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Fylde Council Local Plan Examination - Stage 3

On Behalf of Carrington Group Ltd

E-mail statement to: Tony.blackburn@fylde.gov.uk – Deadline 9pm 28 November 2017

For the purposes of clarity the Carrington Group wish to participate at the following Matters:

Session 3 – Matters 2, 3 and 4

Session 3

Housing - Site Allocations, 5 Year Housing Land Supply and the Settlement Hierarchy

Matter 1 – No Comment

Matter 2 – It has been suggested that the 10% non-implementation rate should be applied to all sites with planning permission, not just small site; is this approach justified? What implications, if any would this have on housing supply, specifically the 5 year housing land supply, if it was applied across the board? Does evidence support the use of a higher 20% non-implementation rate for small sites?

Comments

Planned housing trajectories should be realistic, accounting and responding to lapse rates, lead-in times and sensible build rates. This is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and then being realistic about how fast they will deliver so that supply is maintained throughout the plan period.

Not every planning permission granted will translate into the development of homes. This could mean an entire site does not come forward, or delivery on a site can be slower than originally envisaged. It is thus not realistic to assume 100% of planning permission granted in any given location will deliver homes. Planning permissions can lapse for a number of reasons:

- The landowner cannot get the price for the site that they want;
- A developer cannot secure finance or meet the terms of an option;
- The development approved is not considered to be financially worthwhile;
- Pre-commencement conditions take longer than anticipated to discharge;
- There are supply chain constraints hindering a start; or
- An alternative permission is sought for the scheme after approval, perhaps when a housebuilder seeks to implement a scheme where the first permission was secured by a land promoter.

These factors reflect that land promotion and housebuilding is not without its risks.

A more practical issue is that Plans and housing land trajectories must adopt sensible assumptions, based on national benchmarks, or – where the data exists – local circumstances, to understand the scale of natural non-implementation.

The implications on housing supply are can only be positive. To accommodate a 10% or 20% lapse rate the Council will need to allocate additional sites in order to meet the housing requirement. However, if the lapse rate was proven to be less than the adopted percentage, this would result in additional dwellings being developed; an outcome supported by the Framework.

Whilst some large sites will be needed address none delivery, there is also an opportunity to bring forward smaller sites to benefit SME's which will ultimately support the governments wider ambition to increase competition in the house building market¹.

which aligns with Government expectations withthat can be Housing requirements are a minimum therefore

Matter 3 – In my letter of 3 July 2017 I asked the Council for further clarification on their preferred approach to delivering the identified shortfall in housing delivery using the Liverpool method (across the plan period). In light of the Council's evidence on bringing sites forward for delivery and the availability of additional sites, is the use of the Liverpool method justified?

Comments

The PPG firmly promotes the Sedgefield approach as the most appropriate method: *“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.”*² The choice is not between Sedgefield and Liverpool, but between Sedgefield and re-distributing need to other authorities where it cannot be met in the 5 years.

Whilst it might be argued that the paragraph doesn't prevent the application of the Liverpool approach; the plain wording of the paragraph does not appear to support that interpretation.

I refer to the Fylde Council Housing Land Supply Trajectory Fylde Local Plan 2032 (Base Date 31 March 2017). In this trajectory it is the Councils position that 3,489 dwellings will be delivered between 1 April 2017 and 31 March 2022 this represents an increase of **162%** on the previous 6 years.

The Council can't have it both ways – it can't express unbridled confidence in the delivery of sites and at the same time promote the Liverpool method.

Derbyshire Dales recently tried to promote the use of the Liverpool method. The Inspectors Report³ (13 November 2017) is very clear at §73 that:

“the apportionment of the shortfall over the whole Plan period (the Liverpool approach) would not significantly boost the supply of housing to the same extent as using the Sedgefield approach so the latter should be used, particularly as the Council indicates that it has a 5 year supply applying Sedgefield”.

¹ Autumn Budget 2017 – HC587 (November 2017)

² ID 3-035-20140306

³ Report on the Examination of the Derbyshire Dales Local Plan – File Ref: PINS/P1045/429/7

Matter 4 – The Council in EL7.002 confirm that they have a 5 year housing land supply (5YHLS) whether Sedgefield (5.1 years) or Liverpool (6.4 years) is used. A recent Council planning policy statement (dated September 2017) produced for an appeal (PINS Ref: APP/M2325/W/16/3174723) indicates that the supply is now 4.9 years using the Sedgefield approach or 6.2 years using the Liverpool Method. Can the Council comment on their update and its implications for housing land supply within the plan? Will the housing provision have a reasonable prospect of delivering a 5 year housing land supply at the point of adoption of the plan.

Comments

Planning Appeal PINS Ref: APP/M2325/W/16/3174723 was a successful Appeal (Hearing) submitted by Carrington Group Ltd.

Our position on the balance of the housing requirement and supply in Fylde for the period 1st April 2017 to 31st March 2022, is summarised at Table 5.1 below. It shows that should the Local Plan Inspector be minded to approve the Council's OAN figure of 415 dpa the Council's deliverable 5 year supply position is 4.31 years, not the 4.9 years claimed by the Council.

Table 5.1 – Balance of Requirement and Supply

OAN Plan Period Housing Requirement at 31st March 2017	No. of dwellings
OAN plan period housing requirement 2011- 2031 (21 years) (415 dpa x 21 years)	8,715
OAN housing requirement between 1 st April 2011 and 31 st March 2017 (6 years x 415 dpa)	2,490
Completions between 1 st April 2011 and 31 st March 2017 (6 years)	1,538
Under delivery (shortfall) between 1 st April 2011 and 31 st March 2016 (2,490 – 1,538)	952

Five Year Housing Requirement at 31st March 2017	No. of dwellings
Annual housing requirement	415
5 year housing requirement and shortfall ((415 dpa x 5 years) + 952)	3,027
Adjusted 5 year requirement including shortfall and 20% buffer (3,027 + 20%)	3,632
Adjusted annual housing requirement (3,632 / 5)	726

Five Year Supply at 31st March 2017	No. of dwellings
Adjusted 5 year requirement including shortfall and buffer	3,632
Total Supply as set out in table 4.1 above	3,132

Over/Under Supply 5 year period (Total Supply – Requirement, 3,123 – 3,632)	- 500
Equivalent Years Supply (3,132 / 726)	4.31

Our assessment had regard for the Lichfields (41917/02/MW/PN/14780793v1) letter which was submitted to the Inspector on 14 September 2017, in which Lichfields, Turleys, Emery Planning and Pegasus Planning cast doubt on the Council' delivery rates.

Our assessment included additional sites and was supported by Gladman.

It is our view that the Council is not able to demonstrate a supply of specific deliverable sites sufficient to provide five years' worth of housing against their housing requirement; a position which will only worsen when all or a proportion of Wyre's unmet need (1,356 dwellings) is taken into consideration.

The Council needs to identify additional sites (in the short term) to address the lapse rate, unmet need and non-delivery of sites. The most logical location for these additional dwellings is to the east of Poulton le Fylde (which is a Tier 1 Settlement in Wyre); a location which will now benefit from a new bypass an announcement was made by Highways England on 24 October 2017) confirming the delivery of the bypass (Option 1 of the draft proposals) as part of the Government's £15 billion Road Investment Strategy. A copy of the publication supporting the announcement is attached for reference.