3.27 of the consultation document provide further justification as requested by the Inspector
Metacre	It is understood from the Inspector's letter to the Council dated 3/07/17 that the Inspector has already recommended that there is no justifiable basis to apply the Liverpool approach and that the shortfall should be delivered within the first five years of the plan period (Sedgefield approach)	The Inspector's letter does not say that there is no justifiable basis for employing Liverpool. Rather, it asks the Council to respond to supplementary questions in support of its case for Liverpool. The Council's responses are in paragraphs 3.5 to 3.18 and the justification is then summarised in paragraphs 3.19 to 3.27
Hollins	For the purposes of justifying the Liverpool approach, the Council accepts the evidence submitted by Wyre Council (WC) which states that it cannot accommodate all its housing requirement. However, it does not yet accept that it must assist Wyre with its unmet need via the emerging Local Plan.	The Council has referred to Wyre Council's representation, but this does not imply any agreement to its contents or evidence. Wyre Council's position is that it is planning for less than what it considers to be its OAN; therefore by implication Wyre Council considers it is unable to assist Fylde by providing sites to contribute to a five-year supply for Fylde.

Consultee	Point raised	Council response
Hollins	Considered to be a strong housing market in Fylde; further demonstrated by the participation of numerous housebuilders at the EiP; no evidence to demonstrate that the housing market cannot achieve the five year housing requirement if the Sedgefield method were applied.	The Council will have a five-year supply at adoption under the Liverpool method, with a supply approximating to five years under Sedgefield. However, writing the Sedgefield method into the Local Plan poses risks to the effectiveness of the plan should delivery slip for any reason, even though the Local Plan allocates sites for the whole plan period housing requirement.

Consultee	Point raised	Council response
Comments on specific sites in the 5-year supply trajectory		
Joint statement (TW Wainhomes HLM SLG)	<p>HSS1 Queensway St Annes:</p> <p>Discussions at Stage 2 hearings: At least a year of site preparation works was required (potentially more given that there are significant issues with delivering the required link road for which funding had not yet been approved). The funding was based on 30 dwellings per annum over the next 12 years. A general consensus was reached however regarding the start of delivery on the site, which would be pushed back to 2018/19. The Council claimed that the delivery rates it used were based on direct information from the developer (Kensington Developments) however no representatives of the developer were in attendance to confirm this point. The Inspector requested that the Council provide evidence of the anticipated build out rates or of past build rates on other Kensington sites. Position discussed at stage 2 Hearing Sessions: 0, 30, 45, 60, 60; Total 195. July 2017 HSS: 0, 50, 100, 100, 100 Total 350</p> <p>Summary: The Council appears to have taken on board the consensus reached over when delivery will start on the site but is now claiming significantly higher rates of delivery in the July 2017 HSS 5YHLS than the June 2017 HSS 5YHLS without any evidence or justification for doing so.</p>	<p>The Council does not agree that there was a “consensus” that no further changes to delivery rates could be made. The Council did not agree that consideration of actual predicted delivery rates should be limited to those who attended the hearings. The Council subsequently enquired about expected delivery rates from site promoters who had not attended the hearings, and incorporated that evidence on the same basis.</p> <p>The Council disagrees with this opinion. The site owner and developer has submitted evidence by email to the Council of a delivery rate of 50 units in the first year and 100 units in all subsequent years. The Council have amended the delivery rate in the five year supply statement in response to the evidence.</p>
SLG Story	Highly optimistic for a single regional housebuilder; locally based privately owned developer, £9M turnover, with resources likely to be commensurate to their scale; no evidence produced by Council to support Kensington's build-out rates; site at Lytham Quay build out was 21, 46, 35 dwellings in successive years; site at Runnell Farm Blackpool was 35, 43 in successive years; site at Moss House Road, Marton Moss, Blackpool commenced December 2015, 5 under construction, none completed as at April 2017	
Story SLG	anticipate a build out rate of 30dpa to be more realistic; consider a more realistic level of delivery should be identified for this site and would assert that an output of 60 dwellings per annum (from 2019/20) would be far more appropriate and realistic	
Greenhurst	A number of the conditions on the outline either not or partially discharged; likely that access construction July 2018-July 2019, housing commenced July 2019.	
McT	<p>MUS4 Heyhouses Lane, St. Annes</p> <p>Exceptionally optimistic in the completion numbers to be achieved and the speed at which these will be attained. This is particularly pertinent for larger strategic sites that have yet to be started, examples being 2018/19 completions for...Heyhouses Lane, St Annes (MUS4),... It is considered that short term unit numbers and speed/timing of delivery are too optimistic.</p>	<p>The Council disagrees with this opinion. The site has outline planning permission with a signed section 106 agreement. The Council therefore expects the delivery rate to be in accordance with the standard methodology.</p>

Metacre	<p>HS2 Jubilee House</p> <p>The site is an operational business park, the residential permission (13/0001) expired in August 2016 and since the permission the owners have sought planning permission for the erection of a sign displaying the occupants of the offices (ref. 14/0762) and more recently have submitted an application to allow a coffee shop to be open up to members of the public (17/0747). This suggests that the site is not 'available now' and the owner does not intend to seek the residential redevelopment of this site in the near future. The site does not therefore meet the NPPF tests of deliverability and these 20 dwellings should be removed from the supply.</p>	<p>The Council disagrees with this opinion. The Council considers the site to be deliverable</p> <p>The development is a major refurbishment of a "legacy" office building and construction of new buildings to provide a combination of modern office space and 20 apartments. The refurbishment of the building is complete but the remaining parts of the development are to follow. A single planning permission covers all parts of the scheme. The site remains owned by the developer, and there are no obstacles to the apartments coming forward immediately.</p>
Wainhomes	<p>HS3 Ashton Nurseries, Mythop Road, Lytham</p> <p>Outline consent was issued in November 2013 for residential redevelopment of the site. A full application for 12 dwellings was lodged in June 2016, however was withdrawn in May 2017. A resubmission has been made in May 2017 for 12 dwellings and is still to be determined. We do not make a deduction from this site at this stage, however this site will need to be monitored in future.</p>	<p>Comment noted. The Council considers the site to be deliverable</p> <p>The Council resolved to approve the resubmitted application on 26th July 2017 subject to a S106 agreement.</p> <p>The site is available now, and planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers the site to be deliverable. The site is proposed for allocation in the emerging local plan: a barrier to delivery has therefore been removed.</p>
Joint statement (TW Wainhomes HLM SLG)	<p>HS12 Fairways, Heeley Road, St Annes</p> <p>Joint statement: Discussions at Stage 2 hearings: No permission currently exists, only a resolution to grant permission but no Section 106 agreement has been signed. Therefore this site should not be included in the 5YHLS.</p> <p>Summary: The Council has included 20 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.</p> <p>Hollins Greenhurst Metacre</p> <p>The S106 has not been signed for nine years since Planning Committee 30/07/2008, suggests that the likelihood of the application being taken forward and implemented is considered to be low.</p> <p>The Council does not provide evidence to demonstrate that a further application will be submitted, nor does it confirm what the proposals will be. There is significant uncertainty regarding the development of this site.</p> <p>Therefore, we recommend removing the site from the deliverable five year supply (subtract 20 units)</p> <p>A site visit confirms the site is still in use for car sales.</p>	<p>The Council disagrees</p> <p>The Council does not agree that consensus was reached. The Council maintained its position that the site is deliverable.</p> <p>The Council disagrees. The site is available now, and planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers the site to be deliverable, and upon visual inspection demolition and site clearance work is currently taking place (October 2017). The site is proposed for allocation in the emerging local plan: a barrier to delivery has therefore been removed.</p> <p>Mistaken identity</p>

<p>Joint statement (TW Wainhomes HLM SLG)</p> <p>Hollins Story Metacre Wainhomes Greenhurst</p>	<p>HS13 Kingsway Garage</p> <p>Joint statement: Discussions at Stage 2 hearings: No permission currently exists, only a resolution to grant permission but no Section 106 agreement has been signed. Therefore this site should not be included in the 5YHLS.</p> <p>Summary: The Council has included 30 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.</p> <p>An outline planning application was submitted in September 2011 for development of 30 sheltered apartments on the site, however, the application is undetermined and the site remains within active use as a garage; significant uncertainty regarding the development of this site; cannot be considered deliverable in the context of footnote 11 of the NPPF</p>	<p>The Council disagrees.</p> <p>The Council does not agree that consensus was reached. The Council maintained its position that the site is deliverable.</p> <p>The property is for sale as at 11/10/2017 "reduced for quick sale". The lease on the garage business expires 17th January 2018. The site is available, and planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers the site to be deliverable. The site is proposed for allocation in the emerging local plan: a barrier to delivery has therefore been removed.</p>
<p>Joint statement (TW Wainhomes HLM SLG)</p> <p>Hollins Greenhurst Wainhomes</p>	<p>HS14 Axa, Lytham</p> <p>Discussions at Stage 2 hearings: No permission currently exists, only a resolution to grant permission but no Section 106 agreement has been signed. Therefore this site should not be included in the 5YHLS.</p> <p>Summary: The Council has included 45 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.</p> <p>The developer has undertaken community consultation proposing C2 use of the site. The Council has not provided any further evidence; significant level of uncertainty regarding the development of this site</p>	<p>The Council disagrees.</p> <p>The Council does not agree that consensus was reached. The Council maintained its position that the site is deliverable.</p> <p>The Council has received planning application 17/0738 which provides for fully self-contained living accommodation which would not fall within the planning use class C2.</p> <p>Therefore the Council considers the site to be deliverable and has increased the supply to 65 units to reflect changed circumstance since March 2017.</p>
<p>Joint statement (TW Wainhomes HLM SLG)</p>	<p>HS15 West of Ballam Road, Lytham</p> <p>Discussions at Stage 2 hearings: No permission currently exists, only a resolution to grant permission but no Section 106 agreement has been signed. Therefore this site should not be included in the 5YHLS.</p> <p>Summary: The Council has included 9 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.</p>	<p>The Council disagrees.</p> <p>The Council does not agree that consensus was reached. The Council maintained its position that the site is deliverable.</p> <p>Development had commenced under a permission for a smaller number of dwellings(9), but a subsequent application has been approved for 12; however, it is the 12 unit scheme which is being implemented. The site is clearly deliverable, as it is being delivered.</p>

Wainhomes	HS61 Land at Roseacre, Wildings Lane, St Annes Planning permission was minded for approval at planning committee in November 2016, subject to revised pedestrian access, the withdrawal of objections from Blackpool airport and completion of a S106. At the present time this permission is yet to be issued. Given the outstanding matters to resolve and in the absence of a planning permission, we do not make a deduction from this site at this stage, however further information should be required prior to the Examination.	Comment noted. The Council considers the site to be deliverable. The finalisation of the S106 and the granting of planning permission are expected imminently.
Wainhomes Greenhurst	HS65 Dalmeny Hotel The site has been discounted on the grounds that the S106 contribution taken to Planning Committee in March 2017 has not been signed. A £300,000 contribution to affordable housing off-site was required and has been identified by the applicant as rendering the development unviable. It is considered that there are viability issues on site. This application was withdrawn 04/09/17. We discount 34.	The application has since been withdrawn. Therefore the Council considers the site to no longer be deliverable and to reflect this changed circumstance since March 2017 the supply should be amended accordingly.
Joint statement (TW Wainhomes HLM SLG)	HSS4 Coastal Dunes Discussions at Stage 2 hearings: To reflect advice of developer/agent, delivery rates should be adjusted to 45 dwellings per year with delivery starting in Q4 2017/18 (i.e. ¼ of a year's delivery in 2017/18). June 2017 HSS 30 60 60 60 60 Total 270. Consensus reached at stage 2 Hearing Sessions 11 45 45 45 45 Total 191 July 2017 HSS 30 45 45 45 45 Total 210 Summary: The Council has included 19 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings and has provided no evidence that the developer has indicated an earlier start to deliveries.	The site owner and developer submitted evidence by email to the Council that whilst both northern and southern phases are running they expect to be at 60dpa across both sites (30 each). Following that however the Council would expect the annual completions to be nearer 45 dpa. The Council amended the delivery rate in the five year supply statement May 2017 edit, directly in response to the evidence. No contradiction to the Council's position from the developer Persimmon (see below)
Story	Will deliver only 8 dwellings in first year, remove 22 dwellings	
Greenhurst	The Phase 1 reserved matters permission was for 73 dwellings, not 76. Remove 3 dwellings	Agreed. The supply has been adjusted accordingly
Persimmon	Persimmon Homes notes the Council's statement that the 5 year housing land supply statement and the housing trajectory have been updated to reflect factual information regarding delivery rates	Comment noted

Hollins Wainhomes Greenhurst	HSS6 Land at Lytham St. Annes Way, Whitehills The Council does not reference any applications in support of the inclusion of this site; no site specific evidence; currently occupied by two semi-detached residential properties and associated businesses that are in active use; should be removed from the 5 year housing land supply	The Council disagrees with this opinion. The site is available now, and planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers the site to be deliverable. The site is proposed for allocation in the emerging local plan: a barrier to delivery has therefore been removed. The site is the remaining parcel of a larger site. The site is currently for sale, for development (October 2017).
Story	MUS1 Cropper Road East Part of site assumes 30 dwellings in first year of construction; at odds with Council's assumptions, should be reduced to 15.	The Council disagrees. Although the individual sites within MUS1 are shown individually, as there is one developer they are considered together when assessing build-out. The rate shown accords with the information provided by the developer's representative during the hearings
Greenhurst	HS22 Former Clock Garage, Westby Having been validated in December 2015, the reserved matters application is still awaiting a decision with comments and additional information having not been submitted since July 2016; progress on the application has ceased; clearly issues with the application being determined	The Council disagrees with this opinion. The site is available now, and planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers the site to be deliverable. The site is proposed for allocation in the emerging local plan: a barrier to delivery has therefore been removed.
McT Metacre Wainhomes Greenhurst HLM	HSS2 Blackfield End Farm Highly optimistic delivery rates, should be reduced to accord with Councils assumptions as previously, remove 70 units In terms of the trajectory applied to Hallam Land Management's interests in Warton at Blackfield End Farm and Clifton House Farm (as set out in Annex 2/Appendix 3 of the consultation document), we confirm that this is what was agreed at the Examination Hearings, and this is set out below for reference: Blackfield End Farm (360 units total) 0 25 50 50 50 Total (5YS) 175 At Blackfield End Farm, a Reserved Matters application (Ref: 17/0129) went to Committee last week and was delegated to Officers to approve subject to receiving highways comments and agreeing conditions, so we are hopeful of approval within September. Beyond that we are working with Miller Homes to discharge the remaining conditions with a view to starting on site in early 2018, with delivery expected to begin in autumn 2018 (so halfway through year 2) at rates of 50 dpa.	The Council disagrees. The site owner has provided anticipated delivery rates Confirmation noted

<p>Joint statement (TW Wainhomes HLM SLG)</p> <p>Story Wainhomes Greenhurst Metacre</p>	<p>HS27 Oaklands Caravan Park, Warton</p> <p>Discussions at Stage 2 hearings: This site is very unlikely to come forward for housing within the 5 year period as it is an active caravan park. Therefore it should be removed from the 5YHLS.</p> <p>Summary: The Council has included 53 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.</p> <p>Site still operating as a caravan park and is therefore not available now under NPPF footnote 11. No evidence that S106 will be signed since Planning Committee in January 2016 or that a developer is secured to redevelop site for housing, which suggests viability issues. For development to commence then existing residents would need to be relocated. Intentions of landowner are unclear. Remove from 5 year supply</p>	<p>The Council considers that the site to no longer be deliverable and to reflect changed circumstances since March 2017 the supply should be amended accordingly.</p>
<p>Hollins</p>	<p>HSS12 Land East of Warton</p> <p>Has an interest in this site and has told the LPA that it is not deliverable because it is not presently viable. This was also discussed during the Stage 2 Hearing Sessions. Condition 7 of the outline permission for site HSS12 requires that no more than 15% of the approved development could be occupied until the completion and bringing into use of highways works, namely the Preston Western Distributor Road (PWDR); the relocation of the BAE Systems gate; and, works at the Church Road/Lytham Road/Highgate Lane junction as required by the Blackfield End Fam (BEF) approval. During the meeting on 11/08/2017, HSL informed the LPA that an application to vary condition 7 would be submitted and that it would propose an increase in the percentage of development allowed in advance of the highways works to 65%. This would provide a developer with sufficient confidence to move forward with the site under viable terms.</p> <p>The LPA informed HSL that highways evidence would need to be provided to justify this. At the time of writing this RS, the application has not been submitted and highways evidence is being considered. If it is not possible to provide the LPA with sufficient highways evidence to enable them to approve the variation of condition application, the site will not be deliverable. At this time, it should be removed from the 5-year HLS altogether resulting in a loss of 30 dwellings.</p>	<p>The Council encourages the applicant to continue efforts to resolve the issue. The Council will work with the LEP and other stakeholders in support the delivery of the infrastructure to assist with the site being brought forward, including the Preston Western Distributor Road.</p>

HLM	<p>HSS13 Clifton House Farm, Warton</p> <p>In terms of the trajectory applied to Hallam Land Management's interests in Warton at Blackfield End Farm and Clifton House Farm (as set out in Annex 2/Appendix 3 of the consultation document), we confirm that this is what was agreed at the Examination Hearings, and this is set out below for reference:</p> <p>Clifton House Farm (115 units total) 0 0 0 0 15 Total (5YS) 15</p> <p>With regard to the delivery of units at Clifton House Farm, and the 15 units to be delivered in 2021-22 (i.e. within the next 5 years), it should be noted that we have an instruction to submit a s73 application to remove/amend the Grampian condition which allows 15% of the approved homes to be delivered prior to a series of road infrastructure schemes (some of which are outside of our client's control), so this could potentially start delivering a year earlier. However as things stand total 5 year delivery of 15 units is considered realistic.</p>	Confirmation noted
Joint statement (TW Wainhomes HLM SLG) Greenhurst Story Wainhomes	<p>HSS8 The Pastures, Fleetwood Road, Wesham</p> <p>Discussions at Stage 2 hearings: No increase in delivery from this site was discussed and agreed at the Stage 2 hearings. Consensus reached at stage 2 Hearing Sessions: 30 30 30 30 30 Total 150. July 2017 HSS: 39 39 38 38 38 Total 192</p> <p>Summary: The Council has included 42 more dwellings in the July 2017 HSS 5YHLS than the June 2017 HSS 5YHLS but has provided no evidence or justification for doing so.</p> <p>Reduce delivery rates to SHLAA assumptions</p>	<p>The Council does not agree that there was a "consensus" that no further changes to delivery rates could be made. The Council did not agree that consideration of actual predicted delivery rates should be limited to those who attended the hearings. The Council subsequently enquired about expected delivery rates from site promoters who had not attended the hearings, and incorporated that evidence on the same basis.</p> <p>The site owner and developer submitted evidence by email to the Council of a delivery rate of up to 40 units per year. The Council amended the delivery rate in the five year supply statement in the July 2017 edit, directly in response to the evidence. The Council disagrees that the figure should be reduced.</p>
Story	<p>HSS9 Land North of Blackpool Road, Kirkham</p> <p>Housing Trajectory at Appendix 2 of the 2017 5YHLSS suggests that there are 90 dwellings remaining on Story Homes part of the site. As the developer of this site we can confirm that there is in fact 60 dwellings yet to be delivered on the site and therefore, 30 dwellings should be removed from the supply.</p>	<p>Actual delivery according to the developer is running ahead of the rate recorded in completion statistics held by the Council. The Council's recorded delivery of the site, which has reserved matters approval for 117 dwellings, is: 2015/16 – 17, 2016/17 – 10, therefore total at base date completed 27, remaining 90. The Council has recorded 22 completions in the 6 months to 30th September (after the base date) which explains why the developer is able to report greater progress on the site.</p>

Hollins Greenhurst	HS28 Sunnybank Mill, Kirkham No application referenced in support of this site; existing industrial site; Wainhomes judgement requires the Council to provide site specific evidence that site is deliverable. Prior notification for the proposed demolition relates only to Unit 1 which forms part of the wider Sunny Bank Mill allocation proposed by Policy SL4. The mill comprises one large building which is separated into 11 units which fall under at least seven different land ownerships meaning there could be fundamental achievability issues.	The Council disagrees with this opinion. The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers this site to be deliverable. The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed. Part of the site is already being developed
Joint statement (TW Wainhomes HLM SLG) Metacre Hollins Wainhomes Greenhurst	HS30 Pennine View Discussions at Stage 2 hearings: Planning Permission has lapsed and this site should therefore not be included in the 5YHLS. Summary: The Council has included 12 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings. History of unimplemented and expired permissions on the site; no further evidence in support as required by Wainhomes judgement	The Council disagrees. The Council does not agree that consensus was reached. The Council maintained its position that the site is deliverable. The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers this site to be deliverable. Upon visual inspection site clearance has now taken place and the Council has held discussions concerning a revised development scheme. The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.
McT	HS57 Land at Brook Farm, Dowbridge, Kirkham Exceptionally optimistic in the completion numbers to be achieved and the speed at which these will be attained	The Council disagrees with this opinion.
Hollins Wainhomes Greenhurst	HS38 Land Rear of High Meadows, lower Lane, Freckleton No applications quoted in support of site; no additional information as required by Wainhomes judgement, should be removed from 5 year supply	The Council disagrees with this opinion. The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers this site to be deliverable. The Council has held pre-application discussions concerning a proposed development scheme. The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.

Hollins Greenhurst Wainhomes Story	HS66 Quernmore Trading Estate Freckleton Permission was refused in March 2017 for failure to agree a S106; current appeal; no additional information as required by Wainhomes judgement, should be removed from 5 year supply	The Council disagrees with this opinion. Planning permission was refused, however the principle of development was not one of the reasons for refusal. The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable. The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed. The site was omitted in error from previous version of the Housing Land Supply Statement and Housing Trajectory, but this was corrected in the July edit.
Joint statement (TW Wainhomes HLM SLG) Hollins Prospect	Elswick NDP Allocation Discussions at Stage 2 hearings: No increase in delivery from this site was discussed or a consensus reached at the Stage 2 hearings. Summary: The Council has included 35 more dwellings in the July 2017 HSS 5YHLS than the June 2017 HSS 5YHLS but has provided no evidence or justification for doing so. Council confirms that the inclusion of 50 dwellings within the HLS is based solely on additional allocations via the emerging Neighbourhood Plan i.e. it does not relate to the committed small sites; the Council will be able to update the Inspector on committed large sites in Elswick since the base date; remains no timetable for the NDP NDP will not come forward, further sites should be allocated in Elswick e.g. Beech Road	The Council has maintained that 50 homes will be brought forward through the Neighbourhood Plan. It is acknowledged that the Neighbourhood Plan has not been brought forward in line with the expected timescale. Planning permission has since been granted for 24 dwellings at Land off Copp Lane. Further sites have been put forward, notwithstanding that certain applications have been refused. The situation will be reviewed by the Council in the light of the outcomes of the appeals in progress.
Story Hollins Wainhomes Greenhurst	HS41 Thornfield Caravan Park, Staining Allocation in plan but no planning permission. Still an active caravan park, Facebook site shows that bookings still being taken and therefore not available under footnote 11 of the Framework; no up to date evidence from Council: should be removed from 5 year supply.	The Council does not agree with this opinion. The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers this site to be deliverable. The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.

<p>Joint statement (TW Wainhomes HLM SLG)</p> <p>Hollins Wainhomes</p>	<p>HS45 Rear of 54 Bryning Lane Wrea Green</p> <p>Discussions at Stage 2 hearings: No increase in delivery from this site was discussed and agreed at the Stage 2 hearings.</p> <p>Consensus reached at stage 2 Hearing Sessions 0 15 10 0 0 Total 25</p> <p>July 2017 HSS 0 15 21 0 0 Total 36</p> <p>Summary: The Council has included 11 more dwellings in the July 2017 HSS 5YHLS than the June 2017 HSS 5YHLS but has provided no evidence or justification for doing so.</p> <p>A full application for 36 homes remains currently pending; there can be no certainty that the application will be approved and the outline permission has lapsed, no further evidence provided in support of the site; inclusion appears speculative</p> <p>Should be removed from 5YHLS</p>	<p>A planning application for the larger number of dwellings (36) had been received in 2016, but this information had been omitted from the Five Year Housing Land Supply Statement published in May 2017, and that published in June 2017. However it was referred to in the Council's Stage 2 Matter 5 MIQ statement.</p> <p>The Council does not agree that there was a "consensus" at the Stage 2 hearings that the Council was debarred from making corrections to delivery at sites outside those mentioned within the hearings. Evidence of the existence of the new application was, in any case, available.</p> <p>The Council considers the site to be deliverable. Planning application 16/0156 for 36 homes was approved with a signed S106 agreement on 15th August 2017. Application to discharge conditions has been received.</p>
<p>Metacre Hollins Greenhurst</p>	<p>HS47 Land North of North View Farm, Wrea Green</p> <p>Site has a history of unimplemented permissions; no current application; no further evidence in support contrary to Wainhomes judgement; could be numerous reasons why previous application withdrawn</p> <p>Should be removed from 5YHLS (15 dwellings)</p>	<p>The Council does not agree with this opinion.</p> <p>The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable.</p> <p>The Council considers this site to be deliverable.</p> <p>The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.</p>
<p>Joint statement (TW Wainhomes HLM SLG)</p> <p>Greenhurst Wainhomes</p>	<p>HS50 Rowan Close, Clifton</p> <p>Discussions at Stage 2 hearings: No permission currently exists, only a resolution to grant permission but no Section 106 agreement has been signed. Therefore this site should not be included in the 5YHLS.</p> <p>Summary: The Council has included 30 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.</p> <p>The S106 has not been signed since Planning Committee in September 2015, reserved matters are required to be submitted and approved and conditions need to be discharged before the site can be delivered. There are clearly delays with the site alongside potential viability or deliverability issues</p> <p>Should be removed from 5YHLS (30 dwellings)</p>	<p>The Council disagrees.</p> <p>The Council does not agree that consensus was reached. The Council maintained its position that the site is deliverable.</p> <p>The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers this site to be deliverable. The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.</p>

Story Hollins Wainhomes Greenhurst	<p>HS51 Newton Hall</p> <p>Allocated site but no planning permission; active use as farm, recent permission granted for cover for slurry tower; no evidence that landowner intends to bring forward; cannot be available now under footnote 11 of the Framework; agricultural use indicates uncertainty</p> <p>Should be removed from 5YHLS (15 dwellings)</p>	<p>The Council does not agree with this opinion.</p> <p>The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers this site to be deliverable.</p> <p>The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.</p>
Story Hollins Wainhomes Greenhurst	<p>HS52 Cobweb Barn</p> <p>The site forms an allocation within the Local Plan, however, it does not benefit from planning permission; no further evidence provided as required; no applications referred to; inclusion speculative at this stage.</p> <p>Should be removed from 5YHLS</p>	<p>The Council does not agree with this opinion.</p> <p>The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers this site to be deliverable. The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.</p> <p>Since March 2017 the Council has received planning application 17/0595, the number of units and delivery date has been amended to reflect changed circumstance since March 2017.</p>
Story Hollins Metacre Wainhomes Greenhurst	<p>HS53 Singleton Village</p> <p>Council has not provided any robust up-to-date evidence how or where this will be delivered; outline application was withdrawn; no current application; no further evidence; inclusion speculative</p>	<p>The Council agrees.</p> <p>The applicant has withdrawn the application. Therefore the Council considers the site to no longer be deliverable and to reflect changed circumstance since March 2017 the supply should be amended accordingly.</p>

Consultee	Point raised	Council response
Overall Five Year Housing Supply Calculation		
HBF	Although disagrees with the housing requirement, agrees with the calculation method after para 8 (including 20% buffer)	Noted
HBF Prospect	The sources of supply used to identify the five year supply are generally considered acceptable. However caution must be applied to those which do not yet benefit from planning permission, including allocations; considered that a general non-implementation discount is required.	The Council disagrees: the Framework requires a supply of deliverable sites, rather than a list of sites where there is knowledge with absolute certainty of delivery. The Framework does not require a discount to be applied to the supply of deliverable sites.
HBF Story Metacre Prospect Greenhurst	50 homes over 5 years for long-term empty properties re-entering the market is not justified as required by PPG; Council must have an Empty Homes Strategy and present robust evidence; potential for double counting; this element should be deleted	The Council disagrees. This matter has already been considered, and the Council had considered that it had been resolved, at the Examination hearings. Evidence included within the representation from Wainhomes (EL2.006a) demonstrated that at the beginning of the plan period there was a stock of 724 long-term empty properties which could be brought back into occupation, since when there had been an average annual change of -46.75. The Council has a robust approach to dealing with empty homes. The allowance for 10 homes per annum over 5 years is therefore fully justified.
HBF Story Rigby Gladman HLM Prospect Greenhurst	Assumption that all larger sites will deliver as anticipated is unrealistic; recommend a 10% non-implementation allowance be applied to all permissions	The Council disagrees. Larger sites are included on the basis that they are expected to deliver; without this, such sites could not justify inclusion in the supply.
Wainhomes	The document states that as the sites were forensically evaluated at the Examination a 10% non-implementation allowance is no longer applied. However sites which we had understood would fall within such an allowance are now included in the trajectory, hence why the Joint Position Statement has been prepared to deal with not just that issue but other sites. As set out in Appendix 2 of this statement there are other sites which are included in year 5 without any application. Whilst the table in paragraph 14 of Annex 2 suggests such sites will come forward in Year 5 without a non-implementation allowance the 5 year supply is increased without the necessary evidence	Allocated sites were always included within the 5-year trajectory. The sites were evaluated at the Stage 2 hearings, according to the requirements of the Inspector.

Consultee	Point raised	Council response
Greenhurst	Concerned that no “sense check” has been applied by the Council to the delivery rates put forward by site promoters at the examination	The Inspector suggested to the Council during the hearings that the evidence put forward by site promoters would have to be seriously considered, and continued use of assumptions where the information was available would be untenable. The Council has taken this position.
Hollins	HSS does not apply a non-implementation allowance to large sites and seeks to justify this by stating that a forensic approach has been adopted to the delivery of large sites. However, the SoCG for appeal 3166394 confirmed that “the Council has not carried out a forensic evaluation of all Large Sites that have capacity for between 10 and 100 dwellings” and that “the Council has focussed on all strategic sites that have a capacity of more than 100 dwellings” (SoCG, para. 6.1s). This demonstrates that the Council should, at the very least, apply a non-implementation allowance to sites with a capacity of 10 to 100 dwellings	This reference in the SoCG for the Woodlands Close Newton appeal referred to the build-out rates for sites, rather than for whether a site would deliver. The EIP hearing sessions did consider whether each allocated site would deliver, in the level of detail required by the Inspector.
TW	Considers it reasonable to only apply a discount to small sites following the examination of individual large sites	Support noted
TW	Smaller sites often experience non-delivery for a multitude of reasons including but not limited to lapsed permissions (e.g. individual landowners with no immediate desire or need to see a site delivered). A 10% reduction small sites (1-9 dwellings) is likely to under-estimate the scale of under-delivery. Therefore, a minimum 20% discount for non-delivery should be applied to small site commitments; even with a 20% reduction, the Council’s anticipated trajectory would still see 262 dwellings from small sites within the 5YHLS at an average rate of 52 completions per year (substantially higher than past rates of development).	No evidence is provided to support the contention that the 10% allowance is insufficient. The Council considers it robust and appropriate. Relying on data from the Housing Land Availability Schedule, the Council is aware that 61 units were the subject of a lapsed planning permission from 2011 to 2017. To estimate what proportion of implementable planning permissions the 61 represents, the Council has relied on the total number of small site completions and the total number of current small site commitments. Accordingly the 61 units represents approximately 11% of the implementable planning permissions over the corresponding time period. Therefore, in line with the approach of other Local Authorities and in seeking to make a reasonable allowance for small sites not coming forward in the five year period, the Council will apply a 10% discount to all small sites within the supply.
Story	Assumption of 40 dpa from small sites and windfalls in years 4 and 5 is considered reasonable based on previous rates of delivery	Support noted

Consultee	Point raised	Council response
Metacre	There will undoubtedly have been a large number of small windfall sites approved over (the period with no plan in place) which may not necessarily be approved in the context of an adopted Plan. This is particularly the case given the relatively short supply of previously developed land in the Borough and the tightly drawn settlement boundaries. In this context the historical windfall delivery rate is not a robust means of forecasting realistic windfall delivery going forward; without compelling evidence, should be deleted from the supply	Small windfalls are typically not likely to have been identified as available for development before a planning application or pre-application enquiry is received. This is indeed what makes them constitute windfalls. The Council does not agree that the Local Plan to 2032 will make planning permission for windfalls on suitable sites more difficult to obtain. Windfalls are allowed for specifically within the development strategy. The inclusion of a windfall allowance based on historic performance therefore remains a robust assumption.
Hollins	Allowance of 40 dpa for small windfalls is based on 2003/4 to the base date; if the average were taken during the plan period, it would only be 35 dwellings per annum; no evidence on expected future trends, as required; relies solely on historic delivery rates during a time when the Council was largely unable to demonstrate a 5-year HLS	The Council does not agree that planning permission for windfalls on suitable sites will be more difficult to obtain. Windfalls are allowed for specifically within the development strategy. The inclusion of a windfall allowance based on historic performance therefore remains a robust assumption.
TW	Considers that the 327 small site commitments should be spread evenly across the first 5 years (as previously in the June 2017 HSS). This would lead to a projected 66 dwellings from small site commitments per year in the trajectory, which would still be nearly double the plan period average	The Council disagrees with this opinion. Small sites are at least as likely as large sites to come forward in accordance with the delivery assumptions
Greenhurst	5 year supply statement gives 1,538 completions from 2011; Housing Land Availability Schedule states 1,503. Therefore shortfall should be 987	Correct. The Council has adjusted its assessment following the identification of this error, which relates to demolitions and changes of use. The Council has produced an updated calculation to reflect this and other adjustments made which is attached as Appendix 1. Statements to appeals incorporating this calculation are attached as Appendices 2 and 3.

Consultee	Point raised	Council response
Greenhurst	Projected completions over the forthcoming five year period are gross completions. No allowance has been made for demolitions or other losses of dwellings to other uses (eg conversions and changes of use). In order to make the supply more robust and realistic, it is necessary to estimate a likely demolitions allowance to generate a net supply; plan period to date has seen total of 144 losses (27 demolitions and 117 other losses), which equates to an average figure of 24 dpa, therefore recommend allowance of 24 dpa	<p>The Council does not agree with this opinion in relation to understanding and calculating demolitions. Having reviewed the historic completion data the Council agrees that it requires amendment by 35 units. 27 of these units are demolitions, where no replacement dwellings have been proposed, the remaining 8 units are corrections not related to demolitions. The Council agrees to amend the historic delivery by 35 units in-line with the published data in the most up to date Housing Land Availability Schedule. All other demolitions recorded by the representor are the result of an incorrect reading of the data table within the Housing Land Availability Schedule. If these were to be included it would result in 'double counting' as all sites included within the housing land supply are net of any existing dwellings within the application site.</p> <p>The historic demolitions which have been inaccurately recorded by the Council are: 2011/2012: 0; 2012/2013: 0; 2013/2014: 1; 2014/2015: 22; 2015/2016: 2; 2016/2017: 2; Total: 27. Based on this data Council considers it appropriate to make an allowance for demolitions of 5 dwellings per annum.</p> <p>The Council has produced an updated calculation to reflect this and other adjustments made which is attached as Appendix 1. Statements to appeals incorporating this calculation are attached as Appendices 2 and 3.</p>
Story	Have analysed Council's supply, discount 494 dwellings, to provide supply of 3,086 dwellings, then apply non-implementation allowance, conclude supply is 2,850 dwellings	The Council disagrees with the supply figure and the application of a non-implementation allowance to all sites
HLM TW Wainhomes SLG	The Council's claimed 5-year supply position does not accurately reflect the discussions and consensus reached on individual site delivery at the Stage 2 Hearings (which took place on 20th and 21st June). Lichfields have provided a letter (attached at Appendix 1) setting out this consensus in detail, to which ourselves and other parties are undersigned; which concludes that the Council's existing supply should be reduced by at least 306 dwellings (from 3,710 to 3,404).	The Council does not agree that discussions on certain sites led to a "consensus". The developers' representatives expressed views, and the Council expressed its view, which maintained its position that the sites in question were deliverable. The supposed "consensus" also refers to delivery rates on sites. The Council agreed to amend the delivery rates on sites based on information provided by site promoters; but the Council did not agree that should be limited to those who attended the hearings. The Council subsequently enquired about expected delivery rates from site promoters who had not attended the hearings, and incorporated that evidence on the same basis.

Consultee	Point raised	Council response
Metacre	If allowances for 80 windfalls, 50 in Elswick and 50 for long term empty homes discounted, deliverable supply is reduced by 555 dwellings to 3,122 dwellings. Assuming Sedgefield and based on the Council's suggested 415 dpa this would equate to a 4.3yr supply. Based on 432dpa it would equate to a 4 yr supply.	The Council disagrees with the figures used and elements excluded from this calculation.
Metacre	Assuming Sedgefield and based on the Council's suggested 415 dpa this would equate to a 4.3yr supply. Based on 432dpa it would equate to a 4 yr supply.	The Council disagrees with the figures used and elements excluded from this calculation.
Hollins	Have analysed Council's 5 year supply, conclude it should be 3,000 dwellings (page 268 of EL7.003b), equivalent to 4.1 years supply (having applied 5% non-implementation allowance to large sites)	The Council disagrees with the figures used and elements excluded from this calculation.
Story	Provides calculation of 5-year supply based on Council's requirement: 5yr requirement 3,632 (agrees with Council); supply 2,850, equivalent to 3.9 years supply (Tables on EL3.007d pages 980-981); also Liverpool 4.9 years	The Council disagrees with the supply figure incorporated into this calculation
Rigby	Provides calculation of 5-year supply based on Council's requirement: 5yr requirement 3,632 (agrees with Council); supply 3,339, equivalent to 4.7 years supply (this only applies 10% discount, no other changes)	The Council disagrees with the supply figure incorporated into this calculation
TW	Provides calculation of 5-year supply based on Council's requirement: 5yr requirement 3,632 (agrees with Council); supply 3,103, equivalent to 4.3 years supply (Table on EL3.007e page 1190);	The Council disagrees with the supply figure incorporated into this calculation
Story	Provides alternative calculation of 5-year supply based on 430 dpa: 5 yr requirement 3,830 based on same method of calculation (backlog of 1,042); supply 2,850, equivalent to 3.7 years supply (Tables on EL3.007d pages 981-982); also Liverpool 4.8 years	The Council disagrees with the numbers incorporated into this calculation
Rigby	Provides alternative calculation of 5-year supply based on 430 dpa: 5 yr requirement 3,830 based on same method of calculation (backlog of 1,042); supply 3,339, equivalent to 4.4 years supply (this only applies 10% discount, no other changes)	The Council disagrees with the numbers incorporated into this calculation
TW	Provides alternative calculation of 5-year supply based on 430 dpa: 5 yr requirement 3,830 based on same method of calculation (backlog of 1,042); supply 3,103, equivalent to 4.1 years supply (Table on EL3.007e page 1182)	The Council disagrees with the numbers incorporated into this calculation
Metacre	Alternative calculation of 5-year supply based on 430 dpa; even the Council's alleged deliverable supply of 3,677 dwellings would only equate to a 4.7 year supply (180 dwelling shortfall).	The Council disagrees with the housing requirement figure incorporated into this calculation

Consultee	Point raised	Council response
HLM	If a 10% slippage rate is applied to the Council's supply (based on the Sedgefield methodology), the 5-year supply reduces from 3,710 to 3,339 which equates to: 4.60 years based on 415 OAN per annum (shortfall of 293 dwellings), 4.36 years based on 430 OAN per annum (shortfall of 491 dwellings), 4.21 years based on 440 OAN per annum (shortfall of 623 dwellings), 4.08 years based on 450 OAN per annum (shortfall of 755 dwellings), and 3.51 years based on 495 OAN per annum (shortfall of 1,349 dwellings). In short, by not accounting for any slippage, it leaves the plan in a potentially vulnerable position, as just one moderate sized site failing to deliver would render the plan out of date.	The Council disagrees that the incorporation of a "slippage allowance" is appropriate.
Greenhurst	We have undertaken our own assessment of the Council's supply and found there to be 3.4 years supply using the Sedgefield approach and 4.3 years using the Liverpool approach	The Council disagrees with the numbers incorporated into this calculation leading to this conclusion
HBF McT Prospect	On basis of conclusions, Council cannot identify 5-year supply under Sedgefield	The Council disagrees with this calculation
Story Wainhomes HLM	Even based on the Council's own supply figure the 5YHLS position at 5.1 years using the Sedgefield approach is marginal with an oversupply of only 45 dwellings; lack of flexibility in the 5YHLS could result in failure of the Plan shortly after adopted	<p>The Council has produced an updated calculation which is attached as Appendix 1. Statements to appeals incorporating this calculation are attached as Appendices 2 and 3.</p> <p>The Council's approach is not marginal under the Liverpool method (6.2 years supply). The Council recognises and accepts that the 5 year supply is finely balanced under Sedgefield. However, a 5-year housing land supply of 6.2 years under Liverpool and of 4.9 years under Sedgefield (i.e. approximating to 5 years) is likely to satisfy the principal objective of paragraph 47 of the Framework to identify a deliverable supply of housing land; this approach has been endorsed by the Inspector in the appeal decision APP/G2713/A/13/2194376 (Huby, Hambleton). This is particularly likely to be so if the Liverpool method has been endorsed by the Local Plan Examination, on the basis that a supply approximating to 5 years under Sedgefield was in any case deliverable through plan allocations.</p>
Greenhurst	<p>The Council's five year position is so fragile that the overall supply position could be jeopardised by the underperformance of just one questionable site. However, even if the sites came forward as projected (which we question), when the correct shortfall (of 987 dwellings) is factored back into the five year supply calculation, this would reduce the Council's stated five year position to 5.0 years with a surplus of 3 dwellings (ie $(415 \times 5) + 987 = 3,062 \times 1.2 = 3,674$. $3,677 - 3,674 = 3$. $(3,677 \div 3,674) \times 5 = 5.0$ years).</p> <p>The plan has therefore not been positively prepared and there is a high risk that the OAN will not be delivered. Without this inbuilt flexibility from the outset, the plan is at risk of being found immediately out of date by virtue of a lack of a five year supply.</p>	<p>The Council agrees that the corrected shortfall should be 987.</p> <p>The Council has produced an updated calculation to reflect this and other adjustments made which is attached as Appendix 1. Statements to appeals incorporating this calculation are attached as Appendices 2 and 3.</p>

Consultee	Point raised	Council response
HLM	Accept that the 20% buffer should reduce to 5% within the current 5-year period	Comment noted: the current need for the 20% buffer does not reflect any current lack of delivery
TW Greenhurst	At the Woodlands Close Newton appeal, Inspector concluded that the Council could only demonstrate a 4.8 years' supply; Council acknowledged that the 5-year supply statement (July Edit) remained subject to consultation; Council accepted it could only be afforded limited weight.	The Five Year Supply Statement (July edit) remained subject to consultation at that time
TW	Has obtained a legal opinion (pages 1196-1200 of document EL7.003e); based on the legal opinion no material weight can be given to the claim by FBC that it does not need to allocate additional sites and no evidence is provided in the Additional Evidence Document additional documents that justifies the proposition that sites in excess of 15 units would prejudice the development strategy; given that the Council has not sought to identify additional sites, it cannot use the alleged inability of early delivery as a reason for adopting the Liverpool approach.	The legal opinion is based on the premise that "consensus" was reached. The Council disagrees. The developers' representatives expressed views, and the Council expressed its view, which maintained its position that the sites in question were deliverable. The supposed "consensus" also refers to delivery rates on sites. The Council agreed to amend the delivery rates on sites based on information provided by site promoters; but the Council did not agree that should be limited to those who attended the hearings. The Council subsequently enquired about expected delivery rates from site promoters who had not attended the hearings, and incorporated that evidence on the same basis.

Consultee	Point raised	Council response
Settlement Hierarchy		
Warton		
HLM	<p>We agree that no change is required to the current settlement hierarchy or Local Plan based on the new evidence base.</p> <p>We do wish to highlight that Warton previously scored '3' in terms of having an 'urban centre' and '3' for a supermarket under the 'shopping' category in the 2012 assessment.</p> <p>The latest 2016 assessment reduces the urban centre score to '0' and retains the '3' for the supermarket. However, Warton has a centre around the Church Rd/Lytham Rd junction which includes a range of services, which locals call the Village Centre, and the Council have (or are due to) receive significant s106 funds to upgrade the public realm in this area. Indeed, it includes 2 convenience stores, a petrol station, a hardware store, sandwich/coffee shop, fish and chip shop, estate agents, library, village hall and a pub. Elsewhere along Lytham Road, there is also a further convenience store, Subway, hairdressers, an art shop, and a bathrooms/kitchen shop within the settlement.</p> <p>Despite this, other smaller settlements with centres of a similar/lesser size and scale and with less services, such as Clifton, Wrea Green, Elswick, Little Eccleston and Staining, score '2' in the shopping category under 'Rural Centres' (previously defined as 'villages'). Given the range of services found, Warton should be afforded at least the same score in this category resulting in a score 5 in relation to shopping, and 21 overall (with bus services).</p> <p>If bus services are excluded, our position is that Warton should score 18 and should still be defined as a Local Service Centre; still consider Warton is rightfully identified as a Strategic Development Location in the Local Plan; had access to employment opportunities been added to the settlement hierarchy evidence, Warton would clearly generate a much higher score.</p>	<p>Comments noted. The development proposed in Warton and the identification of Warton as a Local Service Centre will provide support for the existing range of facilities, and the development of further appropriate facilities.</p> <p>The Settlement Hierarchy Note has not included review all of the facilities referred to in each settlement, but the designation of Warton as a Local service Centre is considered robust.</p>
Wesham		
TW	Kirkham and Wesham is considered to be a suitable location to which additional balanced and sustainable growth should be directed. In particular, the allocation of land at Weeton Road, Wesham would assist in the delivery of sustainable development within the Borough	Comment noted
St Annes		
Oyston	Noted that the settlement hierarchy set out in Policy S1 remains in the Council's opinion, robustly justified. We have no argument with this position which indeed lends further support to concentrating development in St Annes as the most sustainable settlement	Support for the settlement hierarchy justification is noted.

Consultee	Point raised	Council response
Wrea Green		
Wainhomes	No changes are proposed therefore objection remains	Comment noted
Wainhomes	<p>The position of the Council is:</p> <ul style="list-style-type: none"> • The March 2016 assessment gave Wrea Green a score for bus services of 9. This is calculated from 1 bus an hour serving 9 destinations. • The June 2017 assessment gives Wrea Green a score for bus services of 6. This is calculated from 2 buses an hour serving 4 destinations. <p>Score has reduced yet</p> <ul style="list-style-type: none"> • The frequency of bus services has increased to 2 per hour; • Wrea Green is now served by a half hourly service to both Blackpool and Preston. The previous service was just Blackpool to Little Eccleston. Preston was not served. • The timetable (Appendix 3) shows that the journey times from Wrea Green to Blackpool have reduced considerably. For example:It takes around 27/28 minutes to travel from Wrea Green to Blackpool; The previous bus Route 76 took 1 hour to get to Blackpool. It takes 43 minutes to travel to Preston. The previous bus Route 76 did not serve Preston. <p>(the bus timetables are in document EL7.003f pages 1248-1257)</p> <p>Therefore the bus service has improved in frequency, reduced times and serving the two key destinations in the area. Therefore the position that Wrea Green should now have a score less than it did in March 2016 is clearly not appropriate.</p>	<p>The Council has decided not to include bus services in the settlement hierarchy assessment, due to the cut backs which have affected the whole of Lancashire. However, if the score for Wrea Green increased to 17 for bus services, 1 point is added to Wrea Green's score, giving a score of 2 for buses and a score of 22 overall.</p>
Wainhomes	<p>It is also noted that the update has only addressed Elswick and Wrea Green, therefore when assessing total scores against other settlements a true comparison cannot be made.</p>	<p>It is interesting to note that the additional destinations have only been added to Wrea Green's score, they would also affect the scores for Kirkham, Wesham and Clifton. Wesham is a Local Service Centre.</p>

Consultee	Point raised	Council response
Wainhomes	<p>Table 7 then sets out the total score at March 2016 minus the bus services. This table and the helpful coloured rows show Wrea Green as 7th in the hierarchy out of 19 settlements. The table clearly demonstrates that Wrea Green is in a false position in the settlement hierarchy and should clearly be a Local Service Centre. Therefore the clear evidence is that the bus service has materially improved and that even excluding the bus services, Wrea Green should be a Local Service Centre.</p>	<p>A Local Service Centre is defined in the settlement hierarchy background paper (ED002) as follows:</p> <p>Settlements which provide a more limited range of services to the local community, compared to key service centers – they provide facilities to serve local community needs. They serve their own communities and those in nearby rural settlements with basic services and are well placed to provide for local housing and employment needs.</p> <p>Wrea Green is not a Local service Centre, Wesham and Freckleton, the two local service centres, contain a wider range of services and are more sustainably located adjacent to the larger settlements of Kirkham and Warton.</p> <p>The final paragraph of page 6 of the settlement hierarchy background paper (ED002) describes Wrea Green. It does not have a retail centre with a cluster of shops such as are found at Freckleton and Wesham.</p> <p>Wrea Green has been correctly defined as a Tier 1 Larger Rural settlement.</p>

Consultee	Point raised	Council response
CAPOW RWPC	<p>Need to include evaluations on the proximity of work (NPPF requirement); population alone should not be a standard measure, it needs to be linked to facilities available, public transport, work and infrastructure; any population inadequately so supported should have a reduced score; availability of a suitable level of local jobs, both in number and remuneration compared with local house prices also needs to be considered.</p> <p>It is unclear how points allocations and comparative points allocations between topics were arrived at; no explanation of the relative correlations or hierarchy of "value". For example, one bus service per hour scores the same as 9 and 19 per hour only scores one more point; unclear why, for example, "a "local rural shop" always gets two points or why a Primary School always gets 5 points. Why does a Doctor's surgery only warrant 1 point when an older less mobile population will make more use of that than a Primary School? By the same token why does an Open Space score 5? How were points allocations within this system determined and with what background data are these used? Has this system been proven to be of any real value? Is the assessment over-simplified merely for speed on completion?</p> <p>To allocate 2 points for each rural settlement on the basis that there is only one local shop in any location is not correct. Stainling, Elswick and most certainly Warton and Freckleton have a number of local shops, whereas Wrea Green has one, and with no ability, within the central service area, to add any extra.</p> <p>Total Scoring needs to be reconsidered on the basis of sustainability, comparison of points values, correlation, availability of services, jobs and facilities, location character, potential for flooding, need and road safety to support the CURRENT approval housing population. THEN it could be taken as a basis for the allocation of potential development</p>	The Settlement Hierarchy Background Paper ED002, page 2 section 3 explains that the methodology used is based on the accessibility criteria and scoring used in the former North West of England Plan Regional Strategy to 2021 (RSS). The methodology used has been specifically informed by the criteria for assessing new residential development. The Council considers that the overall methodology is robust and allows for objective differentiation between the settlements.
CAPOW RWPC	Why does not Moss Side with some 100 properties (including Willow Mead Park) and a train station not feature in the Scoring Table on Page 15?	Moss side is not a settlement. Settlements are all areas of Fylde bounded by limits of development. Therefore, it is not included in the settlement hierarchy assessment.
CAPOW RWPC	There are no available Village primary school places and will not be for a decade, according to the Head Teacher. Therefore a current points allocation must be NIL, since more development will cause issues and is no different from the absence of a primary school. LCC Education also indicates existing and long-term over-subscription at this school. All this is with less than half of approved development actually being completed and potential attendees per number of new dwellings, seem low.	The methodology does not assess the capacity of facilities such as schools, it scores for their existence.
CAPOW RWPC	We do not have a library, so that scores NIL.	Wrea Green has a mobile library and therefore receives a score of one, a permanent facility would have scored 2.

Consultee	Point raised	Council response
Elswick		
Residents of Elswick, also GTPC	<p>Endorse the Settlement Hierarchy comments relating to Elswick</p> <p>Village must retain its current status and not be destroyed by Developers and Land Owners.</p> <p>Support for the Tier 2 status of the village</p> <p>Elswick should never have been proposed as a Tier 1 (larger rural settlement) in the Fylde local plan, Fylde Council clearly made a mistake in its original assessment which was based on determining the sustainability of each village by awarding points for amenities such as bus services, shops, leisure facilities, schools etc. Elswick scored very poorly in the assessment and based on its score and size should have been classed as a Tier 2 (small rural settlement) village from the outset. Following the overwhelming objections from the village Fylde Council readily rectified its' mistake by reclassifying the village as Tier 2 in their published submission</p> <p>Withdrawal of the 78 Poulton to St. Anne's bus service in April 2016 has reduced the village services by 50% since Fylde Council designated the village a Tier 2 village</p> <p>Developer's statement that the village bus services have increased is absolute pure fiction</p> <p>The Tier 1 villages in Fylde are all at least 50% bigger than Elswick</p> <p>Tier 1 villages are all on the edge of urban conurbations thus having access to considerably more facilities</p> <p>Elswick is the same size as other Tier 2 Villages such as Clifton and Singleton (460 houses)</p> <p>Elswick is one of the remotest and least sustainable villages in Fylde. It has no school, no health centre or doctors surgery and is six miles from the nearest supermarket.</p> <p>There is no industry or employment of value in Elswick.</p> <p>Elswick is a dormitory village; most people are employed ten miles away in Blackpool or within a wider radius</p> <p>The nearest doctors is in Great Eccleston, there is already considerable pressure on the surgery and currently appointments need to be booked four weeks in advance.</p>	<p>The Council notes the support for the Settlement Hierarchy as set out in Policy S1 of the Plan</p>

Consultee	Point raised	Council response
	<p>There are currently few amenities within the village, only one small village shop and no supermarkets, no primary or secondary schools, and no doctors, no dentist, no post office, no library, no bank</p> <p>There is only one small shop in the village ---all residents have to travel significant distances to buy their general needs.</p> <p>The road networks in and around the village are already over used as they are facilities that were set up to support the traffic of the mid/late 20th century and are falling into disrepair with current usage</p> <p>The village cannot sustain dramatic increases in housing/population that would result in (from?) it being classed as Tier 1</p> <p>Objection also based on the unsuitability of the roads especially the junctions on A585 road.</p> <p>Village roads are B roads and already struggle with the current volume of traffic in and around the village</p> <p>Highways England has issued a warning to Fylde and Wyre that the cumulative effect on surrounding road junctions into and from the village will cause a detrimental effect/safety issue. Wyre responsible for the nearest village Circa>1 mile to Elswick have subsequently rejected additional development of 92 houses due to local road concerns.</p> <p>Public transport would not meet most people's needs regarding work, as people will need to commute</p> <p>I personally have to travel over 10 miles to get to work as there is little employment in this area</p> <p>Objection to further housing being built on Mill Lane and Beech Road, Mill Lane land is a natural flood plain, and has indeed been flooded both this year and last year</p> <p>No safe road access to the Mill Lane planned site</p> <p>The junction of Lodge Lane/Roseacre Road has already been the scene of accidents at the junction; additional traffic will exacerbate this problem</p> <p>There are no plans for additional services (i.e. schools, buses, GP surgeries) to support additional residents. It is increasingly difficult for existing residents to use these services</p> <p>It will increase volumes of traffic onto the main arterial roads in this area; the A585 is already significantly congested with traffic trying to access the M55</p>	

Consultee	Point raised	Council response
	<p>New housing to meet the Council's obligation has already been approved for Great Eccleston, Inskip and Kirkham</p> <p>It has no Health Centre, with the nearest Medical facility being at Great Eccleston, 1.5 miles away & there is no regular bus service between the two sites.</p> <p>Great Eccleston Health Centre is running to almost full capacity & the Surgery is unable to expand. Attempts to relocate and extend the Practice have failed due to lack of available and affordable land. Due to the Surgery's large patient list the waiting time for routine appointments is four to five weeks. The same problem arises with waiting times & trying to register new patients at the nearest Dental Practice in Great Eccleston.</p> <p>Cannot even get a bus direct to Blackpool where lots of the villagers are employed</p> <p>The problems we face accessing the A585 would be unthinkable if the village was to grow as it is going to be even worse with the new developments in Great Eccleston. We are really struggling to access the A585 at Thistleton now so if the village was to grow it would be an accident waiting to happen</p> <p>There are no indoor fitness centres</p> <p>Residents of Elswick have shown no desire to have their village enlarged or re-classified, nor to be provided with the usual amenities of a Tier 1 Village. I understand the request for reclassification comes only from property developers, whose motivation is profit rather than the quality of rural life.</p> <p>Current approved planning applications already increase the size of the village by 12%, therefore Elswick has already done its share</p> <p>Due to reduced bus service a family member is unable to get to work for her 9 am morning shift in Kirkham at a sensible time. Consequently she has had to reduce her working hours.</p> <p>There are no buses at all after 7.30 pm or on Sundays</p> <p>As LCC needs to make savings of £262 million from 2016-21 on top of savings already made, Fylde BC concludes that it is highly unlikely that subsidies for bus services will be reinstated.</p> <p>Recently, our nursery closed down</p> <p>There may be plans to close Bonds ice cream when the owner retires</p>	

Consultee	Point raised	Council response
	<p>Currently on Rightmove there are 24 houses for sale in Elswick, half the size of each of the two development applications appealed; there does not seem to be any interest in these houses - question whether Elswick really does need so many houses</p> <p>Young people attending secondary schools in Poulton, and Fylde College on the outskirts of Poulton, have been especially adversely affected (by the withdrawal of the 78 bus service)</p> <p>Several villagers who don't drive have to get taxis just to get to work</p> <p>There will be a significant impact on the junction between the B5269 (Thistleton Road) and the A585 (Fleetwood Road). As you may be aware from accident statistics this is already a dangerous junction and the imposition of any increase in traffic can only have a negative effect.</p> <p>The March 2012 Strategic Hierarchy Assessment included two bus services for the village. These were the 76, an hourly service between St Anne's and Blackpool, and the 80/82 which provided an hourly service to Preston and Fleetwood. The 76 was rebadged as the 78 in April 2016 and the route reduced to Poulton le Fylde to St Anne's. This failed in February 2017 and the service was withdrawn. I am assured by the Transport officers at the County Council that there are no plans to replace it.</p> <p>Following County Council cuts the 80/82 service has also been drastically reduced. It now runs between Myerscough College and Preston on a two hourly basis. Although a 75a bus has been introduced this also runs at a two hourly frequency between Preston and Fleetwood. This bus operates in tandem with the 80 service, partially restoring the former hourly 80/82 service.</p> <p>Refute the Developers suggestion that Copp School should be included in the Settlement Hierarchy Assessment</p> <p>The nearest primary school is outside the boundary of the village and situated on a busy road, to get to the school means walking along narrow pavements or, what seems to be the most common practice, driving to the school and parking on the road by the school. The practice of driving/parking increases the danger of the road considerably as cars are parked on bends, causing drivers to take to the opposite side of the road in places where visibility is reduced, thus increasing the possibility of a head on collision.</p> <p>The school is 1200 metres from the village along a very busy road which is subject to 40mph limit</p> <p>There is only a single footpath to the school which is just one metre wide along most of its length and that it is dangerous to walk along the said footpath in summer due to overgrown hedges</p>	

Consultee	Point raised	Council response
	<p>The footpath along this road is narrow but at this time of year as the hedgerows fill out, there are stretches of the footpath that are so overgrown that you have to step on the road to pass, not ideal for young children walking to school.</p> <p>Do they expect small children to walk in the road to get to school?</p> <p>This road has a 40mph speed limit but this is seldom adhered to.</p> <p>When we moved to the village both of our children were of primary age. We had to decide whether to move our children from their existing school to Copp School. In the end we decided to leave them where they were and one of the influencing factors was the inaccessible location of Copp School.</p> <p>The problems on Copp Lane are only going to be exacerbated with all of the ongoing building work at the Great Eccleston end of the road. All of the traffic from those new houses wanting to head towards the motorway will be travelling along Copp Lane and through Elswick village centre.</p> <p>I have had to stop going up to Great Eccleston as it was becoming unsafe to walk on the busy road because of the over grown hedges. The pavement is not safe for children or adults.</p> <p>No school exists for children in Elswick. The nearest Primary Schools are in Great Eccleston but they are only two small schools which will see an increase in numbers when the new housing estate around Great Eccleston is built. This will leave no room for the youngsters in Elswick.</p> <p>The road also floods very badly in heavy rain, impassable on foot in places last week.</p> <p>I narrowly missed been hit (<i>sic.</i>) by the wing mirror of a car speeding and overtaking on this road only last month</p>	
EPC	The village scored very poorly in the sustainability assessment for the Borough	Noted
EPC	Village is one of the more rural Fylde villages and unlike Tier 1 villages is not situated close to urban conurbations and therefore suffers from a lack of facilities and amenities	The Council agrees that Elswick is more remotely located than the Tier 1 settlements and is also considerably smaller than the Tier 1 settlements.
EPC	Elswick has no health centre ...the Health Centre is 1.8 miles away, with a 4 to 5 week waiting list and has confirmed that a new GP needs to be appointed to cope with the houses planned/proposed for the area but has no room for expansion and no site for a new centre. Unlike in urban areas it is not possible to simply register with another doctor or visit a walk in centre. The next nearest doctor's surgery is six miles away and the walk in centre is in Blackpool, ten miles distant.	Noted. Wyre Council noted the issue of health infrastructure in Great Eccleston in its response to the Revised Preferred Option Fylde Local Plan (2015)

Consultee	Point raised	Council response
EPC	Since the study was undertaken sustainability of the village has fallen further with the loss of its principal bus service, the closure of the restaurant at Bonds (with the loss of 14 jobs*), the closure of Tiddlywinkles children's nursery (with the loss of a further eight jobs) and the closure of the village fish and chip/Chinese takeaway.	Noted
EPC	At the time of the study Elswick had an hourly bus service to Blackpool and St Annes which ran to 19-30hrs six days a week and an hourly service which connected the village with both Preston and Fleetwood and operated 7 days a week up to 11-30pm. Following cessation of the Blackpool to St Annes service by the operator and County Council funding cuts, unfortunately the village now only has an hourly service to Preston and a two hourly service to Fleetwood. This service is provided by two buses (80 and 75A) which work in tandem operating on a two hourly frequency. These buses only run 6 days a week and there is no evening service after 20-00 hrs.	It is interesting to note that section 106 monies were used to restore the hourly bus service to Preston (75a). The parish council supports the Councils decision to exclude bus services, due to the budget deficit at LCC. It is LCC practice to allow bus services to end once Section 106 monies have been used up.
EPC	The loss of the Blackpool service is the biggest blow as residents generally look towards Blackpool rather than Preston for shopping, leisure and employment; confirmed by parish plan questionnaire; unfortunately Lancashire County Council has advised that it has no plans to re-introduce the Blackpool service.	Noted
EPC	The size and lack of sustainability of the village dictates that the Elswick should retain its Tier 2 status and allocation of 50 houses.	Noted
EPC	Highways England has raised concerns over incremental development in Elswick cumulatively having impact on Thistleton junction; "further speculative development" would not comply with Local Plan or Emerging Local Plan according to HE.	Noted
Prospect	Elswick comprises a range of community facilities including a village hall, Elswick Memorial United Reform Church (which hosts a variety of community groups), 2 no. public houses, convenience store, playground, all weather sports pitch and Great Eccleston Copp CoE Primary School. The population size of Elswick (identified as between 1,000 and 3,000 in the SHBP) is also reflective of other Tier 1: Larger Rural Settlements including Newton, Staining and Warton.	Paragraphs 28 and 70 of the NPPF promote the retention and development of local services and community facilities in villages such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship. The NPPF does not state that the existence of these facilities should be used to assess the sustainability/accessibility of a settlement. The majority of Fylde's rural settlements do have a place of worship and a public house close to their centre, along with open space, and sports facilities. Therefore, to include these in the scoring would elevate the score of every rural settlement and would not serve any useful purpose.

Consultee	Point raised	Council response
Story	Council's assessment of public transport provision for Elswick in Table 9 does not provide a true reflection of the number of destinations available from the village and as such skews the scoring for this element of the settlement hierarchy assessment; the assessment does not include other Tier 2: Smaller Rural Settlements – Weeton and Singleton as destinations for travel. These settlements are deemed sustainable location within the emerging Local Plan and are considered as destinations for other towns and villages within the SHBP (2016). They should therefore, be included within the assessment for Elswick	The Council agrees that other lower order settlements in Fylde, could be added to the scoring (if bus scores were being used). However, it is interesting to note that Story Homes have chosen not to add the additional destinations to the other affected settlements in Fylde. Scores for Newton, Singleton and Weeton are also affected. Therefore, the conclusions of this rescore exercise are incorrect because the conclusion in relation to Elswick has been skewed.
Story	Public transport provision to settlements in Wyre should be included in the assessment, particularly as Elswick is only 500m from boundary; Poulton, Thornton and Fleetwood provide range of services and employment	The Council agrees that settlements in Wyre could be added to the scoring (if bus scores were being used). However, it is interesting to note that Story Homes have chosen not to add the additional destinations to the other affected settlements in Fylde. Scores for Newton, Singleton and Weeton are also affected. Therefore, the conclusions of this rescore exercise are incorrect because the conclusion in relation to Elswick has been skewed.
JR	Connecting bus services at Poulton and Kirkham have been ignored in the methodology; fails to take proper account of true situation	The methodology considers direct bus services, it does not consider access to further destinations by changing bus. The potential for increasing destinations by changing bus would be unlimited.
JR	Recent LCC commitment to provide £1 million for bus services	The £1 million is for bus services, for the whole of Lancashire, and it is not clear over what time period this money will be spent. Some areas of Lancashire have lost their bus services completely, it is likely that the money will be spent restoring services, where there are now none.
Story JR	Access to public transport is a key consideration when determining the sustainability of settlements and Section 4 of the NPPF promotes sustainable transport as a fundamental part of sustainability; public transport cannot be disregarded on the basis of changes in funding circumstances; other funding can be sought including planning obligations; new development can improve viability of bus services; bus service provision should therefore, still be included as part of the overall accessibility assessment to be consistent with national policy	The Parish Council submission makes it clear that LCC have a practice of stopping bus services once S106 monies run out.

Consultee	Point raised	Council response
Prospect	<p>To support bus services in Elswick, developer contributions are currently being sought from future housing development in the village. These have been sought from:</p> <ul style="list-style-type: none"> • Application ref: 16/0846 (24 units, resolution to approve subject to S.106) – £50,000 • Application ref: 16/0645 (50 units subject to appeal) – £250,000 • Application ref: 16/0180 (50 units subject to appeal) – £250,000 <p>Accordingly there are proposals place to provide a significant amount of future funding to maintain and enhance bus services in Elswick.</p>	The Parish Council submission makes it clear that LCC have a practice of stopping bus services once S106 monies run out.
Story	A reassessment of bus services should leave the score remaining at 2	<p>The Council still concludes that the bus services are an unreliable measure and that the methodology is more robust if they are removed. The Council has not excluded all public transport, trains are still included.</p> <p>The Council concludes that Elswick has been correctly identified as a Tier 2 settlement.</p>
JR	No account taken of the fact that Elswick is on the National Cycle Route 90.	Other settlements are also on national cycle routes, this does not form part of the assessment.
JR	No consideration of accessibility by bus to supermarket and railway station at Wesham, also access by bus to supermarket at Great Eccleston (only 1 mile away)	The methodology scores for the existence of facilities at that settlements i.e. access on foot. The facilities mentioned are counted in the settlements in which they are found thus allowing for differentiation between the settlements.
Story Prospect	Conclusion that Elswick does not have easy access to primary school is at odds with Council's view in committee reports for the applications 17/0247 Land North of Mill Lane and 16/0645 Beech Rd each for 50 dwellings, which accepted that school is within walking distance; no requests from LCC for improvements to Copp Lane; no concerns within LCC consultee response	Elswick does not have a primary school within 800m of the village centre. It is possible to walk to the school, but for the reasons set out in the council's response, it is not an easy walk. The Council carried out a site visit to the school on Tuesday 10th October. It was a fine, warm, sunny afternoon. When the school day finished at 3.15pm only two children were collected on foot and walked back to Elswick.
JR	Footpath is continuous along the length of Copp Lane and does not involve any road crossings between Elswick and the School, and is likely to be improved once approximately 200m of the footpath closest to Elswick is widened to 2 metres as part of the recently approved development on Land East of Copp Lane.	Comment noted
JR	LPA claims distance from the centre of Elswick to Copp CE school is 1260 metres. This is untrue. The distance is 1000m, which is within the CIHT "acceptable" walking distance to school	The Council has measured the distance electronically from the centre of Elswick to Great Eccleston Copp Lane School and it is 1260 metres.

Consultee	Point raised	Council response
Prospect	Manual for Streets defines 'walkable neighbourhoods' as being typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot. However, the guidance acknowledges that this is not an upper limit and that walking offers the greatest potential to replace short car trips, particularly those less than 2km. Gt Eccleston Copp C of E Primary School is located around 1.2km to the north of the village. This is within walking distance of Elswick and certainly less than the 2km within MfS. Elswick residents therefore have easy access to a primary school.	Elswick does not have a primary school within 800m of the village centre. It is possible to walk to the school, but for the reasons set out in the council's response, it is not an easy walk. The Council carried out a site visit to the school on Tuesday 10th October. It was a fine, warm, sunny afternoon. When the school day finished at 3.15pm only two children were collected on foot and walked back to Elswick.
Story	Clear from the Admissions Policy for Great Eccleston Copp C of E Primary School (Appendix E) that the school serves the village of Elswick along with Great Eccleston and Little Eccleston. In an email from the head teacher, dated 27th June 2017 (Appendix F), it was confirmed that the school currently has 130 children on roll, 58 of which are listed as living in Elswick. Although, the school has places for 210 children and is presently under -subscribed. Nonetheless, it is clear from this evidence that the school serves the village	The school does not provide easy access from the village on foot.
Story	Paragraph 55 of the NPPF states to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. In her email (attached to the representation) the head teacher indicates her support for more homes in Elswick as more pupils would effectively provide more funding to help keep the school open; future housing development in Elswick would also help the school to stay open in accordance with paragraph 55	The level of development proposed in Great Eccleston is likely to support the school.
JR	LPA states that 8 reception class school places have been offered for the 2017/2018 enrolment year. This is not true. The School has only 8 children entering the reception class in this year, however its reception class capacity is approximately three times that number	The Council has not seen any evidence that pupil numbers at Great Eccleston Copp Lane school are declining, indeed it is likely that they will increase due to development under construction at Great Eccleston. Pupil numbers were not used to justify changing Elswick to Tier 2, they are not part of the scoring.
JR	Assessment of school places was undertaken by LCC for Copp Lane application: 9 places were needed, the school had the capacity to accommodate	See above
JR	The distance from the settlement to the primary school remained unchanged between the 2012 assessment and the 2016 assessment. The number of available places at the school did not reduce between those dates. The width of the road and pavement did not alter during that period.	The Council has justified its decision to exclude bus services for all settlements, and the school has consistently been excluded from the Elswick score. Elswick is correctly identified as a Tier 2 rural settlement.
Story Prospect	In light of all this evidence, Elswick should be considered as having easy access to a primary school and should be awarded a score of 5 within the accessibility assessment; gives Elswick a total score of 18, taking into account public transport; this is within range for Tier 1 Larger Rural Settlements, therefore should be elevated to that level.	Elswick is correctly identified as a Tier 2 rural settlement.

Consultee	Point raised	Council response
JR	Para 1.3 suggests hierarchy altered in response to the extensive number of objections; number of objections, extensive or otherwise, should not be basis for influencing the Council's assessment, LPAs ought to consider the quality and relevance of objections rather than the quantity; there has been a substantial drive to resist development by a few individuals within Elswick through leaflet drops and public meetings to encourage residents to object; leaflets have included lists of reasons for objection to consultation documents	The Council held consultation events on the Revised Preferred Option so that it could listen to the views of local people, it then decided to update the evidence used in the Settlement Hierarchy Background Paper. Any decisions taken by the Council have always reflected up to date evidence.

Consultee	Point raised	Council response
Gypsy and Traveller Accommodation Assessment Update		
NFGLG	Object to the review in respect to the adoption of the revised GTAA undertaken by ORS. The failure of this research to engage properly with the Travelling community represents a failure to undertake robust research. The lack of engagement with any Travellers in Fylde casts doubt on the predicted outcomes in terms of site requirement	The ORS research is considered robust.
NFGLG	ORS has merely adopted an arbitrary figure of 10% to predict those Travellers who meet the definition. This is wholly unsatisfactory and we strongly dispute that only 10% of Travellers meet the new definition; it is not reflected by our considerable experience, which suggests at least 50% of travellers meet the new definition	ORS' prediction is based on their extensive body of research into the needs of gypsies and travellers, and the extent to which the PPTS definition is met, over the majority of LPAs in the country. However, the use of predictions has only been necessary where it has been impossible to engage with the occupiers of sites.
NFGLG	Even if the assessment was more robust, it still leaves the council with a need to provide for those Travellers who fall outside the definition	Planning for housing for people who do not meet the definition in Annex 1 of the PPTS is based on the SHMA process for determining the OAN for housing

Consultee	Point raised	Council response
Implications for the Local Plan and Sustainability Appraisal		
Gladman	Support reappraisal of amended strategic policies; should also consider appraisal of a raised housing requirement	Comment noted. Alternative strategies were appraised earlier in the plan-making process
HLM TW	Policies need to plan for 9,030 homes at least; further clarity on the acceptability of windfall sites; inclusion of newly approved housing sites in SL1-5; plan for reserve sites for 20% buffer	The Council disagrees
HLM	All land in Warton between Blackfield End and Clifton House sites allocated as reserve sites or to provide deficit in requirement	The Council disagrees that additional sites are required
TW	Allocation of site at Weeton Rd Wesham	The Council disagrees that additional sites are required
Metacre	Any changes will need to be further consulted on as cannot be viewed here	This is acknowledged
Oyston	Allocation of North Houses Lane site and undertaking HRA and SA of site as part of plan level reassessment.	A project level HRA will be required for this site in support of the current application. In the event that the Council needed to identify additional sites, suitable sites would be identified through an assessment process that would consider sustainability issues and whether or not an HRA would be required
Hollins	Must identify additional sites	The Council disagrees that additional sites are required
Greenhurst	Allocation of site ES1 for housing under Policy SL1.	The Council disagrees that additional housing sites are required.

Consultee	Point raised	Council response
Matters referred to not contained within the consultation document		
SLG	Housing needs from Wyre (EL7.003d, pages 1093 – 1095)	
CPRE	Job forecast translation to the employment land requirement (EL7.003a, page 44)	
Fred Moor	Job forecast translation to the employment land requirement (EL7.003a, pages 49-51)	
Liz Oades	Shale gas (EL007.003d, page 955)	
HLM	Housing needs from Wyre (EL7.003a, pages 216-217)	
LCC	Education update (EL7.003d, pages 899-902)	The update from LCC is appreciated
Metacre	Housing needs from Wyre (EL7.003d, page 936)	
MoD	Aerodrome safeguarding/ birdstrike safeguarding zones	

Appendix 1

Revised Calculation of the 5-year housing land supply

Set out below are changes to the Council's position in relation to the 5 year supply of housing land following this consultation and submissions to the Greenhurst appeal.

Item	Consequences
Site Specific Information:	-70 from the supply
Demolitions (Historic correction)	-35 historic completions (resulting in increased backlog)
Demolitions (Future allowance)	-25 (5 years * 5 dpa allowance) from the supply

The resulting impact on the five year housing land supply position is as follows:

Requirement	Sedgefield	Liverpool
Adjusted five year requirement including shortfall and 20% buffer	3,674	2,885
Supply		
Existing supply	3,510	3,510
Potential supply:		
Long term empty homes allowance	50	50
Allowance for small sites	80	80
10% allowance for supply not coming forward	-33	-33
Gross total supply	3,607	3,607
Demolitions allowance	-25	-25
Net total supply	3,582	3,582
Projected oversupply/undersupply	-92	697
Equivalent years supply		
	4.9	6.2

On the basis of the revised information, it is concluded that the council is able to demonstrate a 4.9 year housing supply based on the 'Sedgefield' methodology or a 6.2 year supply based upon the 'Liverpool' methodology.

Appendix 2



Town and Country Planning Act 1990

Appeal at: Land adj 195 Mains Lane, Singleton

**PINS ref APP/M2325/W/16/3174723
LPA ref 16/1006**

**Planning Policy Statement regarding the
Emerging Local Plan and
5-year Housing Land Supply**

for Fylde Borough Council

September 2017

1. Progress of the Emerging Local Plan to 2032

- 1.1. The Council submitted the Fylde Council Local Plan to 2032 (the Plan) and its supporting documents to the Secretary of State for Examination on the 9th December 2016 in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012, specifically Regulations 22(3)(b) and (c). Further information can be found on the appropriate page of the Council's website; which includes the submission version of all documents and the supporting comprehensive evidence base documents.

- 1.2. Mrs Yvonne Wright BSc (Hons) Dip TP MSc DMS MRTPI has been appointed as Inspector to undertake an independent examination into the soundness of the Plan and to subsequently issue a report with her conclusions. The Council has agreed with the Inspector to consider any Main Modifications that she deems necessary either for legal reasons or in relation to soundness.

- 1.3. The Examination of the Plan has commenced and is currently adjourned. Stage 1 Hearing Sessions took place on 28th and 29th March 2017: these hearing sessions covered the duty to cooperate, other legal and procedural requirements and strategic matters including objectively assessed housing and employment needs and the development strategy. Following the Stage 1 Hearing Sessions, the Inspector provided interim findings into the Duty to Co-Operate, OAN and Development Strategy. This has been provided by the appellant as Appendix 2 to the Statement of Case. The Inspector identified that, in the context of what was realistic and achievable, the Council had met the Duty to Co-Operate in the preparation of the Plan. However, she requested that the Council propose modifications to the Plan to deal with the issue of potential unmet need for housing within Wyre. The extract of the Schedule of Proposed Main Modifications below shows the modification that has been proposed:

Policy/paragraph	Modificati on type	Proposed Modification	Reasons for Change
Paragraphs 1.24 to 1.28	Main	1.24 Wyre Council wrote to Fylde Council in May 2016, under the Duty Cooperate, to request that Fylde Council assist Wyre Council in meeting its objectively assessed housing need. The Objectively Assessed Need (<u>OAN</u>) figures for the three Fylde Coast Authorities originate from the ranges set out in the original SHMA 2014 and its updates which considered revised	Inspector's request letter of 11 th April

Policy/paragraph	Modification type	Proposed Modification	Reasons for Change
		<p>population and household formation data. For Wyre Council this gave an objectively assessed need <u>OAN</u> of between 400 and 479 dwellings per annum from 2011 to 2031. Wyre Council considers 479 dwellings per annum to be an appropriate housing requirement figure which ties in with the economic evidence and this figure was accepted by Wyre Council on 14th April 2016.</p> <p>1.25 Wyre Council has identified that the supply of deliverable land is constrained by three main issues:</p> <ul style="list-style-type: none"> • Highway capacity, in particular on the A585(T), and A6 and also at Junctions 1 and 3 on the M55 • Flood Risk • Green Belt <p>1.26 <u>The Wyre Council's evidence base in relation to these issues is remains incomplete and the exact extent of the their unmet need is unknown as the precise numbers of homes that will need to be delivered outside Wyre Council's administrative area has not yet been assessed.</u> It is also unclear what provision, <u>if any</u>, other neighbouring authorities will be able to make. <u>The difficulty has arisen because of timing: the production of plans has not been aligned.</u></p> <p>1.27 <u>Fylde Council are aware of this important issue, however at this stage the precise numbers of homes that will need to be delivered outside Wyre Council's administrative area has not been assessed.</u> <u>Fylde Council recognises that Wyre Council have identified difficulties in planning to meet its objectively-assessed need for housing.</u> Any need that remains unmet following <u>the adoption of Wyre's Local Plan will need to be addressed.</u> <u>Fylde Council will undertake an early review of the Fylde Local Plan (whether full or partial) to examine this issue, working with other authorities adjoining Wyre under the Duty to Co-Operate.</u> <u>The objective of this process would be to ensure that any unmet need is met within the Housing Market Area and/or in other appropriate locations, where consistent with the achievement of sustainable development.</u></p> <p>1.28 <u>It is crucial that Fylde's Plan is not delayed, an up to date plan must be adopted as soon as possible.</u> However, in accordance with the Duty to Cooperate, Fylde Council is committed to continuing to work with Wyre and its other neighbours, once the evidence base relating to Wyre's constraints is complete, in order to address the above mentioned issues.</p>	

- 1.4. Stage 2 Hearing Sessions took place between the 20th and 28th June 2017: these hearing sessions included consideration of development management policies, housing and employment land supply and delivery (but not objectively assessed needs).
- 1.5. At the end of the Stage 2 Hearing Sessions, the Inspector required the Council to undertake a consultation on additional evidence submitted after Submission. The Consultation on Additional Evidence in support of the Fylde Local Plan to 2032 commenced on 3rd August and concluded on 14th September 2017. This consultation covered additional evidence in relation to Economic Forecasts, Objectively Assessed

Needs and the Housing Requirement Figure, Five Year Housing Land Supply and the Housing Trajectory, Settlement Hierarchy, Fylde Coast GTAA update December 2016, Implications for Policies of the Fylde Local Plan to 2032 and Implications for Sustainability Appraisal. The appellant has not made representations to this consultation.

- 1.6. The Council is preparing a report in response to the consultation, which will detail the content of the representations received and the Council's response, including matters relating to the Five Year Housing Land Supply. This will be submitted to the Inspector, who will then decide whether a further hearing session is required.

- 1.7. All evidence documents, matters issues and questions documents including responses from the appellant's agent relating to all of the above can be seen on the appropriate page of the Council website.

2. Five Year Housing Land Supply position

- 2.1. The Council's position in relation to the Five Year Housing Land Supply is set out annually in the Five Year Housing Supply Statement usually base dated at 31st March and published on the appropriate page of the Council's website. At the time of the decision to refuse outline planning permission for application 16/1006 the Council's ***Five Year Housing Supply Statement base dated 31st March 2016*** would be the relevant published version. This document included the following;

15. *The adjusted annual housing requirement at 31st March 2016 base date provides a 4.80 year housing supply. There is an undersupply of 129 homes against the housing requirement of 370 homes per annum. That undersupply will increase, as we move forward in the emerging Plan period, unless the Existing Supply and Potential Supply are bolstered.*

- 2.2. Subsequently the Council has published three additional Five Year Housing Supply Statements. One base dated 28th February 2017 and titled as 'Interim'. Two additional Five Year Housing Supply Statements, both base dated 31st March 2017, however titled either May edit or July edit have subsequently been published. Each of these three documents have been produced as a result of the ongoing EiP and the

resulting changes to the Objectively Assessed Needs and methodology for calculating housing land supply.

- 2.3. The table below gives the historic context to the Council's Five Year Housing Supply Statement:

	November 2012	March 2013	December 2013	March 2015	March 2016	February 2017 (interim)	March 2017 (May)	March 2017 (July)
Sedgefield	-	-	-	4.3	4.8	5.58	4.8	5.1
Liverpool	3.8	3.1	4.5	-	-	6.9	6.07	6.4

- 2.4. Currently, the Council's ***Five Year Housing Supply Statement base dated 31st March 2017 (Examination in Public Edit July 2017)*** is the most recent published housing supply statement. The following paragraphs give further details about the Council's approach to calculating the housing supply within that document.
- 2.5. Local planning authorities should identify sufficient deliverable sites to provide five years' worth of housing against their housing requirement. In other words, a five year supply of deliverable housing land must be identified. This is required under paragraph 47 of the National Planning Policy Framework. The methodology below explains how the Borough's five year supply position has been calculated.
- 2.6. The latest version of the Housing Land Supply Trajectory to 2032 is provided as Appendix 1 to this Statement. The five year supply position is base dated 31st March 2017 and reflects the most up to date information available to the Council, including revisions to delivery assumptions as agreed at the Stage 2 hearings of the Fylde Local Plan to 2032 Examination in Public held between 20 & 28 June 2017.
- 2.7. The Planning Committee at its meeting of 8th May 2017 considered '***Fylde Addendum 3: Analysis of the Objectively Assessed Need (OAN) in light of the 2014-based SNPP and SNHP***' which is an addendum to the ***Fylde Coast Strategic Housing Market Assessment (2013)***. In light of this new evidence the Planning Committee resolved that a figure of 415 homes per annum will meet Fylde's objectively assessed need for housing. Since 2011, Fylde has met the OAN annual housing requirement in one year (2016/17). As a result there has been a cumulative under delivery (shortfall) of 952 homes against the annual housing requirement. At present there has been a persistent under delivery of housing in Fylde and

accordingly under paragraph 47 of the Framework, a 20% buffer has been applied, bringing sites forward from later in the plan period.

- 2.8. The build-out rates that are used in the calculations are the same as those that are used in the emerging Local Plan and the Strategic Housing Land Availability Assessment (SHLAA). The SHLAA is produced with input from a SHLAA Steering Group which includes representatives from the development industry. The assumptions used are that 15 homes will be built in the first year and 30 homes in subsequent years. If the site has a capacity of more than 300 homes then it assumes that there will be two developers and the output will be doubled.
- 2.9. During the Plan EiP Hearing Sessions the Council agreed to amend its approach to build out rates and phasing. Where detailed further information about a specific site has been provided by the site owners, developers or agents the Council has taken this into account and set out build out rates and phasing accordingly. Where there is sufficient evidence that an established development site is delivering at a rate that is at variance to the general delivery assumptions, these varied build out rates are assumed for the remaining units of the development site. In all other circumstances the Council continues to rely upon the evidence put forward in the SHLAA and SHLAA Steering Group. The Council considers that this balanced approach is in accordance with paragraph 47 of the Framework and the NPPG.
- 2.10. Only on sites with full planning permission and a signed Section 106 agreement (if applicable) will development be able to commence in year 1. Sites with outline planning permission, or sites where a Section 106 agreement is yet to be signed, will not be able to commence in year 1. It is anticipated that development will be able to commence on these sites as follows:

Table 3 – Build Out Rate and Phasing

Site Status	Assumed Year of Commencement
Full planning permission, with signed Section 106	Year 1
Full planning permission, awaiting signing of Section 106	Year 2
Change of use, awaiting signing of Section 106	Year 2
Outline planning permission, with signed Section 106	Year 2
Outline planning permission, awaiting signing of Section 106	Year 3
Full planning application received and proposed allocation in emerging Local Plan	Year 3

Outline planning application received and proposed allocation in emerging Local Plan	Year 4
Allocated Site without a full or outline planning application	Year 5

- 2.11. In relation to shortfall in supply, the PPG provides guidance by stating that 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. The Framework is not prescriptive as to which approach Local Planning Authorities should adopt when calculating their five year housing land supply. For comparative purposes the ***Five Year Housing Supply Statement base dated 31st March 2017 (Examination in Public Edit July 2017)*** using the “Sedgefield” approach gives the Council the equivalent of 5.1 years of housing land supply and using the “Liverpool” approach gives the Council the equivalent of 6.4 years of housing land supply.
- 2.12. Notwithstanding this calculation which has been produced principally in support of the EIP, the Council recognises that the ***Five Year Housing Supply Statement base dated 31st March 2017 (Examination in Public Edit July 2017)*** has been subject to the recently-concluded evidence consultation, and remains subject to a number of challenges within the responses to that consultation.

3. The appellant's assessment of the 5-year housing land supply position

- 3.1 In the light of the above, the appellant has submitted a document with the title Assessment of the Fylde Borough Council Five Year Land Supply Position. In this document, the appellant expresses disagreement with the Council's assessment of the 5-year housing land supply position. This document was not submitted in response to the Consultation on Additional Evidence in support of the Fylde Local Plan to 2032 (3rd August to 14th of September 2017) but was received by the Council on 22nd September 2017 in support of this appeal.
- 3.2 The Council has reviewed the 5-year housing land supply position in response to the appellant's document. The following paragraphs explain the Council's position in relation to each of the sites for which the appellant has challenged deliverability or delivery rates.

- 3.3 **HSS1 Queensway:** the appellant states that the expected delivery rate should be 30, then 45, then a steady rate of 60dpa. The Council disagrees with the appellant's opinion. The site owner and developer has submitted evidence by email to the Council of a delivery rate of 50 units in the first year and 100 units in all subsequent years as part of the Local Plan Examination in Public. The Council have amended the delivery rate in the five year supply statement in response to the Examination in Public evidence.
- 3.4 **MUS5 Heyhouses Lane:** there is no such site as MU5. The appellant's reference is to part of site MUS4. The appellant suggests stat the site could deliver 75 dwellings within the five years. The Council disagrees with the appellant's opinion. The site has outline planning permission with a signed section 106 agreement. The Council therefore expects the delivery rate to be in accordance with the standard methodology.
- 3.5 **HS12 Fairways, Heeley Road:** the appellant states that "It is understood that the Council agreed to remove the site from the supply during the EiP hearings." This is incorrect. The Council maintained its position that the site is deliverable. The appellant asserts that the site should be removed from the supply as they cannot see evidence that discussions remain ongoing. The Council disagrees with the appellant's opinion. The site is available now, and planning permission is not a prerequisite for the site to be considered deliverable. The Council considers the site to be deliverable, and upon visual inspection site clearance work is currently taking place (September 2017). The site is proposed for allocation in the emerging local plan: a barrier to delivery has therefore been removed.
- 3.6 **HS13 Kingsway Garage, Ansdell:** the appellant states that: "It is understood that the Council agreed to remove the site from the supply during the EiP hearings." This is incorrect. The Council maintained its position that the site is deliverable. The appellant asserts that the site should be removed from the supply as they cannot see evidence that discussions remain ongoing. The Council disagrees with the appellant's opinion. The site is available now, and planning permission is not a prerequisite for the site to be considered deliverable. The Council considers the site to be deliverable. The site is being actively marketed for sale for potential development (September 2017). The site is proposed for allocation in the emerging local plan: a barrier to delivery has therefore been removed.

- 3.7 **HS14 Axa Lytham:** the appellant states that: "It is understood that the Council agreed to remove the site from the supply during the EIP hearings." This is incorrect. The Council maintained its position that the site is deliverable. The appellant asserts that the site should be removed from the supply as they cannot see evidence that discussions remain ongoing. The Council disagrees with the appellant's opinion. The site is available now, and planning permission is not a pre-requisite for the site to be considered deliverable. The Council has received planning application 17/0738 for 65 homes. Therefore the Council considers the site to be deliverable and has increased the supply to 65 units to reflect the changed circumstance since March 2017.
- 3.8 **HS65 Dalmeny Hotel:** the appellant states that the site should be removed from the supply as the hotel "remains in operational use and continues to take advance bookings. Interestingly, each stage of the EIP has been held in the Dalmeny Hotel." This only serves to reveal the shortcomings in the appellant's research, as the application that was submitted related to three buildings at the rear of the site on Clifton Drive, and would not have compromised the operation of the hotel. However, the application has since been withdrawn. Therefore the Council considers the site to no longer be deliverable and to reflect this changed circumstance since March 2017 the supply should be amended accordingly.
- 3.9 **HSS4 Coastal Dunes:** the appellant suggests that a detailed delivery trajectory of 11 units in the first year followed by 45 units in subsequent years was "discussed and agree (*sic.*) at the EIP hearing session". The Council disagrees with the appellant's opinion. The site owner and developer submitted evidence by email to the Council that whilst both northern and southern phases are running they expect to be at 60dpa across both sites (30 each). Following that however the Council would expect the annual completions to be nearer 45 dpa. The Council amended the delivery rate in the five year supply statement May 2017 edit, directly in response to the Examination in Public evidence. The owner and developer's representation to the Evidence consultation states: "Persimmon Homes notes the Council's statement that the 5 year housing land supply statement and the housing trajectory have been updated to reflect factual information regarding delivery rates". The representation does not contradict or suggest that correction is required to the delivery rates proposed for their own site.
- 3.10 **HS27 Oaklands Caravan Park Warton:** the appellant states that this site should be removed from the supply as it remains in use as an active caravan park. The Council

considers that the site to no longer be deliverable and to reflect changed circumstances since March 2017 the supply should be amended accordingly.

- 3.11 **HSS8 The Pastures, Fleetwood Road Wesham:** the appellant states: "JM understand that Rowland Homes have confirmed a delivery rate of 30dpa. It is understood that the Council agreed this delivery rate at the EiP hearings." This is incorrect. The site owner and developer submitted evidence by email to the Council of a delivery rate of up to 40 units per year as part of the Local Plan Examination in Public. The Council amended the delivery rate in the five year supply statement in the July 2017 edit, directly in response to the Examination in Public evidence.
- 3.12 **HS30 Pennine View Wesham:** the appellant states that the site should be removed from the supply. The Council disagrees with the appellant's opinion. The site is available now, and planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers the site to be deliverable. Upon visual inspection, site clearance work has now taken place and the Council has held discussions concerning a revised development scheme. The site is proposed for allocation in the emerging local plan: a barrier to delivery has therefore been removed.
- 3.13 **HS66 Quernmore Trading Estate:** the appellant states that the site should be removed from the supply because "The Council have no (*sic.*) put forward an (*sic.*) evidence to suggest that the site will reasonably come forward". The Council disagrees with the appellant's opinion. The principle of development of the site is accepted. The site is available now, and planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers the site to be deliverable. The site is proposed for allocation in the emerging local plan: a barrier to delivery has therefore been removed. The site was omitted in error from the previous version of the Housing Land Supply Statement and Housing Trajectory, but this was corrected in the July edit.
- 3.14 **Elswick Neighbourhood Plan Allocation:** the appellant disputes the delivery of 50 dwellings within the five year period. The Council disagrees with the appellant's opinion. The Council has granted planning permissions for 24 dwellings, and it is anticipated that suitable sites will provide the remainder within the 5-year period, given the level of active developer interest in the settlement.

- 3.15 **HS41 Thornfield Caravan Park, Staining:** the appellant states that the site should be removed from the supply due to its current use as a caravan park. The Council disagrees with the appellant's opinion. The site is available now, and planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers the site to be deliverable. The site is proposed for allocation in the emerging local plan: a barrier to delivery has therefore been removed.
- 3.16 **HS47 Land North of North View Farm Wrea Green:** the appellant states that there is no evidence that the site will come forward in the five year period. The Council disagrees with the appellant's opinion. The site is available now, and planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers the site to be deliverable. The site is proposed for allocation in the emerging local plan: a barrier to delivery has therefore been removed.
- 3.17 **HS50 Land East of Rowan Close Clifton:** the appellant states that "The Council agreed a consensus at the EiP hearing sessions that the site should not contribute to the five year housing land supply". This is incorrect. The Council maintained its position that the site is deliverable. The appellant asserts that the site should be removed from the supply as they cannot see evidence that discussions remain ongoing. The Council disagrees with the appellant's opinion. The site is available now, and planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers the site to be deliverable.

4. Conclusions on the Council's Five-Year Housing Land Supply Position

- 4.1 In response to the assessment undertaken by the appellant and other information provided to the Council, adjustments have been applied to the data contained in the Five Year Housing Supply Statement base dated 31st March 2017 (Examination in Public Edit July 2017). The Council has made adjustments to site delivery based on updated information and the correction of an error relating to the treatment of demolitions. These changes include the removal of sites HS27 and HS65 as noted above. The Council has undertaken a recalculation of the Five Year Supply position, at the same base date, to incorporate the effects of the changes.
- 4.2 The Council now considers that its current position in respect of 5-year supply is a total net supply of 3,582 against an adjusted requirement of 3,674 (Sedgefield) or

2,885 (Liverpool), giving the equivalent of 4.9 years' supply (Sedgefield) or 6.2 years (Liverpool).

- 4.3 The Five Year Supply calculation is a forecast based on the best available information and reasonable assumptions. It cannot be certain as to the delivery of sites, and is at the mercy of events. For instance, additional windfall sites may come forward unexpectedly, or a site may suffer a delay due to unforeseen conditions on site. Therefore, a five year housing land supply approximating to five years is likely to satisfy the principal objective of paragraph 47 of the Framework to identify a deliverable supply of housing land. This approach has been adopted by the Inspector in appeal decision APP/G2713/A/13/2194376 (Huby, Hambleton), in which the Inspector stated: *"this represents a supply of just over 4.8 years...I have not been able to scrutinise the deliverability of individual sites in the way that would be done in a Site Allocations DPD examination. On the basis of my analysis, the Council is less than two months short of a five year supply, which is well within the margins of error for such a calculation. I therefore conclude that I cannot give significant weight to the outcome of the housing land supply analysis and its supporting evidence".*
- 4.4 The Council's 5-year housing supply position remains based on the annual housing requirement of 415. The Government's current consultation relating to the standard methodology for the assessment of housing needs provides a "sense-check" of the Council's position and an indicator of the Government's preferred approach: it therefore can be considered Government guidance. The data tables accompanying the consultation provide an indicative assessment of housing need based on the proposed formula, assessed for each local planning authority. For Fylde, this provides a requirement of 296 dwellings per annum. The Council's housing requirement figure of 415dpa therefore comfortably exceeds the requirement of the consultation standard methodology, and the Council's five year housing supply figure should therefore be considered in this context.
- 4.5 It is for the decision-maker to determine the weight to be attributed to this or any of the previous housing supply statements; however, in the context of this appeal, the Council's case does not rely on any weight given to the existence or otherwise of a five year housing land supply. It is acknowledged that the presence of a five-year housing land supply does not provide justification for the refusal of planning permission in itself, and the Council's case for refusal does not at all depend on the five-year housing land supply position.

Appendix 3**Stephen Smith Supplementary Proof****Appeal at Land at Kilnhouse Lane and Queensway, Lytham St Annes**



Town and Country Planning Act 1990

Appeal at: Land at Kilnhouse Lane and Queensway, Lytham St Annes

PINS ref.: APP/M2325/W/16/3164516

LPA ref.: 16/0524

Supplementary Proof and Rebuttal Evidence of Stephen Smith

for Fylde Borough Council

September 2017

1. Introductory Comments on Housing Land Supply

- 1.1 The following document sets out the Council's response to the 'housing supply sites and sources' contested in the Proof of Evidence of Mr Jackson in section 7. The Council has considered the opinions of Mr Jackson, reviewed all evidence held and made appropriate adjustments to the housing land supply. The Council has taken account of evidence which has arisen after 31st March 2017 where this is material to a site already included in the supply. No new or additional sites have been included in the supply. Either the delivery of existing sites has been re-profiled, altered or removed entirely from the supply.
- 1.2 In all the following analysis it must be noted that the Council engages on a regular basis with land owners and developers and often enters into agreements which can restrict the disclosure of certain material information. Therefore full disclosure of potential development interest in particular sites may not be publicly available and publishable by the Council. It should also be given consideration that the opinion of the Council on housing land supply matters is considerably influenced by the ongoing, meaningful and efficacious public consultations. The Housing Land Supply Trajectory (part of the Local Plan) upon which the Council's Annual Five Year Housing Land Supply Statement relies has been consulted upon firstly in December 2015 as part of the Revised Preferred Option consultation, then again in August 2016 as part of the Publication Version consultation and finally at the Examination in Public from March 2017 to present.
- 1.3 The Examination in Public resulted in two additional public consultations on the Council's Five Year Housing Land Supply Statement both of which have resulted in changes and amendments. The progress of this iterative exercise must be considered to add weight to contents of the Housing Land Supply Statement and in particular the assumptions and allowances that are made in relation to the supply of land for housing. At the outset of each public consultation the Council contacts each site owner, promoter and/or developer. The Council has adopted the entirely reasonable and practicable approach of considering a lack of response to be at the very least acquiescence to the proposed documents.

1.4 I should also note that the true question in terms of deliverability is not whether there is certainty that the quantum identified will come forward within a particular period of time, or whether one analysis is “*more*” probable or realistic. It is simply whether there is a “*realistic prospect*” that the numbers identified by the Council will be delivered within five years. That is what the language of NPPF footnote 11 says. It is also consistent with the judgment of Ouseley J. in ***St Modwen Developments Ltd v. SSLCG*** [2016] EWHC 968 (Admin) (CD10.8)¹ at para. 51:

“The assessment of housing land supply does not require certainty that the housing sites will actually be developed within that period. The planning process cannot deal in such certainties. ... [The Inspector’s] focus had to be on deliverability, which was not disproved by showing that there were uncertainties.”

1.5 I would also make the further contextual point before turning to address the site specific issues that the appropriate OAHN and deliverable housing supply are primarily matters for the ongoing Examination of the Fylde Local Plan. That exercise allows the examining Inspector to consider a wide range of evidence from a variety of stakeholders and to form an appropriate overview. Section 78 Inspectors regularly offer the view that a detailed assessment of housing land supply is better addressed through the development plan process.

2. Site Specific Review

2.1 The following review of individual site has been undertaken in response to the Proof of Evidence of Mr Jackson. Only sites where Mr Jackson states that he disagrees with the Council’s position are given further detailed consideration. The presentation of the information follows the format first set out by Mr Jackson and his opinions are included in full for ease of reference. Later sections deal with matters relating to the housing land supply assumptions and methodology.

¹ See appendix SSS1

2.2 Table 1 and 2 below presents an additional two columns headed ‘FBC Revised’ and ‘Comment’. FBC Revised refers to the number of housing units the Council considers should be included in the five year housing land supply given the opinions of Mr Jackson and it’s own review of available evidence. Comment provides some narrative in support of the Council’s position.

Table 1 - Sites with Planning Permission

Ref	Site	FBC	Indigo	Comment	FBC Revised	Comment
HSS1	Queensway, St Annes	350	150	<p>Disagree. Outline planning application ref: 08/0058 for a development of 1150 dwellings, the provision of a 1.5ha school site and 34.8ha of parkland was approved on 21 June 2012.</p> <ul style="list-style-type: none"> • Condition 16: No development hereby permitted shall commence until a scheme for the implementation of all site access measures and off-site highway works/improvements have been submitted to and approved (including details of the Queensway roundabout). <p>There is no evidence that Condition 16 has been discharged.</p> <ul style="list-style-type: none"> • Condition 18: No other development hereby permitted, or any site preparation, shall commence until the new Queensway Roundabout junction have been completed in accordance with the approved scheme <ul style="list-style-type: none"> • Condition 23 (site preparation plan): preloading construction area shown on drawing D4996.014. Photo evidence shows not complete. Reserved Matters for the first 110 dwellings was approved on 1 April 2015 (ref: 3/0257). Conditions partially discharged to ‘allow a technical start on site’. However, substantial level of information still required prior to building construction (and even more for post Phase 1 development) eg Condition 15: “Prior to any further building works asides the roundabout the development will need to confirm details of the flood compensatory storage scheme for the whole development in order for condition 15 to be fully satisfied”. <p>LCC advised that Kensington has requested LCC consider an alternative access arrangement to the signalised roundabout. This would be a traffic signal crossroads (see Mr Corbett</p>	350	<p>The Council does not agree with Mr Jackson’s opinion.</p> <p>The site owner and developer submitted evidence by email to the Council of a delivery rate of 50 units in the first year and 100 units in all subsequent years as part of the Local Plan Examination in Public.</p> <p>The Council amended the delivery rate in the five year supply statement in the May 2017 edit, directly in response the Examination in Public evidence.</p>

				<p>proof). No agreement has been reached with LCC. When agreement, preloading of site required - circa 9 months, then 12 months for construction of access (which will require PP - reasonable to assume this would a standalone application rather than a Section 73 to 08/0058).</p> <ul style="list-style-type: none"> • Assume agreement reached on access - circa October 2017 • Planning application submitted and preloading starts (9 months) - circa July 2018 • Access construction between circa July 2018 and July 2019 • Housing start being built from circa July 2019, therefore Y9 (2019/20) <p>Reduce capacity of the deliverable five year supply by 200 units.</p>		
HS14	Axa, Lytham	45	0	<p>The applicant has shown no commitment to progress S106 over the last four years since Planning Committee. The Council have advised that the application will be disposed of in due course.</p> <p>On 10 August 2017, prior notification for the proposed demolition of the existing buildings on site was approved. Correspondence dated 18 May 2017 on the Council's application system, highlights the applicant's (Gladman) intention to redevelop the site following demolition for a Use C2 residential apartment block with care.</p> <p>As per the Inspector's Appeal Decision issued on 19 May 2015 (ref: APP/L3245/A/14/2228348) (Appendix 24) in relation to a proposed development of up to 30 dwellings at land south of Brook Cottages, Ford, Shrewsbury, C2 units should not be included in the Council's 5 year supply figures unless they comprise self-contained residential units.</p> <p>At this stage, the format and number of units proposed is therefore unknown.</p> <p>Remove site from the deliverable five year supply.</p>	65	<p>The Council does not agree with Mr Jackson's opinion.</p> <p>The Council has received planning application 17/0738 which provides for fully self-contained living accommodation which would not fall within the planning use class C2.</p> <p>Therefore the Council considers the site to be deliverable and has increase the supply to 65 units to reflect changed circumstance since March 2017.</p>
HSS4	Coastal Dunes, Clifton Drive North, Blackpool Airport Corridor (Phase 1)	31	28	Disagree. Phase 1 site has reserved matters consent for 73 dwellings (not 76). 45 units out of the 73 approved homes have been completed therefore only 28 units are to be built	28	<p>The Council agrees with Mr Jackson.</p> <p>Reserved matters have been approved for 73 units and the</p>

				<p>out. Given the progress on site so far, it is considered that the 28 units will be delivered in Year 7 (2017/18).</p> <p>Reduce capacity of the deliverable five year supply by 3 units.</p>		<p>housing supply should be amended to reflect changed circumstance since March 2017.</p>
HSS4	Coastal Dunes, Clifton Drive North, Blackpool Airport Corridor (Phase 2)	210	122	<p>Disagree. It is evident that the applicant is progressing with the Phase 2 site and so, at this current time, it is likely that the site will commence within Year 7 (2017/18). However, as this is the same developer as Phase 1 (Persimmon Homes), the figures need to be amended to reflect a total of 30 dwellings being delivered across both Phases in Year 7 - ie 28 dwellings on Phase 1 and 2 on Phase 2. Phase 2 will then continue to deliver ongoing completions of 30 dpa.</p> <p>Reduce capacity of the deliverable five year supply by 88 units.</p>	210	<p>The Council does not agree with Mr Jackson's opinion.</p> <p>The site owner and developer submitted evidence by email to the Council that while both the northern and southern phases are running they expect to be at 60 units per annum across both (30 each). Following that however the council would expect the annual completions to be nearer 45 dwellings per annum.</p> <p>The Council amended the delivery rate in the five year supply statement in the May 2017 edit, directly in response the Examination in Public evidence.</p>
HSS2	Land Opposite Blackfield End Farm, Warton	175	105	<p>Agree with start in Year 8 (2018/19) but reduce build out rate to match SHLAA assumptions of 15 homes built in the first year and 30 homes in subsequent years. Although the site capacity exceeds 300 homes, there is only one developer, so higher rates are not justified and not evidenced.</p> <p>Reduce capacity of the deliverable five year supply by 70 units.</p>	175	<p>The Council does not agree with Mr Jackson's opinion.</p> <p>The site owner and developer submitted evidence in person to the Council of a delivery rate of 25 units in the first year and 50 units in all subsequent years as part of the Local Plan Examination in Public.</p> <p>The Council amended the delivery rate in the five year supply statement in the May 2017 edit, directly in response the Examination in Public evidence.</p>
HS27	Oaklands Caravan Park, 252 Lytham Road, Warton	53	0	<p>Disagree. An application for the variation of condition 1 of planning permission ref: 11/0759 to enable 110 static holiday caravan pitches and 4 holiday cottages was approved August 2016 (ref: 16/0364). This application covers the same site as application ref: 15/0194.</p> <p>Site still operating as a caravan park and is therefore not available now under NPPF footnote 11. No evidence that S106 will be signed since Planning Committee in January</p>	0	<p>The Council agrees with Mr Jackson.</p> <p>Therefore the Council considers the site to no longer be deliverable and to reflect changed circumstance since March 2017 the supply should be amended accordingly.</p>

				2016 or that a developer is secured to redevelop site for housing, which suggests viability issues. Intentions of landowner are unclear. Remove site from the deliverable five year supply.		
HSS8	The Pastures, Fleetwood Road, Wesham	192	150	Agree that site is currently under construction, but reduce build out rate to match SHLAA assumption of 30 homes per year. Reduce capacity of the deliverable five year supply by 42 units.	192	The Council does not agree with Mr Jackson's opinion. The site owner and developer submitted evidence by email to the Council of a delivery rate of up to 40 units per year as part of the Local Plan Examination in Public. The Council amended the delivery rate in the five year supply statement in the July 2017 edit, directly in response the Examination in Public evidence.

Table 2 - Other sites within the Supply

Ref	Site	FBC	Indigo	Comment	FBC Revised	Comment
HS12	Fairways, Heeley Road, St Annes	20	0	Disagree. The planning history for the site and the fact that the S106 has not been signed for nine years since Planning Committee, suggests that the likelihood of the application being taken forward and implemented is considered to below. Remove site from the deliverable five year supply.	20	The Council does not agree with Mr Jackson's opinion. The site is available now, planning permission has lapsed but is not a pre-requisite for the site to be considered deliverable. The Council considers this site to be deliverable and upon visual inspection site clearance work is currently taking place (September 2017). The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.
HS13	Kingsway Garage, St Annes	30	0	Disagree. It has been five years since Planning Committee with no progress on the S106. It is considered that this delay is not a "reasonable period of time" for the S106 to be signed	30	The Council does not agree with Mr Jackson's opinion.

				<p>and that the likelihood of the application being progressed at this stage is low.</p> <p>As per the Inspector's Appeal Decision issued on 19 May 2015 (ref: APP/L3245/A/14/2228348) (Appendix 24) in relation to a proposed development of up to 30 dwellings at land south of Brook Cottages, Ford, Shrewsbury, C2 units should not be included in the Council's 5 year supply figures unless they comprise self-contained residential units.</p> <p>At this stage, the format and number of units proposed is unknown.</p> <p>Remove site from the deliverable five year supply.</p>		<p>The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable.</p> <p>The Council considers this site to be deliverable.</p> <p>The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.</p>
HS65	Dalmeny Hotel	34	0	<p>Disagree. The site has been discounted on the grounds that the S106 contribution taken to Planning Committee in March 2017 has not been signed and has been identified by the applicant as rendering the development unviable. It is considered that there are viability issues on site.</p> <p>Remove site from the deliverable five year supply.</p>	0	<p>The Council agrees with Mr Jackson's opinion.</p> <p>The applicant has withdrawn the application.</p> <p>Therefore the Council considers the site to no longer be deliverable and to reflect changed circumstance since March 2017 the supply should be amended accordingly.</p>
HSS6	Land at Lytham St Annes Way, Whitehills	15	0	<p>The final part of the site proposed to be allocated by emerging Local Plan Policy SL2 (which holds limited weight due to the status and level of unresolved objections to the Local Plan) is currently occupied by two semidetached residential properties and associated businesses that are in active use. The site is not available now against NPPF footnote 11.</p> <p>There is no evidence on achievability or viability.</p> <p>Remove site from the deliverable five year supply.</p>	15	<p>The Council does not agree with Mr Jackson's opinion.</p> <p>The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable.</p> <p>The Council considers this site to be deliverable.</p> <p>The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.</p>
HS22	Former Clock Garage, Preston New Road, Westby	14	0	<p>Disagree. Having been validated in December 2015, the reserved matters application is still awaiting a decision with comments and additional information having not been submitted since July 2016. It is considered that progress on the application has ceased in order for the site to be sold and reserved matters subsequently submitted on the developer's behalf. There are clearly issues with the application being determined or indeed progressing.</p>	14	<p>The Council does not agree with Mr Jackson's opinion.</p> <p>The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable.</p>

				Remove site from the deliverable five year supply.		The Council considers this site to be deliverable. The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.
HS28	Sunnybank Mill, Kirkham	15	0	<p>Disagree. Prior notification was given for the demolition of Unit 1 in August 2017 and preapplication discussions took place in June and July 2017. However, the outcome of this is not known.</p> <p>The prior notification for the proposed demolition relates only to Unit 1 which forms part of the wider Sunny Bank Mill allocation proposed by emerging Local Plan Policy SL4 (which holds limited weight due to the status and level of unresolved objections to the Local Plan). The mill comprises one large building which is separated into 11 units which fall under at least seven different land ownerships meaning there could be fundamental achievability issues with the delivery of the wider site.</p> <p>Should this site come forward in isolation to the wider allocation, it could also compromise its comprehensive redevelopment. There is no evidence that the remainder of the site is achievable.</p> <p>Given the complexities and timescales associated with the amalgamation of the separate parcels of land on the remaining part of the site, in order to create a single development site, it is unrealistic for the site to be delivered within the five year period. There may be longer-term prospects to deliver outside the five year period, but the site is not available now under NPPF footnote 11. There is no evidence on achievability or viability.</p> <p>Remove site from the deliverable five year supply.</p>	15	<p>The Council does not agree with Mr Jackson's opinion.</p> <p>The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable.</p> <p>The Council considers this site to be deliverable.</p> <p>The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.</p>
HS30	Pennington View, Weeton Road, Wesham	12	0	Disagree. Whilst the site is proposed to be allocated by emerging Local Plan Policy SL4 (which holds limited weight due to the status and level of unresolved objections to the Local Plan), the site has been subject to a number of planning applications since 2010, all of which have either been refused or expired without being implemented, suggesting there may be deliverability issues with the site. There is no live planning application for the site and there is no reasonable prospect of a scheme being built out over the next five years. Therefore, the site is not deliverable against NPPF footnote 11.	12	<p>The Council does not agree with Mr Jackson's opinion.</p> <p>The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable.</p> <p>The Council considers this site to be deliverable.</p>

				Remove site from the deliverable five year supply.		Upon visual inspection site clearance has now taken place and the Council has held discussions concerning a revised development scheme. The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.
HS38	Land rear of High Meadows, Lower Lane, Freckleton	13	0	Disagree. The site is proposed to be allocated by emerging Local Plan Policy SL5 (which holds limited weight due to the status and level of unresolved objections to the Local Plan) for 13 dwellings. However, the site is not identified on the Policies Map and it is not possible to locate the site or its capacity. There is no historic, current live or pending permission. Therefore, there is no evidence that the site is deliverable against NPPF paragraph 11, ie there is no evidence that the site is available now, offer a suitable location for development now, that the site is achievable with a realistic prospect that housing will be delivered within five years and that development of the site is viable. Remove site from the deliverable five year supply.	13	The Council does not agree with Mr Jackson's opinion. The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable. The Council considers this site to be deliverable. The Council has held pre-application discussions concerning a revised development scheme. The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.
HS66	Quernmore Trading Estate, Croft Butts Lane, Freckleton	10	0	Disagree. Permission was refused in March 2017 for failure to provide a S106. The application is currently subject to an appeal (ref: APP/M2325/W/17/3176657), which suggests potential achievability and viability concerns. Therefore, there is no evidence that the site is deliverable against NPPF paragraph 11. Remove site from the deliverable five year supply.	10	The Council does not agree with Mr Jackson's opinion. Planning permission was refused, however the principle of development was not one of the reasons for refusal. The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable. The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed. The site was omitted in error from previous version of the Housing Land Supply Statement and Housing Trajectory, but this was corrected in the July edit.

HS41	Thornfield Caravan Park, Staining	15	0	<p>Disagree. The site is proposed to be allocated by emerging Local Plan Policy S5 (which holds limited weight due to the status and level of unresolved objections to the Local Plan) for 13 dwellings. However, there is no historic, current live or pending permission on the site.</p> <p>The Facebook website shows that bookings are still being taken, which suggests that the site is not available. Title is not registered with Land Registry.</p> <p>Therefore, there is no evidence that the site is deliverable against NPPF paragraph 11, ie there is no evidence that the site is available now, offer a suitable location for development now, that the site is achievable with a realistic prospect that housing will be delivered within five years and that development of the site is viable.</p> <p>Remove site from the deliverable five year supply.</p>	15	<p>The Council does not agree with Mr Jackson's opinion.</p> <p>The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable.</p> <p>The Council considers this site to be deliverable.</p> <p>The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.</p>
HS47	Land North of North View Farm, Wrea Green	15	0	<p>Disagree. The site is proposed to be allocated by emerging Local Plan Policy S5 (which holds limited weight due to the status and level of unresolved objections to the Local Plan) for 15 dwellings.</p> <p>Two applications for 15 and 13 dwellings on the same site (outline and full) were taken to Planning Committee in March and July 2015 respectively. Both applications were approved subject to S106. However, the S106s were never signed and the applications were withdrawn in November 2016, suggesting potential achievability and viability concerns.</p> <p>Therefore, there is no evidence that the site is deliverable against NPPF paragraph 11.</p> <p>Remove site from the deliverable five year supply.</p>	15	<p>The Council does not agree with Mr Jackson's opinion.</p> <p>The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable.</p> <p>The Council considers this site to be deliverable.</p> <p>The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.</p>
HS50	Land East of Rowan Close, Ash Lane, Clifton	30	0	<p>Disagree. The S106 has not been signed since Planning Committee in September 2015, reserved matters are required to be submitted and approved and conditions need to be discharged before the site can be delivered. There are clearly delays with the site alongside potential viability or deliverability issues.</p> <p>Remove site from the deliverable five year supply.</p>	30	<p>The Council does not agree with Mr Jackson's opinion.</p> <p>The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable.</p> <p>The Council considers this site to be deliverable.</p> <p>The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.</p>

HS51	Newton Hall, School Lane, Newton	15	0	<p>Disagree. The site is proposed to be allocated by emerging Local Plan Policy S5 (which holds limited weight due to the status and level of unresolved objections to the Local Plan) for 86 dwellings. However, there is no historic, current live or pending permission.</p> <p>Site is currently a farm in active use and is therefore not available. Title is not registered with Land Registry.</p> <p>Therefore, there is no evidence that the site is deliverable against NPPF paragraph 11, ie there is no evidence that the site is available now, offer a suitable location for development now, that the site is achievable with a realistic prospect that housing will be delivered within five years and that development of the site is viable.</p> <p>Remove site from the deliverable five year supply.</p>	15	<p>The Council does not agree with Mr Jackson's opinion.</p> <p>The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable.</p> <p>The Council considers this site to be deliverable.</p> <p>The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.</p>
HS52	Cobweb Barn, Oak Lane, Newton	15	0	<p>Disagree. The site is proposed to be allocated by emerging Local Plan Policy S5 (which holds limited weight due to the status and level of unresolved objections to the Local Plan) for 29 dwellings. However, there is no historic, current live or pending permission.</p> <p>Site is currently agricultural land in active use and is therefore not available.</p> <p>Therefore, there is no evidence that the site is deliverable against NPPF paragraph 11, ie there is no evidence that the site is available now, offer a suitable location for development now, that the site is achievable with a realistic prospect that housing will be delivered within five years and that development of the site is viable.</p> <p>Remove site from the deliverable five year supply.</p>	30	<p>The Council does not agree with Mr Jackson's opinion.</p> <p>The site is available now, planning permission is not a pre-requisite for the site to be considered deliverable.</p> <p>The Council considers this site to be deliverable.</p> <p>The site is proposed for allocation in the emerging local plan, a barrier to delivery has therefore been removed.</p> <p>Since March 2017 the Council has received planning application 17/0595 the number of units and delivery date has been amended to reflect changed circumstance since March 2017.</p>
HS53	Singleton Village, Singleton	15	0	<p>Disagree. The site is proposed to be allocated by emerging Local Plan Policy S5 (which holds limited weight due to the status and level of unresolved objections to the Local Plan) for 15 dwellings.</p> <p>There is no planning permission on site. The site went to Planning Committee in April 2015 and was approved subject to S106. However, the application was withdrawn in May 2016, therefore suggesting viability and achievability issues.</p>	0	<p>The Council agrees with Mr Jackson's opinion.</p> <p>The applicant has withdrawn the application.</p> <p>Therefore the Council considers the site to no longer be deliverable and to reflect changed circumstance</p>

				Therefore, there is no evidence that the site is deliverable against NPPF paragraph 11. Remove site from the deliverable five year supply.		since March 2017 the supply should be amended accordingly.
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Table 3 - Summary Position on Individual Sites and the Housing Land Supply resulting from Table 1 and Table 2

FBC Original	Indigo	FBC Revised
1,324	555	1,254

3. Allowance for supply not coming forward

3.1 The Council does not agree with Mr Jackson's opinion in relation to calculating an allowance for housing supply not coming forward in the five year period. It is recognised that not all developments identified within the five year supply will be developed. During the Local Plan to 2032 Examination in Public Hearing Sessions a detailed 'forensic' evaluation of all large sites (sites of 10 units or more) was completed and the Housing Land Supply Trajectory amended according. Given this site specific evidence, the Council no longer considers it appropriate to apply a 10% allowance to all sites within the supply; instead the discount applies to small sites only.

3.2 Relying on data from the Housing Land Availability Schedule, the Council is aware that 61 units were the subject of a lapsed planning permission from 2011 to 2017. To estimate what proportion of implementable planning permissions the 61 represents, the Council has relied on the total number of small site completions and the total number of current small site commitments. Accordingly the 61 units represents approximately 11% of the implementable planning permissions over the corresponding time period. Therefore, in line with the approach of other Local Authorities and in seeking to make a reasonable allowance for small sites not coming forward in the five year period, the Council will apply a 10% discount to all small sites within the supply.

4. Demolitions

4.1 The Council does not agree with Mr Jackson's opinion in relation to understanding and calculating demolitions. Having reviewed the historic completion data the Council agrees with Mr Jackson that it requires amendment by 35 units. 27 of these units are demolitions, where no replacement dwellings have been proposed, the remaining 8 units are corrections not related to demolitions. The Council agrees to amend the historic delivery by 35 units in-line with the published data in the most up to date Housing Land Availability Schedule. All other demolitions proposed by Mr Jackson are the result of an incorrect reading of the data table within the Housing Land Availability Schedule. If these were to be included it would result in 'double counting' as all sites included within the housing land supply are net of any existing dwellings within the application site.

4.2 The historic demolitions which have been inaccurately recorded by the Council are shown in table 4 below. Relying upon the data in table 4 the Council considers it appropriate to make an allowance for demolitions of 5 dwellings per annum.

Table 4 - Historic Demolitions 2011 to 2017

Year	Demolitions
2011/2012	0
2012/2013	0
2013/2014	1
2014/2015	22
2015/2016	2
2016/2017	2
Total	27
Allowance	5dpa

Source: Housing Land Availability Schedule 2017

5. Empty Homes Allowance

- 5.1 The Council disagrees with the opinion of Mr Jackson that there should be no allowance for empty homes returning to the housing supply. This was a matter covered in detail at the local plan Examination in Public during 2017. Evidence was presented by Wainhomes (EL2.006a – available on the Council’s website) relying on data provided by Department for Communities and Local Government (DCLG), this data is re-presented below;

Table 5 - Long Term Empty Properties (DCLG) Live Data Table

Year	Long Term Empty Properties	Annual Change
October 2011	724	-
October 2012	653	-71
October 2013	581	-72
October 2014	506	-75
October 2015	537	+31
	Average	-46.75

Source: Wainhomes (EL2.006a – available on the Council’s website)

- 5.2 The Council relied on this data source as evidence that there was a stock of 724 long term empty properties which could be brought back into occupation in 2011, the start of the plan period. These would be properties that could be relied upon to meet an objectively assessed need for housing. This data source and the Council’s reliance upon it for supply (50 units) were matters covered during the Local Plan Examination in Public and there is no proposed Main Modification on this matter. The Council has a robust approach to dealing with empty homes, the latest update on this can be seen at Item 7 of the Environment, Health and Housing Committee Meeting on September 5th 2017 (available on the Council’s website).

6. Revised Calculations of the 5 Year Housing Land Supply

6.1 Table 6 sets out the changes to the Council's position in relation to the supply of housing land in response to Mr Jackson's opinions. The resulting impact on the five year housing land supply position is also set out in a consistent format to that of Mr Jackson for ease of comparison.

Table 6 – Agreed Changes in the Supply

Item	Consequences
Site Specific Information	-70 from the supply
Demolitions (Historic correction)	-35 historic completions (resulting in increased backlog)
Demolitions (Future allowance)	-25 (5 years * 5 dpa allowance) from the supply
Empty Homes	No change
Supply not delivering within 5 years	No change

Table 7 – Revised calculation of 5 Year Housing Land Supply

	Sedgefield			Liverpool		
	FBC	Indigo	FBC Revised	FBC	Indigo	FBC Revised
Requirement						
Adjusted five year requirement including shortfall and 20% buffer	3,632	3,674	3,674	2,870	2,885	2,885
Supply						
Existing supply	3,580	2,811	3,510	3,580	2,811	3,510
Potential supply						
Long term empty homes allowance	50	0	50	50	0	50
Allowance for small sites	80	80	80	80	80	80

10% allowance for supply not coming forward	-33	-289	-33	-33	-289	-33
Gross total supply	3,677	2,602	3,607	3,677	2,602	3,607
Demolitions allowance	0	-120	-25	0	-120	-25
Net total supply	3,677	2,482	3,582	3,677	2,482	3,582
Projected oversupply/undersupply	45	-1,192	-92	807	-403	697
Equivalent years supply	5.1	3.4	4.9	6.4	4.3	6.2

7. Conclusions

7.1 On the basis of the revised information and assumptions set out above, I have concluded that the council is able to demonstrate a 4.9 year housing supply based on the 'Sedgefield' methodology or a 6.2 year supply based upon the 'Liverpool' methodology. Mr Birch addresses the implications of the revised housing supply figures in his supplemental proof of evidence.

