



## **HALLAM LAND MANAGEMENT LTD**

## **FYLDE COUNCIL LOCAL PLAN**

## **EXAMINATION HEARING STATEMENT**

### **SESSION 3: HOUSING – SITE ALLOCATIONS, 5 YEAR HOUSING LAND SUPPLY AND THE SETTLEMENT HIERARCHY**

**Date:** November 2017

**Pegasus Ref:** KL/MAN.0145/R019v1

## **Pegasus Group**

Suite 4b | 113 Portland Street | Manchester | M1 6DW

**T** 0161 393 3399 | **W** [www.pegasusgroup.co.uk](http://www.pegasusgroup.co.uk)

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

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**1. INTRODUCTION**

- 1.1 Pegasus Group are instructed by Hallam Land Management (HLM) to make representations to the Fylde Local Plan Stage 3 Examination Hearings. HLM have land interests within the Fylde District.
- 1.2 This statement provides a response to the questions set forward for Session 3: Housing – Site Allocations, 5-year housing land supply and the settlement hierarchy.

**2. SESSION 3: HOUSING – SITE ALLOCATIONS, 5 YEAR HOUSING LAND SUPPLY AND THE SETTLEMENT HIERARCHY**

***Question 1: In the light of the Council's updated site allocations and site delivery methodology:***

***a) Is the amount of housing proposed for each site justified having regard to any constraints and the provision of necessary infrastructure?***

***b) Are the Council's revisions to the methodology for site delivery and adjustments to the build out rates reasonable and justified?***

***c) Is the housing trajectory realistic for each updated allocation: are there any sites which might not be delivered in accordance with the timescale set out in the trajectory?***

2.1 Unfortunately, we have not had scope to undertake a full, up-to-date, detailed review of delivery rates on all the sites within Policies SL1 and SL5; therefore, we cannot fully comment. We can, however, make reference to the representations to the additional evidence consultation (EL.002) in September 2017. A consensus letter was provided by Lichfields on behalf of Taylor Wimpey UK Limited and signed by Pegasus Group on behalf of HLM, Emery Planning on behalf of Wainhomes Ltd and Turleys on behalf of Strategic Land Group (**see Appendix 1**). This letter concluded that the Council's existing supply should be reduced to at least 306 dwellings from (3,710 to 3,404).

2.2 Below we have provided a brief summary of the amount of proposed housing for each site and if these sites should be included in the 5YHLS:

- **Fairways, Heeley Road, St Annes (HS12)** – 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. The Council has included 20 more dwellings in the 5 YHLS than the position on which consensus was reach at the Stage 2 hearings.
- **Kingsway Garage, St Annes (HS13)** – 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. The Council has included 30 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.
- **Axa Lytham (HS14)** – 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. The Council has included 45 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.
- **Land to the West, Ballam Road, Lytham (HS15)** - 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. The Council has included 9 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.
- **Coastal Dunes, Clifton Drive North, Blackpool Airport Corridor (HSS4)** - 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). 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.

- **Oaklands Caravan Park, 252 Lytham Road, Warton (HS27)** - 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. The Council has included 53 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.
- **The Pastures, Fleetwood Road, Wesham (HSS8)** - No increase in delivery from this site was discussed and agreed at the Stage 2 hearings. 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.
- **Elswick Neighbourhood Development Plan Allocation** - No increase in delivery from this site was discussed or a consensus reached at the Stage 2 hearings. 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.
- **Rear of 54 Bryning Lane, Wrea Green (HS45)** - No increase in delivery from this site was discussed and agreed at the Stage 2 hearings. 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.
- **Rowan Close, Ash Lane (HS50)** - 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. The Council has included 30 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.
- **Pennine View (HS30)** - Planning Permission has lapsed and this site should therefore not be included in the 5YHLS. The Council has included 12 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.
- **Queensway, St Annes (HSS1)** - 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 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.

2.3 Indeed, the appeal decision mentioned in question 4 affirms the Council's 5YHLS. This appeal decision confirms that the Council are unable to demonstrate a five-year supply of housing, with

the parties submitting an agreed position of a 4.9-year HLS using the Sedgefield approach and a 6.2-year HLS using the Liverpool approach. As will be discussed later in this statement, we fully support the Sedgefield approach to the deliver the borough's housing requirement and as such, we believe that the Council are unable to demonstrate a 5-year supply. In light of the above appeal, it can be assumed that the housing allocations are not currently delivering at the desired level to provide a 5-year supply of housing. We consider the 5-year housing land supply position to be finely balanced/vulnerable and it should be demonstrated that the Council have not accounted for all changes and the individual delivery rates when determining this supply. At present, we do not the Council have accounted for this.

- 2.4 Moreover, the Council do not account for any slippage in terms of the delivery from sites within the trajectory which come about due to unforeseen circumstances, which is a critical flaw in their approach. This will leave the plan in a particularly precarious position throughout its lifetime and particularly towards the back end of the plan period. Indeed, the Lichfield letter at Appendix 1 demonstrates that at least 306 units should be removed already from the supply at this stage on the basis of the local information tabled at the previous examination hearings, and it is highly unlikely that further sites will underdeliver as the 5-year period progresses and new constraints and issues arise.
- 2.5 That said, we note the Council are utilising the 20% buffer thereby bringing supply from the back end of the plan period forwards to ensure choice and competition upon adoption. We endorse this approach. Furthermore, should the Council continue to deliver high numbers over the next few years (as indicated by last year's figures), we accept that the 20% buffer should reduce to 5% within the current 5-year period. Based on last year's delivery and the fact that a lot of the next 5-year supply already has planning permission, that outcome would seem likely.
- 2.6 Nevertheless, we question if the amount proposed for each allocation will be delivered and in the case that it isn't, this will have a detrimental impact on the Council's five-year supply. As shown with the evidence provided above, there is evidence to suggest that the Council cannot demonstrate a five-year supply and the existing housing supply figure should be reduced and additional land brought forward.
- 2.7 In order to boost the 5YHLS, we highly recommend that the Council identify additional land/extend existing allocations to ensure there is an adequate 5YHLS to accommodate the OAHN needs of the borough.

***Question 2: It has been suggested that the 10% non-implementation rate should be applied to all sites with planning permission, not just small sites: 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***

- 2.8 HLM firmly disagree that a 10% implementation rate should only be applied to small sites. This should be applied to all sites with planning permission. To assume that all larger sites will deliver as anticipated is unrealistic as there are numerous reasons why these sites can stall or not deliver.

It is recognised that detailed discussions are held when planning the development of larger sites, however, these discussions cannot foresee all eventualities. On this basis, HLM recommend that the 10% non-implementation rate is applied to all permissions irrespective of size.

2.9 By implementing this rate across the board, there is a strong possibility that this will lead to lower housing supply figure. If this is the case, alternative and additional sites should be allocated to allow for this.

**Question 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?**

2.10 The Council retains its recommendation and preference for the use of the Liverpool method as the preferred method for calculating the 5-year supply from the adoption of the plan, however, HLM fully endorse the use of the Sedgefield method of delivery. This approach requires the delivery of any under-supply of housing to be delivered within the first five years, in line with Planning Policy Guidance (ID 3-035);

*‘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 five years, local planning authorities will need to work with neighbouring authorities under Duty to Cooperate’.*

2.11 As shown in the Table 1 below, taken from Annex 1 Objectively Assessed Housing and Economic Development Needs, the Council have demonstrated an under delivery of housing from 2011-2016.

Table 1: Housing Land Supply Trajectory (base date 31<sup>st</sup> March 2017)

	1 2011-2012	2 2012-2013	3 2013-2014	4 2014-2015	5 2015-2016	6 2016-2017	7 2017-2018	8 2018-2019	9 2019-2020	10 2020-2021	11 2021-2022	12 2022-2023	13 2023-2024	14 2024-2025	15 2025-2026	16 2026-2027	17 2027-2028	18 2028-2029	19 2029-2030	20 2030-2031	21 2031-2032	
Total Housing Provision	140	162	234	230	317	455	676	740	883	773	802	737	565	396	340	325	280	252	166	160	160	8793
Annual Housing Requirement	415	415	415	415	415	415	415	415	415	415	415	415	415	415	415	415	415	415	415	415	415	8715
Annual Performance Against Requirement	-275	-253	-181	-185	-98	40	261	325	468	358	387	322	150	-19	-75	-90	-135	-163	-249	-255	-255	78

2.12 Indeed, the Council have only delivered 415 dpa twice since 1991, which was in 1992/93 and 2016/17. The Council have stated that 415 dpa will represent a significant step change for the Council in terms of delivery and have used this as an excuse to not target a higher OAN figure.

2.13 We do not consider this under-supply to be a valid reason for the LPA to not provide for the OAHN need that now exists in the borough. Given these previous delivery rates, we feel it is imperative that this under -supply of housing is provided within the first five years of the plan, and as such, the Sedgefield approach is adopted.

- 2.14 To address this under delivery and provide a five-year supply of housing, we recommend that the LPA identify an additional supply of sites should be allocated for residential development.

***Question 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?***

- 2.15 The appeal decision above, dated the 6<sup>th</sup> November 2017, confirms that Fylde Council currently have a HLS of 4.9 years. Given that the plan has not yet been adopted and the Council are unable to demonstrate a five-year supply, this raises some serious concerns.
- 2.16 In light of this, and the fragile nature of the five-year supply, added to the Council's past under delivery of housing, the Council need to address this under supply imminently to ensure that when the plan is adopted, the Council can confidently demonstrate a five-year supply. To address this lack of supply, we highly recommend that the Council allocate additional sites for residential development. By identifying additional sites, this will bolster the supply of housing and provide more certainty that a five-year supply can be provided at the point of adoption of the local plan and beyond.

***Question 5: In the Settlement Hierarchy Note (July 2017) (part of EL7.002), the Council concludes that there is no justification for altering the positions of Wrea Green and Elswick within the settlement hierarchy. Does the evidence support this approach?***

- 2.17 HLM have no comment to make on this issue.

**APPENDIX 1: Lichfield’s Joint Statement**



Mr T Blackburn  
15 Ottawa Close  
Blackburn  
BB2 7EB

**Date:** 14 September 2017

**Our ref:** 41917/02/MW/PN/14780793v1

**Your ref:**

Dear Mr Blackburn

This Statement has been prepared for the Inspector's attention on behalf of representatives of the development industry with land interests in Fylde and who were, either themselves or through their agents, in attendance at the Fylde Local Plan Examination in Public [EiP] Stage 2 Hearing Sessions in June 2017. They include Colin Robinson of Lichfields (on behalf of Taylor Wimpey UK Limited), Graham Lamb of Pegasus Planning (on behalf of Hallam Land Management Limited), Stephen Harris of Emery Planning (on behalf of Wainhomes Limited) and David Diggie of Turleys (on behalf of Strategic Land Group).

The EiP Inspector will recall that on days 1 and 2 (Tuesday 20<sup>th</sup> and Wednesday 21<sup>st</sup> June 2017) of the Stage 2 hearing sessions a forensic examination was undertaken regarding the delivery from several sites in the Council's Five Year Housing Land Supply [5YHLS] trajectory from June 2017<sup>1</sup>. A general consensus was reached between all parties (including the Council) in relation to the delivery of many of the sites and it was the understanding of the undersigned parties that the agreed position would be accurately reflected when the Council produced and published its updated 5YHLS position for consultation.

As part of the current Consultation on Additional Evidence in Support of the Fylde Local Plan to 2032, Fylde Borough Council [FBC] has published a 'Five Year Housing Supply Statement, base dated 31st March 2017 Examination in Public Edit July 2017' [July 2017 HSS]. The July 2017 HSS states that the Council considers it can demonstrate a 5.1 year supply of housing land, based on the Sedgfield method.

The undersigned parties have now reviewed the updated July 2017 HSS and wish to notify the Inspector that the claimed delivery from many of the sites does not reflect the general consensus reached and/or points discussed had during the Stage 2 hearing sessions.

This statement addresses each site in turn and for each site, sets out:

- 1 A summary of the points discussed and/or consensus reached;
- 2 The delivery from the site set out in the June 2017 HSS;
- 3 The expected delivery following the Stage 2 Hearings;
- 4 The delivery from the site set out in the July 2017 HSS; and,

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<sup>1</sup> Set out in the 'Five Year Housing Supply Statement, base dated 31st March 2017.

- 5 A summary of how the delivery in the July 2017 HSS reflects, or otherwise, the points discussed and/or general consensus reached at the Stage 2 Hearing Sessions.

### **Fairways, Heeley Road, St Annes - HS12**

*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.

Table 1 Housing Supply from Fairways, Heeley Road, St Annes - HS12

	Year 7 2017/18	Year 8 2018/19	Year 9 2019/20	Year 10 2020/21	Year 11 2021/22	Total 5YHLS
June 2017 HSS	0	0	15	5	0	20
Expected position following the Stage 2 Hearings	0	0	0	0	0	0
July 2017 HSS	0	0	15	5	0	20

Source: June 2017 HSS, July 2017 HSS, Stage 2 hearing sessions and Lichfields Analysis

*Summary:* The Council has included 20 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.

### **Kingsway Garage, St Annes - HS13**

*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.

Table 2 Housing Supply from Kingsway Garage, St Annes - HS13

	Year 7 2017/18	Year 8 2018/19	Year 9 2019/20	Year 10 2020/21	Year 11 2021/22	Total 5YHLS
June 2017 HSS	0	0	15	15	0	30
Consensus reached at stage 2 Hearing Sessions	0	0	0	0	0	0
July 2017 HSS	0	0	15	15	0	30

Source: June 2017 HSS, July 2017 HSS, Stage 2 hearing sessions and Lichfields Analysis

*Summary:* The Council has included 30 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.

### **Axa, Lytham - HS14**

*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.

Table 3 Housing Supply from Axa, Lytham - HS14

	Year 7 2017/18	Year 8 2018/19	Year 9 2019/20	Year 10 2020/21	Year 11 2021/22	Total 5YHLS
June 2017 HSS	0	0	15	30	0	45
Consensus reached at stage 2 Hearing Sessions	0	0	0	0	0	0
July 2017 HSS	0	0	15	30	0	45

Source: June 2017 HSS, July 2017 HSS, Stage 2 hearing sessions and Lichfields Analysis

*Summary:* The Council has included 45 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.

### Land to the West, Ballam Road, Lytham - HS15

*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.

Table 4 Housing Supply from Land to the West, Ballam Road, Lytham - HS15

	Year 7 2017/18	Year 8 2018/19	Year 9 2019/20	Year 10 2020/21	Year 11 2021/22	Total 5YHLS
June 2017 HSS	0	12	0	0	0	12
Consensus reached at stage 2 Hearing Sessions	0	0	0	0	0	0
July 2017 HSS	9	0	0	0	0	9

Source: June 2017 HSS, July 2017 HSS, Stage 2 hearing sessions and Lichfields Analysis

*Summary:* The Council has included 9 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.

### Coastal Dunes, Clifton Drive North, Blackpool Airport Corridor - HSS4

*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. 1/4 of a year's delivery in 2017/18).

Table 5 Housing Supply from Coastal Dunes, Clifton Drive North, Blackpool Airport Corridor - HSS4

	Year 7 2017/18	Year 8 2018/19	Year 9 2019/20	Year 10 2020/21	Year 11 2021/22	Total 5YHLS
June 2017 HSS	30	60	60	60	60	270
Consensus reached at stage 2 Hearing Sessions	11	45	45	45	45	191
July 2017 HSS	30	45	45	45	45	210

Source: June 2017 HSS, July 2017 HSS, Stage 2 hearing sessions and Lichfields Analysis

*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.

## **Oaklands Caravan Park, 252 Lytham Road, Warton – HS27**

*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.

Table 6 Housing Supply from Oaklands Caravan Park, 252 Lytham Road, Warton – HS27

	Year 7 2017/18	Year 8 2018/19	Year 9 2019/20	Year 10 2020/21	Year 11 2021/22	Total 5YHLS
June 2017 HSS	0	0	15	30	8	53
Consensus reached at stage 2 Hearing Sessions	0	0	0	0	0	0
July 2017 HSS	0	0	15	30	8	53

Source: June 2017 HSS, July 2017 HSS, Stage 2 hearing sessions and Lichfields Analysis

*Summary:* The Council has included 53 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.

## **The Pastures, Fleetwood Road, Wesham - HSS8**

*Discussions at Stage 2 hearings:* No increase in delivery from this site was discussed and agreed at the Stage 2 hearings.

Table 7 Housing Supply from The Pastures, Fleetwood Road, Wesham - HSS8

	Year 7 2017/18	Year 8 2018/19	Year 9 2019/20	Year 10 2020/21	Year 11 2021/22	Total 5YHLS
June 2017 HSS	30	30	30	30	30	150
Consensus reached at stage 2 Hearing Sessions	30	30	30	30	30	150
July 2017 HSS	39	39	38	38	38	192

Source: June 2017 HSS, July 2017 HSS, Stage 2 hearing sessions and Lichfields Analysis

*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.

## **Elswick Neighbourhood Development Plan Allocation**

*Discussions at Stage 2 hearings:* No increase in delivery from this site was discussed or a consensus reached at the Stage 2 hearings.

Table 8 Housing Supply from Elswick Neighbourhood Development Plan Allocation

	Year 7 2017/18	Year 8 2018/19	Year 9 2019/20	Year 10 2020/21	Year 11 2021/22	Total 5YHLS
June 2017 HSS	0	0	0	0	15	15
Consensus reached at stage 2 Hearing Sessions	0	0	0	0	15	15
July 2017 HSS	0	0	15	30	5	50

Source: June 2017 HSS, July 2017 HSS, Stage 2 hearing sessions and Lichfields Analysis

*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.

### Rear of 54 Bryning Lane, Wrea Green - HS45

*Discussions at Stage 2 hearings:* No increase in delivery from this site was discussed and agreed at the Stage 2 hearings.

Table 9 Housing Supply from Rear of 54 Bryning Lane, Wrea Green - HS45

	Year 7 2017/18	Year 8 2018/19	Year 9 2019/20	Year 10 2020/21	Year 11 2021/22	Total 5YHLS
June 2017 HSS	0	15	10	0	0	25
Consensus reached at stage 2 Hearing Sessions	0	15	10	0	0	25
July 2017 HSS	0	15	21	0	0	36

Source: June 2017 HSS, July 2017 HSS, Stage 2 hearing sessions and Lichfields Analysis

*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.

### Rowan Close, Ash Lane – HS50

*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.

Table 10 Housing Supply from Rowan Close, Ash Lane – HS50

	Year 7 2017/18	Year 8 2018/19	Year 9 2019/20	Year 10 2020/21	Year 11 2021/22	Total 5YHLS
June 2017 HSS	0	0	15	15	0	30
Consensus reached at stage 2 Hearing Sessions	0	0	0	0	0	0
July 2017 HSS	0	0	15	15	0	30

Source: June 2017 HSS, July 2017 HSS, Stage 2 hearing sessions and Lichfields Analysis

*Summary:* The Council has included 30 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.

## **Pennine View – HS30**

*Discussions at Stage 2 hearings:* Planning Permission has lapsed and this site should therefore not be included in the 5YHLS.

Table 11 Housing Supply from Pennine View – HS30

	Year 7 2017/18	Year 8 2018/19	Year 9 2019/20	Year 10 2020/21	Year 11 2021/22	Total 5YHLS
June 2017 HSS	0	0	0	0	12	12
Consensus reached at stage 2 Hearing Sessions	0	0	0	0	0	0
July 2017 HSS	0	0	0	0	12	12

Source: June 2017 HSS, July 2017 HSS, Stage 2 hearing sessions and Lichfields Analysis

*Summary:* The Council has included 12 more dwellings in the 5YHLS than the position on which consensus was reached at the Stage 2 hearings.

## **Queensway, St Annes – HSS1**

*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.

Table 12 Housing Supply from Queensway, St.Annes (HSS1)

	Year 7 2017/18	Year 8 2018/19	Year 9 2019/20	Year 10 2020/21	Year 11 2021/22	Total 5YHLS
June 2017 HSS	30	60	60	60	60	270
Position discussed at stage 2 Hearing Sessions	0	30	45	60	60	195
July 2017 HSS	0	50	100	100	100	350

Source: June 2017 HSS, July 2017 HSS, Stage 2 hearing sessions and Lichfields Analysis

*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.

**Conclusion**

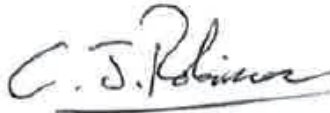
In total it is considered that the Council has included 306 additional dwellings in the July 2017 HSS than was expected following the discussions and general consensus reached during the Stage 2 hearing sessions. Furthermore, the Council has not provided any evidence or justification for its claimed delivery from the sites set out in this statement.

Delivery was also questioned on other sites (including Jubilee House, Valentines Kennels and Brook Farm, Dowbridge) and whilst no consensus was reached in terms of reducing delivery rates on these sites, this suggests that further reductions may be required to the wider 5 year supply, and that 306 dwelling figure should be viewed as a minimum reduction.

The undersigned parties confirm that this statement gives a fair reflection of the discussions during the Stage 2 hearing sessions to the best of their recollection.

This joint statement focusses upon our understanding of the agreements reached between the parties, in respect of the 5YHLS. However, some of the representors to the Local Plan will, through separate representations, make additional comments in respect of housing supply across the plan period.

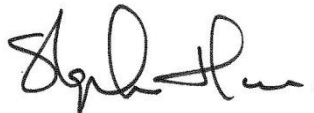
Colin Robinson      Lichfields  
(on behalf of Taylor Wimpey UK Limited)



Graham Lamb      Pegasus Planning  
(on behalf of Hallam Land Management Limited)



Stephen Harris      Emery Planning  
(on behalf of Wainhomes Limited)



David Diggle      Turleys  
(on behalf of Strategic Land Group)

